

Bhutan for Life
Environmental and Social Management Plan for
Phrumsengla National Park (2024)

1. Introduction

(A) Project Background

The Bhutan for Life (BFL) project aims to ensure a robust network of protected areas and biological corridors that secure human well-being, and biodiversity conservation and increase climate resilience in Bhutan. The project provides a 14-year financial bridge that allows for immediate improvement in the management of Bhutan’s protected areas for climate resilience, and the prompt delivery of mitigation, adaptation, and biodiversity gains, while the country gradually ratchets up its own financing resources.

BFL seeks to achieve the following objectives:

- Help Bhutan remain carbon neutral by increasing forest and vegetative cover within the Protected Area System;
- Enhance the socio-economic well-being of communities in and in the vicinity of the PAS through climate-informed natural resources management;
- Maintain stable, thriving, and diverse populations of key species contributing toward national and global biodiversity goals;
- Strengthen organizational, institutional, and financial capacity for effective management of PAS.

BFL includes five components that reflect these goals, divided into 16 milestones (or outputs) and over 80 detailed activities.

(B) Scope of ESMP

The preparation of this Environmental and Social Management Plan (ESMP) was required in order to manage the environmental and social impacts through and specific mitigation actions required to implement the project in accordance with the requirements of WWF’s Social Safeguards Integrated Policies and Procedures (SIPP), the project’s Environmental and Social Management Framework (ESMF), and applicable national legislation and regulations.

The ESMP provides an overview of the environmental and social baseline conditions on the routes of the proposed second segment of the project, summarizes the potential impacts associated with the proposed activities and sets out the management measures required to mitigate any potential negative impacts.

This ESMP will be implemented by BFL focal person in each park authority (PA) and biological corridor (BC), and by the contractor to be commissioned by each PA/BC for the project.

(C) Purpose of ESMP

This Site-Specific ESMP is a project-specific source document detailing the environmental and social protection requirements to mitigate and minimize the adverse impacts. The ESMP’s primary purpose is to ensure that the environmental requirements and social commitments associated with the project are carried forward into the implementation and operational phases of the project and are effectively managed. The specific objectives of this ESMP are as hereunder:

- Minimizing any adverse environmental, social and health impacts resulting from the project activities;
- Conducting all project activities in accordance with the relevant RGoB Laws and WWF's safeguard operational policies and guidelines;
- Preventing environmental degradation as a result of either individual subprojects or their cumulative effects;
- Enhancing the positive environmental and social outcomes of project activities;
- Ensuring that the proposed mitigation measures are feasible and cost-efficient;
- Providing an Action Plan to ensure that the project impact mitigation measures are properly implemented and monitored;
- Ensuring that all stakeholders are engaged in the project activities' preparation and implementation, and their concerns are fully addressed.

(D)Applicable law, policies, and regulation

This ESMP is developed by following the guidelines as outlined in the BFL's ESMF.

Applicable RGoB laws and policies include the Constitution of the Kingdom of Bhutan, 2008; legislation on land and moveable property (Land Act of Bhutan 2007; Land Rules, 2007; The Moveable Cultural Property act of Bhutan, 2005); legislation and regulations on forests and protected areas (National Environment Protection Act, 2007; Forest and Nature Conservation Act of Bhutan, 1995; Forest and Nature Conservation Rules and Regulations of Bhutan, 2017; National Forest Policy, 2011); legislation on water and waste prevention (Water Act of Bhutan, 2011; Waste Prevention and Management Act, 2009); legislative requirements on environmental assessment (Environmental Assessment Act, 2000 and Regulations on the Environmental Clearance of Projects, 2001); and other relevant laws (The Local Government Act of Bhutan, 2009; Livestock Act of Bhutan, 2001; The Biodiversity Act of Bhutan, 2003; The Pesticides Act of Bhutan, 2000; The Penal Code of Bhutan, 2004; National Access and Benefit Sharing (ABS) Policy (Draft), 2014).

WWF's safeguards policies that are relevant to this project are as follows: Policy on Environment and Social Risk Management; Policy on Protection of Natural Habitats; Policy on Involuntary Resettlement; Policy on Indigenous Peoples; Standard on Pest Management; Policy on Accountability and Grievance System; Standard on Physical Cultural Resources; as well as general standards on occupational and community health and safety and on energy efficiency.

In general, RGoB's laws, policies, and guidelines are in line with the WWF's environmental and social safeguards requirements. However, there are a few differences between the two systems. With regard to environmental impacts, there are no direct contradictions between the RGoB laws and regulations and the WWF's SIPP, but the requirements of the latter are more extensive. All project activities should fully comply both with the RGoB's Regulations on the Environmental Clearance of Projects, and with the procedures and mitigation measures prescribed in this ESMF. In case that the WWF's SIPP requirements are more extensive, strict, or detailed than the RGoB legislation and policies, the former will apply to all project activities. With regard to social impacts, the primary discrepancies between the RGoB laws and regulations and the WWF's SIPP refer to the status of non-title holders and informal land use, and the commitment to participatory decision-making processes. First, according to the WWF's SIPP, all users of land and natural resources (including people that lack any formal legal ownership title or usage rights) are eligible to some form of assistance or compensation if the project adversely affects their livelihoods. The RGoB laws only recognize the eligibility of land owners or formal users to receive compensation

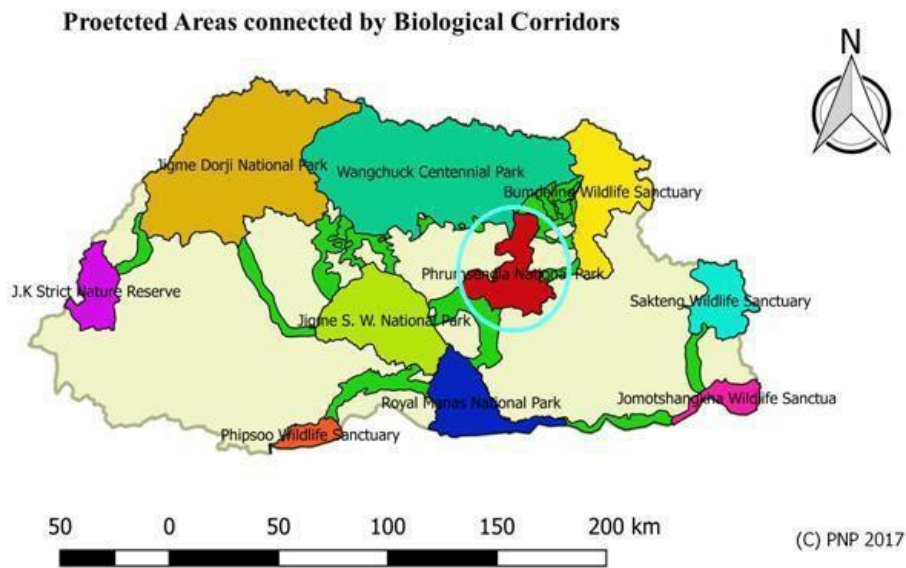
in such cases. Second, the WWF’s SIPP require extensive community consultations as part of the development of various safeguards documents and during project activities. RGoB legislation does not include similar requirements. For the purposes of the BFL project, the provisions of the WWF’s SIPP shall prevail over the RGoB legislation in all cases of discrepancy.

2. Environmental and Socio-Economic Conditions

Geological and topographical conditions

Phrumsengla National Park (PNP) was known as Thrumshingla National Park (TNP) ever since it was notified in 1993 with an area of 768 km². In 2000, the area was extended towards the north with the inclusion of large tracks of suitable tiger habitats. The park was renamed as PNP in 2014 and the total area was revised to 906 km² with the development of new zonation guide line, 2020. However, the physical features were not altered for a prime reason to signify and interlink the conservation paradigm with inherited local communities’ culture. PNP has been implementing conservation activities for the last one and a half decades. The conservation is based on the ten-year periodic conservation management plan (2019-2029).

The purpose of establishment of the park was to conserve the temperate ecosystem of the central region in Bhutan’s Protected Area (PA) landscape. The park was fully operationalized in 2000 with joint funding support from Royal Government of Bhutan (RGoB) and World Wildlife Bhutan Program. PNP is a ‘linchpin’ of Bhutan’s Biological Corridor Complex (B2C2) landscape. The park is connected to Jigme Singye Wangchuck National Park (JSWNP), Royal Manas National Park (RMNP), Bumdeling Wildlife Sanctuary (BWS) and Wangchuck Centennial National Park (WCNP) through a string of Biological Corridors (Figure 1). Heterogeneous geomorphology and wide range of elevation contribute to the formation of special habitats for wildlife in PNP. The elevation ranges from 900 masl (sub-tropical broad-leaved forest) to about 4500 masl (Alpine meadows) (Figure 2 a). Of this, the major portion, >78% of the total area is above 2500 masl. Slope classes are evenly distributed in terms of area coverage (Figure 2 b).



*Figure 1
Location of
Phrumsengla
National Park*

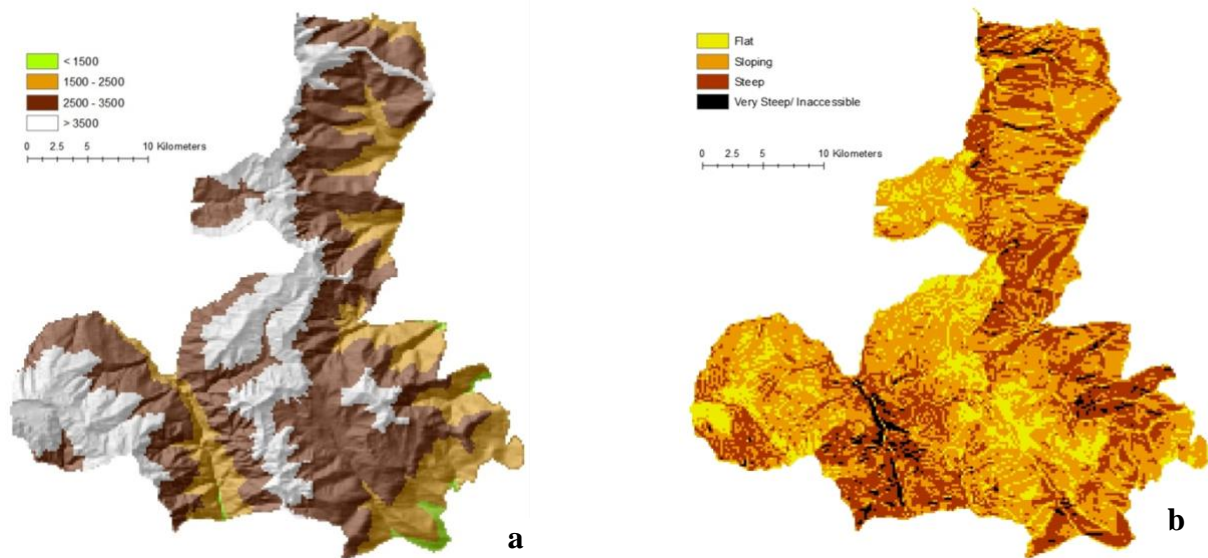


Figure SEQ Figure * ARABIC 2: a. Elevation

Climatic conditions

With wide variation of altitudinal ranges, Phrumsengla National Park experiences a wide range of temperatures as well. The northern part of the park has -21°C minimum and 13°C maximum temperatures and in the south-eastern has a low of 8°C and a high of 28°C . The annual average rainfall in the northern part is 700 mm and the lower elevation receives up to 1500 mm.

Hydrological conditions

Despite being the smallest national park, PNP serves as a vital watershed area for two major river systems, Kuri Chu to its left flank and Chamkhar Chu to its right flank. Apart from that there are numerous springs and tributaries that feed the major river systems. The rich biodiversity of the park itself is a good indication of intact natural resources like water resources.

Flora and fauna

PNP with a wide range of elevation range from sub-tropical broadleaved to the alpine ecosystem holds high conservation value and significance for about 1000 species of plants with over 161 species of trees, 274 shrubs and 316 herbs. The park is a significant repository of floral diversity (TNP, 2008) more than 154 species have been identified for having medicinal values, 21 species as endemic to Bhutan, and two species endemism to PNP (*Rubus sengorensis* and *Lobelia nubigena*). The park is home to one globally threatened species (Vulnerable) *Rhododendron dalhousiae* var. *rhabdotun* and critically endangered species at local context or in Bhutan; *Podocarpus neriifolius* (Dorji, Y.; 2010). The park is fundamentally significant for conservation of its large tracts of old East Himalayan Silver Fir Forest and extensive cover of pristine cool broadleaved forests in the central region of the country. Maximum area of PNP is comprised of fir forest with 267.16 km^2 followed by mixed conifer and broadleaf forests with 256.47 km^2 and 238.25 km^2 respectively. Meadows and scrub with 27.43 km^2 and 48.33 km^2 also significantly contribute for several forms of life in the park. Therefore, PNP is a prime refuge for many threatened flora and fauna thriving across varied vegetation zones in the central region of the country's protected area landscape.

More than 70 species of mammals, about 364 species of birds, and some 55 species of butterflies are recorded in the park. Most recently (August, 2020) the park has recorded National butterfly (Ludlow's Bhutan Swallowtail, *Bhutanitis ludlow*) for the first time. Camera trap picture of a male tiger was captured for the first time in Bhutan on 22nd May 2000 from the PNP in Peeme'. Other than tiger, there are several globally significant species as per IUCN Red List of Threatened Species, 2019.

1. Tiger *Panthera tigris* (Endangered)
2. Red Panda *Ailurus fulgens* (Endangered)
3. Musk Deer *Moschus chrysogaster* (Endangered)
4. Wild Dog *Cuon alpinus* (Endangered)
5. Takin *Budorcas taxicolor* (Vulnerable)
6. Himalayan Black Bear *Ursus thibetanus lanigarr* (Vulnerable)
7. Asian Small-clawed Otter *Aonyx cinereus* (Vulnerable)
8. Clouded Leopard *Neofelis nebulosa* (Vulnerable)
9. Asiatic Golden Cat *Catopuma temminckii* (Near Threatened)

Attributed by a wide range of elevation and diverse vegetation, the park has a rich diversity of birds. Of more than 364 avian species recorded, three are vulnerable, six near-threatened and eight are restricted range species. Significant avifauna species of conservation interest for Phrumsengla National Park are Chestnut-breasted partridge (*Arborophila mandellii*), Rufous-necked hornbill (*Aceros nipalensis*) and Beautiful nuthatch (*Sitta formosa*) listed vulnerable under IUCN list. PNP also records herpetofauna, fish and butterfly species. There are 3 species of amphibians, 12 species of reptiles, 4 species of lizards, and 7 species of fish.



Figure 3: Two tigers of PNP, **a.** *Panthera tigris* and **b.** *Bhutanitis ludlow* (National butterfly)

Socio-economic conditions

The park has about 6,000 inhabitants from 1,165 households living in 32 villages. Administratively, PNP spread across ten Gewogs viz Chumey, Ura and Tang Gewogs of Bumthang Dzongkhag, Saleng and Tsamang Gewogs under Mongar Dzongkhag, Jarey, Metsho and Gangzur gewogs under Lhuentse Dzongkhag, and Shingkar and Nangkor gewogs under Zhemgang Dzongkhag. Two villages enclaved inside the park are Sengor village (29 households), Saleng gewog and Bhim-Tharpaling (4 households), Chumey gewog under Mongar and

Bumthang Dzongkhag respectively. These people are agro-pastoralists and mainly depend on forests for grazing their cattle. Over 75 percent of the park area is under registered grazing grounds and most of the park residents rely mainly on livestock products for their livelihood.

3. Planned activities in the Year 2024-2025

Activity 1. Improvement of alpine meadows.

Budget: Nu. 250,000/-

Timeline: January-March, 2025

Location: Norgye, under Ura Gewog

Dzongkhag: Bumthang

Alpine meadow forms an integral part of wildlife habitat as well as the livestock grazing ground. Some of the park residents are dependent on livestock for their livelihood and the activity site is used as pasture/grazing land by the local herders. The encroaching vegetation shrinks the grazing land and habitat for wildlife species.

This activity is aimed at managing alpine meadows by the felling of trees and plants (herbs, scrubs & shrubs) overtaking the meadows, uprooting unpalatable plants, and cleaning all felled trees and debris. Generally, most of the surrounding areas have gentle slopes with stable topography and good alpine vegetation cover. The activity amounting **Nu. 250000/- (Two hundred and Fifty Thousand)** must be executed from January to March (Q1), 2025. The proposed site is at Norgyen of Ura Gewog covering an area of approximately 4 hectares. The alpine area has been used by 7-8 herders. We see more unpalatable vegetation like *Berberis sp.* and *Rumex sp.* overtaking the meadows, have to clear them to improve the alpine meadow habitats. Seven Forestry staff will be deployed for a month-long period to carry out the improvement works in those meadows. The workers will use herder's camps while executing the activity and water resources will be harnessed from the campsite itself.

Some of the potential environmental and social impacts are the following:

- Wastes from workers.
- Sound and emissions from the chainsaw.
- Occupational health and safety of the workers



Activity 2. Maintenance of Lingmithang Range Office

Budget: Nu. 200,000/-

Timeline: September- December, 2024

Location: Lingmithang under Saling Gewog

Dzongkhag: Mongar

Lingmithang Range Office is one of the Range offices under Phrumsengla National Park. It is located at a distance of about 1km away from Lingmithang town and nearby settlements are about 200-500 m away. The office compound with Range office and staff quarter is well fenced. The CGI roof is rusted and the ceiling is damaged due to extreme weather conditions. As a part of the maintenance work, all the CGI roofs will be painted and the damaged ceiling will be replaced. The maintenance work will be handed over to the community firm of the locality. About 5-7 workers will be deployed for the aforementioned activity. Since the workers are from the nearby locality, no separate campsite is required.

Some of the potential environmental and social impacts are the following:

- Wastes from workers.
- The proposed activity involves worker safety. Therefore, occupational health and safety mitigation measures need to be in place.

Activity 3. Maintenance of Zangkar Beat Office

Budget: 200,000/-

Timeline: July-September, 2024

Location: Zangkar under Jaray Gewog

Dzongkhag: Lhuentse

Zangkar Beat Office is the sub-office under Phawan Range Office located in Zangkar village. The Phawan Range office is one of the Range offices under Phurmsengla National Park. The Zangkar Beat office is about 30km away from the Mongar- Lhuentse highway. The office cum staff quarter was constructed around 2008. Due to the old structure all the electric wires, switches, and sockets are damaged, which poses the risk of short circuits. As a part of maintenance re-electrification work will be carried out. A total amount of Nu. 200,000/- (Two hundred thousand only) will be used to carry out the aforementioned maintenance work. The work will be handed over to a certified electrician (technical person). For the maintenance work, about 4-5 workers will be coming for the work and returning in the evening without having to camp separately.

Some of the potential environmental and social impacts are the following:

- Wastes from workers.
- The proposed activity involves worker safety. Therefore, occupational health and safety mitigation measures need to be in place.

4. Environmental and Social Impacts and Mitigation Measures

Potential impact	Impact scale	Proposed mitigation measures	Responsible party	Cost: Nu.
Activity 1: Improvement of alpine meadows.				250,000/-
Cutting down of trees and plants that are encroaching on the Alpine meadows negatively affects the ecosystem of the Alpine meadows (e.g., grazing areas are diminished)	Long term Minor	<ul style="list-style-type: none"> ● Assess the impacts of climate change on Alpine meadows and lowland grasslands to identify alternative approaches to the sustainable management of the meadows or grasslands [as part of the BFL climate change component] ● Ensure that no accidental damage is caused to local vegetation—major trees that are supposed to be cut shall be clearly marked, and only marked trees will be cut; ● Removal of trees needs to be done in an environmentally sustainable way (e.g., removal of branches); ● Alternative grazing areas shall be identified ● Burning of trees and other plants should be avoided 	PNP management BFL focal	The cost will be met from the activity budget
Noise pollution: Possible noise disturbance as a result of chainsaw usage in clearing out growing vegetation.	Short term Minor	<ul style="list-style-type: none"> ● Use a chainsaw only, if at all necessary, otherwise clear the overtaking vegetation manually using a knife and axe. ● Earplugs and protecting devices shall be provided to workers on site. 	PNP management	
Waste: generation of waste as a result of improvement work	Short term Minor	<ul style="list-style-type: none"> ● Identification of the different waste types at the project site (degradable and non-degradable); ● Ensure that camps are located away from existing streams, rivers, or water sources and that no discharge from camps is made into nearby water bodies; ● Dumping waste shall be prohibited on fragile slopes, forests, religious or other culturally sensitive areas or areas where livelihood is derived; ● Proper waste collection point is made and all waste shall be removed from the project site after completing the improvement works. 	PNP management BFL focal	The cost will be met from the activity budget

Workers' health and safety	Short term Minor	<ul style="list-style-type: none"> ● Comply with the worker's health and safety guidelines (especially wearing PPE) ● Ensure that no underage workers or children are engaged ● Ensure decent work conditions, including an appropriate salary, working hours, accommodation and food for workers shall be provided to all workers ● Implement a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns 	PNP management BFL focal	The cost will be met from the activity budget
Activity 2: Maintenance of Lingmithang Range Office and Zangkar Beat Office				200,000/-
Waste: generation of waste as a result of maintenance activities	Short term Minor	<ul style="list-style-type: none"> ● Proper containers/waste bins should be provided at the project site; ● Dumping of waste on the sides of the road, on private land, or in other non-designated places should be prohibited; ● Dumping waste shall be prohibited on fragile slopes, forests, religious or other culturally sensitive areas or areas where livelihood is derived; ● options for reuse/recycling of the generated waste should be considered. ● Burning of maintenance waste should be prohibited; ● All waste shall be removed from the project site after completion of the project. 	PNP management BFL focal	To be included in the bidding document
Workers' health and safety	Short term Minor	<ul style="list-style-type: none"> ● Comply with the worker's health and safety guidelines (wearing PPE) ● Ensure that no underage workers or children are engaged ● Ensure that workers are employed on the principle of equal opportunity and fair treatment ● Implement a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns 	PNP management Concerned Range Officer	Need to propose the mitigation budget to procure workers PPE

5. ESMP Implementation Arrangements

The implementation of project activities will be carried out by the BFL focal person and the concerned Range Officer (RO) of the PNP. The focal and the concerned RO will be responsible for compliance with all procedures outlined in this ESMP, as well as compliance with any requirements to obtain clearances, permits, approvals, or consent documents from relevant authorities and stakeholders.

This ESMP should be part of the contract that the PA will sign with the Contractor(s) for the implementation of the planned activities in PNP in 2024-2025. The Contractor is obligated to perform all proposed preventive or mitigation environmental and social measures in this plan and to keep the evidence of any documents related to applying these measures (e.g disposal of inert waste, records on OHS information session performed for all workers before starting of activities, all developed OHS plans, etc.). An OHS information session should be organized by the Contractor for all workers prior to the start of the project activities and any specific tasks with high health risks.

The PNP’s Supervising Engineer needs to monitor the implementation of proposed measures by the Contractor and the Contractor’s subcontractors with visual checking, reviewing the records of evidence that the measures have been applied, and asking the Contractor to apply the measures as soon as possible. Non-compliances should be recorded and the Report on any non-compliances should be reported to the ESS officer immediately, and the ESS officer will report it to the PCU (M&E Officer). Each non-compliance should be closed with appropriate measure/s and the evidence should be kept.

Disbursement of project funds to the PA will be contingent upon their full compliance with the safeguard requirements.

6. ESMP Monitoring Arrangements

The BFL focal person in PNP will closely monitor the implementation of all planned activities and the required mitigation measures, and ensure that they fully comply with this ESMP and with the terms and conditions included in the environment clearances issued by RGoB’s national authorities.

PNP’s PA is also fully responsible for the compliance of all external contractors and service providers working in the PNP with the safeguard requirements outlined in the ESMP.

The monitoring of activities under this ESMP will be carried out in the following manner:

Sl.No	Activities	Monitoring team	Timeline		Location	Means of Verification
			Start	End		
1	<i>Improvement of alpine meadows.</i>	Field focal	January 2025	March 2025	Norgyen, Ura	Completion report & Field visit report
		ESS focal	April 2025	April 2025		

2	<i>Maintenance of Lingmithang Range Office</i>	Field focal	October 2024	December 2024	Lingmithng, Saling	Completion and monitoring report
		ESS focal	January 2025	February 2025		
3	<i>Maintenance of Zangkar Beat Office</i>	Field focal	July 2024	September 2024	Zangkar, Jaray	Completion and monitoring report
		ESS focal	October 2024	November 2024		

1. Alpine meadow improvement (habitat management):

- Monitoring by implementing entities:
 - Field visits at least twice—during the intervention and within three months after the intervention
 - Reports by the implementing entities submitted to ESS officer within a week after each field visit
- Monitoring by ESS officer:
 - Field visits by ESS officer – monitor virtually and through field report submitted to by the BLF focal
 - Reports by ESS officer to the PCU (M&E officer) – within one week after the field visit and within three months after the intervention
- Reports by PCU (M&E officer) to Secretariat – within two weeks after receipt of ESS officer’ report
- Bi-annual reports of the Secretariat to WWF US (as part of mid-year and final APRs)

2. Maintenance of range office and beat office

- Monitoring by implementing entities:
 - At least weekly field visits
 - Monthly reports prepared by implementing entities and submitted to ESS officer
- Monitoring by ESS officer:
 - At least once during the implementation by ESS officer
 - Quarterly reports by ESS officer to the PCU (M&E officer)
- Quarterly reports by PCU (M&E officer) to Secretariat
- Bi-annual reports of the Secretariat to WWF US (as part of mid-year and final APRs)

7. Capacity Need and Budget

Activities under this ESMP will be implemented by the BFL focal person, supervising engineer, and a contractor that will employ workers as mentioned in the contract agreement.

The budget for each of the activities is:

1. Improvement of alpine meadow: **Nu. 250,000/-**
2. Maintenance of Lingmithang Range Office: **Nu. 200,000/-**
3. Maintenance of Zangkar Beat Office: **Nu. 200,000/-**

No separate budget for ESS mitigation is proposed. ESS mitigation measures will be met from the respective activity costs. The proposed activities are of very small scale and there are no adverse

social and environmental impacts which require mitigation measures. Therefore, separate fund for mitigation measures is not proposed.

8. Consultation and Disclosure Mechanisms

This ESMP has been prepared in a participatory manner and consulted verbally with local leaders, the *Gups* (head of *Gewogs*) who represent the whole communities. The management informed local leaders regarding the planned project activities, solicited their opinions and enabled them to question proposed mitigation measures. There were no issues raised during the talk with local leaders since our project activities are out of settlement.

The full English version of this ESMP, as well as an executive summary in Bhutanese, shall be disclosed on the website of MoNER, BFL, DoFPS and WWF, Bhutan Program. Hard copies of the ESMP should also be available at the PA Management Office and at the PCU Office.

8. Stakeholder Engagement Plan

The proposed activities for PNP under the BFL-funded project for years 6 and 7 (2024 and 2025) are all outside the settlements, possibly it may not have any adverse environmental and social impacts. However, in lieu of unseen impacts in the future, the PNP management has consulted with local leaders verbally to solicit their opinions and to enable them to question proposed mitigation measures. And the *Gups* informed there is no objection as there are no settlements. In case, if any consultations happen to be carried out during implementation due to any unforeseen consequences, the BFL focal person under the supervision of PNP management shall submit the official minutes of consultation meetings (along with a list of participants, disaggregated by gender and age) to ESS focal within one week after the completion of the consultation. The ESS officer will submit the consultation reports to the PCU (M&E officer) one week after their receipt. The PCU (M&E officer) will report to the Secretariat on a semi-annual basis.

9. Grievance Redressal Mechanisms

This ESMP and its mitigation measures are required to be disclosed to communities for 30 days prior to the start of implementation of activities.

In addition, the BFL focal point is responsible for making local communities aware of the grievance mechanisms: the BFL-specific grievance mechanism, WWF's Grievance Mechanism, and the GCF Independent Review Mechanism.

BFL-specific Grievance Mechanism

A grievance redressal mechanism (GRM) is in place to address any grievances arising from the implementation of BFL activities, on resources, non-performances of project obligation including safeguards, violation of law and/or corruption, project governance and implementation, fair

access and benefit sharing, stakeholder engagement, labor-related issues and incidents, gender related issues and others.

If the stakeholders have any grievances related to the BLF project they can report their grievances via letter, phone call or verbally to nearby gewog or forest offices. The report can also be sent to the BFL PCU office or WWF office. The procedure for submitting complaints is mentioned in the BFL GRM brochure attached in the annexure.

WWF Grievance Mechanism

A grievance can be filed with the Project Complaints Officer (PCO), a WWF staff member fully independent from the Project Team, who is responsible for the WWF Grievance Mechanism and who can be reached at:

Email: SafeguardsComplaint@wwfus.org

Mailing address:

Project Complaints Officer
Safeguards Complaints,
World Wildlife Fund
1250 24th Street NW
Washington, DC 20037

Stakeholders may also submit a complaint online through an independent third-party platform at <https://secure.ethicspoint.com/domain/media/en/gui/59041/index.html>.

GCF Independent Review Mechanism

The Independent Review Mechanism (IRM) provides recourse to those affected or who may be affected by GCF projects. Complainants can find information on filing a complaint and proceed to file a complaint on the GCF IRM website: <https://irm.greenclimate.fund/case-register/file-complaint>.

Annexure I

BFL: OCCUPATIONAL HEALTH AND SAFETY STANDARDS

Employers and supervisors are obliged to implement all reasonable precautions to protect the health and safety of workers. Implementing entities should hire contractors that have the technical capability to manage the occupational health and safety issues of their workers, extending the application of the hazard management activities through formal procurement agreements.

This section provides guidance and examples of reasonable precautions to implement in managing principal risks to occupational health and safety. It is based on the IFC's Environmental, Health, and Safety Guidelines (April 30, 2007)¹ and the Occupational Health and Safety Guidelines of Bhutan's Construction Development Corporation Ltd., which relies on the national Regulation on Occupational Health, Safety and Welfare 2012, Regulation on Working Conditions 2012 and Labour Act 2007, and in compliance to Sl. No. 21 of Regulation on Occupational Health, Safety and Welfare 2012.

1. General Facility Design and Operation

Integrity of Workplace Structures

Permanent and recurrent places of work should be designed and equipped to protect occupational health and safety:

- Surfaces, structures and installations should be easy to clean and maintain, and not allow for accumulation of hazardous compounds.
- Buildings should be structurally safe, provide appropriate protection against the climatic conditions, and have acceptable light and noise conditions.
- Fire resistant, noise-absorbing materials should, to the extent feasible, be used for cladding on ceilings and walls.
- Floors should be level, even, and non-skid.
- Heavy oscillating, rotating or alternating equipment should be located in dedicated buildings or structurally isolated sections.

Severe Weather and Facility Shutdown

- Workplace structures should be designed and constructed to withstand the expected elements for the region and have an area designated for safe refuge (e.g., in case of earthquake).

Workspace and Exit

- The space provided for each worker, and in total, should be adequate for safe execution of all activities, including transport and interim storage of materials and products.

Fire Precautions

The workplace should be designed to prevent the start of fires. Other essential measures include:

- The workplace shall be provided with adequate means of protection and escape in case of fire.
- The workplace shall be provided with adequate number of relevant fire extinguishers.
- Workers shall wear shoes without iron or steel nails or any other exposed ferrous materials which is likely to cause sparks by friction.
- Smoking, lightening, or carrying of matches, lighters or smoking materials shall be prohibited within and around the construction sites.

All other precautions, as are reasonably practicable, shall be taken to prevent initiation of ignition from all other possible sources such as open flames, frictional sparks, overheated surfaces of machinery or plant, chemical or physical, chemical reaction and radiant heat.

- At every workplace adequate provision of water supply for firefighting shall be provided and maintained.
- Facilities shall be equipped with firefighting equipment (e.g., fire extinguishing bottle). The equipment should be maintained in good working order and be readily accessible. It should be adequate for the dimensions and use of the premises, equipment installed, physical and chemical properties of substances present, and the maximum number of people present.
- Manual firefighting equipment shall be easily accessible and simple to use.

- Fire extinguishers and emergency alarm systems that are both audible and visible should be in place.
- Fire exits should be identified and marked in Dzongkha and English- all workers should be made aware of the fire exits.

Lavatories and Showers

- Adequate lavatory facilities (toilets and washing areas) should be provided for the number of people expected to work in the facility (one for at least one for every 20 workers). Toilet facilities should also be provided with adequate supplies of water and soap and also be connected to sewerage system.

Potable Water Supply

- Adequate supplies of clean drinking water should be provided to workers at the work site.

Clean Eating Area

- Where there is potential for exposure to substances poisonous by ingestion, suitable arrangements are to be made for provision of clean eating areas where workers are not exposed to the hazardous or noxious substances.

Lighting

- Workplace should receive adequate natural light and if required supplemented with artificial illumination to promote worker's safety and enable safe equipment operation.
- Emergency lighting of adequate intensity should be provided in case of failure of the powerline.

Safe Access

- Passageways for pedestrians and vehicles within and outside buildings should be segregated and provide for easy, safe, and appropriate access.
- Equipment and installations requiring servicing, inspection, and/or cleaning should have unobstructed, unrestricted, and ready access.
- Covers need to be provided where ever necessary, if there is risk of falling of overhead object.
- Measures to prevent unauthorized access to dangerous areas should be in place.

First Aid

- The employer should ensure that qualified first-aid can be provided at all times. A sufficient number of first aid boxes or cupboards shall be provided and maintained so as to be readily available during all working hours, provided that the distance of the nearest first aid box or a cupboard shall be not more than 200m from any working place.
- First aid kits include all equipment outlined in Annex 1 to these Guidelines.

- Each first aid box or a cupboard shall be distinctly marked "FIRST AID"

Air Supply

- Workplace should have adequate ventilation for fresh air

2. Information Provision on Occupational Health and Safety (OHS)

2. The Contractor is responsible to hold an information session to familiarize all workers with the OHS procedures specified in these guidelines, in order to ensure they are apprised of the basic site rules of work at / on the site and of personal protection and preventing injury to fellow workers.

3. The information session should consist of basic hazard awareness, site-specific hazards, safe work practices, and emergency procedures for fire, evacuation, and natural disaster, as appropriate. Any site-specific hazard or color coding in use should be thoroughly reviewed as part of orientation training.

3. Physical Hazards

Physical hazards represent potential for accident or injury or illness due to repetitive exposure to mechanical action or work activity.

Rotating and Moving Equipment

Injury or death can occur from being trapped, entangled, or struck by machinery parts due to unexpected starting of equipment or unobvious movement during operations. Recommended protective measures include:

- Designing machines to eliminate trap hazards and ensuring that extremities are kept out of harm's way under normal operating conditions. Examples of proper design considerations include two-hand operated machines to prevent amputations or the availability of emergency stops dedicated to the machine and placed in strategic locations.
- Where a machine or equipment has an exposed moving part or exposed pinch point that may endanger the safety of any worker, the machine or equipment should be equipped with, and protected by, a guard or other device that prevents access to the moving part or pinch point. Guards should be designed and installed in conformance with appropriate machine safety standards.

Noise

- No worker should be exposed to a noise level greater than 90 dB(A) for a duration of more than 8 hours per day without wearing ear plugs/ear muffs.
- Exposures to impulsive or impact noise shall not exceed 140dB(A).
- For every 3 dB(A) increase in sound levels from the permissible limit of noise, the 'allowed' exposure period or duration should be reduced by 50 percent.
- Where it is not practicable to reduce the noise, the employer must limit the duration of time persons employed or working in the workplace are exposed to the noise so that such persons are not exposed to excessive noise.
- Prior to the issuance of hearing protective devices as the final control mechanism, use of acoustic insulating materials, isolation of the noise source, and other engineering controls should be investigated and implemented, where feasible.
- Periodic medical hearing checks should be performed on workers exposed to high noise levels.

Vibration

In any workplace where persons are at work in any process or operation which involves exposure to vibration which may constitute a risk to their health, it shall be the duty of the employer to provide, so far as is reasonably practicable, effective means to reduce the vibration.

Electrical

Exposed or faulty electrical devices, such as circuit breakers, panels, cables, cords and hand tools, can pose a serious risk to workers. Overhead wires can be struck by metal devices, such as poles or ladders, and by vehicles with metal booms. Vehicles or grounded metal objects brought into close proximity with overhead wires can result in arcing between the wires and the object, without actual contact. Recommended actions include:

- Marking all energized electrical devices and lines with warning signs
- Locking out (de-charging and leaving open with a controlled locking device) and tagging-out (warning sign placed on the lock) devices during service or maintenance
- Checking all electrical cords, cables, and hand power tools for frayed or exposed cords and following manufacturer recommendations for maximum permitted operating voltage of the portable hand tools
- Double insulating / grounding all electrical equipment used in environments that are, or may become, wet; using equipment with ground fault interrupter (GFI) protected circuits
- Protecting power cords and extension cords against damage from traffic by shielding or suspending above traffic areas
- Appropriate labeling of service rooms housing high voltage equipment ('electrical hazard') and where entry is controlled or prohibited
- Establishing "No Approach" zones around or under high voltage power lines
- Conducting detailed identification and marking of all buried electrical wiring prior to any excavation work

- Every person who is working on an electric supply line or apparatus or both shall be provided with tools and devices such as gloves, rubber shoes, and safety belts, ladders, earthing devices, helmets, line testers, hand lines whichever is relevant for protecting him/her from mechanical and electrical injury.

Eye Hazards

Solid particles from a wide variety of industrial operations, and/or a liquid chemical spray may strike a worker in the eye causing an eye injury or permanent blindness. Recommended measures include:

- Use of machine guards or splash shields and/or face and eye protection devices, such as safety glasses with side shields, goggles, and/or a full-face shield. Frequent checks of these types of equipment prior to use to ensure mechanical integrity is also good practice.
- Where machine or work fragments could present a hazard to transient workers or passers-by, extra area guarding or proximity restricting systems should be implemented, or PPE required for transients and visitors.

Welding / Hot Work

Welding creates an extremely bright and intense light that may seriously injure a worker's eyesight. In extreme cases, blindness may result. Additionally, welding may produce noxious fumes to which prolonged exposure can cause serious chronic diseases. Recommended measures include:

- Provision of proper eye protection such as welder goggles and/or a full-face eye shield for all personnel involved in, or assisting, welding operations. Additional methods may include the use of welding barrier screens around the specific work station.

Working Environment Temperature

Exposure to hot or cold working conditions in indoor or outdoor environments can result temperature stress-related injury or death. Use of personal protective equipment (PPE) to protect against other occupational hazards can accentuate and aggravate heat-related illnesses. Extreme temperatures in permanent work environments should be avoided through implementation of engineering controls and ventilation. Where this is not possible, such as during short-term outdoor work, temperature-related stress management procedures should be implemented which include:

- Monitoring weather forecasts for outdoor work to provide advance warning of extreme weather and scheduling work accordingly
- Providing temporary shelters to protect against the elements during working activities or for use as rest areas
- Use of protective clothing
- Providing easy access to adequate hydration such as drinking water or electrolyte drinks.

Ergonomics, Repetitive Motion, Manual Handling

Injuries due to ergonomic factors, such as repetitive motion, overexertion, and manual handling, take prolonged and repeated exposures to develop, and typically require periods of weeks to months for recovery. These OHS problems should be minimized or eliminated to maintain a productive workplace.

Controls may include:

- Use of mechanical assists to eliminate or reduce exertions required to lift materials, hold tools and work objects, and requiring multi-person lifts if weights exceed thresholds (adult man- 50kg, adult female-25kg)
- Selecting and designing tools that reduce force requirements and holding times, and improve postures
- Incorporating rest and stretch breaks into work processes, and conducting job rotation
- Implementing quality control and maintenance programs that reduce unnecessary forces and exertions

Working at Heights

Fall prevention and protection measures should be implemented whenever a worker is exposed to the hazard of falling more than two meters; into operating machinery; into water or other liquid; into hazardous substances; or through an opening in a work surface. Fall prevention / protection measures may also be warranted on a case-specific basis when there are risks of falling from lesser heights. Fall prevention may include:

- Installation of guardrails with mid-rails and toe boards at the edge of any fall hazard area
- Proper use of ladders and scaffolds by trained workers

- Use of fall prevention devices, including safety belt and lanyard travel limiting devices to prevent access to fall hazard area, or fall protection devices such as full body harnesses used in conjunction with shock absorbing lanyards or self-retracting inertial fall arrest devices attached to fixed anchor point or horizontal life-lines

Appropriate training in use, serviceability, and integrity of the necessary PPE

- Inclusion of rescue and/or recovery plans, and equipment to respond to workers after an arrested fall

Illumination

Work area light intensity should be adequate for the general purpose of the location and type of activity, and should be supplemented with dedicated work station illumination, as needed. Controls should include:

- Use of energy efficient light sources with minimum heat emission
- Undertaking measures to eliminate glare / reflections and flickering of lights
- Taking precautions to minimize and control optical radiation including direct sunlight.
- Exposure to high intensity UV and IR radiation and high intensity visible light should also be controlled
- Controlling laser hazards in accordance with equipment specifications, certifications, and recognized safety standards. The lowest feasible class Laser should be applied to minimize risks.

4. Personal safety equipment for workers

All workers are equipped with the following personal safety equipment: helmet, gloves, ordinary boots and reflective vest.

Workers that are exposed to dust should also be provided with eye protection glasses and face mask. Workers that are exposed to noise should be provided with ear plugs. Workers that need to work in the dark should be provided with hand and cap lamps.

Workers are instructed regarding safety equipment as follows:

- Always wear complete set of protective wear.
- Do not wear loose clothing, such as overhang shirt, jackets, mufflers etc.
- Tuck shirt and jacket well.
- Secure helmet with belt under the chin.
- Tuck the bottom sleeves of trouser inside safety boot.
- Dress with reflector

5. Standards for workers' accommodation

1. General living facilities

- The location of the facilities is designed to avoid flooding or other natural hazards
- The living facilities are located within a reasonable distance from the worksite.
- Transport is provided to worksite safe and free if the accommodation is reasonably far from the worksite.
- The living facilities are built using adequate materials, kept in good repair and kept clean and free from waste and refuse.

2. Drainage

- The site is adequately drained.

Heating, air conditioning, ventilation and light

- Living facilities are provided with adequate heating, ventilation, and light systems including emergency lighting.

4. Water

- Workers have easy access to a supply of clean/ potable water in adequate quantities.
- The quality of the water complies with national/local requirements and is regularly monitored.
- Tanks used for the storage of drinking water are constructed and covered to prevent water stored therein from becoming polluted or contaminated.
- The quality of the drinking water

5. Wastewater and solid waste

- Wastewater, sewage, food and any other waste materials are adequately discharged in compliance with national and/or international standards and without causing any significant impacts on camp residents, the environment or surrounding communities.
- Specific containers for waste collection are provided and emptied on a regular basis.

6. Rooms/dormitories facilities

- Rooms/dormitories are kept in good condition. They are aired and cleaned at regular intervals.
- Rooms/dormitories are built with easily cleanable flooring material.
- Rooms/dormitories and sanitary facilities are located in the same buildings.
- Residents are provided with enough space.
- The number of workers sharing the same room/dormitory is minimized.
- Doors and windows are lockable and provided with mosquito screens when necessary.
- Separate sleeping areas are provided for men and women.
- A separate bed is provided for every worker and use of double deck bunks is minimized.
- Workers are provided with comfortable mattresses. Workers may be expected to use their own pillows and bed linens.
- Adequate facilities for the storage of personal belongings are provided.
- Separate storages for work clothes and PPE and depending on condition, drying/airing areas are provided.

8. Sanitary and toilet facilities

- Sanitary and toilet facilities are constructed from materials that are easily cleanable.
- Sanitary and toilet facilities are cleaned frequently and kept in working condition.
- Toilets, showers/bathrooms and other sanitary facilities are designed to provide workers with adequate privacy including ceiling to floor partitions and lockable doors.
- Separate sanitary and toilet facilities are provided for men and women.
- Toilet and shower facilities are conveniently located and easily accessible.
- Toilet facilities are environmentally friendly (e.g., pit toilet) and sewage is not disposed into the worksite.
- Open defecation in the vicinity of project sites should be prohibited.

- An adequate number of hand wash basins and showers/bathrooms facilities are provided.

9. Cooking and laundry facilities

Cooking and laundry facilities should be available for workers at the worksite or in close vicinity to it. These facilities should be kept in clean and sanitary conditions.

Annex 1. Contents of first aid box or cup-boards

The first aid boxes or cup-boards shall be distinctively marked with white cross on a green background and shall contain the following equipment:

1.

- | | |
|----------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|
| Small sterilized dressings (12) | 10. Torch light (1) |
| 2. Medium size sterilized dressings (6) | 11. Pair of scissors (1) |
| 3. Large size sterilized dressings (6) | 12. Tablets Aspirin (5gms) 2 dozen |
| 4. Large size sterilized burn dressings (6) | 13. Burn Ointment (2 tubes) |
| 5. (1/2 oz.) Sterilized cotton wool (6 packets) | 14. Dettol (2 phial, about 2 ozs) |
| 6. (2oz.) Bottle containing a two per cent alcoholic solution of iodine (1) | 15. Bandages 4 inches wide |
| 7. (2oz.) Bottle containing Betadine (antiseptic solution) having the dose and mode of administration indicated on the label (1) | 16. Bandages 2 inches wide |
| 8. Roll of adhesive plaster (1) | 17. Triangular bandages (2) |
| 9. A snake bite lancet (1) | 18. Packets of safety pins (1) |
| | 19. A supply of suitable splint |

Annexure II- Brochure for BFL GRM for Phrumsengla National Park

LOGICAL STEPS FOR GRIEVANCE RESOLUTION PROCESS

Each grievance will be registered with the following information:

- Name of the complainant
- Date of the grievance
- Nature of the grievance and location
- Number of persons involved
- Tracking no.
- Potential solutions

Modes of communication:

WHAT HAPPENS TO YOUR COMPLAINT?

The complaint will be investigated by responsible authorities following the logical steps for grievance resolution process within 12 working days. If further investigation is required, the complainant will be informed accordingly and a final response will be provided after an additional period of 8 working days.

If you did not prefer to remain anonymous, you will be notified regarding the complaint resolution once the investigation is completed.

VISIT US:

Bhutan For Life, Project Coordination Unit, Department of Forests and Park Services, Ministry of Energy and Natural Resources, Royal Government of Bhutan

THE GRIEVANCE REDRESSAL MECHANISM FOR BHUTAN FOR LIFE

PHRUMSENGLA NATIONAL PARK

The goal of the BFL GRM is to channel grievances into an acceptable, institutionalized mechanism for timely resolving conflict that may arise from implementation of BFL project activities.

The GRM seeks to address any grievances related to the implementation of BFL activities such as:

- Loss of community resources
- Non-performance of project obligations including safeguards
- Violations of law and/or corruption
- Project governance and implementation
- Fair access and benefit sharing
- Stakeholder engagement
- Budget allocation
- Labour related issues and incidents
- Gender related issues

HOW TO FILE YOUR COMPLAINT

To file your complaint, please contact any of the designated individuals provided below. You may maintain anonymity if you prefer.

BFL FOCAL OFFICER

- Baia Ram Mafchan
17961318
brmafchan@moenr.gov.bt
PNP, Head Office, Ura Gewog, Bumthang
- Pema Tshewang
17708586
pematshewang1980@gmail.com
Ura Range Office, Ura Gewog, Bumthang
- Ugyen Tsewang
17900948
ugyentsewang101@gmail.com
Phawan Range Office, Tshenkar Gewog, Lhuentse

LINGMITHANG RANGE OFFICE

- Jamtsho
17634308
jamtshojamtsho72@gmail.com
Lingmithang Range Office, Saling Gewog, Mongar

ZANGKAR BEAT OFFICE

- Phuntsho Namgay
17741925
pnamgay64@gmail.com
Zangkar Beat Office, Jaray Gewog, Lhuentse

TSAMANG BEAT OFFICE

- Pema Khandu
17131086
pemakhandu12@gmail.com
Tsamang Beat Office, Tsamang Gewog, Lhuentse

SENGOR BEAT OFFICE

- Pema Thinley
17706995
pemathinley03@gmail.com
Sengor Beat Office, Saling Gewog, Mongar

YOU MAY ALSO CONTACT THE BFL PROJECT COORDINATION UNIT (PCU) OR FUND SECRETARIAT (FS) AT:

BFL FUND SECRETARIAT (FS)

- Kuenzang Tobgay
17750414
kuenzangtobgay@bfl.org.bt
Bhutan For Life Fund Secretariat, Royal Textile Academy, Thimphu

BFL PROJECT COORDINATION UNIT (PCU)

- Norbu Yangdon
17987200
norbuyangdon@moenr.gov.bt
BFL Project Coordination Unit, Department of Forests and Park Services, Ministry of Energy and Natural Resources, Taba, Thimphu

IF YOU ARE NOT COMFORTABLE FILING YOUR COMPLAINTS AT PROTECTED AREA OFFICES, YOU MAY ALSO FILE YOUR COMPLAINTS AT THE NEAREST FOLLOWING GEWOG OFFICES:

- Ura Gewog – 17341959
- Jaray Gewog – 17681420
- Metsho Gewog – 17543382
- Tsamang Gewog – 17706422
- Saling Gewog – 77400167

IF THE NATIONAL PROCESS OF GRM IS UNABLE TO RESOLVE THE GRIEVANCE, COMPLAINTS MAY ALSO BE FILED WITH WORLD WILDLIFE FUND (WWF).

Write to the WWF GCF Accredited entity at:
SafeguardsComplaint@wwfus.org
Project Complaints Officer, Safeguards Complaints, World Wildlife Fund 1250 24th Street NW Washington, DC 20037

COMPLAINTS MAY ALSO BE FILED WITH GCF INDEPENDENT REDRESS MECHANISM (IRM) OPTION. COMPLAINT CAN BE FILED BY:

- Sending it by mail or email at irm@gcfund.org
- Sending a voice or video recording
- Filling out the online complaints form available at: <https://gcf.isight.com/external/case/new/group=Complaint>

A complaint for IRM should generally include:

- Name, address and contact information
- A description of the programme (caused adverse impacts to the complainant)
- A description of how the complainants have been/maybe adversely impacted by the project/programme
- Whether confidentiality is being requested and the reasons for it.

COMPLAINTS MAY ALSO BE FILED WITH THE WWF THIRD PARTY GRIEVANCE REPORTING MECHANISM BY USING ETHICS POINT WEBSITE AT:

<https://secure.ethicspoint.com/domain/media/en/gui/59041/index.html>

This mechanism can receive reports online or by phone in multiple languages.

IF YOU ARE UNSATISFIED WITH THE COMPLAINT RESOLUTION PROCESS, YOU CAN APPEAL TO:

GRM Appeal Committee, Bhutan For Life Project, DoFPS, Thimphu, Bhutan.