Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 12/15/2019 | Report No: ESRSC01009
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>Cameroon</td>
<td>AFRICA</td>
<td>P170561</td>
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<table>
<thead>
<tr>
<th>Project Name</th>
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<tr>
<td>Secondary Education and Skills Development Project</td>
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<table>
<thead>
<tr>
<th>Practice Area (Lead)</th>
<th>Financing Instrument</th>
<th>Estimated Appraisal Date</th>
<th>Estimated Board Date</th>
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<th>Borrower(s)</th>
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<tr>
<td>Cameroon Ministry of Economy, Planning and Regional Development (MINEPAT)</td>
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<th>Implementing Agency(ies)</th>
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<tr>
<td>MINESEC, MINEFOP</td>
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Proposed Development Objective(s)

(a) to increase equitable access to and retention in quality secondary education with a focus on gender issues and selected targeted areas; and (b) to improve the relevance of and increase access to skills development programs in selected economic sectors.

Financing (in USD Million)

<table>
<thead>
<tr>
<th>Total Project Cost</th>
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<td>125.00</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]

The project will have three components: (1) Improving equitable access to quality secondary education, (2) Improving the quality and relevance of and increase access to skills development programs in selected economic sectors, and (3) Project management and capacity building. The project will use results-based financing. To ensure/verify that DLIs are reached in compliance with E&S requirements (ESMP, SEP, IPPF, Quality Control Plan/OHS; etc.), each targeted beneficiary (institution, TVET, schools...) will incorporate in its action plan a standardized compliance checklist based
on E&S requirements, as described in the safeguard documents. This compliance check will be included in the DLI verification protocol and hence added in the mandate of external verification.

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]
The proposed project is nationwide. It will be implemented in the five agro-ecological zones of Cameroon. These zones include several plateaus, mountains, savannah, hills, and forests, with four patterns of drainage. The project will be implemented in regions where significant gaps and disparities can be observed in terms of poverty and quality of school infrastructure. This is particularly the case for Far North, North, East and Adamawa regions. The project may face security challenges in three regions (North West and South West anglophones regions and the Far North region) in terms of coverage and project’s activities follow-up. Indigenous Peoples, who are settled in three regions of the country (East, Centre, South) and who are increasingly demanding vocational training, will be one of the target group of the project. It is envisioned that under the project selected training institutions will be rehabilitated and some equipment will be purchased. The number of training institutes to be rehabilitated and their location are not currently known. Additional details regarding the scope of rehabilitation and contracting arrangements will be elaborated during preparation.

D.2. Borrower’s Institutional Capacity

The Bank’s review will consider the Borrower capacity to manage the project’s environmental, social, safety and health performance in compliance with ESSs. From the preliminary review carried out at this concept stage, it can be concluded that MINEFOP and MINESEC’s environmental and social management system and procedures need to be created and sustained to comply with ESS requirements.

At the national level, implementation will be through a Project Coordination Unit (PCU), within the Ministry of Vocational Training (MINEFOP) with general support and coordination of the Ministry of Economy, Planning and Regional Development (MINEPAT) and representation from the Ministry of Secondary Education (MINESEC). A national steering committee is proposed, with a Minister MINEFOP as a president and a Minister of MINESEC as a vice-president and with representatives of MINEPAT, representatives of other ministries and the private sector.

Institutional Capacity Assessment: MINEFOP and MINESEC have limited E&S capacities and are not familiar with the Bank ESF requirements. The country has stable environmental and social institutions, namely the Ministry of the Environment, Nature Protection and Sustainable Development (MINEPDED), which is the central ESIA authority on impact assessment. Another key (governmental) party involved in ESIA impact assessment is the inter-ministerial Committee on the Environment (CIE), who gives an opinion on the quality of reports prior to their approval by the Minister. The decentralized system consists of municipalities, Divisional Committees for the technical and administrative supervision of ESMP and MINEPDED Regional and Divisional Delegations. However, these institutions are facing challenges in terms of institutional capacity associated with staffing, finances and regulatory enforcement. Once the project implementation arrangements have been finalized between the Bank and the client, an environmental and social due diligence of the institutional arrangements will be carried out to assess any gaps in capacity and the need for procuring additional OHS officers dedicated to managing and monitoring the environmental risks and impacts of the project. A thorough Institutional Capacity Assessment (using forthcoming World Bank guidance) will be conducted at Appraisal. Any capacity gaps/ strengthening measures (for the implementation of the Environmental and Social Standards - ESSs) will be captured in an Institutional Capacity Strengthening Plan and reflected in the Environmental and Social Commitment Plan (ESCP).
Staffing: The Borrower’s PCU is recruiting a full-time Safety, Health and Environmental specialist. The Bank has identified the need to hire a full time dedicated Safety, Health and Environmental skills person to support preparation of the project and lead the implementation of ESS1 (Assessment and Management of Environmental and Social Risks and Impacts); Occupational Health and Safety (OHS) of ESS2 (Labor and Working Conditions).

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

A. Environmental and Social Risk Classification (ESRC)

Environmental Risk Rating

The environmental risk rating is Moderate at this stage. Risks and impacts are anticipated to result from general minor rehabilitation activities and equipment purchase, particularly occupational health and safety and nuisance (noise and dust). These risks and impacts are expected to be site-specific, limited in number, and can be mitigated with measures that are readily identifiable. This rating also reflects the challenges associated with the limited environmental and social management capacity of MINEFOP and MINESEC. Certain activities such as the rehabilitation of training centers and strengthening of infrastructure / equipment in selected existing TVET institutions are likely to entail health and occupational safety risks; disposal and management of building/construction wastes; nuisances related to air and noise emissions; etc. During the operation phase of rehabilitated training centers and schools, potential environmental risks and impacts are likely impacts to be related solid waste and wastewater management.

In addition, MINEFOP and MINESEC have no experience or capacity in applying the expanded ESF beyond aspects that are generally included in the Operational Policies, and significant efforts will be required to capacitate MINEFOP and MINESEC and familiarize the Ministry of Environmental (as a regulatory body) with the expanded social and environmental remit.

Social Risk Rating

While the project is not likely to involve land acquisition leading to physical displacement, there could be some temporary economic displacement and this project may generate social and environmental impacts related to Indigenous Peoples, labor, and inclusive participation of key stakeholders. Given the importance of activities to be developed (rehabilitation of training centers, strengthening of infrastructure / equipment in selected existing TVET institutions, training of stakeholders, financial assistance to TVET institutions, etc.) plus gender and disability inclusion challenges, the project’s social risks are substantial.

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:*

Environmental and Social Assessment: Assessment and management of environmental and social risks and impacts will be required mainly associated with rehabilitation of training centers and strengthening of training equipment/facilities in selected existing TVET institutions. Potential impacts are expected to be site specific emerging
mostly from civil works associated with rehabilitation of training centers. Mitigation measures for site specific impacts will be managed through the implementation of required E&S instruments (draft generic ESMP; Resettlement Policy Framework; Indigenous Peoples Planning Framework) to be prepared and disclosed before appraisal. To manage potential risks and impacts, the Borrower will prepare a generic Environmental and Social Management Plan including workplace safety requirements prior to appraisal and final prior to effectiveness.

The generic ESMP will also propose an approach for inclusion of gender and disability groups. The Borrower will also undertake a GBV assessment and propose measures for addressing GBV/SEA risks.

Environmental and Social Management and Monitoring: the E&S instruments will include a generic Environmental and Social Management Plan with clearly defined mitigation measures and monitoring commitments for rehabilitation and operational phases, roles and responsibilities, time plans, costs and implementation procedures for each mitigation measures recommended to be implemented for each training center to be rehabilitated by contractors/subcontractors to be hired for the rehabilitation activity. Twenty (20) TVETs will be targeted and a rough estimate of anticipated costs was done by Borrower to reflect current needs. However, they will be fine tuned as each TVET will be financed based on its specific action plan. The World Bank will require the Borrower to regularly report on E&S performance during implementation.

Contract Clauses: rehabilitation contractors will be required, as a condition of their contracts, to implement and comply with the Generic ESMP, including preparing any specific management plans consistent with the requirements provided in the Generic ESMP.

Institutional capacity: the implementing agencies are not familiar with the new ESF and an Occupational health and Environmental specialist is being hired and will be onboard during preparation. They will work closely with the Ministry of Environment and the Divisional Committee in Charge of Monitoring ESMPs (Divisional multi-sectoral committee, including NGO/CBOs and municipality representatives). They will also work closely with targeted training institutions to ensure that their Quality Control Plan are in place and meet Bank’s requirements.

Areas where “Use of Borrower Framework” is being considered:
Reliance on the E&S Framework of the borrowers is not considered.

ESS10 Stakeholder Engagement and Information Disclosure

Stakeholder engagement is a critical tool for social and environmental risk management, project sustainability and success. In consultation with the Bank the client will prepare and implement an inclusive Stakeholder Engagement and Information Disclosure Plan proportional to the nature and scale of the project and associated risks and impacts. This will need to consider all project’s stakeholders: administrations (MINESEC and MINEFOP), TVETs, with an appropriate outreach program for women and persons living with disabilities in project’s footprint. A draft of the SEP will be prepared and disclosed as early as possible and prior to Grant Approval. The client will seek stakeholder feedback and opportunities for proposed future engagement, ensuring that all consultations are inclusive and accessible (both in format and location) and through channels that are suitable in the local context(s). The Borrower will engage in meaningful consultations with all stakeholders throughout the project preparation and implementation.
paying attention to the inclusion of vulnerable groups (e.g. women, persons with disabilities) and IPs. Borrower will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. The SEP will include a comprehensive GRM to ensure that project’s stakeholders can provide their feedback on projects activities during its implementation.

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

At the PCU level, around 21 persons will be employed as direct workers. There will be three categories of workers: project coordination, technical specialists and project’s support staff. All those persons will be employed under Cameroon regulations for work conditions (Law No. 92/007 of 14 August 1992 on the Labor Code), as well as the requirements of ESS 2. TVETs will hosts apprentices and trainees who will not be employed but will sign engagement contracts with TVETs. Buildings rehabilitation works will involve operators who will employ contracted workers. The borrower will prepare an operational manual in which working conditions will be included with a clear emphasis on the recruitment process, the salary scales, insurance, incentives, right of assembly, etc. for PCU’s staff. The Manual will also propose clear conditions for the enrollment of apprentices in the TVETs. Details will be provided in terms of recruitment process, type of engagement to be signed with the trainee, insurance scheme and protection material to be provided during trainings. The Manual will also describe work conditions and requirement applicable to operators if they are assigned for the project’s rehabilitation works. Specific provisions for the PCU and contracted workers will include prevention of forced and child labor, measures to address GBV/SEA and Occupational Health and Safety (OHS) risks. A project Grievance Redress Mechanism (GRM) will be prepared by the borrower. The GRM will include mechanisms or processes that will enable PCUs staff and TVETs trainees to complain or provide their feedback on their working conditions. Occupational health and safety will be considered during implementation both in relation to rehabilitation of training centers and operation. Contractor and selected training centers will commit to ensuring safe work site. Prior (15-30 days) to operation, a Quality Control Plan/ OHS will be developed and will include detailed requirements for the transport, handling and disposal of waste and other hazardous materials. The OHS plan will include procedures on incident investigation and reporting, recording and reporting of non-conformity, emergency preparedness and response procedures and continuous training and awareness to workers.

ESS3 Resource Efficiency and Pollution Prevention and Management

Anticipated sources of pollution during rehabilitation of training centers include dust, noise, erosion and runoff, and handling and disposal of solid and hazardous materials and wastes. Mitigation measures at rehabilitation sites will include standard pollution prevention and control measures in accordance with the mitigation hierarchy and the World Bank Environment, Health and Safety Guidelines. They will include measures to manage (i) solid and hazardous waste handling and disposal; (ii) wastewater treatment; (iii) storage and handling of hazardous materials; (iv) housekeeping; (v) control of erosion and storm water runoff; and (vi) noise, vibrations, and dust abatement measures; among others. The project will be prohibited from the procurement of R-22 Air conditioners for training centers to be rehabilitated. R-22 is a hydro-chlorofluorocarbon (HCFC) which contributes to ozone depletion. Waste generated by the rehabilitation works will be disposed of at approved sites according with the national laws and
regulations (The Decree 2012/2809 of 26 September 2012 stipulating conditions of waste management in Cameroon, regulates waste management in Cameroon. Per this Decree, it is the responsibility of the waste generator to ensure that the waste is packaged, transported, treated and disposed of in terms of the legal requirements and that there is an auditable record of the steps involved in storing, collecting and transporting the waste). The Generic ESMP will include mitigation measures to minimize and manage the noise levels such by applying standard restrictions to hours of site work.

ESS4 Community Health and Safety
Traffic and road safety access to training centers will be restricted during the rehabilitation. Measures related to traffic and road safety will be incorporated in the Generic ESMP and Stakeholder Engagement Plan. Rehabilitation works will include installation and/or upgrade of fire and life safety management in workshops.

The task team will prepare a GBV/SEA assessment and, based on the results ask borrower to, prepare measures for addressing GBV/SEA risks. In other words, a project’s GBV risks assessment will be done with the support of the Bank’s social experts, a mitigation plan will be elaborated and agreed with the Borrower and Borrower’s capacities on gender and GBV will be reinforced to enable smooth implementation of the plan.
In case interventions in the North West, South West and Far North Regions are firmed up, targeted institutions will need to match minimal safety conditions to be allowed to be financed by the project. For this purpose, the situation will be assessed, and decision will be made on an ad-hoc basis based on specific analysis and CMU guidance.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
In principle, this project will not require land acquisition leading to physical displacement. However, activities such as the rehabilitation of training centers and strengthening of infrastructure/equipment in selected existing TVET institutions are likely to generate impacts on surrounding assets and may cause some temporary economic displacement. The Borrower will ensure that infrastructures to be rehabilitated or improved are not located on disputed land/areas (areas without a land title or subject to legacy land acquisition issues). A Resettlement Policy Framework (RPF) will be elaborated to screen projects activities and identify potential risks that could occur during such works and will set mitigation and compensations principles that would be applied by the Borrower to determine the need to prepare resettlement actions plans (RAPs). Based on the conclusions of specific screening to be conducted prior to rehabilitation works, Resettlement Action Plans may be developed and implemented. An important part of the Stakeholders Engagement Plan will include the outreach programs to be conducted prior to any rehabilitation work.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources
This ESS is not expected to be relevant because the project activities, in particular the rehabilitation works, will be conducted in existing buildings and is not anticipated to affect or involve any impacts on biodiversity or natural resources.
ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

The project is being implemented in some areas where Indigenous Peoples are present. There is an increasing demand of Indigenous Peoples to obtain access to technical vocational training. In order to ensure that IPs have access to activities to be developed (trainings, support to TVETS), the Borrower should ensure that they are fully informed, consulted and involved during project’s design and implementation phases. An Indigenous Peoples Planning Framework (IPPF) will be elaborated. The IPPF will set IPs project’s participation principles and will provide orientations regarding specific activities to be conducted for them. Specific Indigenous Peoples Plan will be elaborated when the project’s footprint is known. The SEP will provide IPs consultation mechanisms to be conducted during the project’s preparation phase. The Grievance Redress Mechanism to be developed in the framework of the ESS10 will provide specific arrangements to ensure that IPs can provide their feedback during the project’s life. The GRM will be developed in such a way that it respects habits and culture of indigenous peoples and enables an efficient resolution of IPs’ complaints.

ESS8 Cultural Heritage

The environmental and social assessment will confirm the existence of tangible or intangible cultural heritage. However, all rehabilitation contracts will include a “Chance Find” clause which will require contractors to stop rehabilitation in the event that cultural property sites are encountered during construction.

ESS9 Financial Intermediaries

This standard is not relevant to the project.

B.3 Other Relevant Project Risks

Boko Haram attacks in the Northern regions of Cameroon and the current conflict in the North West and South West Regions may limit the ability of the Project to be managed in line with the ESF. Security issues may impact negatively the project’s supervision in some parts of the country. Supervision process will comply as well with CMU guidance and team is working with FCV team to refine this aspect as necessary in the project preparation process. The World Bank will explore the possibility to recruit a Third-Party Monitoring Agency (TPMA) to assist the Bank with Project supervision and implementation support if Bank staff cannot travel to the area due to security restrictions. In addition, Borrowers capacity in implementing ESF will need to be strengthened, as well as the capacity of Ministry of Environment, Labor and Divisional Committee in charge of monitoring ESMPs to monitor project activities.

C. Legal Operational Policies that Apply

| OP 7.50 Projects on International Waterways | No |
| OP 7.60 Projects in Disputed Areas | No |

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE
A. Is a common approach being considered?  

No  

Financing Partners  
The project will not apply a common approach.

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

Actions to be completed prior to Bank Board Approval:  
The project will prepare, consult upon, and publish in the Country and the Bank external website,  
- A draft Generic ESMP  
- A draft Indigenous Peoples Planning Framework (IPPF) will be elaborated  
- A draft Resettlement Policy Framework (RPF) will be elaborated  
- A draft Stakeholder Engagement Plan (SEP)  
- Quality Control Plan/OHS

Actions to be completed at Appraisal:  
- A thorough Institutional Capacity Assessment (using forthcoming World Bank guidance). Planning for improvements will follow and be included in ESCP.

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):  
Finalize the draft Generic ESMP, SEP, IPPF, Quality Control Plan/OHS ; Institutional Capacity Assessment (using forthcoming World Bank guidance) and RPF. Prepare any RAPs, as needed.

C. Timing  

Tentative target date for preparing the Appraisal Stage ESRS  
31-Mar-2020

IV. CONTACT POINTS

World Bank  
Contact: Vincent Perrot  
Telephone No: 5330+8097  
Email: vperrot@worldbank.org

Contact: Harisoa Danielle Rasolonjatovo Andriamihamina  
Telephone No: 473-7251  
Email: hrasolonjatovoan@worldbank.org

Borrower/Client/Recipient  
Borrower: Cameroon Ministry of Economy, Planning and Regional Development (MINEPAT)
Implementing Agency(ies)
Implementing Agency: MINESEC
Implementing Agency: MINEFOP

V. FOR MORE INFORMATION CONTACT
The World Bank
1818 H Street, NW
Washington, D.C. 20433
Telephone: (202) 473-1000
Web: http://www.worldbank.org/projects

VI. APPROVAL
Task Team Leader(s): Vincent Perrot, Harisoa Danielle Rasolonjatovo Andriamihavina
Practice Manager (ENR/Social) Aly Zulficar Rahim Recommended on 11-Dec-2019 at 13:16:50 EST
Safeguards Advisor ESSA Hanneke Van Tilburg (SAESSA) Cleared on 15-Dec-2019 at 18:33:8 EST