Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 01/24/2020 | Report No: ESRSC01050
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>
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<tbody>
<tr>
<td>South Sudan</td>
<td>AFRICA</td>
<td>P169949</td>
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</table>

Project Name
South Sudan Enhancing Community Resilience and Local Governance Project

Practice Area (Lead)
Urban, Resilience and Land

Financing Instrument
Investment Project Financing

Estimated Appraisal Date
3/25/2020

Estimated Board Date
5/28/2020

Borrower(s)
Implementing Agency(ies)

Proposed Development Objective(s)
To improve access to basic services and to strengthen the service delivery capacity of local institutions in selected areas.

Financing (in USD Million)

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

A detailed assessment of the contexts are included in the Concept Note. This includes reference to the recent violent conflict and its impact on people, government, infrastructure, and service provision. It specifically focuses on the risks of GBV and social cohesion. It notes that poverty in South Sudan has reached unprecedented levels. Access to infrastructure and services is severely limited and the Government is unable to provide services to the people. The document also refers to the achievements of the Bank-financed Local Governance and Service Delivery Project (LGSDP), predecessor of the current project.

The proposed project aims to address the immediate needs for basic services in areas experiencing high concentration of returnees, while strengthening local institutions’ capacity to better manage inter-communal tensions and
resources. To ensure flexibility and adaptability to accommodate changing population dynamics and fluctuations in the status of the local government and conflict dynamics, block grants will be allocated on a yearly basis and activities will be implemented in a phased manner. The project will finance the activities described below with a preliminary budget estimate of US$65 million. A project period of 36 months is proposed – short enough so as not to perpetuate direct third-party implementation, but long enough to allow sufficient time for community mobilization and local institutional strengthening.

Component 1. Local Service Delivery (US$40 million)
This component will support the construction and rehabilitation of community infrastructure in selected areas. Eligible investments include water supply and sanitation, community roads, health and education facilities, and public market facilities, public goods that proved to have high demand under LGSDP. Selection of counties will be based on the World Bank’s Targeting Framework but with additional indicators that are relevant for the project (See Annex 3). The following four pre-agreed criteria: (i) needs; (ii) feasibility; (iii) equity; and (iv) quick wins (See Figure 3). Financing “quick wins” in the first year would be important to garner people’s buy-in for the proposed project. For this purpose, areas with a substantial number of unfunded subprojects from the predecessor LGSDP will be selected. Areas where returnees have relocated to a third destination will not be targeted due to concerns regarding land ownership. The relative emphasis of the project on rural or urban areas will be determined by the findings of the ongoing in-depth population movement analysis being undertaken by International Organization for Migration (IOM). Particular attention will be paid to ensure equity between conflict-affected areas and more stable areas. To this end, the project will engage an implementing partner (IP) that can access both areas.

Component 2. Local Institution Strengthening (US$12 million)
This component will support activities related to: (i) community mobilization and participatory planning which includes local conflict mitigation training such as local conflict mapping, identification of stakeholders and possible resources for dispute resolution, and training on how to leverage them to address the existing tensions; (ii) support for community institutions on infrastructure construction/rehabilitation/monitoring and local conflict mitigation; and (iii) diagnostic of the functionality of and technical assistance for local governments. This component supports Component 1 as the participatory planning process generates the investment priorities as well as supports community monitoring during subproject implementation. The local conflict mitigation training will build on LGSDP’s successful training, but also be strengthened by working with a local conflict research institute and gender/GBV specialists with expertise on conflict mitigation/resolution on the methodology. To ensure flexibility, the component will be implemented in a phased manner where a participatory social and conflict analysis, as well as local government institutional assessment are undertaken first, and detailed interventions will be elaborated based on the findings. Such an approach will allow the project to tailor the activities depending on how local contexts may evolve. Community mobilization and participatory planning will be undertaken based on a participatory social and conflict analysis. Communities will be mobilized into Boma Development Committees (BDCs) and Payam Development Committees (PDCs), as under LGSDP. BDCs and PDCs are in line with the provisions of the Local Government Act (2009) and the Participatory Planning and Budgeting Guide for Local Governments in Southern Sudan (2010). They will serve as umbrella local governance institutions whose remit goes beyond a specific project to a vision of local development as a whole, and which also serve as an interface between community and the county government. The proposed project will help strengthen BDCs/PDCs’ inclusiveness, accountability, sustainability and functionality (including familiarity with planning, mapping and project identification methods) so that they could be used by other development partners. Efforts will be made to engage with segments of the community who do not traditionally or currently have a voice in decision-making, such as women, youth, people with disabilities and ethnic minorities. The
The proposed project is directly aligned with the Country Engagement Note (CEN) and the Systematic Country Diagnostic (SCD) for South Sudan. Whereas the Bank’s FY13-14 Interim Strategy Note (ISN), approved on 28 February 2013, focused on building legitimate institutions over the long term, the FY18-19 CEN, approved on 16 January 2018, emphasizes meeting the immediate needs of the people. Specifically, the CEN focuses on two objectives: (i) supporting basic service provision for vulnerable populations; and (ii) supporting livelihoods, food security and basic economic recovery. The CEN also emphasizes the Bank’s comparative advantage in seeking medium term development solutions i.e.- institution building. This is in line with the SCD, approved in October 2015, which stressed the importance of ensuring access to basic services, given the extremely low human development indicators that prevail in the country, the low infrastructure base, and significant gaps in basic service provision. The SCD also highlighted the importance of building citizen confidence through community engagement and reconciliation as a pathway out of cyclical fragility.

The Bank team considered a wide variety of implementing agencies, including major UN agencies and international NGOs working in the country. The main selection criteria included:

- Capacity to operate in all areas of the country
- Capacity to mobilize rapidly on the ground
- Technical expertise in community development, conflict mitigation and local service delivery
- Minimal use of subcontracting to local NGOs or groups
- Experience with large donor-funded contracts and projects particularly World Bank projects
- Assessed by the World Bank at corporate level and thus able to use own procedures (on fraud and corruption investigation, financial management, procurement, safeguards)
- Ability to pre-finance using own resources

The Bank reviewed a total of 7 potential third-party implementing partners who specialize in relevant technical areas in South Sudan. These include UNDP, UNICEF, UNHCR, UNOPS, IOM, WFP, CARE and World Vision. Of these, UNOPS and IOM had the most relevant experience, i.e. experience both within the relevant sectors and with large donor-funded projects, as well as ability to follow Bank procedures. The Bank team recommends UNOPS to function as the overall Project Management Unit while IOM sign a partner agreement with UNOPS and function as key implementing partners.
partner. Once the proposed implementation arrangement is approved internally, a detailed assessment will be undertaken to assess the IA’s ability to comply with ESF standards. At this stage, however, it is expected that the IA will be able to follow the Bank’s ESF.

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]

The new operation will in principle target states that were conflict-affected and did not benefit from the predecessor project LGSDP. Those include the 3 former states of the Greater Upper Nile region (Jonglei, Unity, and Upper Nile) as well as four out of the 7 former states which were covered by LGSDP but that did not benefit much, namely Northern Bahr el Ghazal, Western Bahr el Ghazal, Central Equatoria, and Western Equatoria. However, ultimately, it has been agreed with the Government that the geographical targeting will be guided by the Bank’s portfolio-wide geographical targeting framework that is built on a composite index. Selection of the final locations will be determined at the time of implementation based on the established objective targeting criteria and process as stated above. Such an approach would allow sufficient flexibility for the project to ensure alignment with other development partners’ projects and the latest security conditions on the ground. South Sudan is a landlocked country that falls almost entirely (96 per cent) within the Nile River Basin in East-Central Africa. The country is covered by extensive grasslands, wetlands and tropical forests. Its natural assets include significant agricultural, mineral, timber and energy resources. The climate is mostly hot and dry, with seasonal rains that allow for two or three harvests a year in the country’s green belt. Apart from oil, however, its natural resources are largely unexploited and only 4.5 per cent of its potential arable land is cultivated. Livelihoods in the northern dry areas are dominated by seasonal agriculture, pastoralism, fishing and hunting.

D. 2. Borrower’s Institutional Capacity

At the country’s formation in 2011, formal governing institutions were created, but given the years of conflict and the breakdown of former structures, they commenced from a generally low foundation. The new government’s capacity to formulate policy and implement programs is still limited, but is developing and evolving. Institutional frameworks to accomplish environmental and climate-change commitments are still at the nascent stage due to the low priority given to them in the context of the ongoing situation of conflict, as well as the lack of technical capacity and financial resources.

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

A. Environmental and Social Risk Classification (ESRC)

Environmental Risk Rating

The ECRP will involve refurbishment and/or renovations of small scale infrastructure subprojects that will be identified and prioritized by the communities. Risks associated with this kind of infrastructure are generally low-to-moderate with potential adverse environmental impacts that are reversible, temporary in nature and scope, and ones that can be easily and cost-effectively be mitigated. However, the environmental risk rating for ECRP is currently considered High due to the low capacity of local communities to manage natural resources sustainably in the backdrop of pervasive conflict, which extends to control of natural resources which are largely undisturbed and undermanaged. Further, the legal and institutional arrangements to manage, supervise and enforce compliance are
equally nonfunctional with low capacity in controlling and monitoring environmental performance during implementation. A gap the IP is expected to bridge. These, compounded with the fragile country context and the inability of the World Bank project team to conduct on-the-ground supervision substantiates the "High" risk environmental rating.

Social Risk Rating

High

An underlying objective of the CDD-type project is to improve community resilience and cohesion via strengthening of local institutions and citizen engagement through participatory planning process and is thus expected to have a positive social impact in the targeted areas. Equally, the subprojects’ following of the CDD-type planning approach shall reduce risks during the implementation process. Social risks are above all the result of the FCV context in the project area. This includes risks resulting from (i) targeting grievances, (ii) intra-communal tensions over implementation issues, (iii) assets becoming targets of violent groups, (iv) and adverse results from construction and labor activities. Violence (political, criminal, ethnic, etc.) and GBV are two forms of concern as result of escalating social risks. The GBV risk has been rated high via the corporate GBV risk tool and a respective GBV Action Plan will be prepared. Based on this assessment, the overall risk level is considered high.

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:

The breadth, depth, and type of analysis of the assessment and management of environmental and social risks and impacts will depend on the nature, scale, and potential environmental or social impact of the menu of subprojects to be proposed. Given the experience from the predecessor project, it is highly unlikely that activities might impact protected areas or forests of unique value or physical cultural resources. These will range from but not limited to: solar powered water systems; installation of rainwater harvesting systems; latrine provision for public use or in primary health care or education facilities; construction, repair or extension of existing and functioning Primary Health Care Centre (PHCC) or Primary Health Care Unit (PHCU); purchase of furniture or equipment for existing PHCCs or PHCUs; construction, repair or extension of functioning public primary schools, Secondary School (including early childhood development centers); purchase of furniture or equipment for functioning public primary schools, Secondary School (including early childhood development centers; and construction or repair of functioning public market places. Some of these subprojects could potentially have adverse environmental impacts, e.g. construction or repair of health and educational facilities, markets, roads, drainage, water and sanitation facilities among others. Potential adverse environmental impacts may include: contamination of ground water due to proximity of latrines and waste disposal sites or inappropriate location of pit latrines, use of limited or sensitively located local construction material such as aggregate and timber; noise and dust emissions from civil works; generation and dumping of debris (excavated soils); occupational health and safety hazards from handling of equipment by workers; pollution of local surface water resources; loss of vegetative cover causing erosion of loose soils and waste; pollution of soil and water resources due to inappropriate collection and disposal of market refuse and waste; and health hazards due to poor storage of market good providing breeding ground for disease carrying rodents and vectors; injuries from use of the facilities; health hazards due to inadequate cleaning and maintenance of sanitary facilities; safety hazards due to collapsing pit latrines; health hazards due to inappropriate storage and disposal of medical and other waste; health hazards due to bacterial contamination of water resources; other impacts may occur as a result
of the need for land acquisition for infrastructure development and if not addressed consequent impacts on livelihoods; impacts on access to natural resources in relation to water infrastructure; community conflicts over beneficiaries and location of subprojects, hence security concerns for the project host communities and project workers (during work on site, travel to site, and accommodation, where relevant); creation of physical targets for violent groups; labor influx risks; GBV/SEA risks by project and sub/contractor staff; and protection of labor providing inputs to the project.

Given that specific subprojects and locations will not be known prior to project appraisal, a framework approach will be adopted. An ESMF will: (a) provide a methodology for screening viable subprojects; (b) guide integration of good environmental and social practices into subproject design and management; (c) recommend management strategies for the identified Environmental and Social, including health and safety as well as security risks and impacts and (d) be consistent with the new World Bank’s Environment and Social Framework (ESF). The Stakeholder Engagement Framework (SEF), Resettlement Policy Framework (RPF), Social Assessment (SA), GBV Action Plan, Safety and Security Management Plan, and the Labor Management Procedures (LMP) will also be prepared alongside the ESMF, and the Implementing Agencies (IA) will be expected to obtain clearance from the Bank and disclose these safeguards tools prior to appraisal. Importantly, the project will also adapt existing Social Assessments to address questions of conflict-sensitive engagement as well as addressing vulnerability. All these safeguards documents are expected to inform the short, site-specific assessments that will produce generic yet detailed ESMPs for respective subprojects typologies. Contractors will further be expected to prepare site specific C-ESMPS for the individual projects. These commitments with binding timelines will be agreed on together with the Implementing Partners (IP) and will be included in the ESCP.

Areas where “Use of Borrower Framework” is being considered:

N/A

ESS10 Stakeholder Engagement and Information Disclosure

Fostering local conflict management and inter-communal social cohesion as one of the project objectives moves stakeholder engagement to the core of this project. Stakeholders in the local context encompass thereby a multitude of parties, including different households and communities, women/men, elderly/youth/children, returnees and host communities, different ethnic groups, vulnerable groups, government institutions, international non-governmental organizations, CSOs, etc. The SEF will encompass a wider stakeholder mapping exercise, which will be refined during preparation of subprojects. It will equally outline how stakeholders will be engaged during preparation and implementation of sub-projects. Finally, this process will need to be adapted regularly, also given the fast-changing nature of the project’s FCV context.

It will be possible to build on activities as established during the previous project, while due to the gap in project implementations, it will equally be necessary to take this as well as the contextual developments in the meantime into consideration. It will also be possible to build on assessments conducted by previous projects, including the recently concluded social assessments for the health as well as the social safety net projects. Work on the SEF will be conducted complementary and interlinked with the assessments conducted via the Social Assessment to allow a detailed stakeholder identification and analysis on the national level, which allows a simple, template-type assessment for local sites. Beyond social risk management, this is a key prerequisite for the approach noted in component 2 (participatory approach in support of community institutions) and will be included in the procedures for that component. While due to the long-lasting conflict and wide-spread poverty vulnerability is
difficult to distinguish, reiterating from above, it will be important to add special emphasis on the inclusion of women, returnees, elderly, and youth. The SEF will include a robust GRM with provisions for IP/SSAHUTLC, refugees/returnees, and victims of GBV. Specific assessments of a feasible approach on GBV will be developed as part of the Gender and GBV assessment.

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

Although most of the labor is expected to be local, there may be some labor influx for larger and/or more complex subprojects. Project workers engaged or employed may include direct workers (for example, consultants hired in PIUs, such as environment and social specialists); contracted workers (for example, skilled and non-skilled construction workers engaged by contractors of each subproject); community workers (if applicable); and primary supply workers (for example, workers engaged for essential construction materials to be purchased on an ongoing basis, as defined in ESS2.) Project preparation will further clarify labor division between the different implementation arrangements. It should be highlighted that provided labor, including by community workers (if applicable), will be compensated in compliance with ESS2 and agreements and documentation will be established in line with detailed planning provisions in the Labor Management Procedures (LMP). Potential risks related to labor and working conditions, such as labor influx (see also ESS1 Section), child labor, forced labor, non-discriminatory hiring practices with a focus on the risk of related ethnicity-based grievances, work-related discrimination and OHS risks, as well as GBV risks, will be assessed and addressed through the preparation and implementation of LMP and the C-ESMPs. This will also include assessment of safety and security risks for project workers and respective risk management provisions adequate to the context (see above). The C-ESMP and LMP will need to address occupational health and safety risks based on the site-specific context. Environmental Social Health and Safety (ESH) codes of conduct consistent with the Bank standards and guidelines will be prepared and all workers inducted on them. The codes of conduct will extend to cover requirements for responsible environmental management; appropriate social conduct and interactions between camps and surrounding project host communities; and the general community and worker occupational health and safety, including prevention and reduction of communicable diseases and GBV.

ESS3 Resource Efficiency and Pollution Prevention and Management

This standard is relevant as there are potential sources of pollution from spoil material, rubbles, and various waste that could result from the widespread rehabilitation, construction and demolitions. This will range from construction waste, construction rubble, to asbestos containing materials (ACM), dust and air emissions from construction vehicles and equipment etc. Safe waste handling and disposal will be one of the major environmental challenges in the project and is expected to be managed by responsive and site specific C-ESMPs. The subprojects will also procure raw material such as construction water, sand, stones, timber etc, that if not well managed could result to overexploitation and induced strain on the limited community sources. Consequently, construction materials will be sourced from legally approved sites through measures specified in Good International Industry Practices (GIIPs). As the potential menu of subprojects which include water supply and sanitation, community roads, health and education facilities, and public market facilities, as well as the geographical areas of intervention are refined, the relevance of ESS3 for this project will be refined.
ESS4 Community Health and Safety

As discussed in the ESS1 Section, because of the nature and relatively moderate scale of the works under the project, the community health and safety impacts will range from minor to moderate, temporary, and confined to the areas immediately surrounding the construction sites. Anticipated community health and safety risks during implementation will include i) physical hazards on sites where the community has access; ii) traffic and road safety hazards associated with the operation of project vehicles (i.e. IP, government, contractors, suppliers) on public roads and at construction sites; iii) health issues including water-borne, and vector-borne diseases which may result from poor site management (e.g., stagnant water, poor solid waste management), and communicable diseases such as HIV/AIDs associated with labor influx (refer ESS2); iv) security incidents related to communal and political violence as well as crime; and v) hazardous materials such as asbestos containing materials (ACM). To address these short-term impacts, the ESMF and site specific ESMPs will outline detailed management and mitigation measures for community health and safety management during construction and operation.

To address potential risks associated with the security personnel to be hired by contractors, the ESMF will include mitigation measures in compliance with ESS1 and ESS4. Pervasive incidences of GBV in South Sudan are a significant contextual challenge. Assessment of project-related sexual exploitation and abuse (SEA)/GBV will be conducted during project preparation as part of the Social Assessment (SA). Given the context of pervasive insecurity, it is advised that the project adopt a robust approach to address potential GBV risks. Relevant mitigation measures to address these risks (e.g. integrating Codes of Conduct with SEA/GBV-related protections into community consultations and mapping activities to identify potential service providers, and establishment of GRM with procedures and channels to enable safe, confidential and ethical reporting of GBV incidents) will be articulated in the ESMF. The project will also include capacity building and training of relevant stakeholders including government partners, contractors and project workers risks should be monitored throughout project implementation through regular re-assessment with the risk screening tool, particularly as new project locations are determined, and through regular monitoring engagement. The development of a GBV Action Plan will be included in the ESCP.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Land requirements are expected to be minor and established in a participatory manner. Extensive consultations via a CDD approach will ensure that sub-projects will likely be implemented on public lands free of individual or collective, non-government use or land donated voluntarily for the project according to Voluntary Land Donation Guidelines outlined in the ESMF and/or the RPF. As individual land ownership and respective land titling is not widely established, the proposed project will consider any household using lands prior to disclosed subproject commencement as having legitimate land use rights and such rights have to be donated freely to the project according to the above provisions, if respective land is considered necessary for subproject implementation. The project will ensure respective documentation and for any suggested subproject in contradiction with the above provisions, such subprojects will be considered unsuitable for project support.

While in rural areas unlikely, as the project decides to engage also in (semi-)urban areas, involuntary acquisition of small land parcels may be necessary. The project will prepare an RPF to establish a respective mechanism, including livelihood restoration. The RPF will also discuss the institutional responsibilities and process to declare land required for public purpose needs. Depending on implementation arrangements, it will need to be defined with which public institutions the implementing agencies will collaborate accordingly. The RPF will furthermore address any potential
issues of access restriction. Finally, the RPF will provide measures to ensure that the most vulnerable are not disproportionately impacted from land acquisition processes.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources
While most of the projects will be undertaken on already existing and disturbed sites and bomas/payams, there is potential of new other locations (payams/bomas) containing some land with inherent environmental sensitivities relevant to ESS6, the subproject screening process in the ESMF will exclude such sensitive areas. The ESMF will also include specific measures to avoid or minimize negative impact on critical or protected areas if the subproject screening process does not otherwise exclude these areas.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
Analysis by World Bank and other experts confirm that the overwhelming majority of people in the country meet the requirements of ESS7 including the majority of the ethnic groups in South Sudan as well as in the project area, namely the Dinka, Murle, and Nuer; and excluding only recent immigrants from other countries. The approach and implementation process of the proposed project therefore embed its basic principles. Respective planning elements will be included in the overall project design. A Social Assessment has been conducted in line with the requirements of WB OP 4.10 for the related previous project and will be updated to meet the requirements of ESS7. Key identified risks include social ills, GBV, land conflicts, equity issues/targeting as well as elite capture, ethnicity of project staff, exclusion of nomadic pastoralists, inter-communal conflicts, violent attacks, and grievances of non-beneficiaries especially pertaining to exclusion of IDPs/returnees. Mitigation measures encompass, amongst others, awareness campaigns, transparent disclosure of project activities, analysis of risks throughout the project lifecycle, meaningful consultations and participatory approach towards project activities on the ground including site selection, Codes of Conduct, integration of women into committees, transparent procedures on benefit sharing, and constant enhancing of the GRM. The Project will also build in an iterative social/conflict monitoring throughout the project period to see how the project activities interact with the local dynamics, so that the project activities/approach can be adjusted in real-time. The screening of subprojects will exclude any projects requiring FPIC.

ESS8 Cultural Heritage
As ECRP intends to move into urban areas, the potential for chance find of cultural or archaeological significance during construction increases. The ESMF will be updated to comply with ESS8 through the inclusion of chance find procedures. Also, the subproject screening process in the ESMF will exclude activities located in, or in the vicinity of, a recognized cultural heritage site and will include specific mitigation measures to avoid negative impacts if the subproject screening process does not otherwise exclude these areas.

ESS9 Financial Intermediaries
ESS9 is not relevant, as the project does not involve any financial intermediaries.
### C. Legal Operational Policies that Apply

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<tr>
<th>OP 7.50 Projects on International Waterways</th>
<th>Yes</th>
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<tr>
<td>The project triggers OP 7.50 on “Projects on International Waterways” since subprojects under Component 1 may include rehabilitation and/or drilling of new community boreholes. These boreholes will be installed with solar pumps to supply water to communities for domestic use. Under paragraph 7(a) of OP7.50 an exception will be sought to the requirement that other riparian countries be notified of the proposed project since the subprojects will not adversely change the quality or quantity of water flows to the other riparians.</td>
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<th>OP 7.60 Projects in Disputed Areas</th>
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### III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

#### A. Is a common approach being considered?

**Financing Partners**

Not applicable.

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

**Actions to be completed prior to Bank Board Approval:**

An SEP, ESMF (including a Safety and Security Management Plan), SA, GBV Action Plan, and RPF, as well as LMP will be developed, consulted and disclosed prior to appraisal in accordance with the requirements of the ESF, and will take into account lessons learnt from previous interventions. The client will also need to obtain clearance from the Bank and disclose the ESMF (including LMP and SEF) as well as the SA and the RPF prior to appraisal.

**Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):**

Site-specific ESMPs, including measures to address GBV risks as outlined in the ESMF as well as the site-specific Gender-Action Plans, will be prepared during project implementation. Relevant provisions will be incorporated into procurement documents and compensation/assistance measures implemented before the start of civil works of each subproject.

Expansion to other municipalities. The implementation partner to establish the PIU including environmental and social expertise and prepare the ESMF, subproject typology ESMPs, and subsequent subproject-specific ESMPs before the start of project civil works.

Reporting including accidents and incidents notification, as required in the ESCP template.

#### C. Timing

**Tentative target date for preparing the Appraisal Stage ESRS**

01-May-2020

### IV. CONTACT POINTS
Borrower/Client/Recipient

Implementing Agency(ies)

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s):  
Makiko Watanabe

Practice Manager (ENR/Social)  
Robin Mearns Recommended on 20-Jan-2020 at 01:24:47 EST

Safeguards Advisor ESSA  
Nathalie S. Munzberg (SAESSA) Cleared on 24-Jan-2020 at 10:45:22 EST