



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 01/17/2020 | Report No: ESRSA00407



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
El Salvador	LATIN AMERICA AND CARIBBEAN	P171316	
Project Name	El Salvador Early Childhood Care and Education Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	1/22/2020	3/16/2020
Borrower(s)	Implementing Agency(ies)		
Republic of El Salvador	Ministry of Education		

Proposed Development Objective(s)

The Project Development Objectives are to (i) improve ECCE teaching practices nationwide; (ii) upgrade physical learning environments of selected ECCE centers, and (iii) strengthen MINEDUCYT’s institutional capacity for education sector management.

Financing (in USD Million)	Amount
Total Project Cost	250.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

Placeholder: With the objective of improving development and learning outcomes of children from 0-6 years old, aims at (i) improving ECCE teaching practices nationwide; (ii) upgrade physical learning environments of selected ECCE centers, and (iii) strengthen MINEDUCYT’s institutional capacity for education sector management.

D. Environmental and Social Overview

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



The Project's Development Objectives are to: (i) improve ECCE teaching practices nationwide; (ii) upgrade physical learning environments of selected ECCE centers; and (iii) strengthen MINEDUCYT's institutional capacity for education sector management.

Currently, the ECCE System is characterized by limited budget allocation resulting in poor infrastructure conditions, a curriculum that does not respond to a comprehensive ECD framework, and lack of quality in the ECCE workforce.

The new ECCE quality model will apply to public and private schools nationally. In terms of infrastructure, the project will substitute, rehabilitate and/or expand selected schools owned by MINEDUCYT offering kindergarten (KG), prioritized according to the following criteria: (i) KG enrollment, (ii) total enrollment, (iii) social vulnerability of children attending the school, and (iv) risk of collapse by natural event (i.e. earthquakes). Using these criteria, 200 public schools across the country have been preselected by MINEDUCYT, of which 50 schools need to be fully replaced and 150 need to be rehabilitated. From this universe, the project will support pre-investment studies to define a final list of approximately 125 schools to be intervened. As part of the infrastructure upgrade, when there is a proven demand for KG services and the school has physical conditions for it, the project will expand the ECCE supply through new PreK and/or KG classrooms to receive more students. In addition, given that some schools may present risks to students' safety (due to poor structural integrity), the infrastructure works will benefit not only the KG learning spaces, but the entire school, including all educational levels and spaces. The interventions will be comprehensive, ensuring access to basic services, climate resilient design, application of low carbon technologies and energy and water efficiency standards, designs and appliances as well as improving complimentary spaces, such as playgrounds, sports or other recreational areas. Whereas specific site locations are not yet known, high level mapping of the potential beneficiary schools indicates that some schools may be located within protected areas – the environmental and social impacts of which will be assessed once project locations are confirmed, with the relevant mitigation measures detailed in the subproject specific ESMPs.

Given the national scope of the project, indigenous peoples in El Salvador will be project beneficiaries. There are important enrollment gaps between the indigenous and non-indigenous population and between rural and urban populations at all education levels in El Salvador. In terms of early childhood education, MINED's statistics show that relatively few indigenous children between 0-7 years old attend school. In addition, ECCE enrollment in rural areas and among the lowest quintile are 39% and 10%, respectively. Some issues surrounding early childhood education of indigenous peoples identified include geographic remoteness and difficult access to communities, lack of teachers willing to work in indigenous communities and capable of contextualizing content based on local realities and culture, and lack of quality infrastructure and culturally adequate educational materials.

In addition, El Salvador has high levels of contextual violence, particularly in three domains: domestic violence, sexual violence against women, and street/gang related violence. Gender-based violence is highly prevalent in El Salvador. In 2017, at least 10880 acts of violence against women were committed, which is equivalent to a rate of 599.4 per 100,00 women.

D. 2. Borrower's Institutional Capacity

The project will be implemented by the Ministry of Education (MINEDUCYT), under the technical leadership of the Early Childhood National Directorate (DNPI). MINEDUCYT has recent experience with the Education Quality Improvement Project (P126364), which included application of the Bank's safeguards policies, including OP 4.01 and



OP 4.10. This previous project prepared and implemented an Environmental Management Framework and an Indigenous Peoples Plan.

Lessons learned under this previous project include the need for more robust institutional arrangements and improved contractor capacity for environmental and social management, including management of risks related to contextual crime and violence, during infrastructure design and construction to ensure compliance with the environmental and social management plans and national law requirements and avoid delays. In addition, the previous project achieved important developments in strengthening services in the Nahuat language. Capacity strengthening measures to fill gaps and to help embed environmental and social risk management systems more fully and permanently within the ministry structure and policies – including on the new substantive coverage areas under the ESF – include the establishment of an Environmental and Social Unit within the PIU with a coordinator, experienced full-time environmental and social specialists, and a team of technical staff.

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

A. Environmental and Social Risk Classification (ESRC)

Substantial

Environmental Risk Rating

Moderate

The proposed environmental risk classification is Moderate, based on the investments under Component 3 that will finance substitution or rehabilitation and/or expansion of existing PreK and KG buildings. The potential environmental impacts and risks associated with these activities are deemed to be moderate as they are expected to be i) predictable, temporary and/or reversible or easily mitigable; ii) low in magnitude and site-specific; and iv) occurring in already-intervened areas. In addition, the client has gained recent experience in environmental management and oversight under the previous World Bank financed project that included school infrastructure rehabilitation types of investments. This existing experience and capacity will be built upon and further developed and embedded under the proposed project.

Social Risk Rating

Substantial

The proposed social risk classification is Substantial. The project is mainly expected to have positive social impacts from increased quality of ECCE service delivery. Social risks of the project may include exacerbating existing inequalities if potential impacts to and barriers to access for girls, children with disabilities, indigenous peoples, children living in poverty or geographical isolation and other vulnerable and disadvantaged individuals or groups are not properly identified and addressed; and risk that indigenous peoples may not receive early childhood education in their mother tongues, as well as prejudice or discrimination towards individuals or groups in the provision of services and resources. In addition, the legalization of early childhood schools that are not registered to MINEDUCYT carries the risk of affecting existing rights or claims to land if not accompanied with clear and adequate rules for the recognition of relevant land tenure rights. Moreover, high levels of contextual violence, including gender-based and domestic violence, as well as gang related violence, constitute a significant access barrier to project benefits. The borrower has previous experience with World Bank safeguards, including indigenous peoples’ issues, and measures to identify specific risks at the local and municipal level and strengthen capacity for social management including management of contextual risks related to crime and violence will be included in the project.

Public Disclosure



B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The Project's Development Objectives are to: (i) improve ECCE teaching practices nationwide; (ii) upgrade physical learning environments of selected ECCE centers; and (iii) strengthen MINEDUCYT's institutional capacity for education sector management. The project includes five components: (1) ensuring ECCE structural quality standards and curriculum nationwide (US\$80 million); (2) Strengthening ECCE public teachers and principals' professional development (US\$25 million); (3) Upgrading ECCE physical learning environments (US\$123 million); Institutional strengthening (US\$ 20 million); (5) Contingent Emergency Response (US\$0). Under component 3 the Borrower will also conduct legalization (land title) of early childhood centers not currently registered to MINEDUCYT.

Based on the scope of the project's activities, which include technical assistance, capacity building, and infrastructure interventions, including educational center substitutions and rehabilitation and/or expansion, for which the exact locations are not yet known, the Borrower has prepared an Environmental and Social Management Framework (ESMF). The ESMF includes: (a) a high level Environmental and Social Assessment (ESA) describing broad baseline social and environmental conditions, identifying potential environmental and social risks, impacts, and opportunities associated with the proposed activities, and formulating generic mitigation, management, and monitoring measures to address the likely impacts, and (b) the principles, guidelines and procedures for carrying out site-specific screening and assessment, confirming and incorporating appropriate management and mitigation measures into contract documents, and providing guidance on effective implementation and monitoring at the subproject level.

The ESMF (including the ESA), considers i) requirements for coordination and consultation with beneficiaries and affected persons to ensure that potentially adverse environmental and social risks of subprojects are identified and managed, and includes ii) measures to strengthen Borrower capacity for the management and oversight of environmental and social risks. The Bank has requested the Borrower to update the ESMF prior to appraisal to i) reflect the implementation of technically and financially feasible design measures for improving energy, water and raw materials use and to promote greater climate and natural disaster resilience; ii) where applicable, identify measures to avoid, minimize, or mitigate potential adverse impacts on biodiversity and on the sustainable management of living natural resources; and iii) identify measures to ensure facility and community safety during construction and operation. The ESMF also includes a section describing the Environmental and Social requirement aspects of the Contingency Emergency Response (CERC - Component 5), establishing that its activities will need to comply with the same environmental and social requirements applicable to non-CERC activities.

From a social perspective, the ESMF (including the ESA) considers: i) the socio-cultural, institutional, historical and political context where the project will operate, as well as potential risks, barriers to access, and opportunities for greater inclusion of vulnerable and disadvantaged groups including women and girls, indigenous peoples, those living in extreme poverty or geographical isolation, and students with disabilities; ii) the need for cultural and language adaption of the curriculum and classroom materials to the context and realities of indigenous peoples, as well the need to ensure that ECCE workers in indigenous communities are sufficiently qualified from a cultural and language perspective to work with indigenous students; iii) the need to identify and correct discriminatory content in the curriculum and educational materials to ensure they are accessible and tailored for all, as well as to improve the



qualifications of the ECCE workforce to work with students with disabilities; and v) the need for curriculum and educational materials to include content to influence social norms and attitudes related to crime and violence, gender-based violence and domestic abuse. While the ESMF has undertaken an initial assessment of the above aspects drawing on initial stakeholder consultations with key actors, the Bank has made specific recommendations for the Borrower to add detail to the analysis before appraisal, including: i) a process for ensuring that the legalization of educational centers (with respect to land title) does not inadvertently affect existing rights (including collective rights, subsidiary rights and the rights of women) or have other unintended consequences. Similarly, clear and adequate procedures for documenting the voluntary nature of land donations, identifying existing claims and recognition of relevant land tenure rights, establishing fair criteria and facilitating the means to enable functioning, transparent, and participatory processes for resolving competing tenure claims, and including genuine efforts to inform affected people about their rights and providing means to appeal decisions and enabling the use of existing alternative dispute resolution mechanisms; ii) an analysis of the crime and violence situation in the country, with a focus on identifying the most violent municipalities in order to provide information for the preparation of specific analyses of the crime and violence impacts on subprojects and mitigation measures for subprojects to manage the risks related to contextual crime and violence, and iii) further developing information on the social baseline, including characterization of vulnerable and disadvantaged groups, as well as mitigation measures for social risks./

With respect to both environmental and social management aspects, the Bank has also requested MINEDUCYT to carry out national consultations with key stakeholders before the beginning of appraisal and incorporate stakeholder feedback into the ESMF's analysis of risks, opportunities, and related measures and how such measures are integrated in project activities.

The ESMF will also include procedures for screening subprojects involving civil works for i) the presence of indigenous peoples per the criteria in ESS7 in the project area, ii) whether a Resettlement Action Plan needs to be prepared for the subproject for impacts covered under ESS5, and iii) potential sites of physical cultural heritage. For cases where subprojects meet one or more of the above criteria, the ESMF will describe how the Resettlement Policy Framework (RPF), and/or Indigenous Peoples Framework (IPPF), and/or chance finds procedures will apply.

The ESMF provides an overview of measures to be incorporated into subproject ESMPs to mitigate the specific environmental and social impacts of planned activities. Where relevant, these measures will be developed for specific subprojects, and reflected in subproject implementation arrangements (including contractor bid documents for construction phase measures). Depending on the characteristics of the subprojects, these may include:

- Waste Management Plan (construction), including measures for handling and disposal of asbestos and other hazardous materials which may be removed during demolition / remodeling of existing facilities
- Plan for Sourcing and Transportation of Construction Materials
- Traffic Management Plan (construction)
- Community Security Health and Safety Plan (construction)
- Security Personnel management plan (if required)
- Occupational Health and Safety Measures
- Standard code of conduct for project workers
- Chance find screening procedures and protocols
- Emergency Preparedness and Response Plan (operation phase)



- Waste Management Plan for Operation (operation phase) (including e-waste, sanitary waste and non-hazardous waste)

The Borrower will prepare generic versions of the above plans prior to the finalization of, and to inform, the TORs for development of Project Specifications (carpeta tecnica) for specific subprojects. . These generic plans will then be adapted as needed for the ESMPs of specific subprojects, which will be included in the Project Specifications and bid documents. This commitment will be included in the ESCP agreed with the Borrower.

In addition, and prior to appraisal, the Borrower and Bank shall jointly agree upon and disclose the Environmental and Social Commitment Plan (ESCP) detailing measures and actions to implement the ESMF and ensure compliance with the ESF during project implementation.

A draft of the ESMF will be disclosed prior to the beginning of appraisal. Consultations on the project and its environmental and social management aspects, as laid out in the ESMF as well as other instruments discussed below (Stakeholder Engagement Plan, Labor Management Procedures, Resettlement Policy Framework, Indigenous Peoples Planning Framework, and ESCP), will be carried out before and continue during appraisal.

ESS10 Stakeholder Engagement and Information Disclosure

The project has prepared, and will begin to implement (to guide pre-appraisal consultations) as well as disclose before appraisal, both in country and on the Bank’s website, a Stakeholder Engagement Plan (SEP), which i) describes the project stakeholders, making a distinction between those directly affected by the project and other interested parties; ii) describes the timing and methods of engagement with key stakeholders throughout the life cycle of the project, including engagement activities before project appraisal, as well as consultations and information disclosure related to the curriculum development and training activities, and local-level consultations once the locations of infrastructure interventions are known; iii) describes the type of information that will be provided to stakeholders and how feedback from stakeholders will be solicited and recorded, v) describes the project-level Grievance Mechanism to be implemented by the borrower.

Among the key affected stakeholders identified by the SEP are children between 0-7 years old; parents; other actors responsible for children upbringing (family members, neighbors, and others); teaching staff; school administrative staff; school principals; Indigenous Peoples communities and Indigenous Peoples organizations. Among the potential barriers for participation before and during project implementation are children’s limited access to education due to poverty, different learning abilities, ethnic origin, crime-related tensions, family structure and/or GBV. Information on project activities, as well as the content of the environmental and social instruments will be provided to the stakeholders. In addition, participatory processes should consider some stakeholder groups could have limited access to project information; difficulty to attend consultation meetings; experience crime-related tensions that compromise their safety; and ingrained discriminatory practices against Indigenous groups and communities.

The Borrower has already carried out consultations with key stakeholders, including the leaders of nationally representative indigenous organizations as well as representatives from indigenous communities and experts in inclusive education.



Before the beginning of appraisal, the Borrower has been asked to: i) further develop differentiated measures to remove obstacles to participation as well as allow the effective participation of those identified as disadvantaged or vulnerable in the context of subprojects; ii) adapt the GRM to be culturally sensitive and accessible to indigenous peoples and to people who may be physically or economically displaced, and iii) disclose information and organize additional stakeholder engagement activities to share and seek feedback on the overall project design and components, risks and mitigation measures, and the SEP and proposed GRM. A separate GRM for project workers will be in place per the requirements of ESS2.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

Worker categories under ESS2 that may be relevant in the project include direct workers in the form of MINEDUCYT staff hired to work on the project, contractor workers for infrastructure activities, as well as potentially primary supplier workers and community volunteers. The project is also expected to have government civil servants working in connection with the project, who will remain subject to the terms and conditions of their existing public-sector employment agreements, unless there has been an effective legal transfer of their employment or engagement to the project. ESS2 will not apply to such government civil servants (except for the provisions of Protecting the Work Force, and Occupational Health & Safety).

The borrower has developed written Labor Management Procedures (LMP) identifying and describing the different types of workers that are likely to be involved in the project and setting out the way in which they will be managed, in accordance with the requirements of national law and ESS2. The Borrower has been asked to further detail the labor risks associated with the project's infrastructure requirements, including i) the degree of vulnerability of specific types of workers, including women, persons with disabilities, migrants and others; ii) the legal responsibilities of contractors and sub-contractors with regards to working conditions, formal and informal employment, working age, contract types and iii) worker rights and the necessary channels to ensure that work-related grievances are safely communicated to all project workers (as described in the corresponding labor GRM). While the use of community volunteers in the project is not yet confirmed, the Borrower has been asked to further develop in the LMP the requirements for subprojects that could use the work of community volunteers to document how agreements with community volunteers will be reached, and the terms on which such labor will be provided, including how the voluntary nature of the work will be ascertained and documented, how the community volunteers will be represented, and the methods by which community volunteers can raise grievances in relation to the project.

Occupational health and safety hazards associated with civil works under the project are typical of building construction and rehabilitation works, and may include i) traffic related accidents and incidents associated with transport of personnel and materials to and from work sites; ii) damage or injuries resulting from demolition and construction works; iii) falls from heights during demolition and construction activities; iv) falls into excavation sites or collapsing trenches; v) electrocution; vi) failure to use adequate personal protective equipment; vii) slips, trips and



falls; viii) material and manual handling and ix) potential exposure to asbestos and lead. As stated in the LMP and ESMF, contractors shall be required by subproject specific ESMPs to develop Health and Safety management plans appropriate for each work site. For work in urban environments, contractors shall assess site specific hazards, including changes to traffic flows and required measures such as the deployment of traffic controllers or safety signage and barriers, additional security measures to ensure safe work environments inside the work areas and in their immediate vicinity. Emergency preparedness and response plans shall be developed, adequate OHS training shall be provided to workers, incidents will be reported and investigated and corrective measures implemented to prevent recurrence. The Bank has asked the Borrower to i) update the ESMF prior to appraisal to provide additional detail on the identification of OHS risks and the definition of mitigation measures to address the above aspects, as well as a standard worker code of conduct, and ii) describe grievance redress mechanisms or avenues available to all project workers, including direct, contractor’s workers, and community workers. The requirement for the Borrower to finalize the ESMF has been included in the ESCP.

ESS3 Resource Efficiency and Pollution Prevention and Management

Energy efficiency: The Bank has requested that the TORs for the Design of School Prototypes, which will be prepared during project implementation, include technically and financially feasible energy efficiency and climate resilience measures. These shall be considered and incorporated into building design, including measures such as efficient lighting and cooling as well as the promotion of the sustainable use of water (such as through incorporating rooftop rainwater harvesting structures and water storage tanks into school designs) and construction raw materials. The Bank has requested that the TORs for Development of Project Specifications (carpeta tecnica) for the design of new and retro-fitted infrastructure under Component 3 also guarantee sanitary conditions (including water availability).

Pollution management: Waste management practices will aim to avoid, reduce, reuse or dispose of waste materials in a manner that is safe for human health and the environment. The ESMF includes requirements for the development of site-specific Waste Management Plans during construction (including demolition) of infrastructure activities under Component 3. Specific measures aim to ensure there is no soil, water and/or air contamination from handling and disposal of construction waste, specifically hazardous materials such as asbestos. The ESMF also includes requirements for the development of Waste Management Plans for the operation phase under Component 3.

The Borrower has been asked to identify the potential for existing environmental liabilities - to be assessed at the site level in the detailed site planning process. Such liabilities may include, for example, removal and safe disposal of asbestos in existing school structures. Where potential liabilities are identified, these shall be assessed as part of the subproject screening and design process, and where necessary, site specific remedial plans developed and executed. These requirements will be outlined in the ESMF.

ESS4 Community Health and Safety



Infrastructure and equipment design and safety: The Bank has requested that the TORs for Development of Project Specifications (carpeta tecnica) for the design of new and retro-fitted infrastructure under Component 3 will guarantee sanitary conditions (water availability), as outlined under ESS3, and apply the concept of universal access, such as the inclusion of access ramps, guard rails, the use of lead free paint and access to services without discrimination for those with disabilities (for example restrooms) and specific to the needs of the target population (chairs and tables in classrooms). The TORs for the School Prototypes will require that infrastructure designed and built under the project is climate resilient, reducing the vulnerability to natural disasters including seismic activity and flooding.

Community health and safety during construction: The Borrower will ensure that plans are in place to mitigate the risks associated with construction activities to direct beneficiaries and neighbors. Key risks are related to increased vehicular traffic and changed traffic patterns impacting road safety conditions, dust, noise and vibration. Construction sites may also pose a risk to beneficiaries (or other upperclass students in adjoining classrooms, in case of educational campuses that include also older grades) and neighbors especially if construction activities are planned to take place in parallel with ongoing teaching activities. If temporary facilities are needed for current students displaced by the construction activities, these will also need to be appropriately chosen and managed as part of the construction process in a manner consistent with the ESSs. The Borrower will prepare a temporary relocation protocol to be included as an annex to the RPF and inform the TORs for Development of Project Specifications (carpeta tecnica) are finalized. Before appraisal, the RPF will set out the principles for the preparation of such protocol. These and other issues are reflected in the ESMF, which provides guidance on the inclusion of community health and safety requirements in the ESMPs for construction activities at the subproject level. Given the security context of El Salvador, it is possible that contractors in some locations may need security forces; if required then security personnel management plans will also be integrated in the ESMPs for such subprojects, in accordance with this standard.

Community health and safety during operation: Key community health and safety risks are associated with the security and safety of the children in the case of (i) the failure of the infrastructure built under Component 3 in the event of natural disasters or other emergencies, or (ii) inadequate maintenance of facilities leading to unsanitary or unsafe conditions. The ESMF includes requirements for the development of site-specific Emergency Response and Preparedness Plans including general emergency response and preparedness planning and training procedures, as well as operations-phase facility maintenance requirements, and guidelines for managing security personnel. Such plans will be in place as an annex to the ESMF.

In addition, the project will identify, assess, and include mitigation measures for risks of Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), as needed based on the results of the Social Assessment, including for ongoing monitoring during project implementation. A standard code of conduct for contractor workers will be included as an annex to the ESMF before TORs for Development of Project Specifications (carpeta tecnica) are finalized and will be included in project specific ESMPs and contractor bidding documents. In addition, contractors will be required to provide induction and periodic training to project workers on the code of conduct.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement



Component 3 of the project includes minor construction, expansion, and rehabilitation of buildings. While the project will only intervene in educational centers owned by MINEDUCYT, some of these centers may have occupants that may need to be relocated and/or compensated for structures or assets. In addition, although only sites with existing early childhood education centers will be legalized in MINEDUCYT's favor, this may cause land tenure disputes or displacement of existing occupants. The project is not expected to include restrictions of access to legally designated parks and protected areas. Given that the specific sites for infrastructure interventions are not yet known, the borrower has prepared a Resettlement Policy Framework (RPF) to cover such potential impacts. The RPF sets out the procedures to be followed for the preparation of Resettlement Action Plans (RAPs) when they are required for subprojects under ESS5, as well as eligibility criteria for affected persons, procedures and standards for compensation and relocation assistance, and arrangements for consultations, budget, monitoring, as well as how the project-level GRM will address involuntary resettlement-related grievances. The RPF will be disclosed prior to appraisal. In addition, the Borrower has been asked to include in the RPF, before appraisal the main principles to be applied for temporary relocation of schools during construction works, including requirements consistent with the ESSs, as well as a land donation protocol to be applied in case any land donations are included in the project. The Borrower will prepare a temporary relocation protocol, to be included as an annex to the RPF, prior to the finalization of and to inform the TORs for development of Project Specifications (carpeta tecnica) for specific subprojects. The ESMF will include analyses of land tenure to ensure legal rights to land are not compromised by educational center land legalization activities carried out under the project, and provide clear and adequate rules for the recognition of relevant land tenure rights, establishes fair criteria and functioning, transparent, and participatory processes for resolving competing tenure claims, and include genuine efforts to inform affected people about their rights and provide access to impartial advice.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The specific locations of the centers to be intervened are still to be determined; however, due to the fact that works will consist only of substitution or rehabilitation and/or of existing schools and learning centers, which are likely to be located in already intervened areas near settlements, in rural or urban settings, it is not expected that any of the project activities will have a significant adverse impacts on biodiversity or natural resources. Whereas specific site locations are not yet known, high level mapping of the potential beneficiary schools indicates that some schools may be located within protected areas. The ESMF provides generic guidance on the application of the mitigation hierarchy to define measures to avoid, minimize or mitigate potential impacts on biodiversity and on the sustainability of living natural resources. The Borrower has been requested to further detail the screening processes in the ESMF to prevent siting of facilities in or near natural or critical habitats or internationally recognized areas of biodiversity value; to provide further assessment in case of any schools that are inside of or adjacent to protected areas; and to ensure that any residual impacts will be addressed through site-specific mitigation measures.

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

According to the 2010 census, there are around 14,300 indigenous peoples in El Salvador, representing about 0.7% of the population, although these numbers are often challenged by indigenous organizations. As the project is national in scope, Indigenous Peoples meeting the criteria of ESS7 will be beneficiaries. In addition, some of the



selected municipalities for the infrastructure interventions may be in areas where indigenous peoples meeting the criteria of ESS7 may be present or have collective attachment to the project area.

The Borrower, in consultation with nationally representative indigenous organizations, has prepared an Indigenous Peoples Planning Framework (IPPF), which identifies barriers to access and proposes measures to ensure project benefits are culturally pertinent, including in relation to the development of the curriculum, educational tools, and educational agent training. The Borrower has been asked to further develop the measures that the project will take to integrate feedback from consultations with indigenous peoples in project activities, as well as how these will be devolved to indigenous organizations.

The IPPF also outlines how subproject specific IPPs will be prepared in cases where infrastructure interventions are carried out where indigenous peoples are present or have collective attachment to the project area, per the criteria in ESS7.

An advanced draft of the IPPF is being circulated for the Decision Meeting and the document will be disclosed prior to appraisal.

The Stakeholder Engagement Plan describes the overall approach to engaging with nationally representative indigenous peoples' organizations during project preparation as well as indigenous communities in cases where they are present in specific project sites. The SEP has been in consultation with nationally representative indigenous organizations.

ESS8 Cultural Heritage

The project is not expected to have negative impacts on cultural heritage, whether tangible or intangible, as all civil works are expected to take place on sites with existing infrastructure. However, given the possibility that civil works may include excavations, screening criteria in the ESMF include identification of any identifiable cultural heritage early in the design process, further screening procedures and chance finds protocols will be incorporated into subsequent subproject-level ESMPs.

ESS9 Financial Intermediaries

This standard is not relevant.

B.3 Other Relevant Project Risks

There is a security risk related to crime and violence in El Salvador, which may impede safe access to education centers for both students and project contractors. Before appraisal, the Social Assessment will include an analysis of this risk and possible impacts on the project, as well as an assessment of the municipalities crime and violence is most likely to impact the project. The ESMF will include a description of how sub-project preparation will include more specific contextual crime and violence analyses and develop mitigation measures as necessary.



All expected environmental and social risks associated to the project investments identified at this stage have been described in the sections above. The site specific assessments to be prepared for subprojects will evaluate any other potential risk that may be associated with specific subprojects.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

This policy does not apply as the project is not expected to include activities which would have any effect on international waterways.

OP 7.60 Projects in Disputed Areas No

This policy does not apply as the project is not expected to work in disputed areas.

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

DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED	TIMELINE
ESS 1 Assessment and Management of Environmental and Social Risks and Impacts	
ORGANIZATIONAL STRUCTURE Establish and maintain an organizational structure with qualified and experienced staff and resources to support management of E&S risks.	11/2020
ENVIRONMENTAL AND SOCIAL ASSESSMENT Prepare, adopt and implement an Environmental and Social Management Framework (ESMF), which shall include an Environmental and Social Assessment (ESA) for the Project, in a manner acceptable to the Bank.	04/2020
MANAGEMENT TOOLS AND INSTRUMENTS The TORs for the Project Specifications (Carpeta Tecnica) shall include generic requirements, as well as requirements to confirm and further specify at the site-specific level as part of subproject ESMPs, for the management of potential environmental and social risks as per the ESMF .	04/2020
MANAGEMENT TOOLS AND INSTRUMENTS The Borrower will prepare the following generic plans and include them as an annex to the ESMF, in a manner acceptable to the Bank : <ul style="list-style-type: none"> • Waste Management Plan (construction), including measures for handling and disposal of asbestos and other hazardous materials which may be removed during demolition / remodeling of existing facilities • Plan for Sourcing and Transportation of Construction Materials 	04/2020

Public Disclosure



<p>The Borrower will prepare the following generic plans and include them as an annex to the ESMF, in a manner acceptable to the Bank:</p> <ul style="list-style-type: none"> • Traffic Management Plan (construction) • Community Security Health and Safety Plan (construction) • Security Personnel management plan (if required) 	04/2020
<p>The Borrower will prepare the following generic plans and include them as an annex to the ESMF, in a manner acceptable to the Bank :</p> <ul style="list-style-type: none"> • Occupational Health and Safety Measures • Chance find screening procedures and protocols • Emergency Preparedness and Response Plan (operation phase) • Waste Management Plan for Operation (operation phase) (including e-waste as well as non-hazardous waste) 	04/2020
<p>Screen any proposed subproject and other Project activities in accordance with the ESMF prepared for the Project, and, thereafter, draft, adopt, and implement any Environmental and Social Management Plans (ESMP), as required, in a manner acceptable to the Bank.</p>	08/2020
<p>MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of the ESCP, including the relevant E&S documents, ESMPs, and the Labor Management Procedures, into the TORs for the project specifications (Carpetas Tecnicas), and subsequently ESHS specifications of the procurement documents with contractors, including evaluation of contractor capacity to comply with such measures.</p>	08/2020
<p>MANAGEMENT OF CONTRACTORS Ensure that the contractors prepare project-specific ESMPs (contractor ESMPs) and other plan as required and have the capacity to and comply with the ESHS specifications of their respective contracts.</p>	08/2020
<p>CONTINGENT EMERGENCY RESPONSE In the event of an emergency which leads to activation of the Contingent Emergency Response of the Project under Component 5, the necessary instruments and measures will be developed as required prior to undertaking of the emergency response activities, to ensure compliance with the ESSs.</p>	08/2020
<p>ESS 10 Stakeholder Engagement and Information Disclosure</p>	
<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION: Update, adopt, and implement a Stakeholder Engagement Plan (SEP).</p>	04/2020
<p>PROJECT GRIEVANCE MECHANISM: Establish, maintain and operate a grievance mechanism (GRM), as described in the SEP.</p>	04/2020



PROJECT GRIEVANCE MECHANISM: Provide quarterly reports to the Bank on the functioning of the GRM	08/2020
ESS 2 Labor and Working Conditions	
LABOR MANAGEMENT PROCEDURES Develop and implement Labor Management Procedures (LMP), in a manner acceptable to the Bank.	04/2020
GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and in a manner consistent with ESS2.	01/2021
OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES Develop and implement occupational, health and safety (OHS) measures, including measures on emergency preparedness and response, as part of the ESMPs, in accordance with the ESMF.	06/2021
ESS 3 Resource Efficiency and Pollution Prevention and Management	
MANAGEMENT OF WASTE AND HAZARDOUS MATERIALS: Waste management measures will be developed and thereafter implemented, including training, for contractors. These measures will be a part of the ESMPs to be prepared in accordance with the ESMF.	06/2021
RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: Resource (including energy and water) efficiency and pollution prevention and management measures will be developed. These measures will be a part of the ESMPs.	04/2019
TORs for the Design of School Prototypes shall include technically and financially feasible energy and water efficiency and climate resilience measures, as well as provisions for the installation of adequate sanitation facilities.	04/2020
Asbestos and lead handling and disposal measures will be developed and implemented where required. These measures will be part of the ESMPs to be prepared in accordance with the ESMF.	04/2020
ESS 4 Community Health and Safety	
TRAFFIC AND ROAD SAFETY: Adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMPs to be developed in accordance with the guidelines contained in the ESMF.	06/2021
Prepare, adopt, and implement measures and actions to assess and manage risks and impacts to the community including in relation to behavior of Project workers and any risks of labor influx as part of the ESMPs for subprojects.	06/2021
Site-specific Emergency Response and Preparedness Plans as part of the ESMPs	06/2021

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Develop and implement measures and actions as part of the ESMPs to assess and manage the risks to human security of project-affected communities and Project workers that could arise from the use of security personnel.	06/2021
ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	
RESETTLEMENT POLICY FRAMEWORK AND ACTION PLANS: Prepare, adopt, and implement Resettlement Action Plans (RAPs) consistent with the requirements of the Resettlement Policy Framework (RPF) and ESS5, in a manner acceptable to the Bank.	04/2020
TEMPORARY RELOCATION PROTOCOL: Prepare a protocol consistent with the ESSs for the temporary relocation of school under construction and include it as an annex to the RPF, in a manner acceptable to the Bank.	04/2020
LAND DONATION: Agreement between the MINEDUCYT and the indigenous communities -for the use of land, where the preschools classroom will be rehabilitated- under the Project would only be accepted if provided on a voluntary basis, as set out in the ES	04/2020
Prepare a voluntary land donation protocol consistent with the ESSs for voluntary land donation under the project, including specific provisions for land donation of indigenous peoples. To be included as an annex to the ESMF	04/2020
ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	
Measures and actions to avoid, minimize, or mitigate potential impacts that may have significant negative impacts on biodiversity and on the sustainable management of living natural resources. To be included as part of ESMPs.	06/2021
Screening processes will in place to prevent siting of facilities in or near natural or critical habitats, protected and/or internationally recognized areas and to ensure that any residual impacts will be addressed through site-specific mitigation	06/2021
ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	
Prepare, adopt, and implement Indigenous Peoples Plans (IPPs) consistent with the requirements of the Indigenous Peoples Planning Framework (IPPF) for the Project and ESS7, in a manner acceptable to the Bank.	04/2019
Adopt and implement the arrangements for adaptation the grievance mechanism for indigenous peoples, as required under the IPPF and further describe such arrangements in the respective IPPs.	04/2020
ESS 8 Cultural Heritage	
Prepare, adopt, and implement a chance finds procedure as part of the ESMPs	06/2021



ESS 9 Financial Intermediaries

B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework?

No

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

El Salvador counts with various national laws and regulations related to Environmental Impact Assessment, licensing and management, as well as labor management and other areas covered by the ESF. While these laws and regulations will be complied with as they apply to project activities, the project does not expect to rely on these existing systems for E&S management of the project.

IV. CONTACT POINTS

World Bank

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Borrower/Client/Recipient

Borrower: Republic of El Salvador

Implementing Agency(ies)

Implementing Agency: Ministry of Education

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VI. APPROVAL

Task Team Leader(s): Katia Marina Herrera Sosa, Enrique O. Alasino Massetti

Public Disclosure