Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 11/11/2019 | Report No: ESRSA00341
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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<tr>
<td>Peru</td>
<td>LATIN AMERICA AND CARIBBEAN</td>
<td>P170658</td>
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Project Name: CENTRALIZED EMERGENCY RESPONSE SYSTEM IN PERU

Practice Area (Lead): Digital Development

Financing Instrument: Investment Project Financing

Estimated Appraisal Date: 11/11/2019

Estimated Board Date: 12/5/2019

Borrower(s): Ministry of Economy and Finance

Implementing Agency(ies): Programa Nacional de Telecomunicaciones (PRONATEL)

Proposed Development Objective(s)

The proposed project development objective is to improve efficiency in planning, coordination and response in the event of emergencies and disasters in Metropolitan Lima and Callao.

Financing (in USD Million)

<table>
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<th>Amount</th>
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<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]

The duration of the Project will be four (4) years. This Project will ensure that the population of the districts of Metropolitan Lima and Callao receive appropriate attention in the event of emergencies through the integration of all the existing emergency numbers into a unique number, where the calls will be monitored and dispatched at a centralized emergency response Center and referred to the corresponding emergency response units.
The proposed project would serve to improve the critical capacity and infrastructure for emergency planning and response through the implementation of a single number for emergency calls and a dedicated line for GBV cases, which will allow the population to access the 911 Center in a simpler way and will consequently increase the efficiency on the provision of the emergency service while reducing the time of response. The figures in Annex II represent how emergencies are monitored currently and how they will be monitored and dispatched after the implementation of the 911 system.

The project will finance four components following the activities described in the Profile Study done by Programa Nacional de Telecomunicaciones (PRONATEL) and approved by the Ministry of Transport and Communications (MTC) and the Ministry of Economy and Finance (MEF).

Component 1: Building for the Centralized 911 Emergency Response Service (US$16.9 million of which US$14.3 is IBRD, US$2.6 Counterpart Funding). This component will finance the works for the construction of a 911 building and all the basic furnishings needed to operate the 911 emergency response system. To this end, the National Institute of Civil Defense has transferred the rights of use of approximately 4,000 m2 of land where the 911 building will be constructed, to the MTC.

Component 2: Digital Infrastructure for the 911 System (US$22.3 million of which US$18.9 is IBRD, US$3.4 Counterpart Funding). This Component will finance the necessary digital infrastructure to enhance the capacity of the targeted first response emergency entities to effectively plan and respond to emergencies through the effective coordination of the 911.

Component 3: Use and appropriation of platform 911 (US$2 million of which US$1.5 is IBRD, US$0.5 Counterpart Funding). This Component aims at (ii) increasing coordination between the different emergency response units through the development of protocols, (ii) increase efficiency of the emergency response service, 911 and Line 100 through capacity building to the operators and regarding adequate use, response and compliance with the protocols that regulate the 911 system and Line 100 as well as management of technological tools, and (iii) the promotion of the proper use of the 911 emergency service and therefore the reduction of malicious calls through raise awareness campaigns.

Component 4: Project supervision and management. (US$3.9 million of which US$1.5 is IBRD, US$2.4 Counterpart Funding). This Component will finance the effective supervision and management of the Project. The objective of this Component is to ensure effective supervision of the Project activities and will support all costs related to supervision, monitoring of activities, external technical specialists, and capacity building activities for the Project Implementation Unit (PIU) which will fall within PRONATEL’s Studies and Projects Directorate.

D. Environmental and Social Overview

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

Location. The project aims at increasing the effectiveness of response to emergencies in the 51 districts of Metropolitan Lima and Callao. Under Component 1, a centralized emergency response center (from now on, “911 building”) will be constructed in an air force zone. The 911 building will be located within an area of approx. 4,000 m2 next to El Sol Avenue, between Los Pumas and Los Manglares streets, in the Municipal District of Chorrillos, limit with the Municipal District of Santiago de Surco, in an area that is part of a larger air force compound. In April 2019, this
area was lent by INDECI (National Defense Institute) to the MTC (Ministry of Transport and Communications) indefinitely (authorization is included as an annex in the draft preliminary Environmental and Social Analysis and Environmental and Social Management Plan, P-ESA+ESMP). The three story building will have approx. 2,800 m² of roofed area, according to the project preliminary designs (infrastructure details, including the design for the remaining 1,200 m² will be included in the building final designs, which will be obtained during implementation). Operation and maintenance of the 911 building, not financed by the project, will be outsourced by PRONATEL (National Program of Telecommunications). Component 2 will provide the necessary digital infrastructure to enhance the capacity of the targeted first response emergency entities to effectively plan and respond to emergencies. This Component will not finance the deployment of new fiber optic or other IT infrastructure. Component 3 will support capacity building and training for operators, as well as compliance with the protocols that regulate the 911 system. Finally, under Component 4, Line 100 dedicated to gender-based violence (GBV) emergencies will be interconnected to Line 911 in order to facilitate coordination in events of family and/or sexual violence that require urgent intervention. None of these three components include infrastructure works.

Environmental Context. Potential direct environmental impacts are expected only under Component 1. The 911 building will be located in an urban area, within a fenced site that is part of a larger air force compound that has been used by INDECI for the disposal of surplus materials (approx. 11,600 m³ of accumulated materials) from the construction of the COEN (Centro de Operaciones de Emergencia Nacional - National Emergency Operations Center) in 2019, located 100 m away from the project site. There are no green areas, natural nor critical natural habitats and there are no cultural heritage sites (recognized by the Ministry of Culture) within or near the proposed area.

Social Context. There is no physical nor economic displacement foreseen and there are no indigenous communities in the area proposed for the 911 building. It is expected that overall the project will lead to positive social outcomes as its objectives are to increase response efficiency in case of emergencies to the population and increase coordination between response Units. It is also expected that the project will benefit people in urgent need due to various life threatening emergencies as well as victims of GBV as protocols for handling GBV survivor calls, and capacity building to operators of the 911 Line will be provided. However there are institutional risks related to the lack of coordination between the new 911 line and the agencies responsible for delivering response services: National Police Department (NPD), Mobile Emergency Care System (SAMU-health care provider), the Peruvian Corps of Voluntary Firefighters (PCVF) and 100 Line Gender Based Violence. Likewise, it will be paramount that the adequate communication strategies, messages and channels are used in order to ensure that the emergency lines (911 and 100) are equally accessible to all target populations (i.e., extreme poor, indigenous populations, people with disabilities, LGBTI+ groups). Specific modules with applications tailored for people with disabilities will be created. Specific modules with applications tailored for people with disabilities will be created. These strategies are detailed in the project’s draft Stakeholder Engagement Plan (SEP).

D. 2. Borrower’s Institutional Capacity
PRONATEL is responsible for the formulation and execution of the project. The Project Implementation Unit (PIU) will fall within PRONATEL’s Studies and Projects Directorate. PRONATEL was created on December 2018 through Supreme Decree (SD) 018-2018 under the Vice-Ministry of Communications, within the MTC. That same SD mandated the fusion of the previous FITEL (Telecommunications Investment Fund) within the MTC and gave PRONATEL the function to administer the Fund. Bank’s due diligence indicates the PIU’s ability to manage social and environmental risk and impacts in accordance with the Bank’s ESF is limited due to:
(i) Lack of experience on WB projects and environmental and social management: even though FITEL and PRONATEL have had experience with Reimbursable Advisory Services and projects financed through WBG funds (e.g., Digital Inclusion Project - P157355), none of these has included an infrastructure component entailing relevant environmental risks and impacts, such as those foreseen for the 911 building. Requirements for implementing a SEP throughout the project cycle are also new.

(ii) Limited institutional capacity to manage environmental and social aspects: previously within FITEL there has not been a permanent dedicated team of staff to manage social and environmental issues of projects (several different consultants have been hired at different times for different projects). Currently, PRONATEL does not have a dedicated team specialized on managing social and environmental project aspects.

(iii) Unclear institutional arrangements: even though an environmental and a social specialist have been supporting the project throughout its formulation, both are located within PRONATEL’s Supervision Secretariat.

PRONATEL will need specific strengthening measures to implement the provisions established in the ESF relevant to the project and ensure adequate coordination during implementation of the new 911 line. Specific proposed areas of improvement and institutional strengthening measures include, among others:

(i) The PIU will designate or hire an environmental and a social specialist to strengthen its capacity to comply with the WB’s ESF during project implementation (no later than 30 days after project effectiveness date, as sated in the project’s draft ESCP, disclosed on November 9, 2019). These specialists will be trained on ESF requirements and will receive implementation support from the Bank as needed.

(ii) The construction of infrastructure will be supervised by a contractor, and the corresponding bidding documents will include specific language on environmental and social requirements.

(iii) Obtaining the necessary agreements/authorizations and establishment of coordination strategies for adequate project implementation related to environmental and social issues, including: (1) authorization document from INDECI to PRONATEL, authorizing PRONATEL to (i) remove and dispose of construction material that is currently accumulated in the project area (refer to ESS3 for further details), and (ii) remove superficial waterpipes that go through project area (refer to ESS1 for further details). This authorization was received by PRONATEL the 2nd of September, and has been included as an annex in the draft P-ESA+ESMP. (2) Establishment of an Administrative Committee (AC) with relevant representatives of the MTC, Ministry of Interior, Ministry of Health, and Ministry of Women and Vulnerable Populations, which will monitor the project on a monthly basis, including E&S aspects, during construction and operation.

(iv) Capacity building on handling GBV related emergencies and grievances; Capacity building on roles, responsibilities, and protocols between 911 and other institutions providing emergency response services.

Mentioned strengthening measures, along with the interinstitutional coordination strategies needed, have been included in the project’s draft ESCP, disclosed on November 9, 2019.

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Environmental Risk Rating

The environmental proposed risk classification for the project is Moderate under the World Bank ESF. Classification responds to potential environmental risks and impacts stemming from the construction (and operation) of the 911
building under Component 1. These: (i) are predictable and expected to be temporary and/or reversible; (ii) are low in magnitude; (iii) are site-specific, without likelihood of impacts beyond the actual footprint of the infrastructure; (iv) occur away from environmentally sensitive areas, and thus no impacts are expected over natural or critical natural habitats, and no green areas will be affected; (v) are not expected to cause serious adverse effects to the environment; and (vi) can be easily mitigated in a predictable manner. Based on the review of available documentation, and discussions with PRONATEL, key anticipated environmental risks and impacts are related to:

A. During construction of the 911 building:
   i. Overall nuisances to the communities due to noise and vibration, dust, traffic congestion, waste, and visual disturbances from construction activities.
   ii. Risks of occupational accidents during construction, as well as third-party accidents to pedestrians and children mainly due to increased vehicular traffic from the transport of construction materials and waste.
   iii. Inadequate sourcing and transportation of construction material from quarries.
   iv. Inadequate handling, transportation and disposal of waste and hazardous materials during construction (including construction materials currently accumulated within the proposed site).
   v. Impacts on chance archaeological findings.
   vi. Cumulative impacts during construction: (a) increased noise pollution, considering the operation of the neighboring Air Base “Las Palmas” (flights occurring a couple of times per year), which produces noise levels that surpass national Environmental Quality Standards; and (b) increased vehicular traffic, considering the contemporary construction of properties within the area of influence.

B. During operation of the 911 building:
   vii. Lack of a life, fire safety and emergency response and preparedness plan at the 911 building during operation.
   viii. Irregular maintenance and upkeep of the 911 building, including a lack of an adequate environmental management of solid and hazardous wastes (mainly e-waste), water effluents, air emissions and noise levels.

Cumulative impacts during operation have not been identified.

To adequately address and mitigate project’s environmental risks and impacts, the Borrower, with the support of qualified E&S specialists, prepared specific ES instruments aligned with ESF requirements and relevant ES standards. These include a preliminary Environmental and Social Analysis and Environmental and Social Management Plan (ESA + ESMP) of the construction and operation of the 911 building, which will be updated into a final ESA+ESMP once the 911 building technical designs become available, during project implementation. The draft fit-for-disclosure version of the preliminary ESA+ESMP was disclosed on the World Bank’s website, as well as on PRONATEL’s website, prior to the start of Appraisal, on November 9, 2019. The World Bank closely monitored the development of this instrument to ensure both quality of the analysis and on-time delivery, as well foster client capacity building. Technical and economic requirements derived from this document will be incorporated into the procurement documents for the contractor and supervision firm for the construction of the 911 building, as necessary.

Social Risk Rating

Moderate

The project is expected to have overall positive social impacts on the vulnerable as its main objectives are intended to improve emergency response to the populations of Lima and Callao. There is no physical nor economic displacement foreseen and there are no indigenous communities in the area proposed for the 911 building. No adverse impacts such as relocation of households nor adverse impacts on incomes/livelihoods/businesses are foreseen. No
permanent or temporary land acquisition using the principle of eminent domain is expected under this project as the plot of land that will be used is owned by the Ministry of Defense and has been given to the Ministry of Telecommunications for unlimited use indefinitely.

The project will employ approximately 50 operators, (direct contractors), and close to 100 construction workers (subcontractors), as well as a core team of about 10 government staff comprising the PRONATEL-PIU. The 911 building will contemplate that 10% of the phone line operators speak Quechua. A labor management procedure will be developed for the various types of employees of the project and consulted and disseminated as part of the Environmental and Social Assessment (ESA). The LMP will also include references to abiding by the code of conduct to mitigate against GBV incidents at the building.

While the project is not expected to do harm, it is deemed to be Moderate risk due to PRONATEL’s limited capacity to implement social mitigation measures that will address:

(i) the necessity of engaging with vulnerable populations that may need additional support in accessing the benefits of the project in an equitable manner, (ie., the poor, survivors of gender-based violence, LGBTI communities, disabled, elderly, and indigenous populations),
(ii) the development of a social assessment with a focus on gender issues and labor management plans,
(iii) complexity in coordinating protocols across multiple agencies due to confusion in roles and accountabilities during emergency response,
(iv) potential for discrepancies between protocols developed and their application,
(v) need to manage potential grievances related to civil works and the 911 operation and broader project activities,
(vi) potential for revictimization of survivors that experienced gender-based violence, (including LGBTI community),
(vii) frequent dissemination of information to benefiting populations to increase awareness raising of 911 Line and accountabilities of other agencies, and the
(viii) establishment of an effective grievance redress mechanism by effectiveness and that functions throughout project implementation.

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:
This standard is relevant.

Environmental and social assessment of the 911 building:
Potential environmental and social risks and impacts associated with the construction and operation of the 911 building are detailed in section II.A. This type of infrastructure project is not included in the “List of investment projects included within the SEIA” (National System of Environmental Impact Assessment) within the Communications sector, which are subject to the development of an environmental assessment (Annex II of the Implementing Regulations of the SEIA Law - Supreme Decree 019-2009-MINAM). Given this situation, and following the procedures established in the mentioned Implementing Regulations, PRONATEL formally submitted to the
Ministry of the Environment (MINAM) on March 2019 a Request Form to determine the need of an environmental certification for the 911 building within the framework of the SEIA. MINAM’s response, received on June 2019 (and included as an annex in the P-ESA+ESMP), indicate that the project does not require an Environmental Certification under the SEIA requirements.

In compliance with ESS1 requirements and other relevant standards, and considering that the 911 building final design is not yet available, PRONATEL has developed a draft Preliminary Environmental and Social Analysis (P-ESA) and corresponding draft Preliminary Environmental and Social Management Plan (P-ESMP) of the construction and operation of the 911 building (disclosed on November 9, 2019 on the Bank’s and PRONATEL’s website, prior to Appraisal), based on the available information to date (project profile level). This draft P-ESA+ESMP will need to be updated by PRONATEL as follows:

(i) Prior to Bank Approval: updated P-ESA+ESMP, including consultation results and further details on the ESMP, based on the available information.
(ii) During implementation, prior to inviting bids and/or selecting any contractors for the construction of the 911 building: Specific ESA+ESMP (S-ESA+ESMP), once the 911 building final designs are obtained (during project implementation), as stated in the project’s draft ESCP.

The information of the updated P-ESA+ESMP will inform the project final designs (specific necessary E&S requirements will be part of the bidding documents for this consultancy, including mitigation measures for GBV); and, in turn, the S-ESA+ESMP will be part of the bidding documents for construction (separate procurement process than the one for design). Bidding documents will require the contractor to present and develop a specific work plan for the implementation of the ESMP, and allocate a specific budget.

The draft P-ESA+ESMP has been developed in compliance with ESF requirements and WB General Guidelines of Environmental, Health and Safety (EHS). It is proportionate to the expected risks and impacts during both phases, and assesses all relevant direct, indirect and cumulative environmental and social risks and impacts throughout the project life cycle. It includes guidelines for the development of the following environmental and social management plans and measures (which will be part of the S-ESA+ESMP), once the final design of the building is obtained, during implementation: (i) Labor Management Procedure (LMP), including worker’s Code of Conduct (with GBV prevention measures) and worker’s grievance system; (ii) Plan for sourcing and transportation of construction materials; (iii) Waste management plan for construction and operation phases. This Plan includes the necessary measures to adequately handle and dispose the construction materials currently deposited within the project site, which will be the contractor’s responsibility. Further details included under ESS3; (iv) Traffic Management Plan; (v) Chance find procedure; (vi) Energy Efficiency measures; (vii) Emergency response and preparedness plan at the 911 building during operation.

Analyses developed as part of the draft P-ESA+ESMP indicate that there are no associated facilities (as defined in para. 11 of ESS1) related to the 911 building. Also, even though there are superficial waterpipes that go through the project area, these are not operative, and INDECI has authorized PRONATEL (by formal communication – letter) to remove them prior to construction. There will not be a disruption of service.
The information presented in the draft P-ESA+ESMP, disclosed on November 9, 2019 on the Bank’s and PRONATEL’s websites, is key for understanding the project’s most relevant environmental and social risks and impacts, and provide the necessary detail to inform stakeholder engagement and Bank decision making.

Social Assessment with a Gender Focus of the project.
Further to the social assessment as part of the Environmental and Social Assessment, due to the nature of the project, a separate social assessment was developed to focus on the issues of integration of the Line 100 (Gender-based Violence line) and 911. The draft assessment was disclosed prior to Appraisal, on November 9, 2019 on the Bank’s and PRONATEL’s website.

Gender based violence (GBV) in Peru is one of the highest in Latin America and is present in all regions and across all socioeconomic strata. Two out of three women in Peru experience intimate partner violence (IPV), however only 29% seeks help from an institution, typically the police. Women with higher incomes and education than their partners face disparities in the labor market, and they are highly more at risk to experience exposed to violence, particularly in the domestic realm. Women who live in neighborhoods with high levels of violence and criminality are at a higher risk of violence by their partners. GBV rates are high everywhere however they are higher in the Andean regions. Moreover, there is high acceptance of GBV in society: 40% believe that it is justified if a wife is unfaithful to their partner or if she disregards her children.

The Social Assessment with a Gender Focus analyzed the pros and cons of integrating Line 100 into Line 911. It determined that Line 100 is more focused on orientation and information provision and counts with GBV qualified operators, it is recommended that the Line remain separate to Line 911. However, it is important that the Line 100 reap the benefits of improvements made through Line 911 to improve efficiency in the emergency response to GBV cases. The calls to the 911and 100 lines will be free for callers. The assessment identified the following key social risks associated with the project which are considered low for the population at large however higher for vulnerable and/or at-risk populations, (i.e. LBGTI, disabled, women and children, indigenous, and poor):
• Lack of coordination and communication between agencies providing emergency response and governmental organizations,
• Rejection and or lack of application of new protocols in practice,
• Lack of coordination and/or confusion during the transition period of the new line until Line 911 is operational,
• Exacerbation of exclusion rates of the LGBTI community or another vulnerable group due to poorly coordinated referral systems
• Poor quality of service provision.

Mitigation measures developed to respond to potential challenges and included in the Social Evaluation and Gender Action Plan include:
(i) Ensure Line 100 benefits from Line 911 enhancements to streamline efficiency of response through: geolocation, software, equipment, protocols, capacity building and dissemination of the changes and Line.
(ii) Strengthen data collection mechanisms to enhance gender analysis and case analysis to improve targeted response.
(iii) Establish a mechanism that measures satisfaction of customers on quality of services provided.
(iv) Implement a holistic approach that specifies competencies needed for staff working in the 911 Central Unit including language skills (quechua) and psychological training.
(v) Introduce software with artificial intelligence that analyzes the voice onto text to support operators in their assessment of risk.
(vi) Roll-out capacity building packages to PRONATEL and other relevant agencies/institutions coordinating on emergency response services.
(vii) Development of a stakeholder engagement plan with specific measures for a continuous engagement, including the adaptation of messages and communication strategies using a multicultural approach, and
(viii) Establishing and rolling out a grievance redress system.

There is an opportunity to collaborate with the Access to Justice for All Project (P162833) that works with strengthening the Atencion Legal Gratuita – Free Legal Attention (ALEGRAS), centers that provide legal services to victims of violence. Synergies for developing joint protocols, improving referral services, and adopting similar dissemination strategies have been identified.

ESS10 Stakeholder Engagement and Information Disclosure
This standard is relevant.

The Borrower has prepared a draft Stakeholder Engagement Plan (SEP) that will accompany the project’s preparation and implementation phases. The draft SEP has been prepared by PRONATEL in consultation with relevant government entities, communication experts, and project beneficiary groups. Initial consultations took place on October 24, 2019 prior to Appraisal. These will entail the discussion and dissemination of the project objective and activities, and the key findings (risks and mitigation measures) identified in the environmental and social instruments, (P-ESA+ESMP, Social Assessment with Gender Focus, and SEP), and include the following activities:

(i) A workshop was organized near the locality where the 911 Building will be built the 24th of October of 2019. It convened PRONATEL staff of the Lima Metropolitan area as well as other stakeholder groups including: direct project beneficiaries, local organizations (in the area where the 911 will be built), government institutions, (Ministry of Transport, Environment, Culture, Interior, Defense, Health, and Ministry of Women and Population). These Ministries and organizations represent indigenous peoples, women’s rights/GBV groups, and other vulnerable groups (i.e., disabled, elderly, LGBTI+ groups and migrants). Civil works contractor will organize a specific workshop about the construction of the 911 building prior to the start of construction. The consultation and stakeholder activities will be organized both for 911 and 100 Line. The SEP is structured around the different project phases with outreach and consultation activities. The stakeholders can be classified in the following groups:

- Direct beneficiaries: vulnerable people who are at risk of emergencies and disasters, in particular elderly, children, disabled, migrants, LGBTI community, people whose native language is not Spanish, and people who do not have access to a cell phone.
- Territorial and social organizations: community-based organizations, local social groups, such as Vaso de Leche and others who have a social purpose. Local councils and other community groups will be included.
- Public and private entities: (MTC, Ministry of Justice (MINJUS), Ministry of Women (Ministerio de la Mujer), Ministry of Interior (MININTER). Other relevant entities such as High Commission to Erradicate Violence against Women and Family Members, Police, among others.
(ii) Flyers and posters with information about the project will be prepared and distributed in the Municipal Districts of the area of influence (Chorrillos and Santiago de Surco).

(iii) (i) and (ii) will be complemented with a phone line, electronic mail, a webpage link, and additional workshops to provide information and a space for feedback on the project.

The project will include the preparation of a project-level GRM (referred to in ESS1) and another specific for project workers. The MTC counts with a web-based GRM which enables the population to submit grievances, including a tailored mechanism for people with disabilities and inability to access online tools and phones. This system will be enhanced by complementing the web-based channel with a phone number and email address. The overall project GRM will be established before Bank approval. The GRM for the direct workers is the responsibility of the main contractor and the SUNAFIL can be the standard mechanism for the project direct workers. This will be established before construction activities begin (see ESS2). The SEP will be further detailed and updated throughout the project cycle (details in draft SEP).

The project will also introduce a yearly customer satisfaction survey, (a citizen engagement mechanism) in order to assess the customer’s perceptions and experience with the 911 Line. In particular, the survey will look into improvements in response time, and customer service. An indicator to track this over time will be included in the project’s results matrix.

The ESA+ESMP, the social assessment with a focus on gender and the SEP were publicly consulted and disclosed before project appraisal, on November 9, 2019.

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

This standard is relevant.

The standard recognizes the importance of promoting sound worker-management relationships and enhance Program development benefits by treating workers fairly and providing safe and healthy working conditions. Program workers include direct workers, contractors, and subcontractors. Community workers will not be hired or involved in Program activities. Since the infrastructure project will take place in a large metropolitan area, it is expected that most labor will be supplied locally, and no major issues associated with labor influx are anticipated. Local labor laws are aligned with ESS 2 regarding child labor, so the Program will not hire children. MTC has an existing online GRM which will be strengthened through complementary actions including enabling a phone number and email address. Workers’ rights are protected by government organizations such as the Ministry of Labor and Employment Promotion, and the National Superintendence of Labor Inspection (SUNAFIL), among others. SUNAFIL is the national mechanism for any labor complaints, and the PIU and any other workers have access to this mechanism. An Incident Reporting requirement will be in place and is referred to in the ESCP.

The project will employ approximately 100 operators (direct contractors) for the 911 building, and close to 50 construction workers (subcontractors), as well as a core team of about 10 government staff that will comprise the PIU. The operators of the 911 Line will be recruited to respond to emergency calls. They will be training on how to
identify different levels of risk, and dispatch accordingly. A cohort of the operators will be specifically trained on psycho-social support strategies and communication styles in order to manage GBV related cases.

The Borrower is preparing a Labor Management Procedure (LMP) in line with para. 9-13 and 31-32 of ESS 2, which will set out the way in which all types of project workers will be managed in accordance with the requirements of national law and ESS2. The LMP will describe the working conditions and management of worker relationships, the terms and conditions of employment, provisions for non-discrimination and equal opportunity, worker’s organizations and freedom of association, occupational health and safety for workers, provisions to protect the workforce including child labor and minimum wage, and the prevention of forced labor. The LMP will further ensure that the health and safety of workers, especially women, are given adequate attention and equal opportunities. It will also have the details of the grievance mechanism for workers and the roles and responsibilities for monitoring such workers, as well as a worker’s code of conduct.

The disclosed draft P-ESA-ESMP includes guidelines for the development of the LMP. Based on these guidelines, the LMP will be finalized and disclosed prior to Bank Approval, as set out in the draft ESCP. During project implementation, the LMP will be revisited and updated as required and as additional labor-related risks or issues unfold.

ESS3 Resource Efficiency and Pollution Prevention and Management

This standard is relevant.

Energy efficiency measures: The operation of the data center will entail a relatively high energetic cost, as the area needs an air containing system operating at all times. The Borrower will make sure to take into account energy considerations when developing the final design of the building and its data center and make sure that the operation follows basic energy efficiency measures, including for example the use of LED lights. Energy efficiency measures to be considered in project design have been laid out in the draft P-ESA-ESMP, based on the WB’s EHS guidelines for energy conservation. These measures will be further developed prior to Bank Approval (as part of the final P-ESA-ESMP) and considered by the consultancy in charge of the project final designs.

Pollution management: The Borrower has prepared guidelines for a Waste Management Plan for construction and operation phases of the 911 building, in line with para. 17-20 of ESS3, as part of the draft P-ESA+ESMP. It includes specific management measures and procedures to ensure there is no soil, water and/or air contamination from handling and disposal of construction and operation waste, including hazardous materials (mainly e-waste during operation). It also focuses on the adequate handling of the construction materials currently deposited within the project site, based on the results of the environmental baseline (including guidelines for an adequate gathering, transportation and final disposal of the materials). The civil works constructor will be responsible for removing the accumulated material, implementing the corresponding environmental management measures as part of the construction phase (pre-construction refers to the mobilization of workers and interinstitutional coordination only; once the 911 building final design is obtained, the incorporation of further necessary measures for site readiness will be assessed). The prepared guidelines for the Waste Management Plan include a specific budget for waste management activities.
Since the operation of the 911 building will be outsourced by PRONATEL, the corresponding bidding documents will include the necessary E&S requirements regarding the implementation of the Waste Management Plan for operation.

The draft P-ESA+ESMP also includes guidelines for the development of a Management Plan for Material Sourcing and Transportation during construction, requiring queries to be duly accredited and have the necessary permits in force. Both plans will be finalized by PRONATEL during implementation, once the project final designs are in place, and prior to inviting bids and/or selecting any contractors for the construction activities (as part of the S-ESA+ESMP).

ESS4 Community Health and Safety

This standard is relevant.

Key risks and impacts related to community health and safety are linked to civil works construction and traffic safety during the construction of the 911 building. Although no traffic detours are needed, nor road closures (given than construction will occur within an Air Force Complex in an area that is not adjacent to public streets), an increase in traffic congestion is expected during construction, reason why a Traffic Management Plan, in line with para. 10-13 of ESS4, is necessary. The Borrower has prepared guidelines for a Traffic Management Plan as part of the draft P-ESA+ESMP, which considers: operation of intersections to improve traffic flow and particularly enhance road safety, strategies to ensure that trucks unloading equipment/material do not unnecessarily cause traffic jams and so equipment and supplies can be safely off-loaded, sensitization and early communication measures, road safety measures, among others. This plan will be finalized by PRONATEL during implementation, once the project final designs are in place, and prior to inviting bids and/or selecting any contractors for the construction activities (as part of the S-ESA+ESMP).

No other relevant community security risks during construction have been identified, as the 911 building, which will occupy approximately 2,800 m², will be constructed in a fenced area located within an Air Force complex, currently unoccupied.

During operation of the 911 building, main potential community health and safety risks are associated with the security and safety of workers in case of natural disasters and other emergencies (mainly earthquakes and fires). The Borrower has prepared guidelines for an Emergency Response Preparedness Plan for operation phase as part of the draft P-ESA+ESMP, which describes the necessary emergency response and preparedness planning, including guidelines to address tailored needs of people with disabilities, and training procedures at the building in line with para 11 of ESS4. This plan will be finalized by PRONATEL during implementation, once the project final designs are in place, and prior to inviting bids and/or selecting any contractors for the construction activities (as part of the S-ESA+ESMP). Since the operation of the 911 building will be outsourced by PRONATEL, the corresponding bidding documents will include the necessary E&S requirements regarding the implementation of the Emergency Response Preparedness Plan for operation.

Project final designs will include anti-seismic considerations, as well as specific fire safety measures (e.g., sprinklers, alarms, emergency exits, etc.); bidding documents for the consultancy for the project final design will include requirements on these aspects (final P-ESA+ESMP will be part of the corresponding bidding documents, including universal standards for people with disabilities).
Component 3 includes strengthening the capacity of operators and first response unit services for the proper
implementation and delivery of emergency services attending to best practices and processes. This includes training
on how to respond during a natural disaster and other emergencies, as well as developing the necessary protocols
and procedures for that aim.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
This standard is not relevant. The Project will not require land acquisition or physical resettlement of families or
businesses. It is not expected to generate any negative impact covered under ESS5. The 911 building will be located
within an area of approximately 4,000 m2 next to El Sol Avenue, between Los Pumas and Los Manglares streets,
Municipal District of Chorrillos. This area was indefinitely lent in April 2019 from INDECI (Instituto Nacional de
Defensa - National Defense Institute) to the Defense Ministry of Transport and Communications (MTC).

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources
This standard is not relevant. The infrastructure project will be located in an urban area, within a site currently used for the accumulation of construction materials and other waste. There are no green areas, natural nor protected natural areas within the project’s footprint and surroundings, and thus the project will not generate impacts on natural or critical natural habitats.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
This standard is not relevant. The social assessment confirmed that standard 7 is not relevant and that additional language does not seem to be a significant barrier to access as the indigenous population in the area speaks both Spanish and Quechua. Nevertheless, the project will ensure that a 10% of operators speaks Quechua.

ESS8 Cultural Heritage
This standard is relevant. While there are no known archaeological sites within the footprint of the 911 building,
chance findings could occur during earthworks and construction activities. The Borrower has prepared guidelines for a Chance Find Procedure during construction, as part of the draft P-ESA+ESMP, in line with national legislation, and para. 11 of ESS 8. This plan will be finalized by PRONATEL during implementation, once the project final designs are in place, and prior to inviting bids and/or selecting any contractors for the construction activities. The specific ESA+ESMP will be part of the bidding documents for construction.

ESS9 Financial Intermediaries
There will be no involvement of financial intermediaries in the project.
C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

OP 7.60 Projects in Disputed Areas

No

III. BORROWER’S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

<table>
<thead>
<tr>
<th>DELIVERABLES against MEASURES AND ACTIONS IDENTIFIED</th>
<th>TIMELINE</th>
</tr>
</thead>
<tbody>
<tr>
<td>ESS 1 Assessment and Management of Environmental and Social Risks and Impacts</td>
<td></td>
</tr>
<tr>
<td>PIU Organizational Structure Established</td>
<td>01/2020</td>
</tr>
<tr>
<td>Environmental and Social Assessment of 911 Building (Final - pre-technical designs) Completed</td>
<td>12/2019</td>
</tr>
<tr>
<td>Contract Management Details Elaborated</td>
<td>04/2019</td>
</tr>
<tr>
<td>Institutional Agreements Finalized</td>
<td>01/2020</td>
</tr>
<tr>
<td>PRONATEL creates Coordination Committee</td>
<td></td>
</tr>
<tr>
<td>Licenses for Construction Obtained</td>
<td>04/2020</td>
</tr>
<tr>
<td>Works Supervision Activities Initiated</td>
<td>05/2019</td>
</tr>
<tr>
<td>ESS 10 Stakeholder Engagement and Information Disclosure</td>
<td></td>
</tr>
<tr>
<td>Stakeholder Engagement and Information Disclosure Implemented (ongoing throughout project cycle)</td>
<td>11/2019</td>
</tr>
<tr>
<td>Project level GRM Established</td>
<td>01/2020</td>
</tr>
<tr>
<td>ESS 2 Labor and Working Conditions</td>
<td></td>
</tr>
<tr>
<td>Labor Management Procedure established</td>
<td>12/2019</td>
</tr>
<tr>
<td>Worker’s GRM Established</td>
<td>01/2020</td>
</tr>
<tr>
<td>ESS 3 Resource Efficiency and Pollution Prevention and Management</td>
<td></td>
</tr>
<tr>
<td>Management of Resource Efficiency and Pollution Prevention Manual prepared</td>
<td>04/2020</td>
</tr>
<tr>
<td>Waste Management Procedures and Manuals Developed</td>
<td>03/2020</td>
</tr>
<tr>
<td>ESS 4 Community Health and Safety</td>
<td></td>
</tr>
<tr>
<td>Traffic and Road Safety Measures and Manual Developed</td>
<td>03/2020</td>
</tr>
</tbody>
</table>
B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

**Is this project being prepared for use of Borrower Framework?**  
No

**Areas where “Use of Borrower Framework” is being considered:**  
None.

### IV. CONTACT POINTS

**World Bank**

<table>
<thead>
<tr>
<th>Contact</th>
<th>Title</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rocio Sanchez Vigueras</td>
<td>Digital Development Specialist</td>
<td><a href="mailto:rsanchezvigueras@worldbank.org">rsanchezvigueras@worldbank.org</a></td>
</tr>
<tr>
<td>5220+32502</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Doyle Gallegos</td>
<td>Lead Digital Development Specialist</td>
<td><a href="mailto:dgallegos@worldbank.org">dgallegos@worldbank.org</a></td>
</tr>
<tr>
<td>458-5912</td>
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**Borrower/Client/Recipient**

- **Borrower:** Ministry of Economy and Finance

**Implementing Agency(ies)**
Implementing Agency: Programa Nacional de Telecomunicaciones (PRONATEL)

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): Rocio Sanchez Vigueras, Doyle Gallegos
Practice Manager (ENR/Social) Valerie Hickey Cleared on 11-Nov-2019 at 04:23:27 EST
Safeguards Advisor ESSA Valerie Hickey (SAESSA) Concurred on 11-Nov-2019 at 11:26:38 EST