Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 04/04/2019 | Report No: ESRSC00375
BASIC INFORMATION

A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Djibouti</td>
<td>MIDDLE EAST AND NORTH AFRICA</td>
<td>P166059</td>
<td></td>
</tr>
</tbody>
</table>

Project Name: Expanding Opportunities for Learning

Practice Area (Lead): Education

Financing Instrument: Investment Project Financing

Estimated Appraisal Date: 3/4/2019

Estimated Board Date: 4/30/2019

Borrower(s): Ministry of Education and Vocational Training (Ministere de l'Education Nationale et de la Formation)

Proposed Development Objective(s)

Support the Government of Djibouti in increasing equitable access to, and strengthening the teaching and learning conditions in, pre-primary and basic education

Financing (in USD Million)

<table>
<thead>
<tr>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Project Cost</td>
</tr>
</tbody>
</table>

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The project aims to address the following key sectoral challenges: (a) Early childhood education (ECE) provision is limited and, where available, at a nascent stage of development. It is constrained by a lack of classroom space and dedicated or qualified preschool teachers. Therefore, the project proposes to support the regulatory and quality aspects of ECE provision, teacher professional development and materials provision and establishment of dedicated pre-school classrooms (through construction or repurposing of existing spaces); (b) access and retention: the shortage
of infrastructure in urban areas results in the curtailing of enrollments at the beginning of each school year, large class sizes and double shifting. Out-of-school rates are much higher in rural areas than in Djibouti-ville due in part to insufficient numbers of schools. Distance from school, poverty, and opportunity costs deter young children from attending, especially for girls wanting to attend lower secondary education. As a result, the project proposes to construct new or expand existing schools in strategic locations and explore innovative ways to provide educational services to rural areas, with a particular focus on girls’ access to education opportunities; (c) learning and assessing: The quality of education is a central concern as shortages of key quality inputs (learning materials, teacher guides, and development opportunities) impede education quality and teachers need to develop more appropriate pedagogical practices but also receive sufficient professional in-school support. Also, the introduction of Information and Communication Technologies (ICT) into the classroom requires guidance. Another challenge is the lack of data especially related to student performance and teacher pedagogical and content knowledge skills that would allow providing targeted corrective measures. The project aims to improve teacher professional development and build on the government’s current system of centralized training to a decentralized and continued support/mentoring approach. It will also explore ways to strengthen the existing assessments (year 2 and 5 national exams – OTI) and provide capacity building for ministry staff from central to school levels to be able to interpret data and act on it.

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]
The development objective of the Project is to increase equitable access to and teaching and learning in pre-primary and basic education. Project investments will cover both urban and rural settlements of the entire country, including high income and low income neighborhoods. Particular investment sites have yet to be selected. Site specific investments (schools) will be located within the compounds of existing school facilities or on public land, at national, regional and local level. It is thus highly unlikely that the project will induce land acquisition, however, since specific construction sites have yet to be identified and assessed, an ESMF and an RPF are being prepared to address potential land acquisition issues. Components 1 (Improving the Learning Environment), is likely to induce land acquisition for rehabilitation or construction of new school facilities, and involve labor in the civil works. Component 2 (School Improvement Projects), will involve working conditions and rewards for teachers and schools. This component requires stakeholder engagement and information disclosure. Djibouti is characterized by a desert climate with sporadic rainfall. Rainfall rarely exceeds 200 mm per year. The rainy season or cool season often covers the period from October to April and the dry season, very hot where temperatures are generally above 40 °C in the day, extends from May to September and weighs heavily on the degradation of the environment. Arid regions have a strong negative impact on agricultural production. In addition, the scarcity of water resources and their poor quality particularly in Djibouti city is a severe constraint both for agricultural and pastoral activities and for the population and its health. Djibouti’s access to the Red Sea, with 370 km of coastline, could offer opportunities for oil and gas reserves.

D. 2. Borrower’s Institutional Capacity
The Ministry of Education, at national level, has the overall project preparation and implementation responsibilities. Within the ministry, a dedicated office, the Bureau d’exécution des projets (Project Implementation office), will carry out the planning, preparation and execution of the various project activities. At provincial and local levels, school districts and schools, will be the implementing agencies. The project implementing office has limited experience in implementing Bank projects, although the Bank financed a project (closed June 30/2018) in the same ministry, that project was implemented by another PIU within the ministry. An E&S focal point will be assigned in the project implementation office to monitor the implementation of environmental and social aspects, to make sure that all
mitigation measures are correctly integrated in tender documents and to produce periodic E & S reporting to the WB. Provincial E & S focal will also be designated to closely monitor the implementation of these E&S aspects with various stakeholders, including future contracted companies, as well as periodic reporting to the central E&S focal point. As Capacity of the Ministry in E&S matters is weak, the ESCP will support the PIU capacity building.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Environmental Risk Rating

The project is classified as Moderate Risk as the potential adverse risks and impacts on human populations and/or the environment are not likely to be significant. The anticipated environmental Risks/impacts are linked to activities to be funded under component 1.4 Creating preschool classrooms that could include small scale construction of new/ repurposing of existing classrooms and equipping them with necessary inputs (furniture and learning materials). These impacts/risks are mainly linked to construction phase and may include Occupational Health and Safety hazards, Community Health and Safety risks especially to school children and some Environmental risks due to solid waste, dust, noise, vibration generation from construction phase.

Social Risk Rating

The development objective of the Project is to increase equitable access to and teaching and learning in pre-primary and basic education. Project social risks are deemed moderate, although there is a contextual risk, given that the project will manage by a new PIU with mixed experience with Bank financed project requirements. The project involves the rehabilitation and building of new school facilities. The new facilities will be located within the compounds of existing schools or on public land; at national, regional and local level. It is thus highly unlikely that the project will induce land acquisition, however, since specific construction sites have yet to be identified and assessed, an RPF is being prepared to address potential land acquisition issues. Subsequent RAPs will be prepared during project implementation as need be. The procurement of local contractors for civil works, will reduce potential labor influx, which, is not expected. A stakeholder engagement plan will be prepared to strengthen project ownership and prevent potential conflicts between beneficiaries, likewise, a grievance redress mechanism will be put in place. Additionally, project activities to be implemented have already been carried out in previous Bank financed projects, without inducing adverse social impacts, and contextually, the overall political economy framework is still the same. The new project will build on the experience of a Bank financed project which closed June 30, 2018.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

Project operations will cover both urban and rural settlements of the entire country, including high income and low income neighborhoods. Project will involve rehabilitation and construction of new school facilities, however, site
specific school construction sites are yet to be identified and assessed. Multiple stakeholders will be involved in the project. Key project stakeholders will include: i) international donors; ii) the ministry of education; iii) school administrations at national, regional and local level; iii) the teachers as a collective and as individuals; parents as a collective and individuals; students as a collective and individuals, and civil society. The PMU will prepare a Stakeholder Engagement Plan (SEP) prior to Appraisal consistent with the requirements of ESS10. The SEP will include both other interested parties (OIPs), various beneficiaries and directly impacted project affected persons (PAPs), including disadvantaged and vulnerable groups. Components 1: Establishing an enabling environment for delivery of high-quality Early Childhood Education (ECE), involves construction of new school facilities. The selection process for the construction of the new school facilities will be guided by demand for schooling and availability of public land or existing school facilities with space for construction. The new schools facilities will be located within the compounds of existing schools or on public land; at national, regional and local level. It is thus highly unlikely that the project will induce land acquisition, however, all potential construction sites have yet to be identified and assessed, an RPF is being prepared to address potential land acquisition issues. Component 2 (School Improvement Projects), will involve working conditions and rewards for teachers and schools. Impacts/risks under component 1.4: Creating preschool classrooms that could include construction of new/ repurposing of existing classrooms and equipping them with necessary inputs (furniture and learning materials) may generate Risks/impacts that are mainly linked to construction phase and may include Occupational Health and Safety hazards, Community Health and Safety risks especially related to school children and some limited Environmental Risks/impacts due to solid waste generation, dust, noise and vibration. As the geographical areas of intervention are not known, an ESMF is being prepared. During preparation, the WB will conduct its due diligence to make sure that project risks will not exceed Moderate. The ESMF will include a negative list of subprojects that will not be eligible for financing, which are the ones with a potential substantial/high risk (e.g. in critical habitats or ecosystems) given that the overall project risk is moderate. The ESMF will also contain provisions to ensure labor aspects, including child labor and labor influx, are properly addressed in the documents prepared during project implementation, including simplified E&S construction checklists, to be included in civil works contracts. The ESMF will ensure proper consultation with project beneficiaries. Implementing agency will establish the ESMF before appraisal. The ESMF will be part of the Project Operations Manual (OM). The ministry of Education has already implemented a WB funded project with similar activities in rehabilitation and classroom construction. This previous experience, which has been satisfactory, will facilitate the E&S implementation and follow up for this project. A resettlement policy framework (RPF) is likewise being prepared to address potential land tenure issues, as site specific school construction sites have yet to be identified and assessed. Subsequent RAPs should be prepared as need be, during project implementation. The above assessment is based on: extensive consultations with the client; reviews of aide memoirs, review of ISRS of the previous Bank financed project (P123315); review of draft ESMF and RPF; review of the ISDS and the draft PAD.

Areas where reliance on the Borrower’s E&S Framework may be considered:
The Djibouti E&S framework is not being considered to be relied on in whole or in part.
impacted project affected persons (PAPs), including disadvantaged and vulnerable groups. The draft SEP will be disclosed as early as possible before appraisal to allow meaningful stakeholder consultation and inputs before it’s finalized for appraisal. The PMU will put in place, as part of the ESMF, procedures for external communications on environmental and social matters proportionate to the risks and impacts of project activities consistent with the requirements of ESS10. The ESMF will also include a project-level grievance mechanism to respond to public enquiries and concerns.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

Environmental and social risks/impacts related to OHS are expected to be low, for the following reasons. The quantification of the labor force to be employed by the project is not possible at this early stage in the project preparation process, but will be estimated at appraisal ESRS. Labor influx is, however, not expected. The project is likely to use local contractors, and local labor, for the rehabilitation/construction of school facilities. The type of labor will include: manual labor, masons, electricians, painters and plumbers. Direct workers in the project management unit (PMU) will be civil servants, others will include contractors with their manual labor. Risks related to OHS could be induced by minor civil works. OHS measures will address, identify potential hazards to workers, develop preventive and protective measures, and propose training program. The PMU of the Ministry of Education, will prepare a labor management procedure and contractors will prepare labor management plans. These procedures will set out the way project workers will be managed in accordance with the requirements of national laws and ESS2. The procedures will include requirements for: working conditions and terms of employment; nondiscrimination and equal opportunity; worker’s organizations; child labor and minimum age; forced labor; grievance mechanisms; maintenance of training records and documentation and reporting of occupational accidents, diseases and incidents, emergency prevention and remedies for injuries, disability and disease. The Ministry of Education will incorporate the requirements of ESS2 into contractual agreements with contractors together with appropriate noncompliance remedies. The ESMF will assess related OHS risks/impacts and will identify all mitigation measures to be incorporated into labor management procedure and contractors labor management plans.

ESS3 Resource Efficiency and Pollution Prevention and Management

The project may present risks/impacts linked to the management of construction wastes generated, dust emission, noise and vibrations. The ESMF will assess all these risks/impacts and mitigate them through simplified E&S construction checklists to be included in the civil works contracts.

ESS4 Community Health and Safety

Communities health and safety issues are associated to typical risks/impacts of construction sites as, dust, noise and vibrations, wastes and labor influx. The project is funding rehabilitation/construction of classrooms that will be accessed by students, teachers and sometimes other persons. Some risks/impacts are identified concerning public potential exposure to operational accidents or natural hazards, including extreme weather events. The project will also apply the concept of universal access to the design and construction of such new classrooms where technically
and financially feasible to take in account the needs of handicapped or limited mobility people accessing the schools and other facilities. The ESMF will assess all these risks/impacts and mitigate them through simplified E&S construction checklists to be included in the civil works contracts.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
Component 1 of the project (Improving the learning environment) might induce land acquisition by rehabilitating and constructing school facilities. The new schools facilities, however, will be located within the compounds of existing schools or on public land; at national, regional and local level. It is thus highly unlikely that the project will induce land acquisition, however, all potential construction sites have yet to be identified and assessed, an RPF is being prepared to address potential land acquisition issues. Subsequent RAPs will be prepared as need be, during project implementation. Potential loss of land and potential number of PAPs, will be quantified (estimated) at appraisal stage ESRS, once a resettlement policy framework (RPF) is prepared, and final numbers will be confirmed in the potential RAPs to be prepared during implementation. Physical displacement is not expected, but economic displacement can neither be excluded nor confirmed, at this stage in project preparation.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources
This ESS is not expected to be relevant to this project. Project is not allowing interventions in natural habitats.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
There are no communities in Djibouti that fulfill ESS 7 definition of indigenous people.

ESS8 Cultural Heritage
Although project activities will invest in human capital and physical assets, those operations will be carried out within the framework of existing school premises and will be limited in space and time. The physical activities will be confined to small civil works interventions (rehabilitation of school classes and construction of school buildings) within the physical space of existing schools or on confined public land. They are unlikely to affect built heritage, intangible heritage, or natural heritage. Nevertheless, through the ESMF, the PIU of the Ministry of Education, will determine the potential risks and impacts of the proposed activities of the project on cultural heritage and will screen out subprojects with risks/impacts on Cultural Heritage. The ESMF will develop a chance find procedure to be followed during project implementation.

ESS9 Financial Intermediaries
This ESS is not expected to be relevant to this project. The project is unlikely to procure the services of financial intermediaries.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

No
III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered?  No

Financing Partners
NA

B. Proposed Measures, Actions and Timing (Borrower’s commitments)

Actions to be completed prior to Bank Board Approval:
1. Preparation of an Environmental and social commitment plan (ESCP) - Before Appraisal.
2. Preparation of a Stakeholder Engagement Plan (SEP) - Before Appraisal.
3. Preparation of a labor management procedure - After Appraisal, but before Board.
4. preparation of an Environmental and Social Management Framework (ESMF) - By Appraisal.
5. Preparation of a Draft Resettlement Policy Framework (RPF) - By Appraisal.
6. Preparation of potential resettlement action plan (RAP), after Board, but before commencement of civil works inducing land acquisition.

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):
Institutional arrangements for the management of ESS standards, designation of central and provincial focal points
Implementing agency will develop a capacity building program for E&S focal point and Provincial E & S focal points
Implementing Agency will include simplified E&S construction checklists in the civil works contracts.
Contractors will prepare Labor management plans.

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS  18-Apr-2019

IV. CONTACT POINTS

World Bank
Contact: Mohamed Adnene Bezzaouia  Title: Environmental Specialist
### Borrower/Client/Recipient

### Implementing Agency(ies)

Implementing Agency: Ministry of Education and Vocational Training (Ministere de l'Education Nationale et de la Formation)

### V. FOR MORE INFORMATION CONTACT

The World Bank  
1818 H Street, NW  
Washington, D.C. 20433  
Telephone: (202) 473-1000  

### VI. APPROVAL

Task Team Leader(s): Simon Thacker, Samira Halabi  
Safeguards Advisor ESSA: Surhid P. Gautam (SAESSA) Cleared on 04-Apr-2019 at 17:14:51  
Practice Manager: Andreas Blom (PMGR) Conurred on 04-Apr-2019 at 20:57:57