THE KINGDOM OF LESOTHO

SECOND EDUCATION SECTOR DEVELOPMENT PROJECT II

(ESDP II)

APL PHASE II

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)

(FINAL REPORT 04/10/2003)

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### List of Acronyms

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<th>Acronym</th>
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<tr>
<td>DA</td>
<td>District Administrator</td>
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<td>EA</td>
<td>Environmental Assessment</td>
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<td>ECCD</td>
<td>Early Childhood Care and Development</td>
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<td>EFU</td>
<td>Education Facilities Unit</td>
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<td>EMIS</td>
<td>Education Management Information System</td>
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<td>EMP</td>
<td>Environment Management Plan</td>
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<td>Environment and Social Management Framework</td>
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<td>ESIA</td>
<td>Environment and Social Impact Assessment</td>
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<td>ESSF</td>
<td>Environment and Social Screening Form</td>
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<td>FPE</td>
<td>Free Primary Education</td>
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<td>GoL</td>
<td>Government of Lesotho</td>
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<td>LEA</td>
<td>Lesotho Environment Authority</td>
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<td>MoE</td>
<td>Ministry of Education</td>
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<td>MTEF</td>
<td>Medium Term Expenditure Framework</td>
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<td>NES</td>
<td>National Environment Secretariat</td>
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<td>NFE</td>
<td>Non Formal Education</td>
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<td>OP</td>
<td>Operational Policy (World Bank)</td>
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<td>PSCU</td>
<td>Projects Support and Coordination Unit</td>
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<td>RPF</td>
<td>Resettlement Policy Framework</td>
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<td>SC</td>
<td>Steering Committee</td>
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<td>TTI</td>
<td>Thaba-Tseka Training Institute</td>
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<td>TVET</td>
<td>Technical and Vocational Education Training</td>
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1.0 EXECUTIVE SUMMARY

The Kingdom of Lesotho is a small mountainous developing country completely surrounded by South Africa with a population of about 2 million people. With scarce resources, attributable to the harsh environment on the highland plateau and limited agricultural space in the lowlands for sustainable agricultural activities such as subsistence and pastoral farming, Lesotho (despite being landlocked) has abundant highland fresh water resources and the skills of its resourceful people, the Basotho.

Through the Highland Water Project, Lesotho is successfully harnessing its fresh water resources for export to South Africa. Similarly, the Government of Lesotho (GoL) has manifested its commitment to the education of its people by (a) devoting a relatively high share of government budget to education, (b) embracing the Education for All and Millennium Development Goals, (c) identifying education as one of the key strategies for alleviating poverty in its interim Poverty Reduction Strategy Paper (PRSP), and (d) adopting a Free Primary Education (FPE) Policy in 1999.

In line with this strategy, the GoL requested the World Bank for support and the 12 year Education Sector Development Program (II) was designed in 1999 (prior to FPE) as a 12 year Adaptable Program Loan (APL) to support the education sector. The goal of the 12 year program is to assist the GoL in achieving its goal of producing more and better educated Basotho and enabling them to participate in local and regional labor markets.

The ESDP II is to be implemented in three phases: APL 1 (1999-2002), APL 2 (2003 – 2006) and APL 3 (2007 – 2011). The development objective of the proposed ESDP II, APL 2, is to further increase the access, equity, and the quality of primary and secondary education and continued strengthening of the institutional capacity of the Ministry of Education.

The proposed ESDP II, APL 2 is structured to achieve its objectives within nine major investment components of the project. Specifically, Component 1, Improve Coverage through Construction of Classrooms, will finance the construction of new primary schools and the expansion of facilities of existing secondary schools, and possibly a new 100 bed hostel facility at Thaba Tseka Training Institute (TTI). Component 9, may finance the Construction of a new Head Office for the Ministry of Education.

The identification of sites for primary school construction will be based on the needs of local communities as expressed by them and/or the findings from a soon to be commissioned school mapping exercise. The location of the MoE head office and a facility for TTI will be made during the implementation of the project.

The GoL by the National Environment Act 2001 and the World Banks own Operational and Procedural Policies, specifically OP 4.01 requires the government to prepare an Environment and Social Management Framework, ESMF report, which will establish a mechanism to determine and assess future potential environmental and social impacts of project investments under components 1 and 9 of the proposed ESDP II APL 2, and then to set out mitigation, monitoring and institutional measures to be taken during design, implementation and operation of the subprojects to eliminate adverse environmental and social impacts, offset them, or reduce them to acceptable levels.
This is precisely what is required at this stage of project preparation since the location of the schools and facilities have not yet been identified.

OP 4.01 further requires that the ESMF report must be disclosed as a separate and stand alone by the Government of Lesotho and the World Bank as a condition for Bank Appraisal of the APL 2. The disclosure should be both in Lesotho where it can be accessed by the general public and local communities and at the Infoshop of the World Bank and the date for disclosure must precede the date for appraisal of the project.

The key highlights in this ESMF report are as follows:

(i) For the Construction of Schools and for the new 100 bed Hostel facility at TTI, the ESMF establishes the screening process mechanism for the implementation of the project activities to enable the local communities and the Education Facilities Unit (EFU) to simultaneously identify adverse potential environmental and social impacts of their project activities and to address them by incorporating the relevant mitigation measures into the designs before they submit them for review and subsequent approval.

The main feature of this mechanism requires the project implementers to screen their projects at the preparation stage using the screening form in Annex 1 and the environmental and social checklist in Annex 2 to identify potential adverse effects/impacts.

The next requirement is for the implementers to incorporate the necessary mitigation measures into the project design following which they are to submit the project proposals accompanied by the completed screening form and checklist to the reviewing body, which is the EFU for approval.

(ii) For the Construction of the new Head Office Building, which is expected to be a modern urban designed building, estimated to cost a few million US dollars, the use of the screening form and checklist would not be appropriate to identify impacts and to mitigate them. The ESMF therefore requires that an individual and separate Environmental and Social Impact Assessment be prepared by the firm of architects and engineers who would be chosen to design the building, as they design the building. This would ensure that adverse impacts are identified during the planning stages and successfully mitigated before the final design is concluded, thereby ensuring that the final design is environmentally sustainable and sound.

(iii) The ESMF identified and assessed to the extent possible, potential environmental and social impacts and appropriate mitigation measures and presented this in the form of a generic checklist contained in Annex 2.

(iv) The ESMF also developed an environmental and social screening form that would assist in determining potential adverse environmental and social impacts during project implementation pertaining to the project activities. This form is contained in Annex 1.
(v) The capacity to manage the ESMF of the PSCU was assessed. It was found that the PSCU had suitable staffing levels and positions, but required further strengthening through training. A training program and budget was developed and is contained in the body of the ESMF. The Steering Committees, which are to be elected bodies that would represent the local communities and help them to meet their responsibilities in the EA process as outlined in this ESMF would benefit from technical assistance and training. The National Environment Secretariat will also benefit from technical assistance to facilitate their monitoring and supervision of training role.

(vi) Finally the ESMF contains an extensive and comprehensive environmental and social monitoring plan to ensure that environmental and social issues will be managed effectively.

(vii) Meaningful consultations with local communities were held during the in-country study part of the preparation, during which they were sensitized on the requirements of the RPF and ESMF.

This Environment and Social Management Framework Report presents definitive, conclusive and clear procedures consistent with the Laws in Lesotho and the World Bank Safeguard Policies.
2.0 INTRODUCTION

The Government of Lesotho has asked the World Bank for continued support for the Second Education Sector Development Project APL 2 part of which is to finance the construction of new primary schools and the expansion of existing secondary schools, inter alia.

However, since the exact locations for these new schools were not identified at the time the APL 2 was being prepared, the Laws of Lesotho and Operational Policy 4.01 of the Bank requires the Government of Lesotho (GoL) to prepare an Environment and Social Management Framework (ESMF) which is to establish a mechanism to determine and assess future potential environmental and social impacts of all project activities to be financed under APL 2, and then to set out mitigation, monitoring and institutional measures to be taken during implementation and operation of the project activities to eliminate adverse environmental and social impacts, offset them, or reduce them to acceptable levels.

The GoL is further required to disclose this document in-country as a separate and stand alone document so that it is accessible by the general public, local communities, potential project-affected groups, local NGO's and all other stakeholders and also at the Info shop of the World Bank and the date for disclosure must precede the date for appraisal of the project.

Since the location of the schools which are to be decided using the results of a school mapping exercise and requests from local communities, has not yet been decided, each location that is subsequently identified and approved by the MoE would be subjected to environmental and social planning prior to approval. Other project activities under the ESDP 2 which may not be financed by the World Bank are also subject to the provisions of OP 4.01 and hence this ESMF. In those cases, it is required that the Construction of the Head Office for the MoE be subject to its own environmental and social impact assessment and the construction of the 100 bed Hostel facility at Thaba Tseka Training Institute (TTI) be subjected to environmental and social planning prior to approval.

This environmental and social planning for the construction of schools and the hostel at TTI and ESIA for the MoE Head office would be the instruments through which the project activities environmental and social impacts are identified and assessed and would also evaluate alternatives and would design appropriate mitigation, management and monitoring measures.

Scope of Work

The scope of work is to:

(a) Prepare an Environment and Social Management Framework (ESMF)
(b) Prepare a Resettlement Policy Framework (RPF)

The ESMF is to present a framework for screening, monitoring and mitigating potential impacts, with a process for triggering subsequent sub project environment and social assessments, where necessary.
The RPF is required to be a separate document, prepared following the appropriate laws in Lesotho and the World Bank Operational Policy 4.12, and is also required to be disclosed before appraisal of this project. The RPF establishes the resettlement and compensation principles, organizational arrangements and design criteria to be applied to meet the needs of the people who may be affected by the project activities requiring land acquisition and/or denial, restriction or loss of access to economic resources.

**Study Approach and Methodology**

The study was conducted by the consultant using the following approach and methodology:


- An eleven days study tour in Lesotho during which discussions were held with the Management of the Projects Support Coordination Unit (PSCU) and officials of the Education Facilities Unit and National Environment Secretariat. The consultant also attended briefing meetings with potential service providers held by the PSCU for the School Mapping Exercise and the Design of the MoE Head office and visited the potential sites for the construction of the MoE Head office. Field visits were also conducted in Thaba Tseka and Maseru Districts. At Thaba Tseka District, the consultant visited the Thaba Tseka Training Institute where a meeting was held with the acting Director of the Institute and was shown around the two potential sites for the construction of the 100 bed Hostel facility and toured the existing hostel on campus. In Thaba Tseka District, specifically in Mohlakeng Village, the consultant participated in a sensitization meeting held with the local communities and organized by the Supervisor of Government Schools, who was on a country wide tour sensitizing communities on the education for all policy adopted by the GoL. During this sensitization meeting, the consultant met with around 100 participants from the local communities and briefed them on the ESDP 2 APL 2 and on their responsibilities and roles under the project in general but more so on the ESMF and RPF. The community response was very positive and they seemed keen to play their role. The meeting was held on the Mohlakeng Primary School grounds, which contained only two tents that served as shelter from the elements. The consultant held many such meetings throughout potential school sites in the Thaba Tseka and Maseru Districts such as at Masite Ha tlhakanelo, Maseqobela, Senyotong, Mosetoa and Tsepo. During these visits the consultant met with the chief, school teachers and students. These sites were potential school sites for APL 2 but were at present operating a school under tents. The consultant also visited and held meetings at the Mosotho Primary School a school that was financed during APL 1.
The communities were very eager for the project to start and their willingness and determination to operate schools in remote locations such as these in the highlands, just simply under a tent with both students and teachers trekking everyday over difficult terrain to get there was a true testimony of their participatory involvement and was inspiring.

These discussions and consultations with the local communities proved invaluable in designing and coming up with appropriate solutions and recommendations that the communities could claim ownership of and thus ensure the sustainability of the project as a whole. The discussions and consultations were the backbone of the work done by the consultant.

Report writing.
3.0 DESCRIPTION OF THE PROPOSED PROJECT

The Education Sector Development Program (ESDP) II was designed in 1999 (prior to FPE) as a 12 year Adaptable Program Loan (APL) to support the education sector. The goal of the 12-year program is to assist the Government of Lesotho (GoL) in achieving its goal of producing more and better educated Basotho and enabling them to participate in local and regional labor markets. The 1999 ESDP II PAD for APL 1 stated that the program was to produce "more Basotho better educated, and actively employed both regionally and locally and participating in community leadership roles".

The ESDP II is to be implemented in three phases: APL 1 (1999-2002), APL 2 (2003 – 2007) and APL 3 (2007 – 2011). APL 1 supported mostly primary and secondary education, extensive analysis and capacity building in the areas of ECD, TVET, and NFE that would underpin investment decisions in APL 2. Similarly, analytical work completed in APL 2 will underpin investment decisions for APL 3.

Therefore, the development objective of the proposed ESDP II, APL 2, is to further increase the access, equity, and the quality of primary and secondary education and continued strengthening of the institutional capacity of the Ministry of Education.

The proposed ESDP II, APL 2 is structured to achieve its objectives within nine major investment components of the project, which are:

1. Improving Coverage through Construction of Classrooms.
2. Targeted Equity Based Program
3. Essential Teaching and Learning Materials
4. School Support through Decentralized Inspection and Advisory Services
5. Strengthening School – level Management
6. Distance Teacher Education Program
7. Basic Education Curriculum and Assessment
8. Expansion of ECCD through Home-based Care
9. Further strengthening MOE Institutional Capacity

The detailed policy and investment elements of the proposed APL 2 Project for the period July 2003 to December 2007 are:

- 270 primary classrooms with associated administrative block, kitchen, and latrines are built, 70 of which will be located in remote areas
- 80 classrooms will be added to the existing 20 secondary schools which are identified for being overcrowded (4 classrooms for each secondary school)
- 20,000 scholarships awarded to orphans and other disadvantaged children annually
- Additional core primary textbooks provided to cater for the new enrolment and replenishment and secondary textbook revolving fund established
- 5000 primary teachers and 1000 secondary teachers of Math, English, Science, Social Studies and Sesotho provided with refresher course bi-annually
- Primary inspectors (45), primary advisors (85), secondary inspectors (20) and secondary advisors (17) trained
SECOND EDUCATION SECTOR DEVELOPMENT PROJECT (ESDP II) APL PHASE 2

- District management strengthened and 10 District Resource Centres provided with equipment and library materials
- School management (400 primary principles and deputies, 100 primary management committees, 500 secondary principals and deputies, and 30 Secondary Boards) trained in finance and management
- Distance Teacher Education Program continue to be supported so that it produces at least 250 graduates annually from 2005 onwards
- Develop an Integrated Curriculum and Examination Framework, localize the Cambridge Overseas School Certificate Exam and continue to implement National Standardized Tests in basic literacy and numeracy
- ECCD home-based centers established in all districts (at least 2 bases per district)
- Two Non-formal Education Learner Post pilots continue to be supported
- Policy development and capacity building in higher education
- MOE institutional capacity strengthened including (a) Strategic Plan reviewed and annual operational plans in use; (b) MTEF implemented annually and education PER updated by 2004; (c) donor coordination strengthened; (d) Education Planning Unit strengthened in policy development, planning, monitoring and evaluation; (e) construction of MOE Headquarters building; (f) ongoing MOE staff training in strategic areas; and (i) HIV/AIDS policy development.

The activities in Project Components 1 and 9 have particular application with regards to this ESMF and are thus described in greater detail herebelow;

**Project Component 1: Improve Coverage through Classroom Construction**- will finance (a) 270 primary classroom with related facilities including administrative block, kitchen, latrines. At least 70 classrooms will be located in remote “inaccessible” areas; (b) 80 classrooms will be added to existing 10 secondary schools which are identified for being overcrowded (4 classrooms for each secondary school). Each newly constructed classroom will be provided with a set of standard furniture. An additional 100 science kits will be procured.

The identification of the sites for school construction will be based on the findings from a primary and secondary school mapping exercise and/or the request of local communities. Current information from MOE EMIS show that the Thaba Tseka and Maseru Districts have the highest average pupil: classroom ratios (68 and 59). Therefore, the primary construction will be mainly targeted in these two districts unless the school mapping exercise proves the contrary. Further, the community participation in the construction of primary schools will be piloted in three sites in Thaba Tseka. Since community participation has the potential of sustainability, low cost, and higher education participation, such an approach will be piloted with financial support for the project.

This component will also finance the construction of a new 100 bed hostel facility for male and female students at Thaba Tseka Technical Institute.
Project Component 9: Continue to strengthen MoE Institutional Capacity – will finance the following activities: (a) review of Education Sector Strategic Plan, (b) implementation of annual MTEF and updating education PER, (c) strengthening of donor coordination; (d) improvement of MoE’s financial management system; (e) Education Planning Unit strengthened in monitoring, evaluation, research and policy development; (f) construction of MoE Headquarters Building; (g) ongoing MoE staff training in strategic areas; (h) piloting and policy development in non-formal and tertiary education; (j) policy development in higher education; and (k) HIV/AIDS.
4.0 DESCRIPTION OF THE AREA OF INFLUENCE

The Kingdom of Lesotho, known in folklore as the mountain kingdom is an enclave in South Africa located at coordinates 29 30 S and 28 30 E, measuring approximately 30,355 km² with water as it primary natural resource. The terrain is mostly highland with plateaus, hills and mountains. The lowest point is at the junction of the Orange and Makheleng rivers at 1400m and the highest point is at 3,482m in Thabana Ntlenyana. The highlands of Lesotho, known as the Maloti, consist of an elevated and dissected plateau, with much of it above 2000m.

The climate is characterized generally by very cold winters and wet hot summers. 85 percent of the precipitation occurs in the summer season from October to March when 10 to 12 days per month can be expected. Winters are normally dry but snow is common in the highlands. Hail is a common occurrence and sudden weather changes are common, with temperatures falling rapidly within a few hours. The winter season is generally from May to October and minimum temperatures can reach -10 degree C.

Despite being landlocked Lesotho has abundant highland freshwater resources which flow primarily due through the Sengu, Senqunyane and Malibamatso river banks. The hydrology of these rivers is characterized by dendritic drainage patterns with high yields due to rapid run off from steep slopes, and a highly variable flow regime. These freshwater sources are fed by high intensity rainfall during the months from October to March. The Lowland areas also have abundant fresh water sources that flow through the river banks of the Makheleng, Mohokare, Tsoaing, Phuthiatsana, and Tebetebeng river banks.

The homogeneity of the parent soil material in general in most of Lesotho leads to properties that tend to differ by degree (i.e. texture, depth and drainage) rather than by type. The mountainous nature of the terrain determines that large areas are steep and rocky with limited agricultural potential for both agriculturist and pastoralists. Soils with agricultural potential include the recent alluvial, colluvial and the deeper of the residual soils. Of these the riverine and colluvial soils form the most important arable land, which is approximated to be less than 11% of the total land area of the Basotho kingdom. The residual soils on the side and upper slopes are highly variable in depth and degree and more marginal for agriculture. The hydomorphic soils are occupied by marsh lands which are heavily grazed by local livestock.

Soil erosion levels throughout the kingdom vary from low to moderate to high, with areas of moderate to high erosion occurring in, and adjacent to communities. The widespread low to moderate erosion is the result of localized grazing. The main factors affecting soil erosion are the influence of vegetation, soil type and slope. Basalt derived soils, although generally shallow, are particularly stable. Long steep slopes render the land extremely susceptible to erosion once the vegetative cover is seriously weakened or lost. High soil losses currently occur in cultivated and settlement areas. For most areas the average annual soil loss rates exceed the proposed soil tolerances and as a result significant areas have badly degraded land facets for which soil loss rates are excessively high, due predominantly to severe vegetation deterioration within populated areas.
The main crops grown in Lesotho are corn, wheat, sorghum, maize, peas, beans, oats and barley with most households growing vegetables such as cabbage, spinach, onion, potato and tomato.

In most areas the land is also characterized by an absence of significant trees and forest cover. Most villages have a few small trees. Household biomass fuel is derived from poplar and willow species and a small amount comes from the die-back of peach and apricot trees.

The diversity of fauna in the kingdom is very limited. There are approximately less than 70 mammal species in Lesotho, giving the country, by comparison, possibly the lowest mammal species diversity in the southern Africa region. The highlands supports a relatively low diversity of bird species.

The flora in the area is typical Eastern Mountain Region flora which covers the whole basaltic area. Most of the highland vegetation has been disturbed. River valleys, where soil is fertile have been converted to agricultural production. Many steep sided slopes have lost there vegetation and are now being cultivated. Throughout the highland and lowlands the natural vegetation is relied upon for grazing and have suffered critically from over-grazing.

The current environmental and social issues in Lesotho today are from problems associated with population pressure forcing settlement in marginal areas, overgrazing, severe soil erosion, soil exhaustion.

The Highland Water Project which controls, stores and redirects water for export to South Africa poses the single greatest environmental and social challenge facing Lesotho at the present time.

Lesotho is a signatory to many international treaties on biodiversity, climate change, desertification, marine life conservation, ozone layer protection and hazardous waste, to list a few.
5.0 DESCRIPTION OF THE POLICY, LEGAL, REGULATORY, AND ADMINISTRATIVE FRAMEWORKS

Three important developments in education characterize the sector since 1999 which have had a bearing on the design and implementation of the APL 2.

First, in 1999, the GoL introduced a Free Primary Education Policy. The policy was to be implemented in a phased fashion so that fees were to be abolished for one standard every year starting from 2000. In addition to abolishing fees, the policy also includes provision of a teaching learning materials package, school feeding, and maintenance. Immediately after the policy, primary enrollment increased by 12% in 2000 and much of this enrollment was in standard 1. The primary enrollment kept increasing in 2001 and 2002, though the rate or increase is much smaller compared to 2000.

Second, as an explicit strategy for improving the equity and efficiency of the sector budget allocation, ESDP II built in its design the development of a Medium Term Expenditure Framework for Education. Tremendous progress has been achieved in utilizing MTEF for purposes of budget preparation.

Thirdly in 2001, the MoE started the process of developing an Education Sector Strategic Plan. The draft has provided some basic input to the development of the MTEF but it is being finalized by government to provide policy guidelines for priority setting, budgeting and development of projections.

The Education Act 1995 is the statute that governs and regulates the administration of schools, teachers and all other matters relating to education in Lesotho.

Lesotho has a good environmentally regulatory framework enshrined in its Constitution of 1993 and in the National Environment Act 2001 and other local laws and bye-laws. The 1993 Constitution empowers parliament to make laws that provide measures intended to protect and preserve the environment from abuse, pollution and degradation, to manage the environment for sustainable development and to promote environmental awareness.

Lesotho is also a signatory to and has ratified all major international conventions.

The National Environment Act 2001 establishes The National Environment Council primarily as the supreme body in the formulation of policy for the purposes of the Act. The Lesotho Environment Authority (LEA) is to be established as required by the National Environment Act 2001 as the principal agency in Lesotho responsible for the management of the environment and to coordinate, monitor and supervise all activities in the field of the environment.

The Land Act 1979 states that all land in the kingdom is inalienable and is vested absolutely and irrevocably in the king in trust for the Basotho nation and provides for land to be held by other persons other than the state by either customary law or under any other tenure under the act.

The Local Government Act 1996 makes provision for the establishment of Local Authorities and for the purpose of Local Government in Lesotho and for matters
incidental thereto. Consequentially, this act establishes a District Planning Unit for each administrative district in Lesotho whose function is to provide planning services for councils within districts and to finalize the District Development Plan in conformity with the overall National Development Plan.

The Environment Act 2001


Section 9 of the act establishes of the Lesotho Environment Authority whose main functions shall be:

- the principal agency for the management of the environment.
- to co-ordinate, monitor and supervise all sectoral activities of the field of environment.
- be responsible for the implementation of the national environmental policy.
- ensure the integration of environmental concerns in national planning through coordination with all line ministries.
- initiate all legislative proposals, standards and guidelines on the environment in accordance with this Act.
- review and approve environmental impact assessments and environmental impact statements submitted in accordance with this Act.
- Identify projects, activities, policies and programmes or types of projects, policies or activities for which environmental impact assessments must be conducted under this Act.
- Undertake research, compile and disseminate information about the environment.
- Promote public awareness through formal and non formal education on environmental management.
- Monitor and assess projects or activities that are being carried out by relevant line Ministries (in this case the MoE) and bodies to ensure that the environment is not damaged by such projects or activities and that environmental management objectives are being adhered to and adequate early warning on impending environmental emergencies is given.
- Render advice and technical support, where possible, to bodies engaged in environment and natural resource management so as to enable them to carry out their responsibilities effectively.
- Establish such environmental criteria, guidelines, specifications or standards for the protection of the land, air, water, health and welfare of the population from environmental degradation.
- Investigate reports of pollution and other related matters.
- Inter alia.
Section 27 of this Act states that environmental impact assessment (EIA) shall be undertaken on projects and activities specified in the Schedule of this act. The construction of schools can be considered as included in article 2 (i), (j) and (k) of the Schedule of this Act.

The EIA process as required by this Act can be summarized as follows:

(i) Submission of a project brief/application to the LEA which must include; a brief description of the activity to be undertaken; a description of all the tasks to be performed—how, what, where and when; a description of the proposed methods to identify the environmental issues and alternatives; a plan of how the applicant proposes the public participation process—when, where, who, and how; and time and activity schedule setting out when the different tasks will be completed.

(ii) The LEA will make a decision based on the brief to grant a license.

(iii) If a license is not obtained on the basis of the brief, an Environmental Impact Statement must be submitted, including; a non-technical summary; a detailed description of the project and its environment impact; a detailed description of how the environment may be affected; a description of all alternatives identified, such as different locations and processes; a description of the public participation process and its results; other issues required by the LEA during the process.

(iv) The report will then be reviewed and assessed by the LEA. After the assessment a decision will be made indicating; (a) further information or investigations are required, (b) the project will be accepted and considered for licensing or (c) the project must be re-designed or rejected because some issues cannot be approved.

(v) Based on the environmental impact statement and other relevant data, the LEA will issue an Environmental Impact Assessment review report. The review report provides an evaluation of the statement, comparing the statements with this Act and standards. A set of conditions will be outlined and discussed with the applicant before the Environmental Impact Assessment License is issued.

(vi) A Record of Decision will be issued by the LEA, stating the conclusions of the Environmental Impact Review Process. The Record of Decision will usually be accompanied by the EIA review report and a set of conditions which the project has to comply with. The Record of Decision will be published in selected national papers and/or broadcasted on radio or television.

(vii) On Public Participation— the LEA will inform the applicant, if a public hearing is required. The intended process should be discussed with LEA. The public is thus involved in influencing the project.

At the time of preparation of the project the Lesotho Environment Authority was not yet established. To a larger extent, the functions and responsibilities of the Lesotho Environment Authority were being carried out by an overstretched, understaffed and under-funded National Environment Secretariat.
Administrative Framework

The country of Lesotho is a sovereign democratic kingdom. Its Ministry of Education will continue to be the Implementing Agency for the ESDP II APL 2 and the Directorate of Planning in the MoE through the Project Support and Coordination Unit (PSCU) will continue to support and manage the implementation of all project components and activities. The Education Facilities Unit (EFU) is a unit within the PSCU that will provide technical support to the PSCU in the implementation of all activities related to the construction program contained in the ESDP II APL 2.

The PSCU and EFU are headed by a Projects Coordinator and the EFU has four managers who are; (a) The Facilities Design Manager, whose job description requires the post to be occupied by an Architect (and who is in charge of the Architects Section, Transport Section and Administrative Section); (b) The Contracts Manager (who is in charge of the Contracts Section); (c) The Principal Procurement Officer (who is in charge of the Procurement Section) and (d) The Special Services Manager (who is in charge of the Special Services Section).

Administratively, Lesotho is divided into 10 districts, namely, Maseru (capital city), Mafeteng, Mohale's Hoek, Quthing, Qacha's Nek, Thaba Tseka, Mokhotlong, Butha-Buthe, Teyateyaneng, and Hlotse (Leribe).

The Administrative Head of each district is known as the District Administrator (DA).

The Districts are further divided into Local Authorities, which are sub divided into Municipal Councils, Urban Councils, Rural Councils and Community Councils.

There is established a District Planning Unit for each administrative district whose functions are, inter alia, to provide planning services for the Councils within its district and to finalize the District Development Plan consistent with the overall National Development Plan.

The Local communities will elect a steering committee to represent them.
6.0 DESCRIPTION OF THE WORLD BANK'S SAFEGUARD POLICIES

The World Bank Safeguard Policies are:

1. Environmental Assessment OP 4.01
2. Natural Habitats OP 4.04
3. Forests OP 4.36
4. Pest Management OP 4.09
5. Cultural Property OPN 11.03
6. Indigenous Peoples OD 4.20
8. Safety of Dams OP 4.37
9. Projects on International Waterways OP 7.50
10. Projects in Disputed Areas OP 7.60

In light of the type of project activities anticipated, the following World Bank Operational Policies will/may apply:

OP 4.01 Environmental Assessment
OP 4.12 Involuntary Resettlement

Project activities that trigger the policies on Safety of Dams, Natural Habitats, Forestry, Pest Management, Cultural Property, Indigenous Peoples, Projects on International Waters and Projects in Disputed areas would not be supported under the project. Included in Annex 5.0 is a summary of the World Bank Safeguard Policies which should be referred to during the environmental and social screening process when using the screening form in Annex 1

- **OP 4.01 Environmental Assessment**

This policy requires environmental assessment (EA) of projects proposed for Bank financing to help ensure that they are environmentally sound and sustainable, and thus to improve decision making. The EA is a process whose breadth, depth, and type of analysis depend on the nature, scale, and potential environmental impact of the sub project activities of ESDP II APL 2. The EA process takes into account the natural environment (air, water, and land); human health and safety; social aspects (involuntary resettlement, indigenous peoples, and cultural property) and transboundary and global environmental aspects.

The environmental and social impacts of the ESDP II APL 2 project will come from the construction activities of the schools, MoE Head Office and the Hostel Block of the Thaba Tseka Technical Institute that the ESDP II APL 2 will be financing. However, since the location of these schools will not be identified before appraisal of the project, the EA process calls for the GoL to prepare a Environmental and Social Management Framework (ESMF) report which will establish a mechanism to determine and assess future potential environmental and social impacts of the construction activities under the proposed ESDP II APL 2, and then to set out mitigation, monitoring and institutional
measures to be taken during implementation and operation of the sub projects to eliminate adverse environmental and social impacts, offset them, or reduce them to acceptable levels.

OP 4.01 further requires that the ESMF report must be disclosed as a separate and stand alone document in Sesotho by the Government of Lesotho and in English at the World Bank as a condition for Bank Appraisal of the ESDP II APL 2. The disclosure should be both in Lesotho where it can be accessed by the general public and local communities and at the Infoshop of the World Bank and the date for disclosure must precede the date for appraisal of the project.

The policy further calls for the ESDP II APL 2 project as a whole to be environmentally screened to determine the extent and type of the EA process. The ESDP II APL 2 has thus been screened and assigned a Category B

**Category B** projects are likely to have potential adverse environmental impacts on human populations or environmentally important areas – including wetlands, forests, grasslands, and other natural habitats – and are less adverse than those of category A projects. These impacts are site specific, few if any of them are irreversible, and in most cases mitigation measures can be designed more readily than for category A projects. The EA process for category B projects examines the potential negative and positive environmental impacts and recommends any measures needed to prevent, minimize, mitigate, or compensate for adverse impacts and improve environmental performance.

Therefore, this ESMF sets out to establish the EA process to be undertaken for implementation of project activities in the proposed ESDP II APL 2 project when they are being identified and implemented.

- **OP 4.12 Involuntary Resettlement**

Significant efforts are to be made in the design and screening stages of project activities to avoid impacts on people, land, property, including people’s access to natural and other economic resources, as far as possible. Notwithstanding, land acquisition, compensation and resettlement of people seem inevitable for some selected school sites. This social issue is of crucial concern to the Government of Lesotho and the Bank as its impact on poverty, if left unmitigated, is negative, immediate and widespread. Thus, a resettlement policy framework has been prepared by the government and approved by the bank in compliance with OP 4.12. This framework sets the guidelines for the resettlement plans that would have to be prepared for any land acquisition or impacts that triggers this policy. The resettlement plans would have to be submitted to the EFU for review and to the MoE for approval but would also have to be approved by the Bank before the construction is financed.

This policy would be triggered when a project activity causes the involuntary taking of land and other assets resulting in: (a) relocation or loss of shelter, (b) loss of assets or access to assets (c) loss of income sources or means of livelihood, whether or not the affected persons must move to another location.
The resettlement policy applies to all displaced persons regardless of the total number affected, the severity of the impact and whether or not they have legal title to the land. Particular attention should be paid to the needs of vulnerable groups among those displaced. The policy also requires that the implementation of the resettlement plans are a pre-requisite for the implementation/start of the construction to ensure that displacement or restriction of access does not occur before necessary measures for resettlement and compensation are in place. For chosen sites involving land acquisition, it is further required that these measures include provision of compensation and of other assistance required for relocation, prior to displacement, and preparation and provision of resettlement sites with adequate facilities, where required. In particular, the taking of land and related assets may take place only after compensation has been paid, and where applicable, resettlement sites, new homes, related infrastructure and moving allowances have been provided to displaced persons. For project activities requiring relocation or loss of shelter, the policy further requires that measures to assist the displaced persons are implemented in accordance with the project resettlement plans of action. The policy aims to have the displaced persons perceive the process to be fair and transparent.

OP 4.12 requires the RPF to be disclosed both in Lesotho and at the Bank before appraisal.

The provisions of both OP 4.01 and OP 4.12 apply to all components under the project, whether or not they are directly funded in whole or in part by the Bank. Therefore, even though the construction of the Head Office Complex for the Ministry of Education and the Construction of a new 100 bed student hostel for Thaba-Tseka Technical Institute (TTI), may be undertaken with funding from other sources within this project, the EA process and the RPF remain mandatory for the implementation of these activities, even though they may not be financed by the Bank.
7.0 PROPOSED INSTITUTIONAL FRAMEWORK FOR ENVIRONMENTAL AND SOCIAL MANAGEMENT

7.1 Background and Lessons Learned

The Projects Support and Coordination Unit (PSCU) of the Ministry of Education will support and manage the implementation of all project components and activities. The Education Facilities Unit of the PSCU will provide the required technical support for the school construction program and all other civil works.

The EFU is headed by the Projects Coordinator assisted by the Facilities Design Manage, Special Services Manager, Contracts Adviser, Contracts Manager, Construction Supervisor and a team of architects, engineers and technicians.

There is no one in the EFU whose job description includes environmental and social responsibilities as required by the ESMF.

The Lesotho Environment Authority (LEA) whose responsibility it is to be the principal agency in the Kingdom for the management of the environment, has to date not been set up. The roles and responsibilities of the LEA are being undertaken as best they can by the National Environment Secretariat (NES).

The NES is critically understaffed and is thus unable to fulfill its mandate. The NES has categorically stated that without technical assistance or some form of capacity building measure it would not be able to successfully undertake any additional responsibilities under this project.

7.2 Proposed Institutional Framework

The following institutional arrangements are recommended to address the issues presented above thereby enabling the sustainable execution of all measures identified in this ESMF. The recommendations are based on using the existing PSCU, EFU and NES administrative structure but to strengthen them by assigning new responsibilities to existing positions, putting an effective monitoring mechanism procedure in place and by providing training for those key positions assigned new responsibilities. The Steering Committees (SC’s) of local communities are assigned responsibilities and will also benefit from training.

Specifically:

- **Steering Committees (SC’s)**- are to be elected by their local communities and should consist of trainable people who ideally should be well respected individuals who command the respect of their communities. Women are especially encouraged to seek election to their SC’s. The roles of the SC include but not restricted to;

  - represent their communities on all matters required of them regarding the ESDP II APL2 project.
The Government of Lesotho

Environmental and Social Management Framework

Second Education Sector Development Project (ESDP II) APL Phase 2

- Request by submitting an application for a new school in their locality to the MoE.
- Register the names of all primary school going age children in the catchment villages, their ages and standards (i.e. grades) they will be in the following year.
- In close consultation with their communities propose suitable site for the new school in the locality.
- Screen and modify standard designs of new schools, incorporating mitigation measures based on identified adverse impacts.
- Act as liaison between the local community the MoE and EFU officials during the construction of the school regarding all other matters required in this ESMF including monitoring to ensure designed mitigation measures are respected during construction and during operation of the school.
- Commit the local community to binding contracts in cases such as preparation of resettlement and compensation plans.
- To ensure they make available for training, trainable members who would acquire the skills necessary to perform their responsibilities.
- To work with in a cooperative, supportive and reciprocal manner, service providers who would be appointed by the PSCU to work with them.

To successfully carry out these responsibilities the SC's will be trained as per the training program contained in Section 9 of this ESMF.

- The Education Facilities Unit (EFU) —will be responsible for advising the MoE through the PSCU on any and all technical decisions required to successfully implement the civil works activities in the ESDP II APL 2. Specifically, the EFU
  - will advice the PSCU on whether to approve for construction of a new school in a locality.
  - Will advice the PSCU on secondary schools which need to be expanded.
  - Will approve the selection of sites for the building of schools, new MoE Head Office, and the new 100 bed Hostel for TTI, based on submissions and recommendations from SC's and/or service providers, consistent with the requirements of OP 4.12 and the disclosed RPF.
  - Will check for compliance with the EA process contained in section 8 of this ESMF by the SC's and service providers/consultants. In effect the EFU will be the custodians of the requirements of the ESMF and the RPF.
  - Will be responsible for ensuring that the monitoring plan as contained in the individual submissions for civil works are implemented as stated therein and for the overall monitoring of the entire ESDP II APL 2 requirements as contained in section 10 of this ESMF.

To ensure that the EFU can undertake their responsibilities key people will be trained (see section 9). The individual responsibilities would then be assigned by the Projects Coordinator.
There is no need to employ additional staff as the present staffing levels are deemed adequate. All that is required for the existing staff to be trained and assigned additional/new responsibilities, so that the ESMF can be sustainably implemented.

- **The National Environment Secretariat (NES)** – the roles and responsibilities in this ESMF have been mostly assigned to the SC’s and the PSCU/EFU. However, the NES will perform two key roles:

1. An enforcement monitoring role as stated in Section 10.

2. Coordinate and implement the training program as stated in Section 9. NES would also benefit from training as per section 9.
8.0 PROPOSED SCREENING MECHANISM AND ENVIRONMENTAL CHECKLIST OF RISKS AND MITIGATION MEASURES

The sections below will illustrate specific steps involved in the environmental and social assessment process leading towards clearance and approval of the EA process for the project activities anticipated to have adverse environmental and social impacts. The steps incorporate guidelines from both the Lesotho Environment Authority (LEA) and the World Bank OP 4.01.

The project activities that are anticipated to have adverse environmental and social effects are;

(a) the construction and operation of new primary schools and expansion of facilities at secondary schools. This activity would be collectively referred to as construction of schools for the purposes of this EA process.

and

(b) the construction of MoE Head office and the construction of 100 bed hostel at Thaba Tseka Technical Institute TTI). These activities would be collectively referred to as construction of facilities for the purposes of this EA process.

The Construction of schools will be implemented by the Steering Committee (SC) of local communities. The construction of schools will be based on existing standard architectural school designs that are presently being used by the MoE. The construction of the schools will be done by MoE certified contractors appointed by the PSCU.

The Construction of facilities will be implemented by the Education Facilities Unit (EFU).

In applying these steps, with the assistance of service providers the implementers (i.e. the SC and EFU) will gain initial experience which will be invaluable to them when they assume responsibility for managing the mitigation measures involved in the implementation, operational and monitoring stages of the project activities. Therefore, under the proposed project, capacity will be developed at the level of the SC and EFU and their service providers1 to carry out the following EA process:

1) For Construction of Schools

(a) This process can only start after approval has been given by the MoE/World Bank to build a school in a particular local community.

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1 The service providers are local consultants who would be engaged by the EFU to work with SC’s to help them carry out their responsibilities for the process leading from making a request for a school, site selection, supervision of construction of the school, EA screening etc. The EFU will also require service providers in the form of consulting firms who would provide architectural and engineering services for design and supervision of the new MoE and TTI hostel facilities.
(b) Once a local community has been approved for a school construction, the SC will screen the standard school designs to identify adverse environmental and social impacts on their chosen land site by using the screening form in Annex 1.0 and the environmental and social checklist in Annex 2.0.

(c) Once these impacts are identified the various mitigation measures would also be identified from the use of the completed screening form and checklist. The SC will modify various aspects of the standard design to incorporate the required mitigation measures.

(d) The SC will re-screen the modified designs using the previously completed screening form and checklist to ensure that all impacts have been adequately identified and mitigated.

(e) Additionally, for situations where this screening process has identified that OP 4.12 is triggered, then the provisions of the Resettlement Policy Framework would apply. This would require that the SC chose another site that does not trigger OP 4.12 or maintain the site that triggers OP 4.12 but to prepare a resettlement and compensation plan (RAP) that is consistent with the provisions of the RPF.

(f) Throughout this screening process the SC would be assisted by service providers.

(g) Once the SC is satisfied that the modified designs are now environmentally and socially compliant, they would now submit their modified designs which must be accompanied by the site location plan, completed screening form, checklist and where applicable the RAP, to the EFU for acceptance.

(h) The EFU will review the submitted modified design to ensure that all environmental and social impacts have been identified and successfully mitigated based on use of the screening form and checklist. If the screening form has any "Yes" entries, or evidently unjustified "No" entries, the application would need to adequately explain and demonstrate from the modified design that the issue has been managed to avoid unacceptable adverse effects/impacts. If this is the case then the EFU will give a conditional approval for construction to begin based on the following conditions:

- The complete implementation of the Resettlement and Compensation Plan prepared consistent with the RPF where OP 4.12 has been triggered.
- The Construction Contract Documents (i.e. the works and materials specifications, drawings, bills of quantities, contract conditions, etc.) are made consistent with the modified designs.
- That a local service provider assist the SC to supervise the construction process.
If the EFU finds that the submitted modified design is not consistent with the requirements of the screening form and checklist, then the SC would be requested to make additional modifications and/or choose other sites until it is consistent whereby approval would then be given as per (h) above.

Any proposed design that does not comply with the requirements of the Environment Act 2001, LEA requirements and the World Bank Policy OP 4.01 on Environmental Assessment will not be cleared for approval/construction.

The process is designed to ensure that the environmental and social assessment process is part of and conducted during the planning stages with full participation of the local community, thereby ensuring that project activities are environmentally and socially sustainable.

2) For Construction of Facilities

(a) The head office construction is likely to be a fairly large operation to be located in the heart of the central business district in Maseru, costing well in excess of a few million United States dollars. This activity is classified as a B using the classification of OP 4.01 explained in section 6 of this report. Therefore, this would require that an Environmental and Social Impact Assessment be carried out as part of the design process. The issues cannot be handled by use of a simple screening form and checklist.

(b) The carrying out of the EA will be part of the Terms of Reference of the Consulting Firm of Architects and Engineers who would be selected to design the building to ensure that the identification of impacts and their mitigation is part and parcel of the planning and design process, thus ensuring that the final design is environmentally sustainable and sound. The next stages of the screening and approval process will be determined during negotiations between the firm and the MoE as this will be a fairly large undertaking. However, any proposed design that does not comply with the requirements of the Environment Act 2001, LEA requirements and the World Bank Policy OP 4.01 on Environmental Assessment and OP 4.12 on Involuntary Resettlement will not be cleared for approval/construction. To satisfy this requirement, the ESIA prepared by the design consultant for the Head office building would have to be submitted to the World Bank for approval. A draft TOR for the preparation of an ESIA for the MoE Head Office is attached in Annex 3.0.

(c) Whereas, for the Construction of the 100 bed Hostel at TTI, even though the cost is expected to be much greater than the cost of construction of a new primary school, its environmental and social impacts are expected to be of relatively the same severity, as the design is to be simple and of low cost maintenance like the existing hostel block at TTI, therefore, the environmental and social impact on both potential sites from the construction of TTI 100 bed hostel facility would be identified and
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successfully mitigated from the use of the screening form in Annex 1 and the checklist in Annex 2.

(d) The EFU who would act as the implementers for the TTI and engage the services of a consulting firm of architects and engineers to design the hostel block. The Terms of Reference of this firm of service providers would include the use of the screening form and checklist to identify any environmental and social impacts from their design and to incorporate the appropriate mitigation measures into the design. The service provider will on completion of his design submit it with the completed screening form, checklist and recommendation on which site to use, to the EFU for review and approval.

(e) The EFU will review the submitted design to check for compliance with the requirements of the screening form and checklist and thus confirm that the design is environmentally acceptable.

(f) Any proposed design that does not comply with the requirements of the Environment Act 2001, LEA requirements and the World Bank Policy OP 4.01 on Environmental Assessment and OP 4.12 on Involuntary Resettlement will not be cleared for approval/construction.

Environmental Management Plan (EMP): SC design proposals must contain as part of their application an EMP that will consist of a set of monitoring measures to be taken during the implementation and operation of the school to ensure that mitigation measures identified in the modified standard designs are built as designed and remain functional in the post construction stage (i.e. when the school is being used). The EMP should also include the actions needed to implement these measures, including the following features:

Monitoring: Environmental and social monitoring during the construction and operational phase of the school, in order to measure the success of the mitigation measures. Specifically:

• The need for on site construction supervision.

• periodic inspection of facilities post construction stage (i.e when the school is operational) to ensure that the site has regular water supply, toilets are working, waste material is disposed of as required, etc. and that regular maintenance (malfunctions/faults are repaired in a timely manner) is occurring.

The ESIA report for the new head office of the MoE should also contain an EMP to address these issues (included in Annex 3.0 in the TOR for the MoE Head office ESIA).

Public Consultations: Public consultations are critical in preparing an effective and sustainable request for school, land identification and selection, etc. This requirement supports the participatory planning process that is required by legislation in Lesotho. The
first step is to hold public consultations with the local communities and all other interested/affected parties. These consultations should identify key issues and determine how the concerns of all parties will be addressed in the terms of reference of the design of project activities. To facilitate meaningful consultations, the local governments will assist the MoE to provide all relevant material and information concerning the school construction program in the ESDP II APL 2 in a timely manner prior to the consultation, in a form and in Sesotho so that they are understandable and accessible to the groups being consulted. Depending on the public interest in the potential impacts of the project activities, a public hearing may be requested to better convey concerns. To ensure that an appropriate public consultation mechanism is developed, the checklist in Annex 2 includes such a requirement. Once the project activities have been reviewed and cleared by the EFU, the SC’s will inform the public about the results of the review. This approach would be consistent with the Bank’s OP 4.01 Environmental Assessment as well as Lesotho’s efforts to enhance its participatory planning process.

This process has already begun. During the preparation of this ESMF the consultant undertook an eleven days study tour in Lesotho during which discussions were held with the Management of the Projects Support Coordination Unit (PSCU) and officials of the Education Facilities Unit and National Environment Secretariat. The consultant also attended briefing meetings with potential service providers held by the PSCU for the School Mapping Exercise and the Design of the MoE Head office and visited the potential sites for the construction of the MoE Head office. Field visits were also conducted in Thaba Tseka and Maseru Districts. At Thaba Tseka District, the consultant visited the Thaba Tseka Training Institute where a meeting was held with the acting Director General of the Institute and was shown around the two potential sites for the construction of the 100 bed Hostel facility and toured the existing hostel on campus. In Thaba Tseka District, specifically in Mohlakeng Village, the consultant participated in a sensitization meeting held with local communities and organized by the Supervisor of Government Schools, who was on a country wide tour sensitizing communities on the education for all policy adopted by the GoL. During this sensitization meeting, the consultant met with around 100 participants from the local communities and briefed them on the ESDP 2 APL 2 and on their responsibilities and roles under the project in general but more so on the ESMF and RPF. The community response was very positive and they seemed keen to play their role. The meeting was held on the Mohlakeng Primary School grounds, which contained only two tents that served as shelter from the elements. The consultant held many such meetings throughout potential school sites in the Thaba Tseka and Maseru Districts such as at Masite Hatlhakanelo, Maseqobela, Senyotong, Mosletoa and Tsepo. During these visits the consultant meet with the chief, school teachers and students. These sites were potential school sites for APL 2 but were at present operating a school under tents. The consultant also visited and held meetings at the Mosotho Primary School a school that was financed during APL 1.

The ESMF and RPF will be translated into Sesotho by the PSCU and copies in English and Sesotho would be available at the following locations;

- Infoshop of the Word Bank.
- Maseru and District Offices of the National Environment Secretariat
- Office of the PSCU in Maseru
- Office of the EFU in Maseru
Office of the District Administrator in each district.
- Home of the Local Chief of each community that is approved for a school.
9.0 PROPOSED CAPACITY BUILDING MEASURES AND COSTS ESTIMATES

Capacity building for environmental and social management

As described in an earlier section of this framework, project component 9 subcomponent (e) will finance activities to strengthen the institutional capacity of the Education Facilities Unit (EFU) in monitoring, evaluation, research and policy development and sub component (g) by MoE staff training in strategic areas.

For the purposes of this ESMF therefore, capacity building will be targeted at the Education Facilities Unit and at the level of the local committee's.

At the EFU the following staff would be provided with training;

- Facilities Design Manager
- Special Services Manager
- Contracts Adviser
- Contracts Manager
- Construction Supervisor
- Architectural Technicians
- Survey Technicians

The training of EFU staff would take the form of a week long training workshop held nationally based on the proposed training program below to equip the staff of the EFU with the required skills to implement this ESMF thereby ensuring that the project activities of the ESDP II APL 2 are environmentally sustainable. The below training program is consistent with the needs of the EFU to meet their responsibilities as stated in Section 7 of this ESMF.
### Proposed Training Program For EFU STAFF

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<thead>
<tr>
<th>Environmental and Social assessment process</th>
<th>3 days</th>
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<tbody>
<tr>
<td><strong>Review of Standard School Designs</strong></td>
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<td><strong>Screening process</strong></td>
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<td><strong>Identification of Impacts</strong></td>
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<td><strong>Design of Appropriate Mitigation Measures</strong></td>
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<tr>
<td><strong>Rationale for using Screening form and Environmental and Social Checklists</strong></td>
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<tr>
<td><strong>Preparation of terms of reference for carrying out ESIA</strong></td>
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<td><strong>How to review and approve project proposals</strong></td>
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<td><strong>The importance of public consultations in the EA process</strong></td>
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<td><strong>How to monitor project implementation</strong></td>
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<tr>
<td><strong>Case studies</strong></td>
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### Environmental and Social policies, procedures and guidelines | 2 days

- Review and discussion of Lesotho’s environmental policies, procedures, and legislation.
- Review and discussion of the Bank’s safeguards policies.
- Review of ESMF, ESIA, RPF and Resettlement Plan.
- Collaboration with institutions at the local, regional and national levels, e.g. national environment secretariat.

### Selected topics on environmental protection | 1 day

- Land Use, Land Degradation and Soil Erosion
- Flood protection
- Waste disposal
- Ground and Surface Water management

For the local communities, all members of their Steering Committees would be trained based on the training program below to successfully implement their roles and responsibilities as required in this ESMF in particular but also the ESDP II APL 2 project in generally. Subsequently, they would then train members of their communities on the issues raised in the training program. By so doing significantly increasing environmental and social awareness throughout the kingdom as schools are built.

The below training program is consistent with the needs of the SC to meet their responsibilities as stated in Section 7 of this ESMF.
Proposed Training Program For SC Staff

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<thead>
<tr>
<th>Environmental and Social assessment process</th>
<th>Duration</th>
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<tbody>
<tr>
<td>Review of Standard School Designs</td>
<td>1 day</td>
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<td>Screening process</td>
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<td>Use of Screening Form and Environmental and Social Checklists to identify impacts and mitigation measures</td>
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<td>How to monitor project implementation</td>
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<td>Case studies</td>
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<tr>
<th>Environmental and Social policies, procedures and guidelines</th>
<th>Duration</th>
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<tr>
<td>Preparation of application for new school</td>
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<td>Review of ESMF</td>
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<td>Land screening for site selection</td>
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<td>Use of RPF</td>
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<td>Preparation and Implementation of Resettlement Plan.</td>
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<tr>
<th>Selected topics on environmental protection</th>
<th>Duration</th>
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<tr>
<td>Land Use, land degradation and Soil Erosion in their local community</td>
<td>1 day</td>
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<tr>
<td>Safe management of waste disposal and implications on public health.</td>
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<td>Environmental Protection of Water Sources.</td>
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Training Rationale

1. **Training of EFU Staff** - The training of EFU staff would be done by a suitably qualified international consultant.

2. **Training of NES Trainers** - National Environment Secretariat (NES) trainers would be trained by the same international consultant in 1. above.

3. Trained NES trainers will now train SC’s on a “as is required “ basis.

4. **Training of Service Providers** - At the moment it is envisaged that the capacity in the local communities to provide service providers who will be required to work with SC’s will be non existent or minimal. Therefore, to significantly build local capacity, NES trainers will identify trainable people drawn primarily from members of civil society in the local communities, local NGO’s and public service workers who would then be trained by the NES trainers to become service providers to the SC’s providing technical assistance to assist fulfill their responsibilities as outlined in Section 7.
Cost estimates

The costs estimates are based on the assumption that the training program for SC staff and trainers of service providers will be held at the regional levels; resource persons are likely to come from other parts of the country and therefore will require travel allowances; participants will come from the local community and attend during the day only but will receive a per diem. These estimates include an allowance for travel expenses and all costs of the international consultant. It is proposed that the training program for the SC staff will be implemented four times a year, at least once in each quarter in each district over the first two years of the project cycle and complimentary the school construction program. The training program for the EFU staff would be done once, within two months of project effectiveness.

The Total Training Budget is estimated at US$75,000.
10.0 MONITORING INDICATORS AND PLAN WITH COSTS

Responsibilities for Monitoring and Evaluation of the Mitigation Measures would be assigned as follows:

**Education Facilities Unit (EFU)** – The EFU will be responsible for monitoring the environmental and social screening process carried out by the SC’s and for the TTI. The EFU will also be responsible for monitoring the EA process for the MoE head office with support from the National Environment Secretariat. Details of the screening processes are outlined earlier in this report.

**Steering Committee’s (SC’s)** – will be responsible for monitoring of (i) the environmental and social assessment work to be carried out on its behalf by service providers; (ii) overseeing the implementation of the resettlement plans. (iii) the supervision of the civil works contractor during the construction process. (iv) operations and maintenance of the school facilities when handed over to the local community after construction. The SC will be assisted in performing these monitoring duties by their service providers.

**National Environment Secretariat (NES)** - will perform an enforcement monitoring role supported by the EFU (who would perform a self monitoring role) with particular focus on monitoring cumulative impacts of the school construction program on a National level and to ensure that individual mitigation measures are effective at the cumulative and national level.

Monitoring activities by the EFU, SC’s and NES will be performed periodically.

The arrangements for monitoring would fit the overall monitoring plan of the entire ESDP II APL 2 project which would be through the PSCU of the Ministry of Education.

The objective for monitoring are two fold.

1) to alert project authorities and to provide timely information about the success or otherwise of the EA process outlined in this ESMF in such a manner that changes to the system can be made if required.

2) to make a final evaluation in order to determine whether the mitigation measures designed into the project activities have been successful in such a way that the pre-project environmental and social condition has been restored, improved upon or worst than before.

A number of indicators would be used in order to determine the status of affected people and their environment (land being used compared to before, number of schools in a district compared to before, level of participation in project activities compared to before, how many kids in school compared to before, health standards, how many clean water sources than before, how many people employed than before etc). Therefore, the projects EA process will set three major socio-economic goals by which to evaluate its success:
SECOND EDUCATION SECTOR DEVELOPMENT PROJECT (ESDP II) APL PHASE 2

- Affected individuals, households, and communities are able to maintain their pre-project standard of living, and even improve on it;
- Has the pre-project environmental state of natural resources, bio-diversity and flora and fauna, been maintained or improved upon, and
- The local communities remain supportive of the project.

In order to assess whether these goals are met, the project will indicate parameters to be monitored, institute monitoring milestones and provide resources necessary to carry out the monitoring activities.

The following parameters and verifiable indicators will be used to measure the EA process, mitigation plans and performance;

**For the EA process the following indicators**;

- Number of people on the steering committees (SC's) who have successfully received EA training in screening methods etc.; evaluate the training content, methodology and trainee response to training through feedback.
- Numbers of women trained; assess understanding of the need for the EA process as a tool for sustainable development.
- Number of SC's who have adopted the EA process as required by ESDP II APL 2; evaluate the rate of adoption.
- Number of school construction projects screened compared to how many local communities approved for a school.
- In how many SC's planning stages is the EA checklist and screening form applied?; Are the numbers increasing and at what rate?
- How has the adoption of the EA requirements improved the environmental health and bio-physical state of the communities using/affected by the project.
- What are the main benefits that members derive from the use of the EA process?
  - Economic Benefits (i) Increase in achievement of school construction projects adopting EA guidelines (ii) Increase in revenue for SC's resulting from adoption of EA guidelines, compared with conventional practices.
  - Social Benefits – improvement in the environmental health status of cash crop farmers
  - Environmental Benefits (i) improvement in the sustainable use of Lesotho’s natural resources.
- Efficiency of new built schools maintenance and operating performance.
- How many completed schools have their toilet facilities in good working condition one year after completion.
- How many schools have implemented an effective and working facilities maintenance program.
- Overall assessment of (i) activities that are going well (ii) activities that need improvements and (iii) remedial actions required.
- Is the screening process identified in this ESMF working well.
- Final Question: Based on the performance of the school construction program review, what, if any changes to the ESMF or RFP, and additional
training capacity building, are required to improve the performance of the ESMF and the RPF implementation.

Capacity Development and Cost of Carrying out the EA process.

In order to assist the SC's and the EFU in strengthening their environmental assessment capacity, it will be necessary to recruit trained service providers to be funded under component 9 of the project. A breakdown of the costs of the service providers is given below.

SC's: The PSCU will recruit qualified service providers to assist the SC's in carrying out their responsibilities such as (i) environmental and social screening to identify adverse impacts, (ii) modifying of standard designs to incorporate required mitigation measures, (iii) prepare resettlement plans where applicable, monitoring of mitigation measures and implement the EA process.

EFU's: The PSCU will recruit qualified service providers to assist the EFU in fulfilling its responsibilities, such as review new school project design and application and the EA process SC's have gone through, resettlement plans, environmental review, monitoring etc.

The costs to be incurred will be as follows:

Environmental Assessment process of new school construction projects. As recommended in this ESMF, SC's assisted by service providers will screen their own designs/applications before submitting them for approval to the EFU (see section 8). The total cost for EA is estimated at $50,000.

Total cost of carrying out EA process : $50,000

Resettlement Plans. The preparation of resettlement plans and social assessments will be carried out by qualified service providers on behalf of the SC's. Provision would be made under this project in the EFU to support this work. It is estimated that 10% of new school projects or 20, may require resettlement plans; that it takes about 15 days to prepare a resettlement plan and related studies; at a rate of $35/day, the preparation of the 20 resettlement plans will cost $10,500.

Total cost of carrying out Resettlement Plan: $10,500
The Environmental and Social Screening Form (ESSF) has been designed to assist in the evaluation of design proposals for the new school building program and the 100 bed hostel facility at TTI. The form is designed to place information in the hands of implementers and reviewers (SC's and EFU) so that impacts and their mitigation measures, if any, can be identified and/or that requirements for further environmental analysis be determined.

The ESSF contains information that will allow reviewers to determine the characterization of the prevailing local bio-physical and social environment with the aim to assess the potential project impacts on it. The ESSF will also identify potential socio-economic impacts that will require mitigation measures and or resettlement and compensation.

Name of Village/Town/Area in which School is to be Built:

Name of Contact Person of Steering Committee:

Name of District where school is to be built:

Name of Approving Authority: EFU

Name, job title, and contact details for the person who is responsible for filling out this form.

Name:

Job Title:

Telephone number:

Fax number:

E-Mail address:

Date:

Signature:
1. Brief School/Project Description

Please provide information on the number of students who will attend the school, the range of their ages, and the standards they will be in, in the following year. Also provide area of acquired land and approximate size of total building floor areas.

2. The Natural Environment

(a) Describe the land formation, topography, vegetation in/adjacent to the Project area

(b) Estimate and indicate where vegetation might need to be cleared

(c) Are there any environmentally sensitive areas or threatened species (specify below) that could be adversely affected by the project?

   (i) Intact natural forests Yes____No____

   (ii) Riverine forest Yes____No____

   (iii) Wetlands (lakes, rivers, seasonally inundated areas) Yes____No____

   (iv) How far is the nearest Wetlands((lakes, rivers, seasonally inundated areas)? ____________ km

   (v) Habitats of endangered species for which protection is required under Lesotho law and/or international agreements. Yes____No____

   (vi) Others (describe). Yes____No____
3. Rivers and Lakes Ecology

Is there a possibility that, due to construction and operation of the project, the river and lake ecology will be adversely affected? Attention should be paid to water quality and quantity; the nature, productivity and use of aquatic habitats, and variations of these over time.

Yes______ No_______

4. Protected areas

Does the project area (or components of the project) occur within/adjacent to any protected areas designated by government (national park, national reserve, world heritage site etc.)

Yes______ No_______

If the project is outside of, but close to, any protected area, is it likely to adversely affect the ecology within the protected area areas (e.g., interference with the migration routes of mammals or birds)

Yes______ No_______

5. Geology and Soils

Based upon visual inspection or available literature, are there areas of possible geologic or soil instability (erosion prone, landslide prone, subsidence-prone)?

Yes______ No_______

Based upon visual inspection or available literature, are there areas that have risks of large scale increase in soil salinity?

Yes______ No_______

6. Landscape/aesthetics

Is there a possibility that the project will adversely affect the aesthetic attractiveness of the local landscape?

Yes______ No_______
7. Historical, archaeological or cultural heritage site.

Based on available sources, consultation with local authorities, local knowledge and/or observations, could the project alter any historical, archaeological or cultural heritage site or require excavation near same?

Yes____ No____

8. Resettlement and/or Land Acquisition

Will involuntary resettlement, land acquisition, or loss, denial or restriction of access to land and other economic resources be caused by project implementation?

Yes____ No____

If “Yes” Involuntary Resettlement OP 4.12 is triggered. Please refer to RPF for appropriate mitigation measures to be taken.

9. Loss of Crops, Fruit Trees and Household Infrastructure

Will the project result in the permanent or temporary loss of crops, fruit trees and household infra-structure (such as granaries, outside toilets and kitchens, etc)?

Yes____ No____


Will the operating noise level exceed the allowable noise limits?

Yes____ No____

11. Solid or Liquid Wastes.

Will the project generate solid or liquid wastes?

Yes____ No____

If “Yes”, does the project include a plan for their adequate collection and disposal?

Yes____ No____

12. Public Consultation

Has public consultation and participation been sought?

Yes____ No____
If “Yes”, describe briefly the measures taken to this effect.

<table>
<thead>
<tr>
<th>Environmental and Social Components</th>
<th>Impacts</th>
<th>Mitigation Measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Physical Environment</td>
<td></td>
<td>Refer to Annex 5.0 for summary of safeguard policies.</td>
</tr>
<tr>
<td>Soils</td>
<td><img src="https://example.com/impacts_and_measures" alt="List of impacts and mitigation measures" /></td>
<td>Construction in dry season; protection of soil surfaces during construction; re-vegetation or physical stabilization of erodible surfaces. Land restoration measures. Adequate protection from livestock entry by fencing the site perimeters. Control and daily cleaning at construction sites; Provision of adequate waste disposal services. Proper disposal of chemicals and other hazardous materials. Dust control by water, appropriate design and siting, restrict construction to certain times. Appropriate and suitable storage of building materials on site.</td>
</tr>
<tr>
<td>Water Resources</td>
<td><img src="https://example.com/impacts_and_measures" alt="List of impacts and mitigation measures" /></td>
<td>Special attention to drainage; prevention of erosion; consideration of alternative alignments; retention ponds; proper disposal of oil and other hazardous materials Siting of Latrines at safe distances from wells and using closed systems for sewage drainage.</td>
</tr>
<tr>
<td>Air Quality</td>
<td><img src="https://example.com/impacts_and_measures" alt="List of impacts and mitigation measures" /></td>
<td>Dust control by water or other means. Ensure designs incorporate large windows covered by</td>
</tr>
</tbody>
</table>
## THE GOVERNMENT OF LESOTHO

### ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

### SECOND EDUCATION SECTOR DEVELOPMENT PROJECT (ESDP II) APL PHASE 2

- Poor air circulation/quality in classrooms.
- Long overhanging roofs. Position windows for natural cross ventilation. Use appropriate roofing materials with suitable insulation. Restrict construction to certain hours

### Acoustic Environment
- Noise disturbance

### Bio-physical Environment

#### Natural Habitats
- Disturbance of natural habitats
- Disturbance to protected areas

#### Fauna and Flora
- Disruption or destruction of wildlife
- Threats to rare and endangered species

### Social Environment

#### Aesthetics and Landscape
- Marred landscapes
- Debris

#### Historical/Cultural Sites
- Degradation of sites
- Disturbance to structures

#### Human Health
- Transport of hazardous substances
- Traffic accidents
- Pedestrian accidents

#### Human Communities
- Involuntary resettlement
- Loss of crops, buildings, property, or economic livelihood

Refer to Annex 5.0 for summary of safeguard policies.

Minimize loss of natural vegetation during construction; alternative sites, various special measures for sensitive species

Refer to Annex 5.0 for summary of safeguard policies.

Restoration of vegetation; cleanup of construction sites

Alternative alignments and/or sites
Special measures to protect cultural heritage sites

Regulation of transport of materials
Safety designs (signage)
Ensure availability of clean potable water for use in latrines, canteens, and for drinking.
Use of appropriate building materials. No asbestos etc.

Prepare Resettlement and Compensation Plans consistent with disclosed RPF as per OP 4.12
Annex 3.0

Draft Terms of Reference for the Preparation of an Environmental and Social Impact Assessment (ESIA) for the MoE Head Office Building.

1. Review the biophysical characteristics of the planned location of the headquarters building.
2. Assess the potential environmental and social impacts due to the construction of the headquarters building and propose appropriate mitigation measures.
3. Propose measures to handle construction-related wastes effectively.
4. Review the national environmental and social policies, legislation, regulatory and administrative frameworks in conjunction with the World Bank’s safeguard policies, and make recommendations accordingly.
5. Assess the existing environmental management and assessment capacity as well as the capacity to implement the proposed mitigation measures, and make recommendations as appropriate, including potential capacity building and training needs and their costs.
6. Propose institutional arrangements for environmental management, including monitoring indicators, and a costed monitoring plan as appropriate.
7. Prepare an Environmental Mitigation Plan and suggest a few monitoring indicators.
Annex 4.0

Lists of Key Individuals / Firms Contacted

MoE - Director of Planning
MoE - Chief Education Officer
PSCU - Project Coordinator, Dr. Kinandu Muragu
PSCU - Financial Controller, Puseletso Ntiisa-Letuka
EFU - Facilities Design Manager, Mr. Mokete K. Mokete
EFU - Contracts Adviser
EFU - Contracts Manager
EFU - Special Services Manager, Mr. Ekabang Koma
EFU - Education Officer - Mr. Hape Moeketsi
EFU - Systems - Ms. Motseng Maema
NES - Principal Environment Officer, EIA, Ms. Bernice Puling
TTI - Acting Director General, Mr. Sello Lenkoane
Supervisor of Government Schools – Skhulumi Ntsodole
Education Officer - Thaba Tseka District, Mr. Motlatsi Mosoang
Ma Tlhakanelo Tlhakanelo Moshoeshoe – Chief of Masite Hatlhakanelo
Matlaselo Tumo – Chief of Maseqobela
Kankelesoe Letsie - Chief of Mohlakeng
Mamakhothatsa Kibi – Principal, Mohlakeng Primary school
Maposholi Posholi – Principal, Mosotho Primary School
Matsoeberane Noko – Head Teacher, Mosletoa Primary School
Khatlisi Khatlisi – Teacher, Mosletoa Primary School
Malefu Makhaola – Teacher, Mosletoa Primary School
Relbone Makula – Teacher, Mosletoa Primary School
Mabatho Mohapi – Head Teacher, Tsepo Primary School

Parents and other members of Local Communities at various Primary School sites.
Annex 5.0
World Bank Environmental and Social Safeguard Policies
Summary

- **Environmental Assessment (OP 4.01).** Outlines Bank policy and procedure for the environmental assessment of Bank lending operations. The Bank undertakes environmental screening of each proposed project to determine the appropriate extent and type of EA process. This environmental screening process will apply to all sub-projects to be funded by ESDP II.

- **Natural Habitats (OP 4.04).** The conservation of natural habitats, like other measures that protect and enhance the environment, is essential for long-term sustainable development. The Bank does not support projects involving the significant conversion of natural habitats unless there are no feasible alternatives for the project and its siting, and comprehensive analysis demonstrates that overall benefits from the project substantially outweigh the environmental costs. If the environmental assessment indicates that a project would significantly convert or degrade natural habitats, the project includes mitigation measures acceptable to the Bank. Such mitigation measures include, as appropriate, minimizing habitat loss (e.g. strategic habitat retention and post-development restoration) and establishing and maintaining an ecologically similar protected area. The Bank accepts other forms of mitigation measures only when they are technically justified. Should the sub-project-specific EAs indicate that natural habitats might be affected negatively by the proposed sub-project activities, such sub-projects will not be funded under the ESDP II project.

- **Pest Management (OP 4.09).** The policy supports safe, effective, and environmentally sound pest management. It promotes the use of biological and environmental control methods. An assessment is made of the capacity of the country’s regulatory framework and institutions to promote and support safe, effective, and environmentally sound pest management. This policy will most likely not apply to ESDP II.

- **Involuntary Resettlement (OP 4.12).** This policy covers direct economic and social impacts that both result from Bank-assisted investment projects, and are caused by (a) the involuntary taking of land resulting in (i) relocation or loss of shelter; (ii) loss of assets or access to assets, or (iii) loss of income sources or means of livelihood, whether or not the affected persons must move to another location; or (b) the involuntary restriction of access to legally designated parks and protected areas resulting in adverse impacts on the livelihoods of the displaced persons. The ESMF report discusses the applicability of this policy in detail.

- **Indigenous Peoples (OD 4.20).** This directive provides guidance to ensure that indigenous peoples benefit from development projects, and to avoid or mitigate adverse effects of Bank-financed development projects on indigenous peoples. Measures to address issues pertaining to indigenous peoples must be based on the informed participation of the indigenous people themselves. Sub-projects that would have negative impacts on indigenous people will not be funded under ESDP II.

- **Forests (OP 4.36).** This policy applies to the following types of Bank-financed investment projects: (a) projects that have or may have impacts on the health and quality of forests; (b) projects that affect the rights and welfare of people and their level of dependence upon or interaction with forests; and (c) projects that aim to bring about changes in the management, protection, or utilization of natural forests or
plantations, whether they are publicly, privately, or communally owned. The Bank does not finance projects that, in its opinion, would involve significant conversion or degradation of critical forest areas or related critical habitats. If a project involves the significant conversion or degradation of natural forests or related natural habitats that the Bank determines are not critical, and the Bank determines that there are no feasible alternatives to the project and its siting, and comprehensive analysis demonstrates that overall benefits from the project substantially outweigh the environmental costs, the Bank may finance the project provided that it incorporates appropriate mitigation measures. Sub-projects that are likely to have negative impacts on forests will not be funded under ESDP II.

- **Cultural Property (OPN 11.03).** The term "cultural property" includes sites having archeological (prehistoric), paleontological, historical, religious, and unique natural values. The Bank’s general policy regarding cultural property is to assist in their preservation, and to seek to avoid their elimination. Specifically, the Bank (i) normally declines to finance projects that will significantly damage non-replicable cultural property, and will assist only those projects that are sited or designed so as to prevent such damage; and (ii) will assist in the protection and enhancement of cultural properties encountered in Bank-financed projects, rather than leaving that protection to chance. The management of cultural property of a country is the responsibility of the government. The government’s attention should be drawn specifically to what is known about the cultural property aspects of the proposed project site and appropriate agencies, NGOs, or university departments should be consulted; if there are any questions concerning cultural property in the area, a brief reconnaissance survey should be undertaken in the field by a specialist. ESDP II will not fund sub-projects that will have negative impacts on cultural property.

- **Safety of Dams (OP 4.37).** For the life of any dam, the owner is responsible for ensuring that appropriate measures are taken and sufficient resources provided for the safety to the dam, irrespective of its funding sources or construction status. The Bank distinguishes between small and large dams. Small dams are normally less than 15 m in height; this category includes, for example, farm ponds, local silt retention dams, and low embankment tanks. For small dams, generic dam safety measures designed by qualified engineers are usually adequate. This policy most likely will not apply to ESDP II.

- **Projects on International Waterways (O 7.50).** The Bank recognizes that the cooperation and good will of riparians is essential for the efficient utilization and protection of international waterways and attaches great importance to riparians making appropriate agreements or arrangement for the entire waterway or any part thereof. Projects that trigger this policy include hydroelectric, irrigation, flood control, navigation, drainage, water and sewerage, industrial, and similar projects that involve the use or potential pollution of international waterways. This policy most likely will not apply to ESDP II.

- **Disputed Areas (OP/BP/GP 7.60).** Project in disputed areas may occur the Bank and its member countries as well as between the borrower and one or more neighbouring countries. Any dispute over an area in which a proposed project is located requires formal procedures at the earliest possible stage. The Bank attempts to acquire assurance that it may proceed with a project in a disputed area if the governments concerned agree that, pending the settlement of the dispute, the project proposed can go forward without prejudice to the claims of the country having
a dispute. This policy is not expected to be triggered by sub-projects. This policy is unlikely to be triggered by sub-projects to be funded by ESDP II.
Annex 6.0

EA Procedures for the Headquarters Building

Step 1: Screening

To determine the depth of EIA required, potential impacts in the following areas need to be considered:

- Social issues
- Health issues
- Protected and gazetted areas
- Cultural heritage, archaeological sites
- Existing natural resources such as forests, soils, wetlands, water resources
- Wildlife or endangered species' habitats

Step 2: Scoping

To identify the relevant environmental issues, this step determines:

- Level of detail required for the EA
- Extent of the area to be covered in light of the potential impact zones
- Timeframe for the EA based on the potential impact zones
- Sequencing and scheduling of the various EA tasks
- Preliminary budgets

Step 3: Preparation of Terms of Reference for the Headquarters Building

Based on the screening and scooping results, EA terms of reference will be prepared. The EIA will be conducted by a consultant, and the report should have the following format:

- Description of the study area
- Description of the pilot investment
- Description of the environment
- Legislative and regulatory considerations
- Determination of the potential impacts of the proposed pilot investments
- Public consultations process
- Development of mitigation measures and a monitoring plan, including cost estimates

Step 4: Review and Clearance of the EA Report

The EFU will (a) review and clear the pilot investment EIA report, and (b) inform the public about the EA results. The EFU will be furthermore responsible for overseeing the implementation of the EA recommendations.
### Annex 7.0

#### Environmental Mitigation Plan for ESDP II

<table>
<thead>
<tr>
<th>Project Activities</th>
<th>Mitigation Measures</th>
<th>Implementing Agencies</th>
<th>Monitoring Responsibility</th>
<th>Timing</th>
<th>Costs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction of schools, hostel,</td>
<td>Environmental and social screening</td>
<td>SC for Schools EFU for Hostel</td>
<td>EFU</td>
<td>Ongoing</td>
<td>Included in project</td>
</tr>
<tr>
<td></td>
<td>Public consultations/ sensitization</td>
<td>SC</td>
<td>EFU</td>
<td>TBD</td>
<td>Included in sub-projects</td>
</tr>
<tr>
<td></td>
<td>Prepare RAPs as necessary</td>
<td>SC/service providers</td>
<td>EFU</td>
<td>TBD</td>
<td>Included in project</td>
</tr>
<tr>
<td></td>
<td>Environmental guidelines for contractors</td>
<td>SC and EFU</td>
<td>EFU</td>
<td>Ongoing</td>
<td>Included in contract</td>
</tr>
<tr>
<td></td>
<td>Regular maintenance of water points &amp; latrines, solid waste disposal</td>
<td>Schools, TTI</td>
<td>SC for Schools EFU for Hostel</td>
<td>Ongoing</td>
<td>Included in project</td>
</tr>
<tr>
<td>Construction of HQ building for MOE</td>
<td>Carry out separate EA</td>
<td>EA consultants/ Borrower</td>
<td>EFU</td>
<td>TBD</td>
<td>TBD</td>
</tr>
<tr>
<td></td>
<td>Public consultations</td>
<td>EA consultants/ Borrower</td>
<td>EFU</td>
<td>TBD</td>
<td>To be included in project</td>
</tr>
<tr>
<td></td>
<td>Prepare RAPs as necessary</td>
<td>Borrower</td>
<td>EFU</td>
<td>TBD</td>
<td>To be included in project</td>
</tr>
<tr>
<td>Training of Trainers (SCs; EFU, NES; service providers)</td>
<td></td>
<td>NES</td>
<td>EFU</td>
<td>TBD</td>
<td>$60,500</td>
</tr>
<tr>
<td><strong>Total Costs</strong></td>
<td></td>
<td></td>
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