Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 06/05/2020 | Report No: ESRSA00887
## BASIC INFORMATION

### A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
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<tbody>
<tr>
<td>South Sudan</td>
<td>AFRICA</td>
<td>P169949</td>
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</tbody>
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| Project Name                                                                                           |
| South Sudan Enhancing Community Resilience and Local Governance Project                                |

<table>
<thead>
<tr>
<th>Practice Area (Lead)</th>
<th>Financing Instrument</th>
<th>Estimated Appraisal Date</th>
<th>Estimated Board Date</th>
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<tbody>
<tr>
<td>Urban, Resilience and Land</td>
<td>Investment Project Financing</td>
<td>6/10/2020</td>
<td>7/28/2020</td>
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<tr>
<th>Borrower(s)</th>
<th>Implementing Agency(ies)</th>
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**Proposed Development Objective(s)**

To improve access to basic infrastructure and strengthen community institutions in selected counties in South Sudan.

**Financing (in USD Million)**

<table>
<thead>
<tr>
<th>Total Project Cost</th>
<th>Amount</th>
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<tr>
<td></td>
<td>65.00</td>
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### B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

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

A detailed assessment of the contexts are included in the Concept Note. This includes reference to the recent violent conflict and climate change, and their impact on people, government, and service provision. It specifically focuses on the risks of GBV and social cohesion. It notes that poverty in South Sudan has reached unprecedented levels. Access to infrastructure and services is severely limited and the Government is unable to provide services to the people. The document also refers to the achievements of the Bank-financed Local Governance and Service Delivery Project (LGSDP), predecessor of the current project.

The proposed project aims to address the immediate needs for basic services in vulnerable counties as measured by a composite vulnerability index (which include exposure to violence, natural hazard, concentration of the returnees, food insecurity, lack of access to basic services and remoteness), while strengthening the community institutions’
capacity to better manage inter-communal tensions and resources. To ensure flexibility and adaptability to accommodate changing population dynamics and fluctuations in the status of the local government and conflict dynamics, block grants will be allocated on a yearly basis and activities will be implemented in a phased manner. The project will finance the activities described below with a preliminary budget estimate of US$65 million. A project period of 36 months is proposed – short enough so as not to perpetuate direct third-party implementation, but long enough to allow sufficient time for community mobilization and local institutional strengthening.

Component 1: Community Infrastructure and Services (US$45 million)
This component will support investments in community-level socio-economic infrastructure and services in selected areas. Eligible investments are limited to construction or rehabilitation of public goods such as water supply and sanitation facilities, community roads, markets, health facilities, education facilities among others to ensure maximum community benefit. The selection will be made through an open menu approach subject to a negative list where communities will be allowed to choose freely, in a participatory manner, based on their needs. Such an approach, rather than a closed menu approach which gives communities a set of sectors to choose from, provides a better learning process to strengthen the communities’ capacity for local development and budgeting while empowering them to act as active drivers of recovery in an inclusive manner. This approach is especially aligned with efforts to increase the participation and agency of women, girls and other marginalized groups (Component 2). The proposed implementation through UN agencies lends itself to a more complex facilitation that is required for such an open menu approach while ensuring consistency of outcomes across different areas. Communities’ priorities will be validated through local service mapping to avoid overlaps and maximize the limited resources available by possibly pooling the block grants to finance common priorities among neighboring communities.

The project will use the administrative division of the former 10 states, 79 counties, 2008 payams until the new sub-national boundaries are officially agreed. Such practice is in line with how the national budget is being allocated and how other development partners are operating. Selection of counties will be guided by four criteria: (i) vulnerability; (ii) feasibility; (iii) equity; and (iv) quick wins. The Bank will prioritize counties with high vulnerability but where there is practical feasibility i.e.- not too insecure and physically accessible and where there is support from the county government; ensure equities across both conflict-affected areas and more stable areas as the predecessor LGSDP was only in conflict-affected areas , and ensure that more conflict-affected areas benefit from the project (as they have historically been deprived of assistance due to insecurity); and finance “quick wins” by selecting a subset of unfunded subprojects under the LGSDP in more vulnerable counties to deliver tangible results quickly and help build the momentum of the project early on.

The project will encourage contractors to utilize local labor in the infrastructure construction or rehabilitation to the extent possible. Particular emphasis will be given to the inclusion of various social groups facing marginalization or barriers to participation (e.g. women, youth, returnees, ethnic minority groups, people with disabilities etc.).

Component 2. Local Institution Strengthening (US$12 million)

Sub-Component 2.1. Community Institution Strengthening. This sub-component will support activities related to: (i) community mobilization; (ii) participatory risk analysis/mapping and risk mitigation training; (iii) support for community institutions on participatory development planning, infrastructure construction/rehabilitation/monitoring, and operation and maintenance (O&M); and (iv) facilitate constructive interaction between communities and the county government. This sub-component supports Component 1 as the participatory planning process generates the
investment priorities, supports community monitoring during subproject implementation, and O&M of completed subprojects.

Communities will be mobilized into Boma Development Committees (BDCs) and Payam Development Committees (PDCs) in line with the LGA. The Participatory Planning and Budgeting Guide for Local Governments in Southern Sudan (2010), which helps operationalize the LGA, calls for broad and inclusive membership of the BDCs/PDCs including traditional authorities, civil society, and requires gender balance with a 25 percent female representation. Building on the Guide as well as the LGSDP guidelines for BDCs/PDCs composition, ECRP will ensure that there is a minimum of 35 percent female representation. Where BDCs and PDCs already exist, an institutional assessment will be undertaken to assess their composition and capacities. Any deficits will be addressed with interventions based on these findings. PDCs and BDCs will serve as umbrella local governance institutions whose remit will go beyond a specific project. They will be supported to play a larger role in local development and resilience planning for their communities, as well as serving as an interface between community and the county government.

Sub-Component 2.2. County Government Strengthening. This sub-component will finance activities related to: (i) county government functionality assessment; (ii) training for county government officials in areas such as service delivery planning to utilize the infrastructure financed under ECRP leveraging other ongoing external assistance with relevant line departments e.g. - how to ensure sustainable medical supplies, teachers’ attendance etc., positive engagement with communities through participatory development planning, ECRP subproject implementation monitoring, BDCs/PDCs performance monitoring, and periodic reporting on ECRP implementation. This component will also provide mobility support for the county government officials to help them visit the subproject sites and participate in the BDCs/PDCs planning workshops as needed.

Component 3: Project Management and Learning (US$8 million)
This component will support: (i) project management including technical planning, financial management, procurement, social and environment risk management, and communications; (ii) project monitoring which includes geo-enabled monitoring system, social audit, and beneficiary feedback/grievance redress mechanism; (iii) hiring of an independent verification agent that monitors the progress towards achievement of results; (iv) continuous data collection on beneficiary impacts and local conflict dynamics; and (v) just-in-time studies as and when needs arise. Such studies may include PPP-based O&M, technical assessment of the subprojects, GBV risk assessment etc.

Component 4: Contingency Emergency Response (US$0 million)
A contingency emergency response component (CERC) will initially have no budget allocation but would allow for rapid reallocation of project funds in the event of natural or man-made crisis during the implementation of the project. This will allow the proposed project to remain flexible and better adapt to emergencies. CERC will be triggered by: (i) declaration of a state of emergency by the government; and (ii) government request to the Bank for activation of the CERC. CERC is normally implemented by the project implementing agency, although other implementation arrangements can be considered on a case-by-case basis. CERC can finance works, goods, non-consulting and consulting services, training, and operating costs. In case such activities are not covered by the Project’s risk management instruments, an additional CERC-ESMF will be prepared prior to CERC implementation.

The proposed project is directly aligned with the Country Engagement Note (CEN) and the Systematic Country Diagnostic (SCD) for South Sudan. Whereas the Bank’s FY13-14 Interim Strategy Note (ISN), approved on 28 February 2013, focused on building legitimate institutions over the long term, the FY18-19 CEN, approved on 16 January 2018,
emphasizes meeting the immediate needs of the people. Specifically, the CEN focuses on two objectives: (i) supporting basic service provision for vulnerable populations; and (ii) supporting livelihoods, food security and basic economic recovery. The CEN also emphasizes the Bank’s comparative advantage in seeking medium term development solutions i.e.- institution building. This is in line with the SCD, approved in October 2015, which stressed the importance of ensuring access to basic services, given the extremely low human development indicators that prevail in the country, the low infrastructure base, and significant gaps in basic service provision. The SCD also highlighted the importance of building citizen confidence through community engagement and reconciliation as a pathway out of cyclical fragility.

The Bank team considered a wide variety of implementing agencies, including major UN agencies and international NGOs working in the country. The main selection criteria included:

- Capacity to operate in all areas of the country
- Capacity to mobilize rapidly on the ground
- Technical expertise in community development, conflict mitigation and local service delivery
- Minimal use of subcontracting to local NGOs or groups
- Experience with large donor-funded contracts and projects particularly World Bank projects
- Assessed by the World Bank at corporate level and thus able to use own procedures (on fraud and corruption investigation, financial management, procurement, safeguards)
- Ability to pre-finance using own resources

The Bank reviewed a total of 7 potential third-party implementing partners who specialize in relevant technical areas in South Sudan. These include UNDP, UNICEF, UNHCR, UNOPS, IOM, WFP, CARE and World Vision. Of these, UNOPS and IOM have had the most relevant experience, i.e. experience both within the relevant sectors and with large donor-funded projects, as well as ability to follow Bank procedures. UNOPS will function as the overall Project Management Unit while IOM will sign a partner agreement with UNOPS and function as key implementing partner. An assessment of their capacity on the ESF is outlined below.

**D. Environmental and Social Overview**

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

The new operation will target communities based on the principles of vulnerability, feasibility, and equity. The project will use the administrative division of the former 10 states, 79 counties, 2008 payams until the new sub-national boundaries are officially agreed. Such practice is in line with how the national budget is being allocated and how other development partners are operating. Selection of counties will be guided by four criteria: (i) vulnerability; (ii) feasibility; (iii) equity; and (iv) quick wins. Preliminary results show lower vulnerability in the Southwest, while the Southeast, Northeast and Western regions seem more vulnerable. Accordingly, most of counties with high vulnerability are located in Eastern Equatoria, Jonglei, Upper Nile, and Western Bahr-el-Ghazal, most of which were heavily conflict-affected. Quick wins refer to a subset of the previous project’s (LGSDP’s) unfunded subprojects which will be selected based on the following criteria: (i) counties that only had one round of Payam Development Grants; (ii) counties that have more than 4 unfunded subprojects for efficiency; and (iii) counties that have higher vulnerability score. Details are outlined in Annex 3 of the PAD. Selection of the final locations will be determined at the time of implementation. Such an approach will allow sufficient flexibility for the project to ensure alignment with other development partners’ projects and the latest security conditions on the ground.
South Sudan is a landlocked country that falls almost entirely (96 per cent) within the Nile River Basin in East-Central Africa. The country is covered by extensive grasslands, wetlands and tropical forests. Its natural assets include significant agricultural, mineral, timber and energy resources. The climate is mostly hot and dry, with seasonal rains that allow for two or three harvests a year in the country’s green belt. Apart from oil, however, its natural resources are largely unexploited and only 4.5 per cent of its potential arable land is cultivated. Livelihoods in the northern dry areas are dominated by seasonal agriculture, pastoralism, fishing and hunting. The conducted social assessment shows different ethnic groups using lands throughout South Sudan with fluent borders between communities of different ethnic groups. As such, the project will adjust to the overlap of social characteristics, including resulting challenges in terms of targeting and social tensions by applying a holistic geographic targeting approach (see above).

D. 2. Borrower’s Institutional Capacity
At the country’s formation in 2011, formal governing institutions were created, but given the years of conflict and the breakdown of former structures, they commenced from a generally low foundation. The new government’s capacity to formulate policy and implement programs is still limited, but is developing and evolving. Institutional frameworks to accomplish environmental and climate-change commitments are still at the nascent stage due to the low priority given to them in the context of the ongoing situation of conflict, as well as the lack of technical capacity and financial resources.

Based on request by the Government of South Sudan, this project will engage UNOPS as the implementing partner. UNOPS will partner with IOM in the implementation of this project via a UN-to-UN agreement. UNOPS is one of the largest infrastructure provider and IOM one of the largest WASH providers in the country. Collaborating and harmonizing some of the approaches, such as the use of BDCs/PDCs, with their ongoing projects can help sustain the project’s outcomes. Both organizations have considerable experience with the implementation of community-driven development initiatives, including WB-funded. The combination of UNOPS and IOM provides strong expertise in implementing the project in line with the ESF; although this is the first ESF-based project implemented by the World Bank in South Sudan. This includes sustainable infrastructure development, stakeholder engagement, as well as PSEA. UNOPS has acquired sufficient experience working with the World Bank and its policies through the previous and current safety net project and has demonstrated good performance. IOM has a well-developed understanding of conflicts and forced displacement, expertise in community engagement and local service delivery along the humanitarian-development continuum, practical experience providing GBV services to survivors and increasing women’s participation in decision-making, and strong analytics on population movement. IOM implements activities in-house with minimal sub-contracting, which assures quality control. In South Sudan, IOM served as the TPM for LGSDP and hence has a good understanding of the approach this project also aims to adopt. Furthermore, IOM has been engaged in preparatory analytical work on population movements and conflict assessments for this project. Both, particularly IOM, are present in most areas of the country, including government and opposition-held areas. Important from an ESS10 perspective, both have adequate field-based staff and contractors at hand. Both are “project-based” meaning that they staff-up or -down based on the donor projects being implemented and thus can increase their capacity to manage large projects. Both also have the ability to pre-finance using their own resources, have been assessed by the World Bank, and can use their own procedures for fraud and corruption investigation, financial management, procurement, and environmental and social risk management under the risk management instruments prepared following the requirements outlined in the World Bank’s Environmental and Social Framework. The Government will have no fiduciary or implementation role in the project. Nevertheless, the Bank will collaborate closely with the Government. An inter-ministerial National Steering Committee (NSC) will be established and include, among others, Ministry of Gender, Child, Social Welfare (MoGCSW) and the Ministry of Humanitarian Affairs. At the county-level, a County Coordination Team (CCT) chaired by the county commissioner with the county planning officer as the secretary, comprising relevant department heads and the RRC county coordinator will serve as the point of
contact for the project. On the local level, LGSDP helped create a platform where communities could actively participate in determining local development initiatives in the form of Boma Development Committees (BDCs) and Payam Development Committees (PDCs). The LGSDP managed to establish an inclusive and participatory planning process with substantial citizen engagement in particular with high female representation through BDCs/PDCs; except the more conflict-affected areas. The project will utilize BDCs and PDCs where they already exist and look to strengthen them. Where they do not exist, the project will form new ones in line with the LGA and its implementation guidelines so that these can both interface the county government for local development and help mitigate conflict and natural hazard risks. BDCs and PDCs will be key institutions in the continuing stakeholder engagement of the project on the local level.

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

A. Environmental and Social Risk Classification (ESRC)  

**Environmental Risk Rating**  
High

The ECRP will involve refurbishment and/or renovations of small scale infrastructure subprojects that will be identified and prioritized by the communities. Risks associated with this kind of infrastructure are generally low-to-moderate with potential adverse environmental impacts that are reversible, temporary in nature and scope, and ones that can be easily and cost-effectively be mitigated. Subproject risks are reduced by exclusion of activities by a negative list of interventions as well as by the screening of subprojects outlined in the ESMF. However, the environmental risk rating for ECRP is currently considered High due to the low capacity of local communities to manage natural resources sustainably in the backdrop of pervasive conflict, which extends to control of natural resources which are largely undisturbed and undermanaged. Further, the legal and institutional arrangements to manage, supervise and enforce compliance are equally nonfunctional with low capacity in controlling and monitoring environmental performance during implementation. A gap the IP is expected to bridge. These, compounded with the fragile country context and the inability of the World Bank project team to conduct on-the-ground supervision substantiates the "High" risk environmental rating.

**Social Risk Rating**  
High

An underlying objective of the CDD-type project is to improve community resilience and cohesion via strengthening of local institutions and citizen engagement through participatory planning process and is thus expected to have a positive social impact in the targeted areas. Equally, the subprojects’ following of the CDD-type planning approach shall reduce risks during the implementation process, with subproject screening and negative list on interventions further supports risk reduction. Social risks are above all the result of the FCV context in the project area. This includes risks resulting from (i) targeting grievances, (ii) intra-communal tensions over implementation issues, (iii) assets becoming targets of violent groups, (iv) and adverse results from construction and labor activities. Violence (political, criminal, ethnic, etc.) and GBV are two forms of concern as result of escalating social risks. The GBV risk has been rated high via the corporate GBV risk tool and a respective GBV Action Plan has been prepared. Based on this assessment, the overall risk level is considered high.

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 breadth, depth, and type of analysis of the assessment and management of environmental and social risks and impacts depend on the nature, scale, and potential environmental or social impact of the subprojects to be selected. These will range from but not limited to: solar powered water systems; installation of rainwater harvesting systems; latrine provision for public use or in primary health care or education facilities; construction, repair or extension of existing and functioning Primary Health Care Centre (PHCC) or Primary Health Care Unit (PHCU); purchase of furniture or equipment for existing PHCCs or PHCUs; construction, repair or extension of functioning public primary schools, Secondary School (including early childhood development centers); purchase of furniture or equipment for functioning public primary schools, Secondary School (including early childhood development centers; and construction or repair of functioning public market places. Some of these subprojects could potentially have adverse environmental impacts, e.g. construction or repair of health and educational facilities, markets, roads, drainage, water and sanitation facilities among others. Potential adverse environmental impacts may include: contamination of ground water due to proximity of latrines and waste disposal sites or inappropriate location of pit latrines, use of limited or sensitively located local construction material such as aggregate and timber; noise and dust emissions from civil works; generation and dumping of debris (excavated soils); occupational health and safety hazards from handling of equipment by workers; pollution of local surface water resources; loss of vegetative cover causing erosion of loose soils and waste; pollution of soil and water resources due to inappropriate collection and disposal of market refuse and waste; and health hazards due to poor storage of market good providing breeding ground for disease carrying rodents and vectors; injuries from use of the facilities; health hazards due to inadequate cleaning and maintenance of sanitary facilities; safety hazards due to collapsing pit latrines; health hazards due to inappropriate storage and disposal of medical and other general waste including electronic waste from decommissioned water borehole solar panels; health hazards due to bacterial contamination of water resources; other impacts may occur as a result of the need for land acquisition for infrastructure development and if not addressed consequent impacts on livelihoods; impacts on access to natural resources in relation to water infrastructure; community conflicts over beneficiaries and location of subprojects, hence security concerns for the project host communities and project workers (during work on site, travel to site, and accommodation, where relevant); creation of physical targets for violent groups; labor influx risks; GBV/SEA risks by project and sub/contractor staff; and protection of labor providing inputs to the project. Given the experience from the predecessor project, it is highly unlikely that subproject activities might impact protected areas or forests of unique value or physical cultural resources. Given that specific subprojects and locations will not be known prior to project appraisal, a framework approach has been adopted. The prepared ESMF includes in line with the ESF the (i) overall project-wide Environmental and Social Risks assessment in line with ESS1-ESS10; (ii) generic management and mitigation procedures for handling environmental and social risks resulting from the project in the South Sudanese context; (iii) a social assessment including risks of discrimination, community tensions, and violence and respective measures in a social management plan; (iv) a gender-Based Violence Action Plan; (v) Labor-Management Procedures including a workers Grievance Redress Mechanism; (vi) the Stakeholder Engagement Framework including a community Grievance Redress Mechanism; (vii) procedures for screening of E&S risks and impacts of subprojects; (viii) templates for site-specific mitigation measures to be included in ESIAas/ESMPs; (ix) voluntary land donation guidelines, (x) organizational structure and resource planning; and the (xi) monitoring and reporting system. It also includes a summary of the Security Management Plan.
All these environmental and social risk management documents are expected to inform the short, site-specific assessments that will produce generic yet detailed ESMPs for respective subprojects typologies. The screening checklist included in the ESMF, together with the negative list on project activities, support a risk reduction by excluding subprojects which would escalate the risk level. The developed ESMPs alongside the ESHS specifications will be part of the bidding documents and executed contracts. Contractors will further be expected to prepare site specific C-ESMPs for the individual projects. Finally, UNOPS will hire a TPM and E&S aspects outlined in the instruments noted above will be included in its terms of reference. These commitments with binding timelines have been agreed on together with the Implementing Partners (IP) and included in the ESCP.

ESS10 Stakeholder Engagement and Information Disclosure

Fostering local conflict management and inter-communal social cohesion as one of the project objectives moves stakeholder engagement to the core of this project. Stakeholders in the local context encompass thereby a multitude of parties, including different households and communities, women/men, elderly/youth/children, returnees and host communities, different ethnic groups, vulnerable groups, government institutions, international non-governmental organizations, CSOs, etc. The SEF encompasses a wider stakeholder mapping exercise, which will be refined during preparation of subprojects. It equally outlines how stakeholders will be engaged during preparation and implementation of sub-projects. Finally, this process will need to be adapted regularly, also given the fast-changing nature of the project’s FCV context.

It will be possible to build on activities as established during the previous project, while due to the gap in project implementations, it will equally be necessary to take this as well as the contextual developments in the meantime into consideration. It will also be possible to build on assessments conducted by previous projects, including the recently concluded social assessments for the health as well as the social safety net projects.

Work on the SEF has been conducted complementary and interlinked with the social assessment to allow a detailed stakeholder identification and analysis from a country-wide perspective, which allows a simple, template-type assessment for local sites. Beyond social risk management, this is a key prerequisite for the approach noted in component 2 (participatory approach in support of community institutions) and will be included in the procedures for that component. While due to the long-lasting conflict and wide-spread poverty vulnerability is difficult to distinguish, reiterating from above, it will be important to add special emphasis on the inclusion of women, returnees, elderly, and youth.

The SEF includes a robust GRM with provisions for IP/SSAHUTLC, refugees/returnees, and victims of GBV. Specific assessments of a feasible approach on GBV has been developed as part of the Gender and GBV assessment.

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

Although most of the labor is expected to be local, there may be some labor influx for larger and/or more complex subprojects. Project workers engaged or employed will include direct workers (workers hired by UNOPS and IOM); contracted workers (for example, skilled and non-skilled construction workers engaged by contractors of each subproject); community workers (engaged by IOM); and primary supply workers (for example, workers engaged for essential construction materials to be purchased on an ongoing basis, as defined in ESS2.) It should be highlighted
that provided labor, including by community workers, will be compensated in compliance with ESS2 and agreements and documentation will be established in line with detailed planning provisions in the Labor Management Procedures (LMP).

Potential risks related to labor and working conditions, such as labor influx (see also ESS1 Section), child labor, forced labor, non-discriminatory hiring practices with a focus on the risk of related ethnicity-based grievances, work-related discrimination and OHS risks, as well as GBV risks, have been assessed and will be addressed through the preparation and implementation of LMP and the C-ESMPs. This includes also assessment of safety and security risks for project workers and respective risk management provisions adequate to the context (see above). The C-ESMP and LMP will need to address occupational health and safety risks based on the site-specific context. Environmental Social Health and Safety (ESHS) codes of conduct consistent with the Bank standards and guidelines have been prepared and all workers will be inducted on them. The codes of conduct will extend to cover requirements for responsible environmental management; appropriate social conduct and interactions between camps and surrounding project host communities; and the general community and worker occupational health and safety, including prevention and reduction of communicable diseases and GBV. The project will decide on a minimum wage (categorized by type of task, and based on comparable projects implemented by international organizations) and implement it throughout the project / cascade it down to contractors. The minimum age of eighteen for workers will be enforced in recruitment and in daily staff team talks by contractors. Addressing the risk of forced labor, contractors’ obligations will be spelled out in their respective contracts and the PMU will monitor full compliance. The project will ensure, through rigorous workers’ grievance mechanisms, that workers can articulate violations of their rights and receive redress.

ESS3 Resource Efficiency and Pollution Prevention and Management

This standard is relevant as there are potential sources of pollution from spoil material, rubbles, and various waste that could result from the widespread rehabilitation, construction and demolitions. This will range from construction and operation waste: construction rubble, to asbestos containing materials (ACM), dust and air emissions from construction vehicles and equipment, hospital medical waste, boreholes solar panel electronic waste etc. Safe waste handling and disposal will be one of the major environmental challenges in the project and is expected to be managed by responsive and site specific C-ESMPs. The subprojects will also procure raw material such us construction water, sand, stones, timber etc, that if not well managed could result to overexploitation and induced strain on the limited community sources. Consequently, construction materials will be sourced from legally approved sites through measures specified in Good International Industry Practices (GIIPs). As the potential menu of subprojects which include water supply and sanitation, community roads, health and education facilities, and public market facilities, as well as the geographical areas of intervention are refined, the relevance of ESS3 for this project will be refined.

ESS4 Community Health and Safety

As discussed in the ESS1 Section, because of the nature and relatively moderate scale of the works under the project, the direct community health and safety impacts will range from minor to moderate, temporary, and confined to the areas immediately surrounding the construction sites. High risks result mainly from the project context. Anticipated community health and safety risks during implementation will include i) physical hazards on sites where the community has access; ii) traffic and road safety hazards associated with the operation of project vehicles (i.e. IP, government, contractors, suppliers) on public roads and at construction sites; iii) health issues including water-borne,
and vector-borne diseases which may result from poor site management (e.g., stagnant water, poor solid waste management), and communicable diseases such as HIV/AIDs associated with labor influx (refer ESS2); iv) security incidents related to communal and political violence as well as crime; v) gender-based violence; and vi) hazardous materials such as asbestos containing materials (ACM) and hospital medical waste during operation. To address these risks, the ESMF and site specific ESMPs have and will outline detailed management and mitigation measures for community health and safety management during construction and operation.

To address potential risks associated with the security personnel to be hired by contractors, the ESMF includes mitigation measures in compliance with ESS1 and ESS4. Pervasive incidences of GBV in South Sudan are a significant contextual challenge. Assessment of project-related sexual exploitation and abuse (SEA)/GBV have been conducted during project preparation. Given the context of pervasive insecurity, the project adopts a robust approach to address potential GBV risks; including site-specific assessments of the availability of referral systems and its establishment if insufficient. Relevant mitigation measures to address these risks (e.g. integrating Codes of Conduct with SEA/GBV-related protections into community consultations and mapping activities to identify potential service providers, and establishment of GRM with procedures and channels to enable safe, confidential and ethical reporting of GBV incidents) are articulated in the ESMF. The project will also include capacity building and training of relevant stakeholders including government partners, contractors and project workers; risks will be monitored throughout project implementation through regular re-assessment with the risk screening tool, particularly as new project locations are determined, and through regular monitoring engagement. A GBV Action Plan has been prepared and its implementation is a requirement in the ESCP.

The Project has also prepared a Security Management Plan which outlines the Project’s approach to address the pertinent security risks in the project sites. This includes approaches to security risk assessments and categorization, security provisions for different types of workers and communities (on a large spectrum from prevention to response), institutional cooperation with security actors in the region (local, national, international, WB), decision making processes, and according documentation.

The risk of spread of COVID-19 is high, including through project activities, if not addressed. The project will incorporate COVID response needs in the first cohort of subprojects. For example, the project can provide funds to construct handwashing facilities at the community level, including markets, places of worship, public transportation hubs, communal water points, women and girls friendly spaces, and any other densely populated spots. Safety provisions will be included in the site-specific OHS plans. The project will also be sensitive to issues associated with the stigmatization of populations as COVID-19 infection risks.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Land requirements are expected to be minor and established in a participatory manner. Extensive consultations via a CDD approach will ensure that sub-projects will be implemented on public lands free of individual or collective, non-government use or land donated voluntarily for the project according to Voluntary Land Donation Guidelines outlined in the ESMF. As individual land ownership and respective land titling is not widely established, the proposed project will consider any household using lands prior to disclosed subproject commencement as having legitimate land use rights and such rights have to be donated freely to the project according to the above provisions, if respective land is considered necessary for subproject implementation. The project will ensure respective documentation and for any suggested subproject in contradiction with the above provisions, such subprojects will be considered unsuitable for project support; explicitly, this includes that subprojects, which would require involuntary land acquisition, will not be eligible under this project.
ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

While most of the projects will be undertaken on already existing and disturbed sites and bomas/payams, there is potential of new other locations (payams/bomas) containing some land with inherent environmental sensitivities relevant to ESS6; the subproject screening process in the ESMF excludes such sensitive areas. The ESMF also includes specific measures to avoid or minimize negative impact on critical or protected areas if the subproject screening process does not otherwise exclude these areas.

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

Analysis by World Bank and other experts confirm that the overwhelming majority of people in the country meet the requirements of ESS7 including the majority of the ethnic groups in South Sudan as well as in the project area, namely the Dinka, Murle, and Nuer; and excluding only recent immigrants from other countries. The approach and implementation process of the proposed project therefore embed its basic principles. Respective planning elements have been included in the overall project design. A social assessment is included in the ESMF, meeting the requirements of ESS7. Key identified risks include social ills, GBV, land conflicts, equity issues/targeting as well as elite capture, ethnicity of project staff, exclusion of nomadic pastoralists, inter-communal conflicts, violent attacks, and grievances of non-beneficiaries especially pertaining to exclusion of IDPs/returnees. Mitigation measures encompass, among others, awareness campaigns, transparent disclosure of project activities, analysis of risks throughout the project lifecycle, meaningful consultations and participatory approach towards project activities on the ground including site selection, Codes of Conduct, integration of women into committees, transparent procedures on benefit sharing, and constant enhancing of the GRM. The Project will also build in an iterative social/conflict monitoring throughout the project period to see how the project activities interact with the local dynamics, so that the project activities/approach can be adjusted in real-time.

ESS8 Cultural Heritage

As ECRP intends to move into urban areas, the potential for chance find of cultural or archaeological significance during construction increases. The ESMF includes chance find procedures. Also, the subproject screening process in the ESMF excludes activities located in, or in the vicinity of, a recognized cultural heritage site and includes specific mitigation measures to avoid negative impacts if the subproject screening process does not otherwise exclude these areas.

ESS9 Financial Intermediaries

Not relevant.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

The project triggers OP7.50 on “Projects on International Waterways” since subprojects under Component 1 may include rehabilitation and/or drilling of new community boreholes. These boreholes will be installed with solar pumps
to supply water to communities for domestic use. Under paragraph 7(a) of OP7.50 an exception will be sought to the requirement that other riparian countries be notified of the proposed project since the subprojects will not adversely change the quality or quantity of water flows to the other riparians.

**OP 7.60 Projects in Disputed Areas**

No

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

<table>
<thead>
<tr>
<th>DELIVERABLES against MEASURES AND ACTIONS IDENTIFIED</th>
<th>TIMELINE</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>ESS 1 Assessment and Management of Environmental and Social Risks and Impacts</strong></td>
<td></td>
</tr>
<tr>
<td>Functional risk management structure throughout the project setup as outlined in the ESMF with full-term staff on the central level and focal points on the local level.</td>
<td>09/2020</td>
</tr>
<tr>
<td>ENVIRONMENTAL AND SOCIAL ASSESSMENT: Scoping of key environmental and social risks and impacts of the Project and identification of appropriate mitigation measures to be included in the Environmental and Social Management Framework (ESMF) described in 1.3.</td>
<td>06/2020</td>
</tr>
<tr>
<td>Undertake site-specific environmental and social risk screening and impact assessments for sub-projects as outlined in the ESMF.</td>
<td>02/2023</td>
</tr>
<tr>
<td>Prepare, consult on, disclose, adopt, maintain, and implement an ESMF which includes, but not limited to: project-wide E&amp;S Risks assessment in line with ESS1-ESS10, management and mitigation procedures for handling environmental and social risks, social assessment, Gender-Based Violence Action Plan, LMP, SEF incl. GRM, screening procedures, templates for site-specific mitigation measures, organizational structure and resource planning, and monitoring and reporting system.</td>
<td>02/2023</td>
</tr>
<tr>
<td>Prepare, disclose, adopt, maintain, and implement site-specific risk assessments and ESIAs/ESMPs in line with the screening and assessment guidelines provided in in the ESMF described in 1.3. Ensure these are part of the bidding documents and contracts.</td>
<td>02/2023</td>
</tr>
<tr>
<td>Develop, adopt, maintain, and implement procedures for managing contractors and subcontractors.</td>
<td>02/2023</td>
</tr>
<tr>
<td>Obtain or assist in obtaining, as appropriate, the permits, consents and authorizations that are applicable to the Project from relevant national authorities.</td>
<td>02/2023</td>
</tr>
<tr>
<td>An Independent Verification Agent (IVA) will be engaged to provide independent review of environmental and social performance of the sub-projects, including adherence to all aspects of the Project Operations Manual.</td>
<td>10/2020</td>
</tr>
<tr>
<td><strong>ESS 10 Stakeholder Engagement and Information Disclosure</strong></td>
<td></td>
</tr>
<tr>
<td>Prepare and disclose the SEF.</td>
<td>05/2020</td>
</tr>
</tbody>
</table>
Develop specific plans per location and disclose per SEF requirements. Adopt, maintain, and implement the SEPs and update it in case of changing circumstances; reviewed at least biannually. 02/2023

Develop the framework for the grievance mechanism, as part of the SEF. Finalize, adopt, implement, and maintain a detailed GRM based on assessment of existing systems. 02/2023

**ESS 2 Labor and Working Conditions**

Develop outline of Labor Management Procedures (LMP) as part of the ESMF. Update, adopt, and implement the LMP that have been developed for the Project. 02/2023

Develop, adopt, implement, and maintain a grievance redress mechanism (GRM) for direct and contracted project workers as part of the LMP; community workers’ grievances will be addressed by the community GRM. 02/2023

Develop, adopt, implement, and maintain occupational, health and safety (OHS) measures, including security, based on World Bank EHS Guidelines, as part of the ESMF. 02/2023

As part of the OHS measures specified in 2.3, include measures on Emergency Preparedness and Response, and ensure coordination with measures under 4.5. Ensure workers and contractors are trained and implement the plan. 02/2023

Implement training of Project workers designed to heighten awareness of risks and to mitigate impacts on local communities, as defined in ESMF, LMP and GBV action plan. 02/2023

**ESS 3 Resource Efficiency and Pollution Prevention and Management**

Develop, adopt, and implement measures and procedures for managing all streams of waste and hazardous materials during construction, operation and decommissioning. Contractors will prepare, adopt, maintain, and implement a WMP as part of the (C)ESMP. 02/2023

As part of the ESMF, develop, adopt, implement, and maintain measures and procedures for managing natural resources to avoid impacts on community shared resources and/or adverse environmental impacts. 02/2023

**ESS 4 Community Health and Safety**

Measures and actions to assess and manage specific risks and impacts have been and shall be outlined in the ESMF and subsequent ESMPs. Contractors will prepare, adopt, maintain, and implement a Health and Safety Plan as part of the CESMP. 02/2023

Measures and actions as part of the Conflict Sensitivity Tool to assess and manage specific risks and impacts related to conflicts and the fragile context have been and shall be outlined in the ESMF and subsequent ESMPs. 02/2023
In consultation with the host communities, develop and implement road safety management measures as part of the ESMF. Implementors will adopt, implement, and maintain road safety management plans as part of the (C)ESMP.  

| 02/2023 |

Following a gap assessment of GBV/SEA/Child Protection risks and identification of mitigation measures and actions develop, adopt, implement and maintain a GBV/SEA/Child Protection Action Plan.  

| 02/2023 |

Conduct a quality assessment of the current GBV and child protective referral pathway service providers make available in the project-affected communities using good practice standards of care.  

| 02/2023 |

Adopt, implement, and maintain GBV procedures, including training and monitoring, pre-deployment and during project implementation. These have been defined in the ESMF and through a GBV action plan.  

| 02/2023 |

Adopt, implement, and maintain Emergency Response Measures as defined in the ESMF and subsequent ESMPs and included as part of the SEF.  

| 02/2023 |

In the event that security personnel is used for the sub-projects, the contractor shall develop and implement measures and actions to assess and manage the risks to human security of project-affected communities and project workers.  

| 02/2023 |

UNOPS and Technical Advisors shall conduct trainings for the community designed to heighten awareness of environmental and social risks and impacts and mitigation measures.  

| 02/2023 |

Adopt and implement the Security Management Plan (SMP), which has been prepared for the Project to safeguard all project workers and project-affected parties.  

| 02/2023 |

**ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

In the event that land is needed, it will be identified through a participatory community process and in line with voluntary land donation guidelines as outlined in the ESMF. If applicable, FPIC will be ensured, see ESS7.  

| 02/2023 |

A list of limitation on different types of interventions has been included in the ESMF, to be screened during subproject development. The ESMF will develop and implement respective screening procedures.  

| 02/2023 |

Special circumstances requiring a different approach will be addressed on an ad-hoc base following prior review of detailed plans to the satisfaction of the Bank.  

| 02/2023 |

**ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

A list of limitation on different types of interventions has been included in the ESMF, to be screened during subproject development. Site-specific mitigation measures will be developed as necessary.  

| 02/2023 |
### ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

<table>
<thead>
<tr>
<th>Activity</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respective assessments and provisions have been included as a Social Assessment in the ESMF. It equally has included a social management plan to assess respective risk mitigation measures.</td>
<td>05/2020</td>
</tr>
<tr>
<td>Implementation of respective provisions outlined in the social management plan.</td>
<td>02/2023</td>
</tr>
<tr>
<td>Ensure FPIC were applicable, which includes requirements under ESS8. Given the CDD nature of the project, where subproject ownership is with the community covered by ESS7, FPIC will be established via the subproject agreement process.</td>
<td>02/2023</td>
</tr>
</tbody>
</table>

### ESS 8 Cultural Heritage

<table>
<thead>
<tr>
<th>Activity</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Develop and implement Chance Find Procedures as part of the ESMF.</td>
<td>02/2023</td>
</tr>
</tbody>
</table>

### ESS 9 Financial Intermediaries

<table>
<thead>
<tr>
<th>Activity</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td>05/2020</td>
</tr>
</tbody>
</table>

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

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

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

#### IV. CONTACT POINTS

**World Bank**

<table>
<thead>
<tr>
<th>Contact</th>
<th>Title</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Makiko Watanabe</td>
<td>Sr Urban Spec.</td>
<td><a href="mailto:mwatanabe1@worldbank.org">mwatanabe1@worldbank.org</a></td>
</tr>
<tr>
<td>5220+30490</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Borrower/Client/Recipient**

**Implementing Agency(ies)**

**V. FOR MORE INFORMATION CONTACT**
VI. APPROVAL

<table>
<thead>
<tr>
<th>Role</th>
<th>Name</th>
<th>Date and Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Task Team Leader(s)</td>
<td>Makiko Watanabe</td>
<td></td>
</tr>
<tr>
<td>Practice Manager (ENR/Social)</td>
<td>Robin Mearns</td>
<td>Cleared on 03-Jun-2020 at 16:25:40 EDT</td>
</tr>
<tr>
<td>Safeguards Advisor ESSA</td>
<td>Nathalie S. Munzberg (SAESSA)</td>
<td>Conurred on 05-Jun-2020 at 11:51:11 EDT</td>
</tr>
</tbody>
</table>