



**Association for Strengthening Agricultural
Research
in Eastern and Central Africa**

**Environmental and Social Management
Framework**

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1. INTRODUCTION

The Association for Strengthening Agricultural Research in Eastern and Central Africa (ASARECA) is a sub-regional not-for-profit organisation. It was established in 1994 by ten member countries represented by their national agricultural research for development institutes. South Sudan joined the ASARECA family in December 2011, making the number of members 11: Burundi, Democratic Republic of Congo, Eritrea, Ethiopia, Kenya, Madagascar, Rwanda, South Sudan, Sudan, Tanzania and Uganda.

ASARECA's goal is

Enhanced sustainable productivity, value addition and competitiveness of the sub-regional agricultural system.

The core mandate revolves around generating, sharing and promoting knowledge and innovations to solve common challenges facing agriculture in Eastern and Central Africa (ECA). ASARECA, together with partners, work to assist smallholder farmers in the region to practice sustainable, productive and profitable agriculture. The top priority of the organisation is to transform agriculture into a viable market-oriented venture by focusing on access to markets for smallholder farmers and providing them with appropriate information.

1.1. Objective

In order to ensure that the projects implemented by ASARECA and her partners sustainable, this Environmental and Social Management Framework (ESMF) was developed. This framework helps to prevent possible negative impacts to the natural environment and vulnerable communities in the sub-region, as a result of projects implemented by ASARECA. The ESMF provides general policies, guidelines, codes of practice and procedures for the management of environmental and social safeguards. The ESMF ensures that adverse environmental and social impacts are appropriately mitigated during implementation of ASARECA projects.

More specifically, the objectives of the ESMF are to:

- Establish clear procedures and methodologies for environmental review, approval and implementation of subprojects to be financed by ASARECA
- Specify appropriate roles and responsibilities of ASARECA and her partners, and outline the necessary reporting procedures, for managing and monitoring environmental concerns related to subprojects
- Determine the training and other capacity building needed to successfully implement the provisions of the ESMF

Implementation of this ESMF will help to ensure that activities under the proposed projects will (i) protect human health and general welfare; (ii) enhance positive environmental outcomes; and (iii) prevent negative environmental impacts as a result of either individual sub-projects or their cumulative effect

2. MINIMUM STANDARDS

Below are the minimum environmental management standards to be followed, based on development partners' and member countries' requirements. They shall be applied to all ASARECA projects.

2.1. Forests and Natural Habitats

ASARECA resources shall not be used for activities inside protected areas or other critical natural habitats or those that involve significant conversion or degradation of natural habitats, including forest areas that qualify as critical natural habitats. They shall also not be used for activities associated with forest plantations that involve any conversion or degradation of critical natural habitats nor activities involving logging in natural forests, or processing of timber other than from plantations. Should any ASARECA project involve harvesting operations by small-scale landholders or local communities under community forest management, standards for forest management shall be developed with the meaningful participation of locally affected communities, consistent with the principles and criteria of responsible forest management, or adherence to a time-bound phased action plan to achieve such a standard.

ASARECA resources shall support activities related to forest plantations only when such plantations are established on un-forested sites or lands already converted.

Forestry activities supported by ASARECA shall include measures to prevent the introduction of invasive species that threaten biodiversity.

2.2. Pest Management

Any ASARECA research project that involves pest management and control shall have an Integrated Pest Management Plan (IPMP) whose outline structure is as found in Annex 1. Organisational resources shall only support activities that require the use of pesticides when:

- they include the application of integrated pest management (IPM) practices, incorporating the promotion of biological and environmental control methods over chemical pesticides wherever possible;
- and also include the application and promotion of pesticide management practices outlined in the guidelines of the International Code of Conduct on the Distribution and Use of Pesticides;
- and when project implementing countries have legislation and or technical services to guide pesticide distribution and use

The following criteria apply to the selection and use of pesticides in ASARECA projects:

- They must have negligible adverse human health effects;
- They must be shown to be effective against the target species;
- They must have minimal effect on non-target species and the natural environment;
- The methods, timing and frequency of pesticide application must be aimed to minimize damage to natural enemies; and
- Their use must take into account the need to prevent development of resistance in pests

If a project is not using pesticides but might result in increased use of pesticides, a budget component shall be set aside for training farmers (or farmer groups) and or creating awareness about proper use of pesticides.

In addition to the above, any pesticide used under ASARECA resources must be manufactured, packaged, labelled, handled, stored, disposed of, and applied according to

standards that, at a minimum comply with the FAO's *Pesticide storage and stock control manual* (FAO, 1996).

ASARECA shall not finance formulated products that fall in WHO classes IA and IB, or formulations of products in Class II, if:

- the country lacks restrictions on their distribution and use; or
- they are likely to be used by, or be accessible to lay personnel e.g. farmers, or other persons without training, equipment and facilities to handle, store and apply these products properly.

ASARECA shall not finance any pesticide products which contain active ingredients that are listed on Annex III of the Rotterdam Convention unless the country in question has taken explicit legal or administrative measures to consent to import and use of that active ingredient.

ASARECA shall not finance any pesticide products which contain active ingredients that are listed on Annex A & B of the Stockholm Convention on Persistent Organic Pollutants, unless for an acceptable purpose as defined by the Convention, or if an exemption has been obtained by the Country under this Convention;

2.3. Genetically Modified Organisms

ASARECA supports research in Genetically Modified Organisms (GMOs) only when the proposals demonstrate consistency with the national bio-safety framework in the country concerned. In case the implementing country lacks the necessary bio-safety framework, the proponent, with the approval of the relevant national authorities, will propose the adoption of internationally accepted best practice and code of conduct.

Proposals involving contained laboratory research shall verify that the proposing institute has in place institutional guidelines for conducting recombinant DNA research and a mechanism for internal approval and monitoring and risk management of such research. These guidelines have to be of international standard (e.g. the NIH Guidelines¹ accessed on 6th October 2013 from http://oba.od.nih.gov/oba/rac/Guidelines/NIH_Guidelines.pdf).

Prior to the approval of proposals involving confined field trials of genetically engineered crops, fish and livestock, ASARECA requires that the sections of the proposal covering risk assessment and management, description of the conduct of the field trial, and post trial monitoring measures, are subject to a third party expert review. Such third party review will also determine whether or not there is a risk of transboundary movement of any GMOs.

ASARECA shall not carry out research on GMO in countries where such research triggers category A environmental assessment.

2.4. Social Policies

ASARECA resources shall not be used for any activity that would require involuntary resettlement. Any land or property acquired, must be on the basis of a willing buyer-willing seller and shall be documented as such. Activities that would damage physical cultural property shall also not be supported.

¹ National Institutes of Health (NIH) Guidelines for Research Involving Recombinant or Synthetic Nucleic Acid Molecules

2.5. Construction and Civil Works

Where ASARECA resources are used to finance construction or civil works, an Environmental Assessment (EA) shall be carried out in compliance with both development partner and any applicable national legislation.

3. GENERAL IMPACTS AND MITIGATION

ASARECA, in developing and implementing sub-projects may generate some social and environmental impacts. The potential generic ones have been identified in this ESMF while the specific ones will be identified during sub-project development and mitigated during implementation.

Table 1: General Potential Impacts

Negative Impact	Proposed Mitigation Measure
i. Poisoning of people applying the pesticides, through physical contact and inhalation	<ul style="list-style-type: none">• Provision of appropriate protective wear• Training of those people expected to apply the pesticides
ii. Increased vulnerability to pests due to poor pesticide management or introduction of new cultivars	<ul style="list-style-type: none">• Use of IPM practices• Comprehensive testing of new cultivars for pest resistance prior to release
iii. Pollution from agrochemical use or poor handling of pesticides	<ul style="list-style-type: none">• Promotion and application of pesticide management practices (e.g. international standards)
iv. Land / water degradation due to infrastructure development	<ul style="list-style-type: none">• EA of construction and civil works and implementation of identified mitigation measures
v. Loss of biodiversity through clearance of land not previously used for agriculture	<ul style="list-style-type: none">• Carry out research only in labs, research stations and already converted farmlands
vi. Possible contamination of species by GMO	<ul style="list-style-type: none">• Ensure following internationally accepted standards e.g. containment
vii. Pollution of water or land through waste generation from processing activities	<ul style="list-style-type: none">• Biodegradation for manure, recycling, construction of facilities to handle liquid waste

4. ESMF IMPLEMENTATION PROCESSES

A description of the processes to be followed in implementing the ESMF is given below:

4.1. Screening

It is a requirement that all projects must be screened to identify the environmental and social impacts before a recommendation for funding is made. Initial screening of the projects will be carried out by the project proponents, with technical assistance from the officer responsible for environmental management within ASARECA. The screening will be done with the aid of an Environmental and Social Screening Form (ESSF) (Annex 2). The use of the screening form will ensure objectivity and transparency. Completing the form will enable the project

proponent to identify potential environmental and social impacts that will result from project implementation.

4.2. Categorisation

Basing on the results from the screening exercise, the officer responsible for environmental management within ASARECA shall assign an appropriate environmental category (A, B or C)². The ASARECA Project itself is classified as Category B by the World Bank (WB). As such any project that falls under Category A would not be eligible for funding under WB funding. Only those projects categorised as B or C would be approved for further screening for possible funding.

4.3. Development of the Safeguards Instruments

It is the responsibility of the project proponent to develop the ESMP or the IPMP. The proponent can develop the instrument themselves or hire a consultant to do it, at their own cost. This should be done in line with this ESMF and the legal requirements of the relevant countries. The proposed structure of the ESMP is as found in Annex 3.

4.4. Approval

Approval of environment and social effects of any project that has potential for adverse impacts shall be done in line with the development partners policies and the legal instruments of relevant countries.

4.5. Implementation

Activities from the EMPs and IPMP shall be integrated into the project implementation plans and included in the monitoring plans.

4.6. Compliance with the ESMF

This section highlights the measures that will be taken to monitor, report and strengthen implementation of the ESMF.

4.6.1. Monitoring and Reporting

Projects shall be required to monitor both the implementation of identified mitigation measures and their effectiveness. They will be required to report on these two aspects during the ASARECA reporting period i.e. once in every 6 months. Projects must also have plans with clear indicators for monitoring in relation to the ESMF objectives and to the issues highlighted in the EMPs or IPMPs.

ASARECA shall undertake periodic reviews to monitor compliance with the ESMF. In order to do this effectively, ASARECA shall establish Environmental Focal Persons within all the ASARECA countries. These shall be staff of the countries' environmental agencies who are able to assist with this function whenever need arises. The compliance levels and scores are as

² **Category C** – a sub-project without potential to cause significant environmental and or social impacts is exempted from further environmental assessment. **Category B** –a sub-project with potentially significant impacts that are site-specific, with few if any irreversible, and in most cases mitigatory measures can be designed readily. **Category A** - a sub-project likely to have significant adverse impacts that are sensitive, diverse, or unprecedented, or whose impacts are difficult to reverse.

indicated in Table 1. Tables 2 and 3 show criteria for scoring both at organisational and individual project levels.

Where an activity has indications of serious breach of the ESMF, ASARECA shall assess the true extent of the breach and determine the next steps of action including termination of the project concerned.

Table 2: Compliance Scores

Compliance Level	Score
Completely Satisfactory	90
Highly Satisfactory	80
Satisfactory	70
Moderately Satisfactory	60
Moderately unsatisfactory	50
Unsatisfactory	40
Highly Unsatisfactory	30

Table 3: ESMF Compliance Weights at Organisational Level

Area	Weight	Criteria
Screening	10	No. of Sub-Projects Screened out of total no.
Categorising	5	No. of Sub-Projects Categorised
Assessment - EMP	15	No. of EMP approved
	10	No. of EMP in place-not approved
Assessment - IPMP	15	No. of IPMP approved
	10	No. of IPMP in place-not approved
Reporting	25	No. of reports with ESS content in line with EMP / IPMP
	10	No. of reports with general ESS content

100

Table 4: ESMF Compliance Weights for Individual Projects

a) Category B-Both EMP & IPMP				b) Category B-Only EMP or IPMP			
Area	Weight	Criteria	Rank	Area	Weight	Criteria	Rank
Screening	10	Screened	1	Screening	10	Screened	1
		Not Screened	0			Not Screened	0
Assessment - EMP	15	EMP approved	1	Assessment - EMP or IPMP	30	EMP approved	1
		EMP in place-not approved	0.5			EMP in place-not approved	0.5
		No EMP	0			No EMP	0
Assessment - IPMP	15	IPMP approved	1	Assessment - IPMP or EMP	0	IPMP approved	1
		IPMP in place-not approved	0.5			IPMP in place-not approved	0.5
		No IPMP	0			No IPMP	0
Budget allocation / Implementation	30	Budget allocated and followed	1	Budget allocation / Implementation	30	Budget allocated and followed	1
		Budget allocated, partly followed	0.5			Budget allocated, partly followed	0.5
		ESS activities not funded	0			ESS activities not funded	0
Monitoring and Reporting	30	Two reports a year with ESS content according to Monitoring Plan	1	Monitoring and Reporting	30	Two reports a year with ESS content according to Monitoring Plan	1
		Only one report with ESS content according to Monitoring Plan	0.5			Only one report with ESS content according to Monitoring Plan	0.5
		No report with ESS content	0			No report with ESS content	0
100				100			

4.6.2. Environmental Auditing

Periodic Compliance audit shall be done by ASARECA to improve environmental management. The audit report shall be shared with stakeholders for information and to guide decision making.

5. RESPONSIBILITIES

All projects undertaken under ASARECA shall make a declaration, as part of the project agreement, ascertaining that no activities will infringe any of the provisions of this ESMF.

The office of the Deputy Executive Director (Programmes) holds overall responsibility for the ESMF. The Environmental and Social Safeguards Specialist is directly responsible for its implementation. Specifically to perform the following roles:

- i. Review and clear winning proposals for compliance with the ESMF before they are submitted for funding approval.
- ii. Request proponents of non-compliant proposals to revise them accordingly

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- iii. Review safeguards documents and ensure that environmental mitigation measures recommended are of acceptable standards
 - iv. Monitor implementation of the mitigation measures

It is the responsibility of the Programme Managers to ensure that all projects under their programmes are compliant with this ESMF i.e.:

- i. have undergone screening
- ii. have prepared the relevant ESS instruments as required
- iii. mitigation measures are implemented and
- iv. ESS are adequately reported on

6. CAPACITY BUILDING

This section outlines the training and technical assistance that will be provided to build capacity so that ESMF responsibilities may be successfully fulfilled. ASARECA shall organize training activities for its staff to equip them with the knowledge and skills for reviewing EIA reports and for monitoring compliance with the ESMF.

ASARECA shall ensure that the principal investigators of all projects have the required knowledge and are equipped with the skills necessary to comply with the ESMF provisions.

7. FINANCING

Financing for ensuring implementation of the ESMF shall be part of the core ASARECA budget and every project categorised as B shall have a budget for ESS.

Annex 1: Integrated Pest Management Plan Template

IPM is an ecosystem-based strategy focuses on pest management through a combination of techniques (biological, habitat manipulation, cultural practices, resistant varieties, etc.). Pesticides are used only if necessary and according to established guidelines. Treatments are made with the goal of removing only the target organism and selected and applied to minimises risk to human health, non-target organisms and the environment.

Short Project Title	
Project Countries with Specific Locations / Sites	
Project Contact Person in ASARECA Secretariat	
Project Period	
Person responsible for IPM	
Job Title and Institution	
Contacts: email, phone	

1. Introduction:

1.1. Project: Give a brief description of the project

1.2. Location: Give a brief description of the sites and adjacent areas where pesticide application is being considered. Include:

- a. vegetation type, sensitive habitat, food plots
- b. wildlife and or livestock
- c. water sources - surface, drainage, wetlands, wells, groundwater
- d. human settlement

2. Methods: Name the crop(s) and or livestock and the target pest(s), including insects, diseases and weeds. For each key pest, determine the thresholds³, choose appropriate practices from each major category (Prevention, Avoidance, Monitoring, Suppression - Ref Appendix 1).

2.1. Non-Chemical: Identify the method (cultural, biological, mechanical / physical, etc.) to be used for each specified crop / livestock and the target pest (a table can be used here).

2.2. Pesticides: Explain the need for pesticide as opposed to non-chemical means. Identify the target pest and the pesticide (include the active ingredients) to be used for each specified crop / livestock. Indicate who will use the pesticides and the application method (a table can be used here).

3. Impact Identification and Mitigation: Identify key environmental and social impacts, assess level of significance and propose mitigation measures for the significant impacts regarding:

3.1. The social environment

3.2. The biophysical environment

3.3. Highlight any training provisions planned

³ Damaging level of that particular pest infestation at which point pesticide use is required

(a table can be used here)

4. Monitoring plan: Indicate monitoring strategies to ensure effective implementation to prevent pest resistance and potential harmful effects on the social and biophysical environment.

Identified Significant Impact	Monitoring Indicator	Monitoring Location	Parameter to be Measured	Freq of Measurement	Responsibility	Est. Cost (USD)

Appendix 1: Pest Management Practices

This table gives examples under each category and is by no means exhaustive

Principle	Practices	
	Crops	Livestock
<p>PREVENTION: Preventing pest infestation reduces need for pesticide applications and thus potential impacts.</p>	<ul style="list-style-type: none"> • Certified seed and transplant material • Resistant varieties, varieties best suitable to local environment • Prevent weeds from going to seed e.g. cultivate, pull, mow, flame, weed in time etc. • Reduce moisture on plant surfaces to prevent disease incidence e.g. use drip irrigation / avoid overhead irrigation between 6 p.m. and midnight to minimize disease • Destroy and/or remove crop residues to control weeds and break pest cycles • Eliminate unmanaged plants that serve as pest reservoirs, such as abandoned crops • Test soil annually to determine fertility and pH and time application according to crop needs. Apply nutrients, fertilizers and pH-adjusting agents accordingly. 	<ul style="list-style-type: none"> • Good herd health helps maintain animal resistance to infestations - housing, nutrition and sanitary conditions kept at optimal levels. • Examine new animal additions for pests and, if necessary, treat to prevent contamination of animals already present. • Quarantining new animal additions.
<p>AVOIDANCE: Reduces need for pesticide applications and thus potential impacts.</p>	<ul style="list-style-type: none"> • Rotate crops that break the pest cycle. • Match crops to appropriate sites to optimize plant health and avoid known pests • Choose pest-resistant cultivars • Adjust planting dates and select cultivars with maturity dates that allow avoidance of early or late-season pests • Use and manage trap crops to protect main crop from insect pests and insect-vectored diseases. 	<ul style="list-style-type: none"> • Remove breeding materials e.g. manure to break the cycles • Choose pest-resistant breeds • remove affected animals or do whole herd quarantine

<p>MONITORING: "Estimate extent of pest populations." Monitoring limits pesticide use to those occasions when intervention is necessary to prevent economically significant damage.</p>	<ul style="list-style-type: none"> • If no monitoring guidelines are available, monitor weekly to determine presence, density and location of pests and to determine crop growth stage. Record findings. • Use weather monitoring devices to measure precipitation, humidity and temperature, where available. Suitable for large commercial farms and research stations. • Use pest-forecasting tools (e.g., computer modelling software) as additional guides for on-farm pest monitoring activities in conjunction with weather data to predict risk of pest infestation. Suitable for large commercial farms and research stations. 	<ul style="list-style-type: none"> • If no monitoring guidelines are available, monitor weekly to determine presence and density of pests. Record findings. • Use pest-forecasting tools (e.g., computer modelling software) as additional guides for on-farm pest monitoring activities. Suitable for large commercial farms and research stations.
<p>SUPPRESSION: Using cultural, biological, and chemical controls to reduce pest population or its impacts. Applying suppression actions only when pest populations exceed the action threshold reduces potential impacts of pesticides on resource concerns.</p>	<ul style="list-style-type: none"> • Use cover crops, especially pest-suppressing crops (allelopathic) • Plant using appropriate within and between row spacing optimal for crop, site, and row orientation • Reduced tillage and residue management practices • Mulch for insect or weed control. • Inter-seed cover crop within or between rows • Mechanical pest controls e.g. cultivate, hoe, and hand remove insects and weeds, prune infested plants etc. • Use physical pest controls and deterrents e.g. flame weeding; noise-makers, ribbons etc. • Maintain or improve soil aeration and drainage to avoid standing water and minimize disease. • Insect mating disruption devices • Conserve naturally occurring biological controls • Release beneficial organisms where appropriate e.g. predatory mites for control of two-spotted mites and trips. • Use compost as a soil amendment to increase biological diversity in soil and plant health and suppress plant disease. 	<ul style="list-style-type: none"> • Conserve naturally occurring biological controls e.g. wasps, beetles and mites • Release beneficial organisms where appropriate e.g. release predatory organisms.

Annex 2: Environmental and Social Screening Form

The Environmental and Social Screening Form (ESSF) has been designed to ensure that proposed sub-projects are subjected to the appropriate extent and type of environmental assessment. Screening helps to determine which sub-projects are likely to have adverse environmental and or social impacts so that appropriate mitigation measures can be determined.

General Information	
Short Project Title:	
Applicable Country(ies)	
Name, department, job title, for the person who is responsible for filling out this form	
Provide baseline environmental information of the project area(s) where the sub-project is to be implemented	
Contact details (Telephone and email)	
Date	
Signature	
1. Project Description	
Please provide brief information on the type and scale of the sub project, sub project area, area of plants and buildings, status of water resources, involvement of GMOs, amount of waste (solid, liquid and air generation), location and lengths of channel networks, buried and or surface located pipes, etc. including construction work areas and access roads. (Complete on a separate sheet of paper if necessary).	
Environmental Screening	
2. GMO	
Would the sub-project involve research and testing on GMO?	
Yes _____ No _____	
Give a brief description if YES:	
3. Pesticides	
Would the sub-project activity involve the use of chemical pesticides?	
Yes _____ No _____	
Give a brief description if YES:	
4. Fertilizers	
Would the sub-project activity involve the use of fertilizers	
Yes----- No-----	
Give a brief description if Yes	
5. The Natural Environment	
Do sub-project activity have potential to negatively impact level of biodiversity?	
Yes _____ No _____	
Give a brief description if YES:	

6. Water Quality
Is there a possibility that water quality and or quantity will be adversely affected? Yes _____ No _____ Give a brief description if YES
7. Geology and Soils
Based upon visual inspection or available literature, are there areas of possible geologic or soil instability (erosion and landslide prone)? Yes _____ No _____ If YES, give a brief
8. Solid or Liquid Wastes
Will the sub-project generate solid or liquid wastes? Yes _____ No _____ If "Yes", does the sub project include a plan for their adequate collection and disposal? Yes _____ No _____
Social Screening
9. Noise Pollution
Will the operating noise level exceed the allowable decibel level for that zone? Yes _____ No _____
10. Restricted Access to Resources
Will the sub-project activities restrict people's access to natural resources? Yes _____ No _____
11. Cultural and Spiritual Sites
11. Will the sub-project alter any cultural/ spiritual sites in the vicinity? Yes _____ No _____
12. Loss in Livelihoods
12. Will the sub-project cause any losses in livelihood opportunities? Yes _____ No _____
13. Resettlement
Will the sub-project require any resettlement or compensation of residents including squatters? Yes ___ No ___



Categorization⁴	
<i>(to be filled by ASARECA officer responsible for Environment Management)</i>	
<i>If all the above questions are answered No, then the sub-project is categorised [C]). Such a project shall be given environmental clearance and sent for further processing. If some questions were answered in the affirmative further screening will be done to determine if the sub-project belongs to category [A] or [B]⁵. A project categorised [B] is legible for provisional approval subject to carrying out of environmental assessment.</i>	
Please choose a category basing on the above responses [A] _____ [B] _____ [C] _____	
..... Name and signature of the officer responsible for environment management Date

⁴ ASARECA shall, as much as possible, take into account respective national legislation and where there is a discrepancy and no compromise can be found, the ASARECA/development requirements will apply. The implication is that the sub-project in the country may not be funded

⁵ ASARECA is a category B project and cannot have a sub-project with a higher level of categorisation.



Annex 3: Environmental and Social Management Plan Template

An EMP is a site or project specific plan developed to ensure that appropriate environmental management practices are followed during a project's development and or operation. It ensures application of environmental management best practice and implementation of mitigation measures for anticipated impacts.

Short Project Title	
Project Countries with Specific Locations / Sites	
Project Contact Person in ASARECA Secretariat	
Project Period	
Person responsible for EMP	
Job Title and Institution	
Contacts: email, phone	

5. Introduction:

5.1. Project: Give a brief description of the project

5.2. Location: Give a brief description of the sites and adjacent areas (social and bio-physical)

6. Impact Identification and Mitigation:

Identify environmental and social impacts, assess level of significance and propose mitigation measures for the significant ones in relation to the social and biophysical environment. Highlight any training required.

Potential Impact	Proposed Mitigation	Timing	Responsibility	Est. Costs (USD)

7. Monitoring plan: Indicate monitoring strategies to ensure effective implementation of mitigation measures

Mitigation Measure	Parameter to be Monitored	Location	Actual Measurement	Frequency of Measurement	Responsibility	Est. Cost (US\$)