

L. ENVIRONMENT MANAGEMENT FRAMEWORK

L.1 Environment Management Framework

1. A key objective of the Project is to support employment generation and livelihoods improvement for the poorest sections of the populations in the project area. The project will accomplish this objective through a participatory and community-driven process. Under this approach, the project interventions will be focused on forming and strengthening VPRCs, SHGs and EAGs, which will become the decision-making bodies in regards to the employment generation and livelihood improvement activities in their respective areas. These activities would be demand-driven Business plan Proposals, and will be proposed by the EAGs based mostly on the analysis of their livelihoods in terms of their skills, resources, income-expenditure patterns, value-chains and the opportunities for new and innovative livelihoods

2. It is imperative to ensure that the environment is not compromised in the process of livelihoods generation. Since the subproject proposals will be proposed by the EAGs, exact information on subprojects that will arise out of the Project is not available *a priori*. While the nature and scale of subprojects are not expected to cause any serious long-term adverse impacts on the environment, it is important to design environmental safeguards for ensuring that:

- Livelihood Business plan Proposal with severely adverse and unmanageable environmental impacts are not approved;
- Livelihood Business Plan Proposal are designed and implemented with adequate and appropriate environmental mitigation measures;
- Cumulative environmental impacts of subprojects are addressed;
- Environmental benefits of subprojects are enhanced and environment-enhancing livelihood activities are promoted; and
- Long-term sustainability of the benefit from subprojects is assured by securing the natural resource base on which they are dependent.

3. **Environmental management Framework:** To achieve these objectives in a comprehensive and coordinated manner, an Environmental Management Framework (EMF) has been developed for the project. The framework approach has been adopted so that environmental aspects can be adequately addressed for a vast range of subproject activities that could be potentially proposed by EAGs and supported by the project. The EMF comprises of the following components:

- Environmental appraisal procedure for categorization of subprojects and triggering of appropriate mitigation measures;

- Technical Environmental Guidelines (TEGs), which have been developed to address the environmental concerns associated with specific subproject activities likely to be supported by the project. These are complemented by a list of subproject activities that would not be supported by the project due to their severely adverse environmental consequences. The EMF also incorporates a cultural property plan and a pest management plan for the subprojects where these issues may be significant;
- Environmental Monitoring and Evaluation Plan; and
- Environmental Training and Capacity Building.

4. **Implementation Arrangement:** The EMF lays out the roadmap for activities pertaining to environmental aspects of subprojects that have to be carried out at the planning, approval and implementation stages of the subproject cycle.

5. A Village Livelihood Plan (VLP) will be developed by the VPRCs. Based on this and other information, individual subprojects will be developed by EAGs and will be subject to an environmental appraisal. The appraisal will include environmental categorization of the proposed subproject, and prescription of the required environmental assessment requirements and the required mitigation measures. The subproject proposal will also be scanned to ensure that it is not included in the “negative” subproject list (subprojects with potential severely adverse and unmanageable environmental impacts)

6. The EMF lays out the organization process for ensuring that the environmental safeguards are followed through all the stages, starting from subproject proposal submission by the EAGs, through the implementation of the subprojects. The specific activities at each step are delineated, along with the assignment of responsibilities for them. A summary of the EMF activities in relation to Village Development Cycle is presented in Table 12.1:

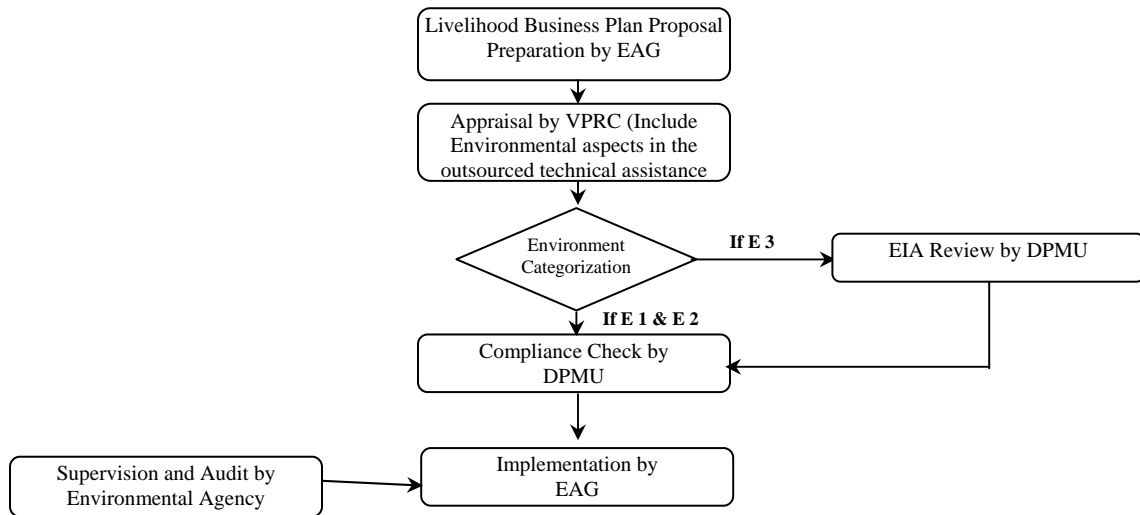
Table 12.1 EMF activities in Village Development Cycle

Responsible Agency	EMF Activities	Outcomes
PLANNING AND DESIGN STAGE		
VPRC and Gram Sabha	A. <u>Communications Campaign and VPRC Plan Preparation</u>	VPRC Plan
EAG	B. <u>Submission of Business Plan Proposal to VPRC</u>	Environmental Checklist in the Livelihood Business Plan Proposal
EAG (with the assistance of the DPMU Appraisal Team, which includes an Environmental Appraiser)	C. <u>Environmental appraisal of Business Plan Proposal</u> <ul style="list-style-type: none"> • Environmental appraisal is a part of the over-all appraisal of the proposed Business Plan. • Environmental appraisal checks for absence of the proposed Business Plan activity from the list of “negative” activities. • Appraisal includes environmental 	<ul style="list-style-type: none"> • Completed form A-1 for each Business Plan Proposal proposal. • TEGs relevant to the proposed Business Plan Proposal are prescribed. • Unless there are issues requiring

Responsible Agency	EMF Activities	Outcomes
EAG Environmental Appraiser at DPMU	<p>categorization (E1, E2, or E3) of the proposed Business Plan Proposal activity.</p> <ul style="list-style-type: none"> • Completion of Form A-1 for the proposed Livelihood Business Plan Proposal • The Environment Appraiser will document the baseline site-specific environmental information for each proposed Business Plan Proposal on Form A-1. • Relevant TEGs (from ERM) are attached to Form A-1. • Conditions for final environmental clearance, if withheld, are to be recorded in Form A-1. • If the Livelihood Business Plan Proposal activity is classed E3, an EIA needs to be conducted and its report submitted to VPRC with the proposal. The EIA report is submitted to DPMU for evaluation. <p><u>D.Commissioning of EIA study (for E3 class Livelihood Business Plan Proposal)</u></p> <p><u>E.Evaluation of the EIA report (for E3 Livelihood Business Plan Proposals)</u></p> <ul style="list-style-type: none"> • Livelihood Business Plan Proposal activity is rejected if the EIA report does not adequately address the anticipated environmental impacts. • If the EIA report is acceptable, the Livelihood Business Plan Proposal is given the final environmental clearance and forwarded to the VPRC. 	<p>revision in the Business Plan Proposal, environmental clearance is provided for E1 and E2 class Business Plan Proposal.</p> <ul style="list-style-type: none"> • For E3 class Business Plan Proposal, the requirement for EIA study is communicated to the Business Plan Proposal proponent. • EIA report is submitted to VPRC, which forwards it to DPMU • Final decision for E3 class Business Plan Proposal proposals.
IMPLEMENTATION		
DPMU	<p>F. Monitoring and Evaluation</p> <ul style="list-style-type: none"> • 5% of the E1 and E2 class Business Plan Proposal in operation are randomly selected for environmental monitoring every year. <p>G. All E3 class Business Plan Proposal are monitored for the specified parameters at the monitoring frequency stipulated in the monitoring plan prepared as a part of the EIA.</p>	<ul style="list-style-type: none"> • Yearly supervision reports

7. The process flow chart for implementing environmental mitigation framework is summarized in Figure 12.1.

Figure 12.1 EMF Flow Chart



7. Environmental Monitoring and Auditing: The EMF includes an environmental monitoring and evaluation plan, as well as an environmental consultancy/audit to periodically evaluate the adequacy of the EMF and to modify it as required. In order to mainstream the environmental aspects into the process of livelihoods generation, the EMF also includes an environmental capacity building component, aimed at developing professional environmental management capacity as well as promoting environmental awareness in the project villages

8. The procedures and materials that have been developed as components of the EMF for the project have been compiled as the “Environmental Resource Manual”, and included in the COM

9. Institutional Arrangement for Implementation of EMF at the different levels of project management are summarized below:

10. SPMU Level: At the state level, the Specialist, Livelihoods will be responsible for the overall environmental aspects of Vazhndhu Kaatuvom Project including the environmental training program and the environmental audit for the whole project (to be conducted twice during the project duration).

11. The environment capacity at the SPMUU will be complemented with support from the Environment Agency (EA), which will be contacted to provide technical and environmental management assistance for the duration of the project. The EA will have

the responsibility of facilitating the implementation of the EMF. This EA will be responsible for providing state-level support to the project team, development and delivery of training, education and communication materials, providing technical assistance in coordinating environmental assessment process for E3 class Business Plan Proposal, and conducting project-level environmental audits. The ToR for the Environmental Agency is given in **Attachment L.1**.

12. DPMU Level: At the district level, the Asst. Project Manager, Livelihoods and Environment will be looking after the environment aspects which will include:

- Identification and capacity-building of resource persons at district level for creating capacity for environmental appraisal of Business Plan Proposal
- Identification and capacity building of resource agency for conducting yearly environmental supervision of the selected Business Plan Proposals.
- Ensure environmental appraisal of Business Plan Proposal proposals
- Arranging for and participating in the yearly environmental supervisions, and to submit yearly supervision reports to the SPMU.
- Serve as Master Trainer for environmental management training programs
- Facilitation of environmental audits.
- Implementation of specific environment-enhancing Business Plan Proposals Guidelines are also attached for selection of agencies for conducting the EIA for E3-class Business Plan Proposals

13. **Block and Village Levels:** the Facilitator, Livelihoods in the PFT and VPRC members will be trained in EMF and will be responsible for implementing environmental aspects

14. Capacity Building on Environmental Aspects: The training program developed for the Vazhndhu Kaatuvom Project aims at building environmental awareness and environmental management capacity in the project administration structure as well as in the intended target communities. The training programs for the staff in the project agencies at various levels as well as for the village communities will be organized by the Environment Agency at the SPMU, which will be given the overall responsibility for environmental training and capacity building on a state-wide basis. The training program has two distinct objectives:

- To develop and enhance capacity for environmental management in the project implementation agencies, and
- To create environmental awareness and sensitisation in the target communities

15. Technical Training for Environmental Management: The Environment Agency will develop a specific training program for the key officials of the project, focused on the procedural and technical aspects of environmental assessment and management. This

training would be mandatory for Environment and Eco-friendly Livelihoods Officers and the Environmental Appraisers from the DPMU of each district.

16. The training will involve initial orientation, main training program and refresher training programs. The main and refresher training programs will be for duration of 2-3 days each, where as the initial orientation workshop will be of duration of one day. EMF and TEG refresher training program will be offered once in a year. This training cycle is suggested keeping in mind people's training retention time, change in officers and likely changes in methods and/or approaches. The main themes of the content of the training program will be:

- Environmental overview
- Need of environmental impact assessment studies
- Tools and techniques for environmental assessment
- Environmental mitigation measures
- Environmental regulations and Acts
- Pollution- its classification, monitoring
- Environmental Management Framework: Familiarization with the Environmental Resource Manual (ERM) for the Vazhndhu Kaatuvom State Society
- Micro-level activities and environmental related issues.
- Technical environmental guidelines – Techno-economically viable treatment options including raw material handling, proper system for collection, segregation and storage.
- Reduction, recycle and reuse options.
- Eco-friendly technologies and its importance.
- Coastal based activities and its limitations.
- Energy needs- use of non-conventional and renewable energy sources.
- Proactive environmental intervention through innovative Business Plan Proposals
- Conservation of natural resources
- Disaster and crisis management

17. General Training for Environmental Awareness and Sensitization : For the purpose of general environmental awareness and sensitization, the master trainers at the Environment Agency will develop a Core Group of Trainers (CGT) in each district. In addition to other members, the CGT will include the Environment and Eco-friendly Livelihoods Officer and the Environmental Appraisers from the DPMU of each district. Ideally, the CGT in each district would have at least 5 trainers. The CGT trainers will in turn train the trainers, who may be the key officials in the village/ block level agencies of their region as well as the interested pictorial/ graphical. These trainers will then target the communities in their respective regions, focusing on the following topics:

- Linkages between environment and poverty
- Basic concepts in environment and ecology
- Environmental issues in the community/ region
- Facilitation and Preparation of formats
- Micro-level activities and environmental related issues.

- Technical environmental guidelines – Techno-economically viable treatment options including raw material handling, proper system for collection, segregation and storage.
- Waste-reduction, recycle and reuse options.
- Eco-friendly technologies and its importance.
- Coastal based activities and its limitations.
- Energy needs- use of non-conventional and renewable energy sources.
- Conservation of natural resources.
- Environment and Sustainable Development.

18. The training programs will be organized regionally and will be designed to reach extensively in the target communities. It is intended that each community will get exposure to at least three environmental awareness programs during the five-year project period.

19. The community representatives like, VPRC, EAG and SAC members will also receive training in order to sustain environmental concepts beyond the project period.