



# Concept Environmental and Social Review Summary

## Concept Stage

### **(ESRS Concept Stage)**

Date Prepared/Updated: 04/07/2021 | Report No: ESRSC01983



**BASIC INFORMATION**

**A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
Burundi	AFRICA EAST	P175327	
Project Name	Productive Safety Nets and Jobs Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Social Protection & Jobs	Investment Project Financing	9/15/2021	10/27/2021
Borrower(s)	Implementing Agency(ies)		
Ministry of Finance	Ministère de la Solidarité Nationale, des Droits de la Personne Humaine et du Genre (Ministry of Nat		

Proposed Development Objective

The development objectives of the proposed Project are to scale up productive social safety nets systems to extreme poor and vulnerable households in selected areas while strengthening the delivery mechanisms for the development of a basic social safety net system inclusive of refugees and host communities.

Financing (in USD Million)	Amount
Total Project Cost	150.00

**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 proposed Project would scale up safety nets programs to the national territory of Burundi. The Project would be structured in 4 components. Component 1 would deliver cash transfers to extreme poor beneficiaries for a duration of 30 months, targeting a total number of 250,000 households. Component 1 would support as well the development of delivery systems that are necessary for scaling up social safety nets programs. A special focus would be put on the



development of a national Social Registry as main national tool for outreach and targeting of social programs. Component 2 would deliver accompanying measures on human capital development to the same households receiving the cash transfers. Accompanying measures would promote a better nutrition, family planning and a better management of household economies promoting proper Early Childhood Development. Accompanying measures would also tackle Gender Based Violence by sensitizing men and women on how to minimize this issue. Component 3 would support economic inclusion of poor and vulnerable individuals, specially women, through an improved access to economic activities and jobs. Component 4 of the Project would promote the integration of host communities and refugees into national social protection systems. Component 5 will finally support Project implementation by financing operational costs to implement components 1 to 5. The Project would include as well a CERC component in the event the country faces any shock that requires an emergency response.

#### D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The area of intervention of the project is the whole country. The proposed project scales up Merakabandi's safety nets activities from 4 to 18 provinces and number of beneficiaries from 56,000 to 250,000.

Burundi remains one of the poorest countries in the world and the third poorest in Africa in 2020. The latest household survey data from 2013/14 shows that 64.9 percent of Burundians lived below the basic needs poverty line and 38.7 percent below the food poverty line. Burundi has one of the highest stunting rates in sub-Saharan Africa as well as one of the highest fertility rates. Half of children under 5 years of age are chronically under-nourished. Stunting rates estimates are 57.7 percent. In Burundi, scarcity of resources such as land, exacerbated by population pressure, environmental degradation, and inequitable resource allocation leads to poverty and conflict.

The regions of North and Center East are the poorest in the country with poverty levels over 70% (Burundi ECVMB 2013-2014). With the exception of Ngozi, the provinces targeted by the project have the absolute highest poverty levels (Cankuzo 74.5%; Muyinga 78.6%; Ruyigi 82.8%).

Given the project's area of intervention, the expected positive and negative impacts of the activities can take place across the country.

The project will scale up productive social safety nets systems to extreme poor and vulnerable households in selected areas while strengthening the delivery mechanisms for the development of a basic social safety net system through four components and the ESF is relevant for all these components. Component 1 would deliver cash transfers to 250,000 extreme poor households during 30 month and would also support the development of a national Social Registry; Component 2 would support the implementation of productive investments (project activities are unknown at this concept stage but will be precise at appraisal phase and mostly will be agro-pastoral activities) by beneficiaries, most of them implemented by women. Each beneficiary would receive a start-up capital of max. 200 dollars for the activity; component 3 will be activated in the event of a natural or man-made disaster or crisis that has caused or is likely to imminently cause a major adverse economic and/or social impact.

The project will directly benefit the poorest households in all administrative provinces of Burundi and about to 250,000 extreme poor households with 100,000 productive investments.



#### D. 2. Borrower's Institutional Capacity

The Ministry of Social Affairs and the National Commission for Social Protection through Merankabandi's Project Implementation Unit (PIU) is the lead implementing agency. It will have the responsibility for all the administrative and financial management tasks of the project, including monitoring and the execution of all Environmental and Social Instruments including an Environmental and Social Commitment Plan (ESCP), Stakeholder Engagement Plan (SEP), an Environmental and Social Management Plan (ESMP), an Indigenous Peoples Plan (IPP), and a Social Assessment.

The Project will be implemented by Merankabandi's Project Implementation Unit. The PIU is staffed with: a PIU coordinator; a Financial Management Specialist; a Procurement Specialist; an Operations Specialist; a Communications Specialist; a M&E specialist; a Payments Specialist; a Safeguards Specialist; an IT Specialist and support staff (assistants, accountants, drivers, guards, etc.) at Bujumbura level and Provincial Coordinators and Field Officers at provincial and commune level respectively.

On the PIU capacity and Social Safeguards, the ratings for the Merankabandi Project have always been Satisfactory or Moderately Satisfactory. Merankabandi has effectively integrated the Batwa as recipients of cash transfers through the project's targeting system benefitting the poorest households of each selected collines and the implementation of an Indigenous People Plan.

To scale up activities at national level, the PIU would need to strengthen its team with additional personnel at least in the following positions: a Productive Inclusion Specialist, Human Resources Officer and a Social Worker to be in charge of the Social Registry. The PIU's Social Specialist position, which is currently vacant, will be filled with a person with experience in Bank safeguards and knowledgeable of the new ESF to spearhead the preparation of ESF documents and the implementation of Environmental and Social Standards, including SEA.SH. The Task Team will need to provide substantial training to PIU staff at the central and provincial level on ESF standards and strengthen their capacity to manage E&S risks and impacts.

The Bank considered the Project's capacity to manage its environmental, social, safety and health risk in compliance with ESS1. From the preliminary review carried out at this concept stage, it can be concluded that the Merankabandi PIU has a strong foundation in Bank safeguards policies but will need to be reinforced to follow the new ESF. The Project will take stock from Merankabandi's experience in adapting to the Covid-19 context promoting social distancing and protecting households against the economic shock that the Covid-19 crisis have caused.



Burundi’s Environmental Protection Office (OBPE) holds the mandate to manage and regulate environmental risks of projects. OBPE regularly reviews and approves environmental impact assessments of projects across the country. However, they do not have the capacity at the local level to monitor and enforce the compliance of mitigation measures stipulated in such environmental assessments. Regarding labor standards, it is the Ministry of Labor that has the mandate to enforce the country’s Labor Code. However, due diligence performed during the identification mission revealed that they also do not have the capacity to monitor labor standards across their territory. Given the lack of capacity of OBPE and the Ministry of Labor to monitor labor standards across their territory, the Project will include its staff in the SEP and will maintain engagement and consultation efforts throughout project preparation and implementation. Further capacity assessments and coordination mechanisms will be reflected in the A-ESRS and SEP documents.

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

### A. Environmental and Social Risk Classification (ESRC)

Substantial

#### Environmental Risk Rating

Moderate

The Environmental Risk Rating for this project is Moderate. The anticipated environmental Risks/impacts are linked to activities to be funded under Component 1, including cash transfers to 250,000 extreme poor households and the development of a national Social Registry, and under Component 2, setting up of around 100,000 productive investments. The proposed “Moderate” environmental rating is further substantiated by potential risks and impact associated with the CERC component. Key risks and impacts that are expected related to COVID 19 transmission risk, if cash transfer activities are not properly managed, as it relates to occupational health and safety (OHS) and community health and safety, pollution due to solid waste, e-waste dust and noise. The development of a National Social Registry will generate e-waste through the creation and using of social registries for managing beneficiary data. Productive investments (family agro-pastoral activities at small scale) may also lead to erosion, siltation, deforestation, solid waste, dust generation, road safety hazards, waterborne diseases, limited use of chemicals and/or pesticides, potential water use and impacts to ecosystem services. The indirect and cumulative risks and impacts for the project as a whole at productive investment sites and regionally are expected to be insignificant given the small-size of the grants (max. 200 dollars/beneficiary) and the dispersion of resources across 18 additional provinces. All these risks and impacts will be addressed through the preparation of an ESMF that will provide an overview of the risks and impacts, and mitigation measures, as well as the institutional arrangements to implement and monitor those mitigation measures. These expected risks and impacts are envisaged to be low to medium in magnitude, temporary, site-specific and easy to manage. Borrower and beneficiaries capacity to manage these risks and impacts are a factor in consideration of environmental risks, as it has no experience in preparing and implementing ESF. A Security specialist will carry out a Security Due Diligence Assessment (SDA) for the Bank, an initial version of which will be completed by appraisal. The client will develop its own Security Risk Assessment (SRA) as part of its Security Management Plan during implementation. No project activities will occur in areas of substantial or high security risk until the SMP has been prepared and cleared by the Bank. The PIU staff members and beneficiaries will have to comply with mitigations measures related to COVID 19 during the project

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implementation activities such as physical distancing, wearing the masks, washing hands. Drivers from the PIU will need a training on road safety to minimize number of accidents.

**Social Risk Rating**

Substantial

The Social Risk Rating for this project is Substantial. Project risks are associated with the large-scale of the activities (country-wide), coverage of Batwa and refugee population, potential conflicts resulting from beneficiary selection and primary support to women, and limited experience of the PIU on the new Environment and Social Framework. The project’s activities are not expected to produce any large-scale, significant and/or irreversible adverse impacts. Planned activities include scaling up of cash transfers across the country and productive investments by beneficiaries. Similar to the existing MERAKABANDI project, the proposed project is expected to have a positive social impact by providing economic support to the poorest households and their communities. It is expected to: i. directly increase the welfare of beneficiary households and indirectly of participating collines through local economy impacts, ii. strengthen the inclusion of previously excluded households by raising their status in their collines; iii. contribute to address gender related challenges ; and iv. promote the integration of Batwa population in project activities. Potential negative impacts of the project include: i. conflicts resulting from targeting and beneficiary selection; ii. exclusion or self-exclusion of Batwa population from project benefits; iii. Increased intra-household and gender-based violence since the women will be the recipient of the cash. MERAKABANDI effectively mitigated these negative impacts. The proposed project will need to continue to implement and scale up best practices across the country’s territory. A preliminary SEA/SH risk assessment has rated the project as low risk, and a set of mitigation and response measures will be implemented according to the level of risk and following the World Bank guidelines on VAWG in social protection. Among others, the project will elaborate a code of conduct addressing SEA/SH behaviors, establish regular training for member staff, and an accountability and response framework, including a referral pathway. It will include at least medical services, psychological assistance and legal counsel to SEA/SH survivors. On the other hand, most studies show positive results of cash transfers on GBV, but it is still not clear how and why this effect is achieved. Therefore, the project will ensure that the subject of intimate partner violence and gender relations at household will be part of community outreach activities and consultations with women in addition to all the measures that had been successfully put into place in the first phase of the project and will be replicated in this project.

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**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 area of intervention of the project is the whole country. The proposed project scales up Merakabandi’s safety nets activities from 4 to 18 provinces and number of beneficiaries from 56,000 to 250,000. For Component 2— Acompanying measures to Cash Transfers, the exact locations, scope, and scale of small productive investments (common agro-pastoral activities ) have not been clearly defined at the concept stage. However, each beneficiary would receive a start-up capital of max. 200 dollars for the activity and details on such activities will explicitly be clear before appraisal stage.



Based on the description of Component 1—Cash Transfer Program in the Project Concept Note, the anticipated environmental, health and safety risks and impacts of the proposed activities entail community health and safety risks including a risk of getting infected with COVID 19 if cash transfer activities are not properly managed. The development of a national Social Registry include occupational health and safety (OHS) risks and generation of e-waste. For Component 2, the risks and impacts associated with productive investments include occupational health and safety (OHS) risks, generation of solid waste, dust generation, noise, erosion, siltation, road safety hazards, management of agrochemicals with negative implications for health and safety of beneficiaries and community members. The scope and scale of the anticipated risks and impacts are expected to be site-specific, limited, localized, temporary and largely reversible.

The Project will address all risks and impacts through the preparation and implementation of an Environmental and Social Management Framework(ESMF) that will include a negative list of ineligible activities and straightforward mitigation measures. For e.g. under component 1, the design of cash transfer activities will include key COVID19 risk mitigation measures; under component 2, the design of productive activities from technical assistance and training on the design of a business plan will include E&S considerations including screening, exclusion or inclusion list for activities and costing. Investments detrimental to the environment and livelihoods including cultural resources property (national level historical or religious objects) will not be eligible.

The ESMF will also include an institutional needs assessment of the PIU and a strengthening plan.

The ESMF will include a Social Assessment (SA) analyzing the potential social risks of the project, namely the risk of creating community tensions as a result of cash transfers, particularly in areas and provinces not covered by the previous project, possible tensions arising from the inclusion of refugees in the Social Safety Nets system, and the risks and impacts of the project on Disadvantaged or Vulnerable Individuals or Groups, as per World Bank Directives. The SA will also include a gender and GBV-SEA/SH assessment to identify a systemic approach to the mitigation of social risks, including Sexual and Exploitation Abuse, and Sexual Harassments (SEA/SH).The gender and SEA/SH assessment will also analyze the results, lessons and experiences from the Merakabandi project, to see whether cash transfers results have led to increasing instances of GBV, including Intimate Partner Violence and SEA/SH and how the project can identify and implement activities oriented to reduce and/or mitigate these risks.

The ESMF will also contain Labor Management Procedures to manage workers of Component 1 and 2 (see Section B.2 below)

E&S considerations embedded in the project design will be reflected in the POM, and the Borrower will commit in the ESCP to monitor impacts of productive investments to ensure that relevant standards are maintained, including the sustainable management of living resources and prohibition on the introduction of alien species. A waste management plan will be prepared and will address e-waste and waste generated by productive investments. A CERC manual will address E&S issues associated with the CERC component will be developed once it is triggered. The team will work with the PIU to develop a Stakeholder Engagement Plan (SEP).

An Indigenous People’s Planning Framework will also need to be prepared, consulted upon and disclosed by the client before project appraisal in line with ESF requirements. The IPPF will include a separate Assessment from the SA particular to the risks and impact of the Project to the Batwa population.

A Security specialist will carry out a Security Due Diligence Assessment (SDA) for the Bank, an initial version of which will be completed by appraisal. The client will develop its own Security Risk Assessment (SRA) as part of its Security Management Plan during implementation. No project activities will occur in areas of substantial or high security risk



until the SMP has been prepared and cleared by the Bank. The Bank SDA and client SRA/SMP will consider security risks related to intercommunity or other social conflicts or violence which may impact project activities.

The ESME, SEP, IPPF, will be prepared by the client, consulted and reviewed by the WB and publicly disclosed as early as possible and before project appraisal. All instruments will be reflected in the Project ESCP, which will also be prepared, consulted, and disclosed before appraisal.

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

Borrower frameworks will not be used in this project, however the project will comply with relevant Burundian laws and all relevant ESF standards.

**ESS10 Stakeholder Engagement and Information Disclosure**

In consultation with the Bank, the borrower will prepare and implement an inclusive Stakeholder Engagement Plan (SEP) proportional to the nature and scale of the project and associated risks and impacts identified. Stakeholders include government institutions, UN agencies, NGOs, local authorities, and civil society, including the vulnerable CBOs. The SEP will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable (Batwa communities, the elderly, persons with disabilities, female headed households, child headed households, orphans and vulnerable children). Dedicated approaches and an increased level of resources may be needed for communication with such differently affected groups so that they can obtain the information they need regarding the issues that will potentially affect (positively or negatively) them. Women and girls will be targeted in specific, separate consultations facilitated by a woman to gather their opinions and suggestions about risks and challenges related to project activities as well as the accessibility and safety of those activities including the GRM. The SEP will be translated to Kirundo and Swahili to allow the participation and comprehension by project beneficiaries.

The stakeholder engagement process will begin as early as possible and will guide the project through preparation and continue into implementation. Prior to appraisal, the following measures will be implemented: i) stakeholder identification and analysis, ii) planning how the engagement with stakeholders will happen, iii) consultation with stakeholders and other groups not listed that might be relevant, and iv) the disclosure of the Stakeholder Engagement Plan. If major changes are made to the SEP during project preparation or implementation, a revised SEP should be publicly disclosed.

The project will include appropriate institutional arrangements to carry out the stakeholder engagement process taking into account the specific challenges associated with COVID-19. If deemed appropriate due to safety measures, stakeholder engagement will minimize close contact. The SEP will carry out communication strategies to deal with COVID. The project will take into consideration new Covid-19 safety protocols edited by the WHO and the Burundian



Government. Specific liaison officers will be identified at the PIU and the field level to coordinate and implement the SEP. As part of the preparation of the SEP, the borrower will maintain and disclose a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account.

The project will expand on the GRM developed by Merankabandi. Merankabandi developed a GRM to collect and manage complaints from beneficiaries from the cash transfer program. The GRM is already operational in the areas where the project is active and accessible to the beneficiaries and non beneficiaries. The GRM modules have been successfully integrated in the Project's Management Information System. In addition, a green line for the Project has been contracted to receive complaints by phone. A Complaints Management Specialist is being recruited to help file and resolve the claims. Furthermore, the GRM for the new project will be adapted to become sensitive to SEA/SH complaints, handling of which will need to follow three key guiding principles that must be systematically applied to adequately respond to the specific nature of SEA/SH cases: confidentiality, survivor-centricity, and survivor safety. Iterative Beneficiary Monitoring (IBM) will also be implemented by the Project to capture SEA/SH cases that might not be reported to the Project's GRM. A Grievance Mechanism will also be provided by contractors for workers to raise work place 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**

The project footprint is envisaged to be small given the nature of activities (cash grants and small productive investments on activities such as common agro-pastoral activities of households). At this stage, the project is expected to involve direct workers and contracted workers. The project ESMF will include Labor Management Procedures (LMP) to manage workers of Component 1 and 2. The project will follow Burundi's Labor Code and WBG standards concerning labor conditions and Occupational Health and Safety (OHS), new Covid-19 safety protocols edited by the WHO and the Burundian Government, sensitization and awareness. The project's LMP will outline a worker's GRM and will include a code of conduct addressing SEA/SH acts, including the sanctions for the perpetrators, for all project workers to sign. It will also cover Occupational Health and Safety (OHS) related issues and COVID-19 prevention strategies. As stated above, considerations related to the security of project personnel will be detailed either in the Project ESMF or under a stand along SMP.. In addition, there will be regular trainings on SEA/SH for all the workers involved in the project.

The project at this stage is unable to estimate the number of workers or labor required. The project's cash transfer activities will rely on Merankabandi's existing PIU under the authority of the Ministry of Human Rights, Social Affairs and Gender (MDPHASG), in coordination with the National Commission for Social Protection (CNPS) Technical Committee and the Permanent Executive Secretariat (SEP). NGOs will be contracted by the project to implement accompanying measures to cash transfers (Component 2), namely productive inclusion and behavior change activities. The project will develop a Labor Management Procedures to manage workers of the aforementioned components. The LMP will include Labor Management Procedures for the direct workers (e.g. PIU staff) and contracted workers:



- COVID-19 awareness, prevention and protection measures to be carried out by project workers, and beneficiaries
- Proactive measures to ensure equitable participation of young women and girls in the awareness-raising of project opportunities.

Given the lack of capacity of the Ministry of Labor to monitor labor standards across their territory, the Project will include its staff in SEP and will maintain engagement and consultation efforts throughout the project.

### **ESS3 Resource Efficiency and Pollution Prevention and Management**

The development of a National Social Registry will generate e-waste through the creation and using of social registries for managing beneficiary data. In addition, productive investments may also lead to minor risks and impacts related to pollution. However, any use of proceeds for the productive grants for any activity that is anticipated to result in significant adverse environmental risks and impacts will not be eligible. In case local producers may decide to use pesticides to increase crop production and productivity or intensification of agricultural production and productivity, de facto triggers pests and pesticides management under ESS3. The World Bank Environmental Health and Safety Guidelines (EHSs) will be used and the ESMF should discuss and address the risks/impacts associated with the handling, use, transport and storage of pesticides and provide mitigation measures associated with those risks and impacts. Currently, ongoing Bank financed-projects(Landscape Restoration and Resilience Project (P160613) have already Pest Management Plan approved by Bank which can be used in this case. In addition, the project is not expected to include significant use of water or impacts on water quality or expected to produce greenhouse gas emissions and such activities will not be eligible.

Solid Waste and e-waste Management: Maintenance of equipment (servers, computers, etc.), collection and disposal of waste will involve the selection of the approved disposal sites in consultation with the regulatory authorities, adoption of the appropriate segregation approaches and disposal to minimize impact on the environment in accordance with the tenets of national standards. The World Bank Group EHS guidelines will complement national applicable standards.

A waste management plan will be prepared and will address e-waste and waste generated by productive investments.

### **ESS4 Community Health and Safety**

This standard is relevant to the project because the community is the center of the project activities. These activities entail potential risks and impacts such as community health and safety (exposure to COVID19 risks, road safety, and exposure to productive investments -related hazards, SEA/SH, exposure to water borne diseases) and social conflicts. Measures will be put in place to prevent or minimize the spread of COVID-19. These include measures to reduce large lines and crowds by, for example, phasing the payment day across weeks, allowing payment only on a specific day of the week based on the last digit of the recipient's ID, etc. This will be communicated widely to the public through the SEP and as part of project design. The project is expected to have community health and safety impacts on the community nor the project will not carry out civil works.

A particular attention will be given to vulnerable or socially excluded groups not having access to project benefits.



A preliminary SEA/SH risk assessment has rated the project as low risk, and a set of mitigation and response measures will be implemented according to the level of risk and following the World Bank guidelines on VAWG in social protection, including an accountability and response framework to handle allegations of SEA/SH and disciplinary actions for violations of the CoC by workers. The project will elaborate a referral pathway for SEA/SH survivors which will include at least medical services, psychological assistance, and legal counsel. In collaboration with the Bank, the Client will conduct a Security Risk Assessment (SRA) during the preparation of the ESMF, which will have a section detailing SRA and mitigation measures, or as a standalone document. However, security personnel will not be employed in this program.

#### **ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

Project activities will not involve civil works or any other activities that could result in economic and/or physical displacement. The Project ESMF will include provisions to screen out productive investment activities that could affect others' land use or livelihood.

#### **ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

While rural areas have sensitive ecosystems such as rivers and forest areas, the eligible activities to be financed focus on productive investments that are not anticipated to have any significant impacts on such ecosystems, and the design of productive investments would avoid negative impacts on forests, natural or critical habitats, or protected areas of high biodiversity value. Productive investments that have the potential to cause significant impacts (e.g. degradation of natural habitats, protected forests, or cultural resources) will not be eligible for financing under the project. However, the ESMF will provide an analysis of the potential E&S risks and impacts, and mitigation measures commensurate to those impacts. Environmental & Social monitoring, including the 6-monthly Reviews, will monitor impacts of productive investments to ensure that the standards of ESS6 are maintained, including the sustainable management of living resources and prohibition on the introduction of alien species.

#### **ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities**

There are a number of Batwa communities within the 18 provinces in which the project will intervene. As one of the most vulnerable groups in the country, Batwa households will undoubtedly be targeted by the cash transfer program. That being said, similarly to Merankabandi, being Batwa will not be an automatic qualifying criteria for inclusion in the program. A stand-alone IPPF including a social assessment (separate from the Project-wide SA) will be prepared to analyze the impacts of the project on Batwa communities and ensure their access to project benefits. The IPPF will include consideration of cultural impacts on the Batwa and provision to engage with them according to their norms and traditions, and culturally appropriate service options and delivery mechanisms. Project activities will not cause relocation or impact resources or cultural heritage of Batwa groups. The SEP will include provisions for consultation with Batwa communities (see ESS10).

#### **ESS8 Cultural Heritage**



No excavation or construction activity is planned for this project because productive investments are not expected to affect cultural heritage. However, this standard may be relevant to some of beneficiaries during the implementation of their activities that may affect graves, shrines, sacred trees or groves that may require attention of relevant government agencies. Investments detrimental to the environment and livelihoods including cultural resources property (national level historical or religious objects) should be relevant to be addressed in this case in the ESMF (refers to above case).

**ESS9 Financial Intermediaries**

The project does not involve any financial intermediaries.

**B.3 Other Relevant Project Risks**

The Project ESMF will include an institutional needs assessment and strengthening plan, as per ESS1. A Security specialist will carry out a Security Due Diligence Assessment (SDA) for the Bank, an initial version of which will be completed by appraisal. The client will develop its own Security Risk Assessment (SRA) as part of its Security Management Plan during implementation. No project activities will occur in areas of substantial or high security risk until the SMP has been prepared and cleared by the Bank.

**C. Legal Operational Policies that Apply**

<b>OP 7.50 Projects on International Waterways</b>	No
<b>OP 7.60 Projects in Disputed Areas</b>	No

**III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE**

**A. Is a common approach being considered?** No

**Financing Partners**

There are no Financing Partners being considered

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

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

- Preparation of an ESMF to identify and address Risks & Impacts from productive investments activities of the beneficiaries;
- A waste management plan will be prepared and will address e-waste and waste generated by productive investments
- Labor Management Procedures (LMP) including OHS relevant issues

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- Gender and SEA/SH risk assessment . Due to the level of risk-rated, the project won't develop a SEA/SH Action Plan, but a set of prevention and mitigation measures will be identified and implemented according to its level of risk. Among them, the elaboration and signature of a code of conduct addressing SEA/SH acts, regular training of workers on SEA/SH risks, awareness-raising community activities, and accountability and response framework for workers that commit of SEA/SH incidents, GRM sensitive to SEA/SH complaints, including the mapping of GBV services providers where survivors will be referred for assistance.
- Environmental and Social Commitment Plan (ESCP), which outlines all relevant ESSs for this project
- Stakeholder Engagement Plan (SEP)
- Indigenous Peoples Plan (IPP)
- Social Assessment (SA)

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

- Implementation of the SEP including a Grievance Redress Mechanism sensitive to SEA/SH complaints
- ESF capacity building
- Implementation of the labor management procedures
- Monitoring of the environmental and social commitments and performance in accordance to legal agreement.

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**C. Timing**

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

14-May-2021

**IV. CONTACT POINTS**

**World Bank**

Contact:	Eric Zapatero Larrío	Title:	Senior Social Protection Specialist
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**Borrower/Client/Recipient**



Borrower: Ministry of Finance

**Implementing Agency(ies)**

Implementing Agency: Ministère de la Solidarité Nationale, des Droits de la Personne Humaine et du Genre (Ministry of Nat

**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):	Surat F. Nsour, Eric Zapatero Larrío
Practice Manager (ENR/Social)	David Seth Warren Recommended on 07-Apr-2021 at 14:11:14 GMT-04:00
Safeguards Advisor ESSA	Peter Leonard (SAESSA) Cleared on 27-Sep-2021 at 20:39:39 GMT-04:00