

Safeguards Compliance Memorandum

Project Information

Project Name	Sangha Tri-National (TNS) Landscape Conservation and Livelihoods Project – (GBFF FTNS)
GEF Focal Area	Biodiversity
Safeguards Categorization	Special Consideration, Category B

Project Description

The **Sangha Tri-National (TNS) Landscape Conservation and Livelihoods Project** is a critical initiative aimed at ensuring the long-term preservation of one of the most ecologically significant and intact forest landscapes in Central Africa. Spanning the borders of **Cameroon, the Republic of Congo (RoC), and the Central African Republic (CAR)**, the TNS landscape encompasses 4.4 million hectares, including three contiguous protected areas: Lobéké National Park in Cameroon, Dzanga Sangha Protected Areas in CAR, and Nouabalé Ndoki National Park in RoC. The TNS is a globally significant biodiversity hotspot, home to endangered species such as forest elephants, lowland gorillas, and chimpanzees, as well as rich cultural and traditional knowledge systems of Indigenous Peoples and Local Communities (IP&LCs).

Despite its importance, the TNS faces numerous challenges, including deforestation, poaching, human-wildlife conflict, and socio-economic pressures on IP&LCs. The project seeks to address these challenges by strengthening governance mechanisms, improving conservation outcomes, and ensuring equitable benefits for IP&LCs, who depend on the forest for their livelihoods and cultural practices. By building on the Sangha Tri-National Trust Fund (FTNS), the project will ensure sustainable financing for conservation activities while enhancing the participation and capacities of local communities, particularly Indigenous Peoples.

Project Components

The project is structured around four interconnected components:

1. **Strengthening the Sangha Tri-National Trust Fund (FTNS) to meet international standards for operational CTFs and donor requirements:**
 - FTNS policies, procedures and systems strengthened to meet international standards and reflect TNS landscape dynamics (needs, challenges and opportunities).
 - FTNS institutional effectiveness is strengthened in planning, execution, monitoring and reporting on funded activities of international donors and specifically GEF.
 - FTNS effective social policies, procedures and systems are in place to meet ESS requirements, risk management, Indigenous Peoples and Local Communities and gender inclusion in conformity with international standards and GEF requirements.
2. **Mobilization of additional resources contributing to more effective and inclusive management of the TNS landscape:**

- FTNS endowment fund is capitalized, contributing to TNS management effectiveness through a more inclusive and efficient approach for regional and transboundary cooperation.
3. **GBFF funding contributes to strengthening improved management effectiveness of the TNS through an inclusive approach:**
- Strengthened governance contributing to TNS conservation objectives and engagement of Indigenous Peoples and Local Communities at PA and transboundary levels.
4. **Communication and knowledge management**
- Enhanced communication and knowledge sharing to disseminate lessons learned and best practices to influence policies and frameworks at national, transboundary and international levels.

The project aligns with the conservation objectives of Cameroon, CAR, and RoC, contributing to their commitments under international conventions such as the Convention on Biological Diversity (CBD) and the Kunming-Montreal Global Biodiversity Framework's 30x30 goal. By reinforcing FTNS and fostering inclusive governance, the project supports the sustainable management of one of Central Africa's most critical ecosystems, preserving its rich biodiversity and promoting socio-economic resilience among local and Indigenous communities.

Project Location and Salient Physical Characteristics Relevant for the Safeguards Analysis

The geographic scope of this project is located in the heart of the Congo Basin (CB) forest, the Tri-National de la Sangha (TNS) landscape is a 4.4 million hectare cross-border area stretching over the Republic of Cameroon (CAM), the Central African Republic (CAR), and the Republic of Congo (RoC). It is a forest complex which comprises three contiguous Protected Areas (PAs) covering 1,328,278 hectares, including Lobeke National Park (LNP) in CAM, the Dzanga Sangha Protected Area complex (DSPA) in CAR and Nouabalé Ndoki National Park (NNNP) in RoC surrounded by different use zones like logging concessions, community forests, community hunting zones and rural settlement areas. The three PAs represent one of the most intact forest blocks in Central Africa, with one of the lowest human footprint in tropical Africa. As a result, the TNS has retained almost all of its physical characteristics and has seen the continuation of ecological and evolutionary processes. The landscape is made up of a wide range of interconnected lowland tropical rainforest habitats from semi-deciduous forest in the northwest to swamp forest in the southeast.

An estimated 55,000 people live in the TNS landscape with an average human density of 2 inhabitants/km², which is very low, where about 10% of the population are indigenous hunter-gatherers and 90% are Bantu. The TNS economy is largely based on extractive resource exploitation of forest resources, in the formal sector for timber and in the informal sector for bush meat, palm wine, fish, diamonds and other non-timber forest products (NTFP). The most vulnerable groups in the TNS landscape include women, youths, and Indigenous Peoples and Local Communities, who rely on forest resources for their livelihoods. These groups face challenges, including discrimination in accessing resources and services due to entrenched social norms and practices. In this context, any adverse environmental and social impacts due to project activities are anticipated to be minor and can be mitigated, as described in the table below demonstrating the risks surfaced through the activities planned for each project component.

Safeguards Standard	Triggered	Explanation
Natural Habitats	Yes	Overall, the project activities are expected to produce benefits in terms of landscapes governance and creation of funding opportunities for field activities relating to the protection of natural habitats and communities. However, such activities as construction of small infrastructure and promotion of livelihoods which may lead to overharvesting of certain natural resources, may have negative impacts on natural habitats. Any potential adverse environmental impacts on human populations or environmentally important areas will be managed through the application of the WWF standard on protection of Natural Habitats.
Indigenous People	Yes	This project has triggered the WWF's Safeguard on Indigenous Peoples to ensure that the rights of Indigenous Peoples are respected throughout its implementation. The project operates in areas with significant Indigenous populations, including the Baka (Cameroon), the Ba'Aka (CAR and RoC) and the Mbendjele (RoC), who are hunter-gatherers and semi-nomadic people who rely mostly on natural resources within the protected areas for their livelihoods and cultural practices. To safeguard their rights, the project will adhere to FPIC processes, respect tenure over traditional territories, and ensure that culturally appropriate and equitable benefits are negotiated with Indigenous communities. Additionally, potential adverse impacts will be avoided or mitigated through participatory and consultative approaches in alignment with the project's Environmental and Social Management Framework (ESMF), that comprises an Indigenous People's Planning Framework which will be used to develop an Indigenous Peoples Plan (IPP) early in the project implementation phase, to ensure proper engagement with Indigenous Peoples throughout the project lifecycle.
Restriction of Access and Resettlement	Yes	This safeguard has been triggered due to the potential adverse impacts from activities, such as improved management of protected areas in the TNS landscape, which may include reduced access to forest resources, such as bushmeat, non-timber forest products, or traditional hunting and gathering areas, that are critical for local livelihoods. The project has triggered this safeguard to ensure that mitigation measures, including compensation plans, sustainable livelihood programs, and grievance mechanisms in the TNS landscape, are established and rigorously monitored to safeguard the rights and well-being of Indigenous Peoples and local communities.

Community Health, Safety and Security	Yes	This project has triggered the safeguard on Community Health, Safety and Security to ensure that the health and well-being of affected communities, as well as project staff, are safeguarded. Given the scope of project activities, there are potential risks related to construction of small-scale infrastructure; water quality; SEAH (Sexual Exploitation, Abuse, and Harassment) associated with potential improper behavior of project and/or Park staff, or from outsiders such as tourists; and zoonotic diseases, particularly in conservation areas and their buffer zones. To address these risks, the project will implement preventive and protective measures, including robust health and safety protocols, SEAH mitigation strategies through a gender action plan and a SEAH/GBV-responsive grievance mechanism, disease prevention measures, and emergency preparedness plans, as outlined in the Environmental and Social Management Framework (ESMF).
Pest Management	No	
Cultural and Physical Resources	Yes	This project has triggered the safeguard on Cultural and Physical Resources to ensure the preservation and protection of both physical and intangible cultural resources in the project areas. As the project operates in landscapes that include sacred sites, burial grounds, and areas of traditional ecological knowledge significant to Indigenous Peoples and local communities, it will implement measures to avoid any destruction or damage to these resources. The project will comply with national legislation and international agreements, ensuring that any potential impacts are identified and mitigated through consultations and participatory processes involving the affected communities.

Summary of Key Safeguards Issues

Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

The safeguards issues and impacts associated with the proposed activities in the project, as described in the table above, include: potential access restrictions to natural resources which may affect Indigenous Peoples and Local Communities’ livelihoods; impacts to natural habitats through the construction of small-scale infrastructure and promotion of livelihoods which may lead to overharvesting of natural resources; the presence of Indigenous Peoples in all three landscapes of the TNS requiring the establishment of an IPP for each landscape to ensure their rights and proper FPIC procedures are respected; potential risks relating to community health, safety and security due to the scope of activities in all TNS landscapes, which may lead to risks relating to SEAH, zoonotic diseases, injuries through the construction of small-scale infrastructure, etc., as described above; and potential infringements to cultural

and physical resources as the project operates in landscapes that include sacred sites, burial grounds, and areas of traditional ecological knowledge significant to Indigenous Peoples and local communities.

The project will not create any large-scale, significant and/or irreversible impacts. All risks and impacts identified are being addressed through appropriate mitigation plans and a monitoring and evaluation system put in place to ensure proper application of policies, implementation of mitigation plans and adaptive management approaches to address issues and adjust the course of action as necessary.

Describe measures taken by the Project Team to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described:

The Lead Executing Agency of the project is FTNS, the Conservation Trust Fund for the TNS landscape, and will have the overall executing and technical responsibilities of the project. FTNS will execute the project through its Executive Board (EB) within its organizational structure. FTNS will allocate the necessary human, logistic and technical resources needed for project execution for activities that are currently part of the Trust Fund's core activities and will be considered co-financing for the GBFF project.

A Senior ESS/ IP&LC/ gender officer will be part of the FTNS Executive Board supporting the strengthening of safeguards, Indigenous Peoples and Local Communities, and gender policies, procedures and monitoring systems within its structures as detailed in the project activities. She/He will be recruited by the Financial Administrator (IUCN) in coordination with the EB while ensuring the non-objection from WWF-GEF Agency. The Senior ESS/ IP&LC/ gender officer will be working in close collaboration with the experts recruited to support FTNS' development on these aspects. She/he will be responsible to coordinate, and accompany, when deemed relevant, the various external consultants hired by the project during field missions. The Senior officer will work in close collaboration with the Program Manager to ensure integration of ESS/ IP&LC/ gender aspects within current documents of FTNS and in terms of monitoring and reporting. FTNS will continue to employ the officer after project completion financed by the interest of the GEF and other donor endowment capitalization.

Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people:

Key Stakeholders and potentially affected people include: Civil society - Indigenous Peoples and Local Communities (IP&LCs) and their organizations: A detailed Stakeholder Engagement Plan describes that IP&LCs were consulted through representative organizations during project design, and will be key stakeholders under each of the project's 4 components. Representatives of the IP&LC key groups (CSOs) will be members of the Project Steering Committee and Technical Working Group.

The FTNS Executive Board will also technically coordinate its activities to be carried out within the project's execution scheme with the following other key stakeholders of the TNS landscape in the geographic or technical area corresponding to their respective legal mandates: i) Regional governing bodies of the TNS (especially the Tri-National Planning and Implementation Committee (CTPE) and Tri-National Scientific Committee (CST)); ii) PA management and relevant staff; iii) pre-identified Indigenous Peoples and Local Communities CSOs who will be strengthened to monitor,

inform and report to fulfill their role as observers and reporters on ESS, Indigenous Peoples and Local Communities and gender.

The project’s financial contribution to the CTPE meetings will ensure the representation of Indigenous Peoples and Local Communities' interests, including the participation of their representatives in discussions and planning activities for the TNS landscape. This approach aims to ensure that at least 20% of the GBFF funds are allocated directly to activities benefiting Indigenous Peoples and Local Communities.

The 3 CSOs who will be supported by the project in order to strengthen the capacities of Indigenous Peoples and Local Communities associations and local network members to effectively engage in PA governance and ESS monitoring will receive financial support from the project through the financial administrator which will be redistributed within their local network in order for Indigenous Peoples and Local Communities and women representatives to be able to do the work on the ground.

Additional consultations will be undertaken at the start of the project and throughout its implementation to refine project strategies in collaboration with these key rights-holders. As such, consultations with communities and participatory approaches have been explicitly incorporated into all relevant activities of the work plan, including the development of an Indigenous Peoples Plan for each PA and buffer zone in the TNS landscape, to ensure IP rights are respected, including the application of FPIC, as relevant. As described in the ESS and gender documents of the project (ESMF, SEP, GAP), participatory monitoring systems have also been included in the project design to promote collective assessments of project impacts and build ownership of its actions.

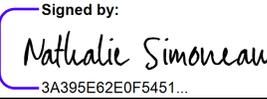
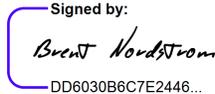
Monitoring and Compliance

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
Have costs related to safeguard policy measures been included in the project cost? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
Have relevant safeguard policies documents been sent to WWF-US? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>

Disclosure Requirements

An Environmental and Social Management Framework which responds directly to the impacts and risks including a Process Framework to address potential access restrictions risks and an Indigenous Peoples Planning Framework which will lead to the development of an Indigenous Peoples Plan for each of the three TNS project landscapes; a Stakeholder Engagement Plan, Consultations, Disclosures and a Grievance Mechanism are required.	
Date received by WWF-US	September 3 rd , 2025
Date Disclosed on WWF-US website	September 8 th , 2025
<i>In Country Disclosure</i>	
Date Disclosed on FTNS website	September 3 rd , 2025
Date Disclosed in TNS landscapes - Lobeke National Park, Southeast Cameroon; Nouabale-Ndoki National Park, RoC; Dzanga-Sangha National Park, CAR	September 3 rd , 2025

Approvals

Nathalie Simoneau, Safeguards Coordinator	Signed by:  3A395E62E0F5451...	Date: 11/17/2025
Brent Nordstrom, Safeguards Compliance Officer	Signed by:  DD6030B6C7E2446...	Date: 11/17/2025