

# ENVIRONMENT AND SOCIAL SAFEGUARDS FRAMEWORK 2025



**Royal Society For Protection of Nature**  
**Thimphu**



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## Preface

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The Royal Society for Protection of Nature (RSPN) remains committed to advancing environmental conservation, while promoting fairness and inclusivity in how environmental efforts impact communities, through its Environmental and Social Safeguards Framework (ESSF). As Bhutan's leading Civil Society Organization in biodiversity protection and sustainable development, RSPN recognizes the importance of continuously strengthening its policies to align with evolving global environmental and social standards.

With the updated Environmental and Social Safeguards Framework, RSPN takes a significant step forward in strengthening its strategic approach. This framework not only reflects RSPN's commitment to sustainable development and legal compliance but also ensures that its conservation efforts contribute to both biodiversity protection and the resilience of local communities. Serving as a vital resource, the framework provides guidance to RSPN staff, partners, and stakeholders in upholding the highest standards of environmental and social responsibility.

This ESSF embodies RSPN's dedication to sustainable development, legal compliance, and active engagement with stakeholders, ensuring that its conservation initiatives not only protect biodiversity but also enhance community resilience. It serves as an essential tool for RSPN staff, implementing partners, and stakeholders, guiding them to uphold the highest standards of environmental and social responsibility.

We extend our sincere gratitude to all contributors, policy experts, environmental specialists, community stakeholders, and partner organizations, who have supported this effort. Through collaborative action, we reaffirm RSPN's role as a leader in conservation and sustainable development, ensuring that our policies and projects reflect the principles of equity, sustainability, and ecological integrity.

**(Chairperson)**

**Royal Society for Protection of Nature**

## Table of Contents

|  |              |
|--|--------------|
| <b>Preface</b>   |              |
| <b>Acronyms</b>  | <b>01</b>    |
| <b>1. Introduction</b>   | <b>02</b>    |
| <b>2. Vision and Mission of RSPN</b>   | <b>02</b>    |
| <b>3. Core value of RSPN</b>   | <b>02</b>    |
| <b>4. Goals of ESSF</b>  | <b>02</b>    |
| <b>5. Scope and Applicability</b>  | <b>02</b>    |
| <b>6. Alignment of ESSF with International and National Standards</b>                    | <b>02</b>    |
| <b>7. Guiding Principles of the RSPN ESSF</b>  | <b>03</b>    |
| <b>8. Environmental and Social Risk Categorization</b>                                   | <b>04</b>    |
| <b>9. Environmental and Social Impact Assessment</b>                                     | <b>05</b>    |
| <b>10. Mitigation Hierarchy</b>  | <b>06</b>    |
| <b>11. Free, Prior and Informed Consent</b>  | <b>06</b>    |
| <b>12. Public Disclosure</b>   | <b>07</b>    |
| <b>13. Gender Equality and Social Inclusion</b>  | <b>07</b>    |
| <b>14. Grievance Mechanism</b>   | <b>07-09</b> |
| <b>15. Whistleblower Protections</b>   | <b>10</b>    |
| <b>16. Monitoring, Reporting, and Evaluation</b>   | <b>10</b>    |
| <b>17. Capacity Building</b>   | <b>10</b>    |
| <b>18. Effective Date and Revision</b>   | <b>10</b>    |
| <b>Annex 1: Potential Questions/Probing for Assessing Environmental and Social Risks</b> | <b>11-12</b> |
| <b>Annex 2: Risk Identification Sample Table</b>   | <b>13-14</b> |
| <b>Annexure 3: Management and Mitigation Action Plan Sample</b>                          | <b>15</b>    |

## ACRONYMS

|                          |  |
|--------------------------|--|
| <b>AF</b>                | <b>Adaptation Fund</b>                               |
| <b>CSO</b>               | <b>Civil Society Organization</b>                    |
| <b>ES</b>                | <b>Environmental and Social</b>                      |
| <b>ESIA</b>              | <b>Environmental and Social Impact Assessment</b>    |
| <b>ESMF</b>              | <b>Environmental and Social Management Framework</b> |
| <b>ESMP</b>              | <b>Environmental and Social Management Plan</b>      |
| <b>ESS</b>               | <b>Environmental and Social Safeguards</b>           |
| <b>ESSF</b>              | <b>Environmental and Social Safeguards Framework</b> |
| <b>GAP</b>               | <b>Gender Action Plan</b>                            |
| <b>GCF</b>               | <b>Green Climate Fund</b>                            |
| <b>GHG</b>               | <b>Greenhouse Gas</b>                                |
| <b>GIS</b>               | <b>Geographic Information System</b>                 |
| <b>IFC</b>               | <b>International Finance Corporation</b>             |
| <b>ILO</b>               | <b>International Labour Organization</b>             |
| <b>MRF</b>               | <b>monitoring and reporting framework</b>            |
| <b>NGO</b>               | <b>Non-Governmental Organization</b>                 |
| <b>RSPN</b>              | <b>Royal Society for Protection of Nature</b>        |
| <b>SDG</b>               | <b>Sustainable Development Goal</b>                  |
| <b>SEAH</b>              | <b>Sexual Exploitation, Abuse and Harassment</b>     |
| <b>tCO<sub>2</sub>eq</b> | <b>tonnes of carbon dioxide equivalent</b>           |

## 1. Introduction

The Royal Society for Protection of Nature (RSPN) is a non-governmental organization established in 1987 under the Royal Command of His Majesty the Fourth King of Bhutan. With the esteemed patronage of Her Majesty, the Queen of Bhutan, RSPN has evolved into a leading and credible Civil Society Organization (CSO) dedicated to the conservation of biodiversity in the Kingdom of Bhutan.

This framework outlines processes for proactive risk management, ensuring that all projects undertaken by RSPN not only meet regulatory, implementation, and monitoring requirements but exceed them to set benchmarks in sustainable development practices.

## 2. Vision and Mission of RSPN

The **vision** of RSPN is to be the leader in conservation, ensuring future generations of Bhutan live in an environmentally sustainable society. The **mission** of RSPN is to inspire personal responsibility and active involvement of the people of the Kingdom of Bhutan in the conservation of the Kingdom's environment through education, community engagement, and sustainable livelihood opportunities.

## 3. Core value of RSPN

The RSPN's core value is to promote environmental conservation in tandem with livelihood improvement in accountable, transparent, efficient and results-based manner.

## 4. Goals of ESSF

**4.1.** The ESSF aims to uphold the highest levels of environmental and social standards, stewardship, social equity, ensuring that projects contribute positively to communities and ecosystems ultimately realizing sustainable and equitable development.

**4.2.** This ESSF provides a robust system for identifying environmental and social risks and mitigating and managing the risks.

## 5. Scope and Applicability

The ESSF shall apply to RSPN, Partners, Grantees, Service Providers, and any other third parties implementing RSPN's projects.

## 6. Alignment of ESSF with International and National Standards

This ESSF aligns with the following international and national standards:

### 6.1. International standards

**6.1.1.** Performance Standards on Environmental and Social Sustainability (2012) of the International Finance Corporation.

**6.1.2.** Revised Environmental and Social Policy (2021) of the Green Climate Fund.

**6.1.3.** Environmental and Social Policy (2016) of the Adaptation Fund and Guidance document for Implementing Entities on compliance with the Adaptation Fund

**6.1.4.** Climate Resilience (SDG 13 - Climate Action): Projects integrate climate adaptation strategies.

## 6.2. National Standards

**6.2.1.** The Country's Constitution 2008 and National Forest Policy 2009, emphasizing on Sustainable Development, Forest Conservation and Environmental Protection.

**6.2.2.** National Environment Protection Act, 2007 underscoring importance on mitigation hierarchy and Pollution Prevention

**6.2.3.** Comprehensive National Development Plan for Bhutan 2030: Balancing social, environmental, and economic priorities

**6.2.4.** Forest and Nature Conservation Act, 2023: Projects avoid disrupting sensitive ecosystems.

## 7. Guiding Principles of the RSPN ESSF

**7.1. Sustainable Development:** RSPN upholds the principles of sustainable development that integrates economic, social, and environmental dimensions to ensure that present needs are met without compromising the ability of future generations to meet their needs. Along this line, projects are designed to contribute to long-term environmental health, social inclusion, and economic stability.

**7.2. Climate change mitigation and adaptation:** RSPN ensures a balance of climate change mitigation and adaptation outcomes, so that projects not only reduce environmental footprints but also enhance socioeconomic and ecological resilience by providing sustainable livelihoods.

**7.3. Mitigation Hierarchy:** RSPN shall avoid adverse environmental and social impacts as a result of projects. If avoidance is not feasible, strive to minimize these impacts through remedial and mitigation measures. Compensation or restoration to offset residual harm shall be the last resort.

**7.4. Compliance with Laws:** Ensuring compliance with national and international legal frameworks, including Environmental Protection Laws, Labour Standards and Human Rights Conventions and Commitments, is critical to maintaining the legitimacy and effectiveness of RSPN's projects.

**7.5. Human Rights:** RSPN shall recognize that all individuals are equal by virtue of the inherent dignity of each as human being, and all human beings are entitled to their human rights without discrimination. RSPN ensures that all individuals are protected from forced labor, receive fair compensation where relevant, and free from discrimination in its projects.

**7.6. Gender Equality and Social Inclusion:** RSPN ensures that individuals of all gender can participate fully and equitably in all its project.

**7.7. Protection of Marginalized Groups:** RSPN considers special and need-based measures to protect vulnerable populations.

**7.8. Free, Prior and Informed Consent (FPIC):** RSPN shall consider obtaining FPIC before implementing projects that may affect their lands, livelihoods, or cultural practices.

**7.9. Transparency and Accountability:** RSPN is committed to ensuring transparency and accountability through regular public disclosures of project processes and decisions and being accountable to addressing ESS complaints.

**7.10.** Any ESS grievances shall be redressed as per RSPN GRM 2025

## 8.Environmental and Social Risk Categorization

**8.1.** RSPN shall categorize its projects into three risk levels to determine the extent of assessment and management required: The categorization process ensures that the level of assessment and management is proportional to the risks and impacts of each project.

**8.2.** Sub-projects within larger programs are individually assessed, and the highest risk category is applied to the entire program.

### Risk Categorization

**Category A:** Projects with potential significant adverse impacts that are diverse, irreversible, or unprecedented. These include projects involving large-scale infrastructure development, land acquisition, or major habitat modification. Category A projects shall be subjected to detailed Environmental and Social Impacts Assessment (ESIA) and preparation of Environmental and Social Management Plan (ESMP).

**Category B:** Projects with limited adverse impacts that are site-specific, reversible, and readily mitigated. These include small-scale construction or rehabilitation activities. Category B projects shall be subjected to rapid Environmental and Social Impacts Assessment (ESIA) and preparation of Environmental and Social Management Plan (ESMP)

**Category C:** Projects with minimal or no adverse environmental and social impacts. No environmental and social impact assessment procedures are required beyond the initial project classification. However, projects of Category C with low-risk shall be assessed through environmental and social screening and compliance checks, and monitored continuously through periodic verification to confirm that no new environmental or social risks emerge. Like risk category A and B, annexure 2: risk identification shall also be applied to Category C projects.

#### Note:

1. *Diverse refers to risks varied in nature and sources, affecting multiple aspects of the project.*
2. *Irreversible refers to impact of a risk occurred cannot be undone or restored to its original state, even with mitigation.*
3. *Unprecedented refers to new and unfamiliar risks, or has no historical precedent within the project area.*

**8.3.** RSPN together with external experts (ESS, Gender, IP) shall identify and categorize the risks into A, B and C. Project risk identification shall be based on analysis of project plans, historical and prevailing data including gender disaggregated data, and lessons learned from similar projects. The risk identification and management shall include gender disaggregated data specific risks, participation by men and women in risk identification.

#### 8.4. Risk Evaluation

Risks are rated on the following basis:

- Likelihood of occurrence (scale of 1–4)
- Impact if it occurs (scale of 1–4)
- Risk Categorization = Likelihood of occurrence × Impact

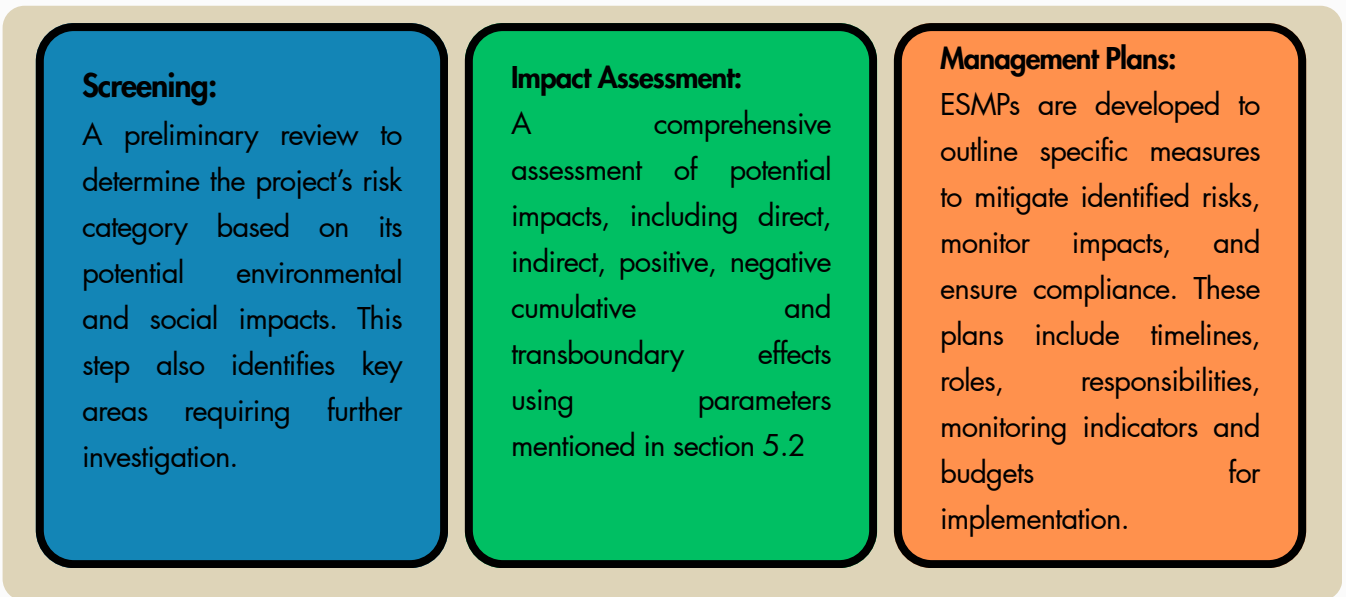
| Risk Score Range | Risk Categorization |
|------------------|---------------------|
| 11– 16           | A                   |
| 6– 10            | B                   |
| 1 – 5            | C                   |

**9. Environmental and Social Impact Assessment**

**9.1.** RSPN shall conduct ESIA for all Category A and B projects to assess potential risks, adverse impacts, opportunities as a result of the project and identify early mitigation and management measures.

**9.2.** ESIA shall consider assessing impacts and management, but not limited to biodiversity conservation and management, Community health safety and security, Labor and working conditions, Cultural Heritage Disruption, Climate Resilience, Pollution Risks, Soil Degradation, Gender Equity Risks, Community Rights, Indigenous People.

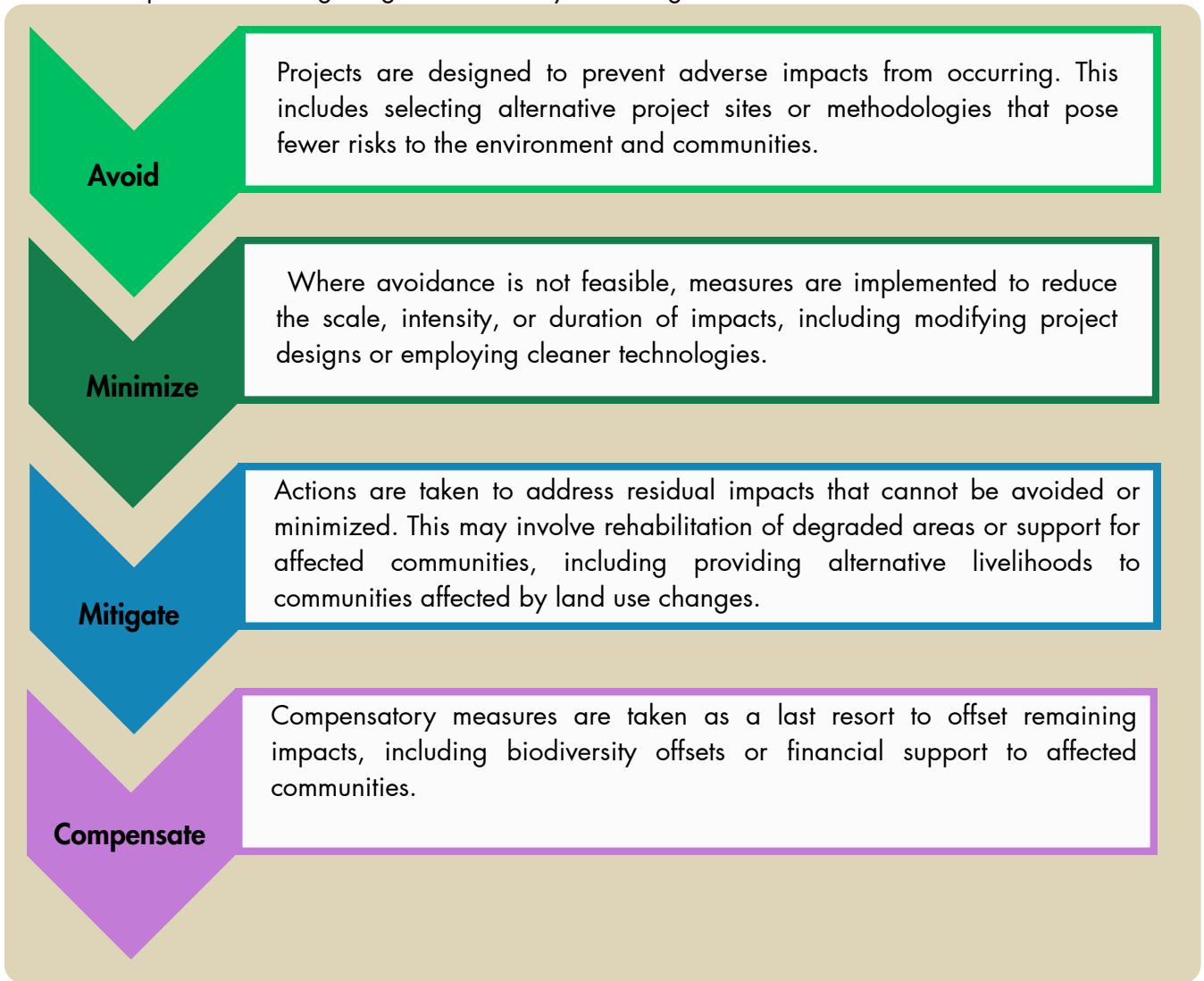
The following flow chart illustrates ESIA processes.



**9.3.** The assessment process emphasizes stakeholder involvement, evidence-based decision-making, and alignment with best practices. Comprehensive documentation of assessments is shared with stakeholders to foster transparency and trust.

### 10. Mitigation Hierarchy

RSPN adopts the following mitigation hierarchy to manage ESS risks:



The hierarchy ensures that adverse impacts are systematically addressed, with avoidance prioritized over mitigation or compensation.

### 11. Free, Prior and Informed Consent

Stakeholder Engagement: To obtain FPIC, RSPN ensures inclusive, culturally appropriate, and gender-sensitive stakeholder engagement throughout the project lifecycle. This includes:



## 12. Public Disclosure

All key documents, including environment and social impact reports are publicly disclosed through RSPN website and provide ample opportunity to review and comment on project plans.

## 13. Gender Equality and Social Inclusion

RSPN integrates gender and social inclusion into all project stages to ensure that projects are equitable and accessible. By addressing systemic inequalities, this emphasizes creating opportunities for historically underrepresented groups and fostering environments where everyone can benefit equally.

**13.1.** For safeguarding gender through equitable participation, benefit-sharing and decision-making opportunities for women, men, and marginalized groups, RSPN shall mainstream gender across all stages of project development, implementation, monitoring and evaluation.

**13.2.** Carry out mandatory gender impact assessments starting from project design to project evaluation and implement corresponding gender-responsive risk mitigation and management measures.

**13.3.** Gauge impacts of RSPN programs and projects on different gender groups at project entry level and mainstream relevant measures.

**13.4.** Develop a Gender Action Plan (GAP) with gender disaggregated data for every project with budget allocation and implement them

**13.5.** RSPN shall designate a Gender Focal point to integrate and implement Gender issues at all levels of project phases. The focal person shall also build RSPN's capacity in terms of Gender mainstreaming and implementing Gender Action Plan (GAP).

## 14. Grievance Mechanism

RSPN ensures that ESS grievances from all stakeholders, including marginalized groups, are heard and addressed in a timely manner.

As per RSPN's GRM 2025, there are two-tiers of redressing grievances including grievances on ESS, gender and SEAH.

RSPN's ESS grievances redressal is categorized into two: Institutional and Project levels

## Grievance Redressal at Institutional Level

Complainants file complaints in-person, writing, email, GRM Portal, Suggestion/Grievance Box both at Head Office and Field Offices.

### Log and Acknowledge: Turn-Around-Time (TAT) 5 Business Days

- GRM Focal Person records the complaints in RSPN's Grievance Registry and ask to provide contact details of complainant, which shall be maintained with strict confidentiality.
- Complainant receives a written acknowledgement within 5 business days.

### Tier 1: Management Level: TAT 10-15 Business Days

- **Initial Review:** Head of the Department review documents and seek informal resolution.
- **Decision/Resolution:** A recommended resolution is proposed within 10 business days of acknowledgement. If the resolution is accepted, the case is closed.
- **Escalation:** If unresolved or if the complaint directly implicates the Department, the grievance escalates to the Management Team.
- **Investigation:** A formal investigation may involve reviewing documents, interviewing witnesses, or consulting RSPN's legal counsel together with Human Resource Committee (HRC).
- **Response:** Management Team issues a written decision within 15 business days of receiving the escalation, detailing corrective measures, timelines, and next steps.
- **Possible Outcomes:**
  - **Resolved:** The complainant agrees with the management's decision and the complaint is closed.
  - **Unresolved:** The complainant disagrees with management's decision and escalates to Tier 2.

### Tier 2: RSPN Board: TAT 30 Business Day

- **High-Level Deliberation:** Board convene a special session/collect more evidence/consult external experts.
- **Final Decision:** Decision shared within 30 business days from the receipt of grievance.
- **Possible Outcomes:**
  - **Resolution:** If Board's decision is accepted, the complaint is closed. If dissatisfied, complainant may seek judicial, or other legal remedies.

### Documentation and Closure

- Once a resolution is passed at any tier, GRM Focal Person records the outcomes in the Grievance Registry.
- GRM Focal Person issues a "Closure Letter" outlining the resolutions to the complainant.

## Grievance Redressal at Institutional Level

- Complainants file complaints in-person, writing, email, GRM Portal, Suggestion/Grievance Box both at Head Office and Field Offices.



### Log and Acknowledge: Turn-Around-Time (TAT) 5 Business Days

- GRM Focal Person records the complaints in RSPN's Grievance Registry and ask to provide contact details of complainant, which shall be maintained with strict confidentiality.
- Complainant receives a written acknowledgement within 5 business days from the receipt of complaint.



- GRM Focal Person checks the severity and nature of the grievances and assess risk (example of High-Risk includes cases involving SEAH/major environmental harm/suspected fraud/corruption).
- Based on the risk, GRM Focal Person conducts a preliminary fact-finding or initial assessment:
- GRM Focal Person may consult project steering committee (PSC) where applicable and conduct project site visit to gather more information and evidences.
- Resolution: If a consensus/simple remedy is readily apparent, GRM Focal Person proposes a solution within 14 business days from the receipt of complaint. If dissatisfied with the proposed.



### Tier 2: RSPN Board: TAT 30 Business Day

- High-Level Deliberation: Board convene an inter-sessional or collect more evidence or consult external experts.
- Final Decision: Decision shared within 30 business days from the receipt of grievance.
- Possible Outcomes:
- Resolution: If Board's decision is accepted, the complaint is closed. If dissatisfied, complainant may seek judicial, or other legal remedies.



### Documentation and Closure

- Once a resolution is passed at any tier, GRM Focal Person records the outcomes in the Grievance Registry.
- GRM Focal Person issues a "Closure Letter" outlining the resolution to the complainant.

## 15. Whistleblower Protections

**15.1. Good Faith:** ESS complaints must be made with reasonable belief in its truth. Malicious or baseless complaints may result in disciplinary actions after a fair investigation.

**15.2. Right to Anonymity:** ESS Whistleblowers can opt to remain anonymous, although providing contact details may help with follow-up.

**15.3. Non-Retaliation:** Any retaliation against an ESS whistleblower is grounds for disciplinary action.

## 16. Monitoring, Reporting, and Evaluation

**16.1.** RSPN shall monitor and track compliance with ESMPs periodically and evaluate the compliance with ESMP based on need.

## 17. Capacity Building

**17.1.** Enhancing Knowledge: RSPN shall provide capacity development for staff, partners, and stakeholders on environmental and social risk management, and gender equality and social inclusion.

## 18. Effective Date and Revision

**18.1.** This ESSF shall be effective from July 1, 2025.

**18.2.** RSPN shall regularly review and update its ESSF where needed, to integrate lessons learned from past projects and incorporate evolving best practices and stakeholder feedback

## Annex 1: Potential Questions/Probing for Assessing Environmental and Social Risks

|   |  |
|---|--|
| <b>Compliance with the Law</b>            | Does the project adhere to national and international legal frameworks?                |
|   | Are there unresolved legal disputes that may affect the project?                       |
| <b>Access and Equity</b>                  | Does the project ensure equitable access to benefits?                                  |
|   | Are there mechanisms to ensure fair resource allocation?                               |
| <b>Protection of disadvantaged Groups</b> | Are disadvantaged groups involved in decision-making processes?                        |
|   | Could the project exacerbate vulnerabilities among marginalized groups?                |
| <b>Human Rights</b>                       | Could the project activities impact the rights of local communities or individuals?    |
|   | Are mechanisms in place to address potential human rights violations?                  |
| <b>Gender Equality</b>                    | Are marginalized genders equitably involved in project activities and decision-making? |
|   | Does the project address gender-specific vulnerabilities and challenges?               |
| <b>Labor Rights</b>                       | Are there risks related to child labor, forced labor, or unsafe working conditions?    |
|   | Does the project promote equitable employment opportunities?                           |
| <b>Community Rights</b>                   | Could the project disrupt traditional practices or land use?                           |
| <b>Avoiding Involuntary Resettlement</b>  | Will the project displace communities or affect their livelihoods?                     |
|   | Are there compensation mechanisms in place for affected populations?                   |
| <b>Protecting Natural Habitats</b>        | Could the project disturb natural habitats or sensitive ecosystems?                    |
|   | Are measures in place to protect endangered species?                                   |

|                                  |  |
|----------------------------------|--|
| <b>Biodiversity Conservation</b> | Does the project involve activities in biodiversity hotspots?                              |
|                                  | Could the project lead to habitat loss or fragmentation?                                   |
| <b>Climate Resilience</b>        | Does the project integrate climate-resilient designs to withstand climate-related impacts? |
|                                  | Could the project increase exposure to climate risks?                                      |
| <b>Pollution Prevention</b>      | Will the project generate significant waste, emissions, or effluents?                      |
|                                  | Are pollution mitigation technologies incorporated into the project?                       |
| <b>Health and Safety</b>         | Are there risks to community or worker health and safety?                                  |
|                                  | Could the project increase exposure to hazards or pollutants?                              |
| <b>Cultural Heritage</b>         | Will the project affect culturally significant sites or intangible heritage?               |
|                                  | Does the project align with community traditions and governance systems?                   |
| <b>Soil Conservation</b>         | Could the project contribute to soil degradation or erosion?                               |
| <b>Zero Tolerance for SEAH</b>   | Are measures in place to SEAH?   |

**Annex 2: Risk Identification Sample Table**

| Parameters                         | Risk Area                    | Description  | Likelihood | Impact | Risk Categorization (Category A/B/C) | Potential Consequences                   | Proposed Mitigation Measure   |
|------------------------------------|------------------------------|--|------------|--------|--------------------------------------|--|---|
| Compliance with the Law            | Legal Noncompliance          | Failure to adhere to local or international environmental regulations.                 |            |        |                                      | Penalties, project delays                | Regular legal reviews; capacity building for compliance.                            |
| Access and Equity                  | Resource Allocation Inequity | Uneven distribution of project benefits among communities.                             |            |        |                                      | Community dissatisfaction, conflicts     | Ensure inclusive project planning; conduct stakeholder consultations.               |
| Protection of Disadvantaged Groups | Social Exclusion             | Disadvantaged groups excluded from decision-making and benefits.                       |            |        |                                      | Increased inequality, project opposition | Targeted outreach programs; quotas for marginalized groups.                         |
| Human Rights                       | Human Rights Violations      | Project activities may inadvertently harm vulnerable groups.                           |            |        |                                      | Reputational damage, community unrest    | Conduct human rights impact assessments; ensure project inclusivity.                |
| Gender Equality                    | Gender Disparities           | Unequal participation of marginalized genders in project benefits or leadership roles. |            |        |                                      | Reduced social impact, community unrest  | Provide gender-sensitive training and ensure equitable representation.              |
| Labor Rights                       | Unsafe Labor Practices       | Unsafe working conditions for laborers on project sites.                               |            |        |                                      | Worker injuries, reputational damage     | Regular safety training; ensure PPE availability.                                   |
| Community Rights                   | Cultural Disruption          | Project activities may affect community traditions or governance systems.              |            |        |                                      | Loss of cultural value                   | Conduct consultation to obtain consent; ensure culturally sensitive implementation. |

|                                   |                               |  |  |  |  |                                      |  |
|-----------------------------------|-------------------------------|--|--|--|--|--------------------------------------|--|
| Avoiding Involuntary Resettlement | Forced Displacement           | Project activities displace communities without adequate compensation.         |  |  |  | Economic and social disruptions      | Develop resettlement action plans; ensure fair compensation. |
| Protecting Natural Habitats       | Habitat Destruction           | Land clearance disrupts sensitive ecosystems or critical habitats.             |  |  |  | Biodiversity loss                    | Avoid critical areas; implement biodiversity offsets.        |
| Biodiversity Conservation         | Invasive Species Introduction | Reforestation activities introduce invasive species.                           |  |  |  | Loss of native biodiversity          | Use only native species for reforestation.                   |
| Climate Resilience                | Infrastructure Vulnerability  | Project infrastructure may not withstand extreme weather events.               |  |  |  | Infrastructure damage, delays        | Use climate-resilient designs and materials.                 |
| Pollution Prevention              | Air and Water Pollution       | Emissions from machinery or waste contaminate the environment.                 |  |  |  | Health hazards, ecosystem damage     | Implement air filtration systems and waste management plans. |
| Health and Safety                 | Community Health Risks        | Dust, noise, or waste may harm local communities.                              |  |  |  | Increased health issues              | Enforce noise and dust suppression measures.                 |
| Cultural Heritage                 | Heritage Site Damage          | Construction near historic sites may cause physical or cultural harm.          |  |  |  | Loss of cultural value               | Site realignment; collaborate with heritage bodies.          |
| Soil Conservation                 | Erosion and Degradation       | Construction or agricultural activities lead to soil erosion or nutrient loss. |  |  |  | Reduced agricultural productivity    | Implement terracing and soil stabilization techniques.       |
| Zero Tolerance for SEAH           | SEAH Violations               | SEAH risks during project activities.  |  |  |  | Reputational damage, legal liability | SEAH training, establish confidential reporting channels.    |

**Note: Likelihood of occurrence: 1=Rare, 2=Unlikely, 3=Likely, 4=Almost Certain**  
**Impact: 1=Low, 2=Medium, 3=High, 4=Critical**

### Annexure 3: Management and Mitigation Action Plan Sample

| <b>Management and Mitigation Measure</b> | <b>Responsible Party</b>  | <b>Timeline</b> | <b>Resources Required</b> | <b>Monitoring Indicators</b>     |
|--|---------------------------|-----------------|---------------------------|----------------------------------|
| Establish buffer zones near wetlands     | Environmental Specialist  | Month 1-3       | \$50,000                  | Area of buffer zones established |
| Conduct community consultations          | Community Liaison Officer | Month 1-2       | \$10,000                  | Number of consultations held     |
| Train workers on safety protocols        | Health & Safety Officer   | Ongoing         | \$20,000                  | Number of training sessions held |
| Develop flood-resilient infrastructure   | Project Engineer          | Month 1-6       | \$150,000                 | Infrastructure compliance audits |



# RSPN

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*Inspiring personal responsibility for  
environmental conservation since 1987*

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