

appendix D. Environmental and Social Safeguards Checklist



Safeguard Risk Identification Form (SRIF)



Section 1: Project Overview

Identification	GEF ID UNEP IMIS:
Project Title	Development of National Action Plan for Artisanal and Small-Scale Gold Mining in the Islamic Republic of Pakistan
Managing Division	Economy Division
Type/Location	National
Region	Asia Pacific
List Countries	Pakistan
Project Description	<i>The project main objective is to assist Pakistan in the development of its National Action Plan for the Artisanal and Small-Scale Gold Mining (ASGM) sector, raise national awareness on the Minamata Convention and build initial national capacity for the early implementation of the National Action Plan and the Minamata Convention</i>
Relevant Subprogrammes	
Estimated duration of project	24 Months
Estimated cost of the project	500,000 USD
Name of the UNEP project manager responsible	Ludovic Bernaudat
Funding Source(s)	GEF Trust Fund
Executing/Implementing partner(s)	Executing Partner: Ministry of Climate Change
SRIF submission version	This is the first submission
Safeguard-related reports prepared so far <i>(Please attach the documents or provide the hyperlinks)</i>	<ul style="list-style-type: none"> • Feasibility report [] • Gender Action Plan [] • Stakeholder Engagement Plan [] • Safeguard risk assessment or impact assessment [] • ES Management Plan or Framework [] • Indigenous Peoples Plan [] • Cultural Heritage Plan [] • Others _____

Section 2: Safeguards Risk Summary

A. Summary of the Safeguards Risk Triggered



Safeguard Standards Triggered by the Project	Impact of Risk ¹ (1-5)	Probability of Risk (1-5)	Significance of Risk (L, M, H) <i>Please refer to the matrix below</i>
SS 1: Biodiversity, Ecosystems and Sustainable Natural Resource Management	1	1	L
SS 2: Climate Change and Disaster Risks	1	1	L
SS 3: Pollution Prevention and Resource Efficiency	1	1	L
SS 4: Community Health, Safety and Security	1	1	L
SS 5: Cultural Heritage	1	1	L
SS 6: Displacement and Involuntary Resettlement	1	1	L
SS 7: Indigenous Peoples	1	1	L
SS 8: Labor and working conditions	1	1	L

B. ESS Risk Level² -

Refer to the UNEP ESSF (Chapter IV) and the UNEP's ESSF Guidelines.

Low risk



Moderate risk



High risk



Additional information required



5	H	H	H	H	H
4	M	M	H	H	H
3	L	M	M	M	M
2	L	L	M	M	M
1	L	L	L	L	L
#	1	2	3	4	5

C. Development of ESS Review Note and Screening Decision

Prepared by

Name: Essa Bataineh Date: 22 Feb, 2022

Screening review by

¹ Refer to UNEP Environmental and Social Sustainability Framework (ESSF): Implementation Guidance Note to assign values to the Impact of Risk and the Probability of Risk to determine the overall significance of Risk (Low, Moderate or High).

² Low risk: Negative impacts minimal or negligible: no further study or impact management required.
Moderate risk: Potential negative impacts, but limited in scale, not unprecedented or irreversible and generally limited to programme/project area; impacts amenable to management using standard mitigation measures; limited environmental or social analysis may be required to develop a Environmental and Social Management Plan (ESMP). Straightforward application of good practice may be sufficient without additional study.
High risk: Potential for significant negative impacts (e.g. irreversible, unprecedented, cumulative, significant stakeholder concerns); Environmental and Social Impact Assessment (ESIA) (or Strategic Environmental and Social Assessment (SESA)) including a full impact assessment may be required, followed by an effective comprehensive safeguard management plan.



Name: _____ Date: _____

Cleared³

Signature *Alexandra Mutungi*

D. Safeguard Review Summary (by the safeguard team)

This is a low-risk project. However, UNEP ESSF guiding principles--resilience and sustainability; human rights, gender equality and women empowerment, accountability and leave no one behind--are still applicable for low-risk projects. Regular stakeholder engagement should be strongly encouraged.

E. Safeguard Recommendations (by the safeguard team)

- No specific safeguard action required ☐
- Take Good Practice approach⁴ ☒
- Carry out further assessments (e.g., site visits, experts' inputs, consult affected communities, etc.) ☐
- Carry out impact assessments (by relevant experts) in the risk areas and develop management framework/plan ☐
- Consult Safeguards Advisor early during the full project development phase ☐
- Other _____

Section 3: Safeguard Risk Checklist

³ This is signed only for the full projects latest by the PRC time.

⁴ Good practice approach: For most low-moderate risk projects, good practice approach may be sufficient. In that case, no separate management plan is necessary. Instead, the project document demonstrates safeguard management approach in the project activities, budget, risks management, stakeholder engagement or/and monitoring segments of the project document to avoid or minimize the identified potential risks without preparing a separate safeguard management plan.



Screening checklist	Y/N/ Maybe	Justification for the response (please provide answers to each question)
Guiding Principles (these questions should be considered during the project development phase)		
GP1 Has the project analyzed and stated those who are interested and may be affected positively or negatively around the project activities, approaches or results?	Y	The project will make an effort to include any potentially affected stakeholders, in particular vulnerable and marginalized groups, from the decision making process that may affect them.
GP2 Has the project identified and engaged vulnerable, marginalized people, including disabled people, through the informed, inclusive, transparent and equal manner on potential positive or negative implication of the proposed approach and their roles in the project implementation?	N	The project will identify, considered the impact of the project, and paid specific attention to vulnerable people (women and in mining communities) in the project design and implementation. It will developed a gender action plan to ensure gender equality.
GP3 Have local communities or individuals raised human rights or gender equality concerns regarding the project (e.g. during the stakeholder engagement process, grievance processes, public statements)?	N	The project will make an effort to avoid inequitable or discriminatory negative impacts on the human rights and gender equality. A plan will be developed to ensure gender equality.
GP4 Does the proposed project consider gender-balanced representation in the design and implementation?	Y	The project will consider gender balance representation in its design and implementation, in particularly for women, and the development of business strategies that include gender mainstreaming in the gold mining value chain process.
GP5 Did the proposed project analyze relevant gender issues and develop a gender responsive project approach?	Y	Women tend to be more vulnerable to health damage from mercury use in the ASGM process. Besides this, the artisanal and gold mining sector employs women). Because of this, the project will generate data on women's participation in the workforce and conditions of the sector, focus attention to gendered differences in mercury exposures, access to protective equipment and training at site level, prioritize female-headed enterprises or those employing female supervisors or managers for pilot projects, and will include criteria for assessment of negative (e.g. occupational injury or disease) but also potential positive impacts on women workers through transition to alternatives.
GP6 Does the project include a project-specific grievance redress mechanism? If yes, state the specific location of such information.		
GP7 Will or did the project disclose project information, including the safeguard documents? If yes, please list all the webpages where the information is (or will be) disclosed.	Y	All project information will be available to the project stakeholders.
GP8 Were the stakeholders (including affected communities) informed of the projects and grievance	Y	Yes, project stakeholders will be informed through steering committee meetings.



redress mechanism? If yes, describe how they were informed.		
GP9 Does the project consider potential negative impacts from short-term net gain to the local communities or countries at the risk of generating long-term social or economic burden ⁷⁵	Y	The project follows a sustainable model that should make all project activities financially and socially feasible in the long term.
GP10 Does the project consider potential partial economic benefits while excluding marginalized or vulnerable groups, including women in poverty?	Y	Vulnerable groups (e.g. women and informal workers) will be informed, trained and involved in the project activities to ensure equal benefits in the mining municipalities.
Safeguard Standard 1: Biodiversity, Ecosystems and Sustainable Natural Resource Management		
<i>Would the project potentially involve or lead to:</i>		
1.1 conversion or degradation of habitats (including modified habitat, natural habitat and critical natural habitat), or losses and threats to biodiversity and/or ecosystems and ecosystem services?	N	The project will assess the situation about mercury in the ASGM sector in Pakistan. It will not take direct action on the ground and therefore it will not have impacts in the biodiversity, natural habitat and management of living resources. The relative adverse impacts of transitioning the use of Hg in the mining communities are not expected to be significant.
1.2 adverse impacts specifically to habitats that are legally protected, officially proposed for protection, or recognized as protected by traditional local communities and/or authoritative sources (e.g. National Park, Nature Conservancy, Indigenous Community Conserved Area, (ICCA); etc.)?	N	
1.3 conversion or degradation of habitats that are identified by authoritative sources for their high conservation and biodiversity value?	N	
1.4 activities that are not legally permitted or are inconsistent with any officially recognized management plans for the area?	N	
1.5 risks to endangered species (e.g. reduction, encroachment on habitat)?	N	
1.6 activities that may result in soil erosion, deterioration and/or land degradation?	N	
1.7 reduced quality or quantity of ground water or water in rivers, ponds, lakes, other wetlands?	N	
1.8 reforestation, plantation development and/or forest harvesting?	N	
1.9 support for agricultural production, animal/fish production and harvesting	N	
1.10 introduction or utilization of any invasive alien species of flora and fauna, whether accidental or intentional?	N	
1.11 handling or utilization of genetically modified organisms?	N	
1.12 collection and utilization of genetic resources?	N	
Safeguard Standard 2: Climate Change and Disaster Risks		

⁵For example, a project may consider investing in commercial shrimp farm by clearing the nearby mangrove forest to improve the livelihood of the coastal community. However, long term economic benefit from the shrimp farm may be significantly lower than the mangroves if we consider full costs factoring safety from storms, soil protection, water quality, biodiversity and so on.



Would the project potentially involve or lead to:			
2.1	improving resilience against potential climate change impact beyond the project intervention period?	N	The project will assess the situation about mercury in the ASGM sector in Pakistan. It will not take direct action on the ground and therefore it will not have impacts in the climate change and disaster risks
2.2	areas that are now or are projected to be subject to natural hazards such as extreme temperatures, earthquakes, extreme precipitation and flooding, landslides, droughts, severe winds, sea level rise, storm surges, tsunami or volcanic eruptions in the next 30 years?	N	
2.3	outputs and outcomes sensitive or vulnerable to potential impacts of climate change (e.g. changes in precipitation, temperature, salinity, extreme events)?	N	
2.4	local communities vulnerable to the impacts of climate change and disaster risks (e.g. considering level of exposure and adaptive capacity)?	N	
2.5	increases of greenhouse gas emissions, black carbon emissions or other drivers of climate change?	N	
2.6	Carbon sequestration and reduction of greenhouse emissions, resource-efficient and low carbon development, other measures for mitigating climate change	N	
Safeguard Standard 3: Pollution Prevention and Resource Efficiency			
Would the project potentially involve or lead to:			
3.1	the release of pollutants to the environment due to routine or non-routine circumstances with the potential for adverse local, regional, and/or transboundary impacts?	N	The objective of the project is to establish significant and documented reductions in use, releases and exposure to mercury in the mining sector and introduce mercury-free alternative methods..
3.2	the generation of waste (both hazardous and non-hazardous)?	N	Due to the project's objective to reduce the use of mercury in the ASGM sector, less hazardous wastes will be released from the sector.
3.3	the manufacture, trade, release, and/or use of hazardous materials and/or chemicals?	Y	The project will incentivize mining communities to adopt safer process management in their activities.
3.4	the use of chemicals or materials subject to international bans or phase-outs? (e.g. DDT, PCBs and other chemicals listed in international conventions such as the Montreal Protocol, Minamata Convention, Basel Convention, Rotterdam Convention, Stockholm Convention)	N	The project will support the participating stakeholders on the elimination and reduction of the use of mercury listed under the Minamata Convention.
3.5	the application of pesticides or fertilizers that may have a negative effect on the environment (including non-target species) or human health?	N	
3.6	significant consumption of energy, water, or other material inputs?	N	
Safeguard Standard 4: Community Health, Safety and Security			
Would the project potentially involve or lead to:			
4.1	the design, construction, operation and/or decommissioning of structural elements such as new buildings or structures (including those accessed by the public)?	N	



4.2	air pollution, noise, vibration, traffic, physical hazards, water runoff?	N	
4.3	exposure to water-borne or other vector-borne diseases (e.g. temporary breeding habitats), communicable or noncommunicable diseases?	N	
4.4	adverse impacts on natural resources and/or ecosystem services relevant to the communities' health and safety (e.g. food, surface water purification, natural buffers from flooding)?	N	
4.5	transport, storage use and/or disposal of hazardous or dangerous materials (e.g. fuel, explosives, other chemicals that may cause an emergency event)?	Y	The project will lead to the reduction in use of mercury and mercury wastes, additionally the best available techniques and best environmental practices will be applied.
4.6	engagement of security personnel to support project activities (e.g. protection of property or personnel, patrolling of protected areas)?	N	
4.7	an influx of workers to the project area or security personnel (e.g. police, military, other)?	N	
Safeguard Standard 5: Cultural Heritage			
<i>Would the project potentially involve or lead to:</i>			
5.1	activities adjacent to or within a Cultural Heritage site?	N	UNEP bans projects that adversely impact any critical physical cultural heritage. The Environmental and Social Management Framework developed for this project concluded that such safeguard was not needed for this project.
5.2	adverse impacts to sites, structures or objects with historical, cultural, artistic, traditional or religious values or to intangible forms of cultural heritage (e.g. knowledge, innovations, practices)?	N	
5.3	utilization of Cultural Heritage for commercial or other purposes (e.g. use of objects, practices, traditional knowledge, tourism)?	N	
5.4	alterations to landscapes and natural features with cultural significance?	N	
5.5	significant land clearing, demolitions, excavations, flooding?	N	
5.6	identification and protection of cultural heritage sites or intangible forms of cultural heritage	N	
Safeguard Standard 6: Displacement and Involuntary Resettlement			
<i>Would the project potentially involve or lead to:</i>			
6.1	full or partial physical displacement or relocation of people (whether temporary or permanent)?	N	No residential resettlements will be carried out as part of the project. Because the project involves the transition of workers from informal and dangerous employment to a proper design methodology, it implicitly involves a risk of displacement. This will be minimized through a phased approach, deliberate involvement of mining communities' workers as a major stakeholder. The Environment and Social Management Framework developed for this project has concluded that no safeguard for involuntary settlement was needed for the project.
6.2	economic displacement (e.g. loss of assets or access to assets affecting for example crops, businesses, income generation sources)?	N	
6.2	involuntary restrictions on land/water use that deny a community the use of resources to which they have traditional or recognizable use rights?	N	
6.3	risk of forced evictions?	N	
6.4	changes in land tenure arrangements, including communal and/or customary/traditional land tenure patterns (including temporary/permanent loss of land)?	N	
Safeguard Standard 7: Indigenous Peoples			



Would the project potentially involve or lead to:		
7.1 areas where indigenous peoples are present or uncontacted or isolated indigenous peoples inhabit or where it is believed these peoples may inhabit?	N	A safeguard for indigenous people will be triggered when an individual mining district is located in an area with indigenous people (IP). In such cases, indigenous peoples' plan (IPP) will be required from the proponent and must be coordinated with the respective commission for indigenous people.
7.2 activities located on lands and territories claimed by indigenous peoples?	N	
7.3 impacts to the human rights of indigenous peoples or to the lands, territories and resources claimed by them?	N	
7.4 the utilization and/or commercial development of natural resources on lands and territories claimed by indigenous peoples?	N	
7.5 adverse effects on the development priorities, decision making mechanisms, and forms of self-government of indigenous peoples as defined by them?	N	
7.6 risks to the traditional livelihoods, physical and cultural survival of indigenous peoples?	N	
7.7 impacts on the Cultural Heritage of indigenous peoples, including through the commercialization or use of their traditional knowledge and practices?	N	
Safeguard Standard 8: Labor and working conditions		
8.1 Will the proposed project involve hiring or contracting project staff?	Y	The executing agency will be responsible for hiring project staff. As per PCA conditions, UNEP guiding principles on selection process and labour and working conditions will have to be adopted.
<i>If the answer to 8.1 is yes, would the project potentially involve or lead to:</i>		
8.2 working conditions that do not meet national labour laws or international commitments (e.g. ILO conventions)?	N	
8.3 the use of forced labor and child labor?	N	Child labor is illegal. The project will not cause the increase of local or regional unemployment as displaced workers will be engaged in alternative mercury-free technologies. The project sites will comply with the Labour and Working conditions as well as national laws.
8.4 occupational health and safety risks (including violence and harassment)?	N	
8.5 the increase of local or regional unemployment?	N	The project will also promote, as part of its design, planning, implementation and monitoring; the financial sustainability of the activities implemented, including those that will occur beyond the project intervention period.
8.6 suppliers of goods and services who may have high risk of significant safety issues related to their own workers?	N	



8.7 unequal working opportunities and conditions for women and men	N	<p>The project will assess potential roles, benefits, impacts and risks for women as well as men in the preparation and implementation of the project with the aim of supporting equality of opportunity and treatment for both women and men. Through the environmental, social and economic safeguard screening processes, the project will avoid, minimize, and/or mitigate any adverse gender issue that may rise during the implementation of the project. By eliminating the use of mercury in the ASGM sector, the project will benefit women and children who are usually employed in the amalgam treatment process at the site and at their living spaces (respectively)</p>
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