Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

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BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Sao Tome and Principe	AFRICA EAST	P177158	
Project Name	Digital Sao Tome and Principe		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Digital Development	Investment Project Financing	3/28/2022	6/16/2022
Borrower(s)	Implementing Agency(ies)		
Ministry of Planning, Finance, and Blue Economy	Ministry of Infrastructure, Natural Resources and Environment		

Proposed Development Objective

To increase access and affordability of broadband internet services in Sao Tome and Principe, and improve government capacity to deliver services digitally.

Financing (in USD Million)	Amount
Total Project Cost	13.00

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

No

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

The proposed project is designed to strengthen the digital foundations of Sao Tome and Principe by increasing high-speed internet access and improving government capacity to provide and deliver digital public services.

The project is composed of the following components:

Component 1: Digital access (indicative amount US$ 8.5 million). This component will focus on supporting wider access and adoption of broadband services through financing for the connection of the Island of Principe to the

international submarine cable network, broadband market reform, and digital inclusion enablers. The component will focus on supporting wider access and adoption of broadband through financing for the connection of the Island of Principe to the international submarine cable network and broadband market reform. It will also support technical assistance on school connectivity and device affordability. By strengthening the enabling environment for broadband market development and data-enabled services, activities financed will help catalyze further private sector investment in infrastructure and services expansion.

Component 2: Enablers for digital public service delivery (indicative amount US$ 4.0 million). This component will focus on supporting greater government capacity to provide services digitally through investments in digital enablers including policy, governance frameworks, and foundations of shared government digital infrastructure, including data protection, cybersecurity, and digital ID. By enhancing the digital capabilities of STP's public administration the project will expand the country's capacity to provide secure digital and citizen-centric services.

Component 3: Institutional Coordination and Project Management (indicative amount US$ 500,000) will finance project management and coordination, including procurement, financial management (FM), monitoring and evaluation (M&E), as well as environmental and social (E&S) safeguards management.

Component 4: Contingent Emergency Response Component (CERC) (amount US$0M). This component will support the Government of STP in swiftly responding to an event that has caused, or is likely to imminently cause, a major adverse economic and/or social impact associated with a natural or man-made crisis or disaster.

D. Environmental and Social Overview

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

In addition to the standard challenges faced by other lower middle-income countries, STP faces challenges related to its size and geography common to other small island states. STP's development challenges are typical of small island nations; the country's small population and land area limit its ability to diversify, constraining its growth and development outcomes, lowering economies of scale, and creating a greater need for public spending. The island of Principe is burdened by double isolation. Located 148 km from São Tomé, the maritime connection between the islands is irregular and insufficient. The air connection depends on favorable weather conditions and is too expensive for most of the population. There are no regular connection services of any kind with Continental Africa. Principe is an Autonomous Region that has had a small local government since 1995. It has opted for a development model prioritizing activities that respect nature, such as responsible tourism, rather than large-scale extractive activities. Príncipe's coastal waters fall within the Gulf of Guinea marine biodiversity hotspot and support high numbers of coral reef fish and mollusk species that are unique to the area, as well as providing important breeding grounds for hawksbill, green and leatherback turtles. Island of Principe is a Biosphere Reserve and is part of the biodiversity hotspot of tropical forests of West Africa, containing a wide range of plant communities and habitats of high international importance such as primary tropical forests, forest shade, palm trees and lowland riparian habitats. In 2012 STP switched from satellite links for international connectivity to the ACE, submarine fiber-optic cable system. Digital development is an important avenue to help STP overcome some of its small island isolation challenges and provides economic opportunities for the country. Improved digital connectivity can help boost access to finance (through mobile money, for example), improve marketing and services connected to international clients and tourists, and improve public sector service delivery. And improving connectivity to the Island of Principe in particular can assist

with the development of the tourism industry and improve communications between the islands. It may also bring increased resilience of telecommunications and enable the development of improved digital public services for citizens and businesses. Component 1 will aim to boost broadband access in Principe through financing of connectivity to the island. There are a number of projects under design and implementation in the west coast of Africa which provide an opportunity to improve connectivity to STP. Some of the options include 2Africa led by Facebook and Equiano led by Google. Other options may however be available and need to be considered, such as upgrading the microwave (satellite) connection between Principe and Sao Tome Islands or connecting Sao Tome and Principe Islands by building a cable between them. The World Bank has commissioned an options study into the different technical options for improvement to connectivity. Besides evaluating the connection between Sao Tome and Principe, it will also include an assessment of the current infrastructure and options for resilience to the ACE cable. However, anecdotal evidence suggest that in STP, the submarine fiber-optic cable system offers more low-cost, high performance and reliable capacity for the the long term compared to satellite links and other options. Moreover, the microwave radio link deployed in 2015 has showed to be unreliable, especially during seasonal precipitation lasting from September through May. As such it is highly likely that the commissioned study on connectivity options reinforces the use of cable to connect the islands. To date, the exact location of project physical intervention sites including the cable route are unknow.

D. 2. Borrower's Institutional Capacity

Institutional capacity and sustainability' risks are rated as 'Moderate'. Experience across the WB STP portfolio suggests that ensuring adequate institutional capacity and sustainability is a major challenge. The Ministry of Infrastructure and Natural Resources (MINR), mandated to lead ICT sector development will lead overall project implementation and act as the main implementing agency under a new PIU. While MINR does have prior experience with World Bank-financed projects, namely the CAB-2 project, it does not have experience implementing projects under the new ESF. In general, the environmental and social capacity at local and central levels are weak and will need to be strengthened. For these reasons the development of E&S instruments and the implementation of E&S standards will be retained by STP's Project Fiduciary and Management Agency (AFAP), already established under the Ministry of Finance, Trade, and Blue Economy and with mandate to oversee coordination, procurement, financial and environmental and social management of the projects in STP and which is currently implementing several projects under the new ESF. AFAP will recruit an additional ES specialist to cover the proposed project.

A Project Preparation Advance (PPA) is being prepared in parallel to support project preparation and early set-up of the PIU at MINR. The PPA will be administered by AFAP until a PIU is in place within MINR. Fiduciary duties will continue to be carried out by AFAP throughout the project. The outcome of the Bank's capacity assessment will be presented in the Appraisal ESRS and, further to the findings, the required measures for institutional strengthening will be set out in the ESCP.

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

A. Environmental and Social Risk Classification (ESRC) — Substantial

Environmental Risk Rating — Substantial

The environmental risk at this stage is considered Substantial due to the analysis of the project's likely environmental risks and impacts combined with the current borrower's capacity in E&S risk management. The potential environmental risks are mainly related to connectivity solutions under component 1, including the

deployment of a submarine cable to connect São Tomé Island to Principe Island and the respective landing sites (cable trenches and a cable station). The potential environmental risks are related to: a) risks to the submarine biodiversity and ecosystem from laying of the cable; b) occupational and community health and safety risks e.g. transmission of communicable diseases (HIV/AIDS and COVID-19); and c) waste management (including hazardous) and safe disposal of any construction debris and d) use of security personnel to protect the ship. The construction of the submarine cable landing sites may also generate some impacts on sensitive coastal and marine habitats and species. These constructions investments relatively small and are unlikely to affect built heritage, intangible heritage, or natural heritage. No significant risk and impacts are expected during operation phase, the Cable Landing Station will generate minimal quantities of domestic solid waste and wastewater. Component 2 will finance hardware to help lay digital government foundations to securely deliver public services digitally, such purchase of new Information Communication and Technology (ICT) is not expected to exceed de minimis threshold for management of e-Waste management issues. However, a simple Code of Practices for e-Waste will be prepared. Component 1, 2 and 3 all include Technical Assistance activities such as trainings and workshops classified as Type-3 (capacity building) that have diffuse and induced impacts, often playing out over a longer term, however the Type-2 activities (policies, plans & strategies) including policy and regulatory reforms on access to digital services and connectivity options study may have potential significant downstream E&S impacts, as such the Terms of Reference will be reviewed and approved by WB to ensure that it considers adequate assessment of environmental and social implications and that the advice provided through the TA for addressing those implications is consistent with the ESF. With regard to Borrower´s capacity to manage environmental risk, AFAP who shall retain the E&S management of the project will recruit an environmental specialist to ensure that potential adverse environmental risks and impacts are well managed. Since the project exact location are not known, an ESMF including Labor Management Plan, Code of Practice for e-Waste Management, Security Risk Assessment (and possible a Security Management Plan) and Biodiversity Management Plan to mitigate the above risks and impact will be prepared, consulted upon and disclosed by Appraisal. The risk rating will be revisited at appraisal based on environmental and social assessments.

Social Risk Rating Moderate

The social risk is classified as Moderate based on the nature of its planned activities. While the overall social benefits of the project are expected to be positive, connectivity works could result in social risks and potential impacts including: (i) small scale negative impacts related to involuntary resettlement due to land acquisition, physical and economic displacement; (ii) potential Occupational Health and Safety (OHS) and Community Health and Safety risks; (iii) possible low SEA/SH risks resulting from works; (iv) minor labor influx risks, including sexually transmitted infections (STIs), teenage pregnancy, early marriage and child labor; (v) potential for risks and impacts on cultural heritage as the exact location of the submarine cable and landing sites are yet to be determined; (vi) social inclusion negative impacts, such as issues related to new digital services accessibility, especially for disabled, elderly, illiterate and the poor; (vii) mismanagement of digitalized citizen data in the creation of a Digital ID service, such as privacy concerns, discrimination, and possibility for abuse; and (viii) risks related to security concerns for the marine operation, including low piracy risks. These risks and corresponding mitigation measures will be set out in the Project's Environmental and Social Management Framework (ESMF), which will include Labor Management Procedures (including a Project workers-specific GRM), a GBV/SEA/SH Assessment and, if GBV/SEA/SH risks will be rated higher than Low, a GBV/SEA/SH Action Plan. The ESMF will also include a Social Assessment to analyze security and data management citizen data risks and their corresponding mitigation measures. A Stakeholder Engagement Plan (SEP), which will be developed incorporating a stakeholder mapping and ensure that a Project Grievance Redress Mechanism (GRM), including GBV/SEA/SH-specific measures to collect and handle potential GBV/SEA/SH

cases safely and ethically, is in place for addressing concerns and grievances during the Project implementation. A Resettlement Policy Framework (RPF) will be developed to address involuntary resettlement risks and impacts. The social risk rating will be revisited at appraisal based on the assessments of project activities. Any necessary environmental and social actions to meet the ESSs will be outlined in the ESCP. Regarding the management of social risks, AFAP will hire a full time social development specialist to coordinate and supervise the social risks agenda. These risks and corresponding mitigation measures will be set out in the Project's Environmental and Social Management Framework (ESMF), which will include Labor Management Procedures (including a Project workers-specific GRM), and a GBV/SEA/SH Action Plan. A Stakeholder Engagement Plan (SEP), which will be developed incorporating a stakeholder mapping and ensure that a Project Grievance Redress Mechanism (GRM), including GBV/SEA/SH-specific measures to collect and handle potential GBV/SEA/SH cases safely and ethically, is in place for addressing concerns and grievances during the Project implementation. A Resettlement Policy Framework (RPF) and possibly a Process Framework (PF) will be developed to address involuntary resettlement risks and impacts. The activities and sub-activities under the respective components will be assessed in greater detail during Project preparation to verify the current environmental and social risk classification, which will be reviewed and revised as needed. Any necessary environmental and social actions to meet the ESSs will be outlined in the ESCP. Regarding the management of social risks, AFAP will hire a full time social development specialist to coordinate and supervise the social risks agenda.

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 Standard is relevant. Project activities are expected to increase high-speed internet access to the island of Principe and to improve government capacity to provide and deliver digital public services. However, achieving the above outcomes may imply environmental and social risks. Potential environmental and social risks include: (i) risks to the submarine biodiversity and ecosystem (habitat destruction and degradation, noise and vibration, chemical pollution and risk of entanglement) from cable laying, (ii) land acquisition, and potential temporary restriction to access to legally designated parks and/or protected area for landing stations and for cable laying resulting in physical and economic displacement, including potential livelihood impacts to coastal habitats and fisherman from marine or coastal cable laying; (iii) labor influx impacts, such as child labor, sexually transmitted infections (STIs), teenage pregnancy, and early marriage; (iv) potential cultural heritage risks and impacts related to the submarine cable and landing sites; (v) occupational health and safety for marine- and land-based works; (vi) community health and safety related to any project interventions in populated areas e.g. transmission of communicable diseases such as COVID-19 and HIV/AIDS, (vii) inclusion risks resulting from structural and cultural challenges to digital services accessibility, especially for disabled, elderly, illiterate, and people facing financial constraints; (viii) waste management and safe disposal of any construction debris; (ix) GBV/SEA/SH risks; (x) data management risks; and (xi) risks associated to security concerns. Moreover, the distribution of hardware and digital devices also poses environmental risks related to safe final disposal of hazardous waste. Cumulative impacts on the marine environment and ecosystem, may result from placing the submarine cable network. The preliminary description of the fiber-optic cable system is not available at this stage, hence the submarine cable will connect the two islands of Sao Tome and Principe and will connected to external network through inland landing sites. The exact locations of the landing sites are also not known at this stage

but both submarine and landing sites will take into consideration existing biodiversity hotspots or legally protected areas and detour these areas where possible. The project will finance a series of TA activities, mainly under component 1 and 2. A TA to support the formulation of policies, programs, plans, strategies or legal frameworks will be provided to the MINR and AGER to address legal and regulatory gaps and bottlenecks. Such activities may lead to moderate downstream environmental risks when implemented through future investments that will require adequate assessment of environmental implications once detailed scope of such reforms are plans are known. As such the Terms of Reference for theses type of activities will be reviewed and approved by WB prior launching the tender process to ensure that it considers adequate assessment of environmental and social implications and that the advice provided through the TA for addressing those implications is consistent with the ESF. The project will also finance a TA to stregthen borrower capacity activities associated with the capacity building programs for the regulator AGER, which are expected to generate minimal or negligible environmental risks and impacts. There is also a potential risk resulting from the mismanagement of digitalized citizen data in the creation of a Digital ID service. Generally, this will include data that the government already has captured, such as civil registry (name, birthdate, national identity number if exists, passport number, etc).

Component 4, a CERC component is expected to be activated in case of a natural event or man-made disaster or crisis that has caused or is likely to imminently cause a major adverse economic and/or social impact. However, since the exact activities to be financed under this component are not yet known, a Negative List as well as an Environmental and Social Screening Check List will be prepared and included in the ESMF as part of the general ESMF.The technical option for connectivity, as well as the exact cable route, is not yet defined. The technical design is at earlier stages and is unlikely to provide reasonable details during project preparation. The view of the cable route and the confirmation of landing sites initially comes from a desktop study (DTS) assessing the cable route, using existing satellite data and taking into account marine reserve boundaries. This has not been completed at this stage and therefore is not possible to indicate an estimate of cable route with any level of confidence (including indicating a rough route with a possible margin of error distance either side). Hence, for this type of the project that is located in ecologically sensitive areas, an environmental and social assessment could inform and improve technical design considerably. However, since there is not enough information on the cable route an Environmental and Social Management Framework approach is being pursued during project preparation and the result of the DTS will feed into an ESIA for the selected technical design during project implementation.Nevertheless which ever solution is selected it will consider the potential site-specific E&S risks. Given that exact location for laying the marine cable and its connection to the landing station are not currently known, a framework approach is proposed. As such, to ensure that all risks related to terrestrial and submarine cable laying activities are adequately managed, the client will prepare an Environmental and Social Management Framework (ESMF) to elaborate management procedures. The ESMF will provide an overview of the project and its components, the applicable legislative and regulatory frameworks and policies, an overview of the baseline conditions and a summary of key anticipated environmental and social impacts and mitigation measures. The ESMF shall include a Labor Management Procedure (including a Project workers-specific GRM), Codes of Practice for e-Waste Management, Biodiversity Management Plan, ocuppational and community mitigation measures to avoid transmission of communicable diseases (COVID-19 Protocol), a GBV/SEA/SH Assessment and potentially related GBV/SE/ASH Action Plan to prevent and mitigate these risks, and chance finds procedure to be followed if previously unknown cultural heritage is encountered during project activities. Furthermore, the ESMF will include a Social Assessment, which will analyze the risks of mismanagement of citizen data and of security issues and their corresponding mitigation measures, among others.

To address involuntary resettlement risks, the Borrower will prepare a Resettlement Policy Framework (RPF). During implementation, once sub-projects information, implementation sites and preliminary designs become available, final

site-specific Resettlement Action Plans (RAP) will be prepared for subprojects when needed. The Environmental and Social Commitment Plan (ESCP) will include a timeline for implementation of mitigation measures as well as other requirements, including the preparation of site specific ESMPs as needed and additional risk management documents that may be identified during project preparation or during the elaboration of the ESIA and/or ESMF.
The Environmental and Social Commitment Plan (ESCP), Stakeholder Engagement Plan (SEP), Environmental and Social Management Framework (ESMF), and Resettlement Policy Framework (RPF) will be elaborated and agreed upon with the Borrower and disclosed by Project Appraisal.
The PIU and AFAP will have the overall responsibility to prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project.

Areas where "Use of Borrower Framework" is being considered:

The project will not rely on the Borrower's E&S Framework in the assessment, development and implementation of sub projects.

ESS10 Stakeholder Engagement and Information Disclosure

AFAP has elaborated a first Stakeholder Engagement Plan (SEP) to cover PPA activities. A detailed SEP for the parent project will be prepared, consulted upon, and disclosed, by Appraisal. The document will (i) describe the Project stakeholders, making a distinction between those directly affected by the project and other interested parties; (ii) specify the timing and methods of engagement with key stakeholders throughout the life cycle of the project, including engagement activities before project appraisal; (iii) describe the type of information that will be provided to stakeholders and how feedback from stakeholders will be solicited and recorded, (iv) if necessary, include differentiated measures to remove obstacles to participation as well as allow the effective participation of those identified as disadvantaged or vulnerable, and (v) describe the Project-level Grievance Mechanism, including GBV/SEA/SH-specific measures, to be developed by the Borrower per the requirements of ESS10. The GRM will build on existing well-functioning mechanisms that have been developed for other Bank funded projects in STP and managed by AFAP. The GRM will be further assessed during project preparation to ensure accessibility and inclusivity. This will be discussed in detail with the Borrower during project preparation with all details included in the draft SEP and more fully outlined in the appraisal stage ESRS. A specific Grievance Mechanism for Project workers under ESS2 will also be established separately from the overall project GRM and will be detailed in the Labor Management Procedures of the Project (which will form part of the ESMF).
The SEP will include provisions for aspects of social inclusion and accessibility for vulnerable stakeholders (especially for disabled, elderly, illiterate, women, youth and the poor), and set out the approach to engage with vulnerable stakeholders and detail what methods will be required, what capacity amongst the PIU to carry out these consultations will be needed. Engagement with stakeholders will continue throughout project implementation.The COVID-19 pandemic continues to pose a challenge for stakeholder engagement and disclosure of information, as stakeholder engagement and consultation processes cannot always be conducted in person. As long as COVID-19 related restrictions place limitations on traditional forms of stakeholder engagement, the requirements of ESS10 will be met by implementing actions such as (i) avoiding public gatherings (taking into account national restrictions), including public hearings, workshops and community meetings; (ii) conducting consultations in small group sessions, where small-group gatherings are permitted, or make all reasonable efforts to conduct meetings through online channels where gatherings are not permitted; (iii) diversifying means of communication and rely more on social media and online channels where appropriate, including, where possible, the creation of dedicated online platforms and chatgroups appropriate for the purpose, based on the type and category of stakeholders; or (iv) employing

traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders to do not have access to online channels or do not use them frequently as these can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions. These and other measures are set out in the World Bank's "Technical Note: Public Consultations and Stakeholder Engagement in WB supported operations when there are constraints on conducting public meetings" (March 20, 2020) and are based on emerging experiences from other WBG projects in STP applying the ESF operating under COVID conditions (e.g. PEREQT).

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

ESS 2 is considered relevant for this project. Labor Management Procedures (LMP) will be prepared, consulted upon and disclosed before Appraisal to cover project workers, including project Direct Workers and consultants, Contracted Workers and any service providers. The LMP will be developed as part of the ESMF. The Project is not expected to include Primary Supply Workers or Community Workers, as defined under ESS2. The number of Project workers is currently unknown. Although the specific details of the project's contractual arrangements have still to be defined, the project will include civil servants. Civil servants working in connection with the project full-time or part-time will remain subject to the terms and conditions of their existing public sector employment or agreement unless there has been an effective legal transfer of their employment or engagement in the Project. The Project will involve consultants and highly skilled workers for developing technology frameworks and shared digital services within STP's public administration, as well as laying the submarine cable. For civil works specifically, labor is expected to be internationally hired for high skilled workers who cannot be found in the locality, and locally for unskilled workers. Targeted OHS training will be provided to all workers (including sub-contractors), with rigorous OHS provisions set out in all procurement documents. Worker camps are not anticipated. Emergency Response measures for workers will also been considered in the ESMF following the guidance under ESS2 to ensure workers health and safety from climate change hazards or other emergencies. The Project will not engage child or forced labor, as defined under ESS2. The LMP will include provisions to ensure that women have equal opportunities to get employment in the PIU and includes measures to prevent SEA/H actions against Project Workers, including sexual harassment in the workplace (PIU workers, other direct workers and contracted workers). The LMP will also set out the procedures and requirements of the Project grievance mechanism required under ESS2, which aims at addressing Project Workers disputes about labor issues.

ESS3 Resource Efficiency and Pollution Prevention and Management

This standard is relevant. The proposed project activities may generate some adverse impacts related to disposal and management of waste during the construction phase, and pose significant public health concerns due to nuisance related to air and noise emissions. Additionally, the distribution of hardware and digital devices may pose environmental risks related to safe final disposal of hazardous waste. The purchase of new ICT is not expected to exceed de minimis threshold for management of e-Waste management issues. However, a simple Code of Practices for e-Waste will be prepared. However, all equipment and infrastructure deployed and procured, will follow resource

efficiency standards. The ESMF will include an assessment of how resources will be managed efficiently to minimize waste generation, harm to the marine or terrestrial environment, and the potential adverse impacts on human health. The ESMF will also include risk management procedures to manage these issues using the mitigation hierarchy and to deal with construction debris and hazardous or non-hazardous materials that may need to be disposed of. It is not expected that the project generates large amounts of GHG emission, however some emissions are expected from fuel engines of boats, vehicles, and generators during cable laying activities.

ESS4 Community Health and Safety

This standard is relevant given the possibility of civil works in the Project. The main projected Community Health and Safety related impacts and risks include (i) increased risk of traffic hazards and incidents associated with presence of trucks and other heavy machinery; (ii) blocking or diversion of traffic to potentially less accessible routes in terms of mobility; (iii) exposure to hazardous materials and possible health risks associated with inappropriate storage/use of chemicals; (iv) exposure to dust emission and noise pollution; (v) health risks linked to inappropriate disposal of solid and human waste; (vi) risks linked to potential misconduct of workers (sexual or otherwise) in the communities around work/accommodation sites; (vii) GBV/SE/ASH risks; and (viii) risks related to the spreading of COVID-19 in beneficiary communities by project workers. These risks and proposed mitigation measures will be assessed in the in the ESMF. The ESMF will also reference WBG EHS Guidelines on Telecommunication, and other GIIPs that provide good internationally good practices on building submarine cables. Mitigation measures will be taken to reduce impacts on communities to minor/acceptable levels, including controlling access to project sites, developing community emergency response procedures, implementing measures to prevent disease and exposure to toxic materials such as the proper disposal of human and hazardous waste, international good practice as set out by the World Health Organization and captured in WBG guidance to limit COVID-19 exposure, as well as specifying in Codes of Conduct the engagement rules for workers with the adjacent communities. Although not foreseen as a significant risk for this operation, the presence of workers may lead to adverse social impacts, such as sexual exploitation and abuse, teenage preganancy, early marriage, as well as the spread of communicable diseases amongst community members. The SEA/SH risk rating is set at Low and will be further assessed during preparation. SEA/SH risk mitigation measures will be included in the Project ESMF. Regarding security considerations, the area around STP is less of a security concern than the East Africa region. However this will be further assessed during scoping phase as the security is dependent on the area of operation, and it is known that piracy is increasing on the Gulf of Guinea. As such, there is a possibility that the operator may deploy private security personnel on the ships that are operating (both for the marine survey and the cable lay) as SOP for the Africa region. It is unlikely that the operator will use security for onshore operations as STP is a safe country of operation. A Security Risk Assessment proportionally to the risks of the project will be prepared by Appraisal, and depending of the results, a follow-up Security Management Plan shall be prepared before project activities on the ground and not later than 90 days after project effectiveness. The project will comply with the requirements of ESS4, and will take into account the ESF Good Practice Note on Assessing the Risks and Impacts of Using Security Personnel in project. It is not expected that the project activities will impact significantly on provisioning and regulating ecosystem services e.g. affect coral reefs that provide spawning, nursery, refuge and feeding areas for a large variety of organisms which are important to the fishing industry or affect mangroves that provide coastal protection from waves, storm surges and high winds, however further analysis will be conducted during the project scoping phase.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

This Standard is relevant given civil works. The only civil works planned for the project involve the connection with Principe. Although the specific investments will not be known before the project implementation phase, submarine cable and the related cable connection landing station might lead to small-scale physical resettlement, land acquisition, and adverse impacts on sources of revenue. Potential physical displacement is expected to be very limited and will avoided as much as possible. The types of economic displacement impacts induced by the project could likely result from i) temporary interruption of economic activities during construction activities; and ii) impacts on mobile vendors. To prevent damage to the cable, a restricted cable access corridor (20 to 50 meters wide) near to shore will be necessary. This prevents boats from sinking anchor in the declared area, and usually most types of fishing as well. This may lead to some disturbance to local communities, particularly for activities such as artisanal or small boat fishing that is generally closer to shore, but is unlikely to result in loss of livelihoods for fishermen.

An advanced draft of a Resettlement Policy Framework (RPF) will be prepared, disclosed and consulted upon by Approval. The commitment to prepare subsequent site-specific RAPs will be included in the ESCP. Site-specific RAPs and/or Abbreviated Resettlement Action Plans (ARAPs) will be prepared, when required, once the sites are determined after the completion of final technical designs. No works will commence prior to the preparation and implementation of appropriate risk management instruments. Resettlement related expenditures will be financed by the government.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

This standard is relevant. The cable laying in the sea may pose risks to the marine environment and coastal and benthic biodiversity(habitat destruction and degradation, noise and vibration, chemical pollution and risk of entanglement). Moreover, the laying of cables in land should not undermine the integrity of coastal resources such as mangroves, grasslands, or other habitats where landing stations may be placed. Every effort will be made to avoid adverse impacts to local biodiversity and living natural resources through application of the mitigation hierarchy and optimizing project technical designs in this regard to the extent feasible, with measures to be outlined in the ESMF through a Biodiversity Management Framework. The project area has been screened for presence of Critical Habitats and identified the Principe Biosphere Reserve as part of the Gulf of Guinea marine biodiversity hotspot, further analysis of natural and critical habitats will be conducted during scope phase of the project and included in the BMP, site-specific ESMPs and other environmental and marine baseline assessments. Since technical design will only be available during project implementation, a specific Environmental and Social Impact Assessment will be warranted, which should include reasonably detailed biodiversity baselines, alternative analysis, consultations and permitting, impact assessment that will lead to a robust Biodiversity Management Plan.

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

The ESS7 is not relevant to the Project as there are no identified vulnerable or marginalized groups with identities and aspirations that are distinct from mainstream groups as defined under the Indigenous People/ Sub-Saharan Historically Under-served Traditional Local Communities in the Project.

ESS8 Cultural Heritage

ESS8 is relevant. Current identified constructions investments are unlikely to affect built heritage, intangible heritage, or natural heritage. However, Borrower will determine later the project-specific potential risks and impacts on cultural heritage through the environmental and social screenings. To manage and mitigate the identified risks related to ESS8, the project will integrate into the ESMF chance find procedures, which will also be included in the relevant ESMPs and contractors' contracts. The ESMF will provide specific provisions to protect cultural heritage from the adverse risks and impacts of project activities as well as supporting its preservation, including meaningful consultation with the relevant stakeholders for cultural heritage. Project activities will be carried out in full respect of the cultural norms of the communities.

ESS9 Financial Intermediaries

The ESS9 is not considered relevant to the Project activities at this stage. No plans of engaging Financial Intermediaries is included in the Project at this stage.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways	No
OP 7.60 Projects in Disputed Areas	No

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? No

Financing Partners

Not applicable

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

Actions to be completed prior to Bank Board Approval:

- Prepare, consult upon and disclose an Environmental and Social Management Framework (ESMF), including Labor Management Procedures, Social and GBV Assessment, Code of Practice for e-Waste Management, Security Risk Assessment and Biodiversity Management Plan; and a Resettlement Policy Framework (RPF).

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

The ESCP is likely to include the Borrower's commitment to:

- Establish a functional E&S risk management system, including recruitment of qualified E&S staff;
- Prepare site-specific environmental and social risk management tools such as ESIAs/ ESMPs, RAPs;
- Design and operationalize an accessible and inclusive GM, including GBV/SEA/SH-specific measures;

- If GBV/SEA/SH risks will be higher than low, implement GBV/SEA/SH mitigation measures per the GBV/SEA/SH Action Plan,
- Implement an appropriate compliance monitoring and reporting system;
- Adopt reporting procedures for (a) regular status updates and (b) immediate notifications on any significant accident or incident to the Bank; and
- Institutional strengthening and capacity building issues.

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS 10-Jan-2022

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Ministry of Planning, Finance, and Blue Economy

Implementing Agency(ies)

Implementing Agency: Ministry of Infrastructure, Natural Resources and Environment

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s):	Audrey Anne Alexandra Ariss, Maria Claudia Pachon
Practice Manager (ENR/Social)	Africa Eshogba Olojoba Recommended on 22-Nov-2021 at 04:48:2 GMT-05:00
Safeguards Advisor ESSA	Ning Yang (SAESSA) Cleared on 22-Nov-2021 at 18:50:13 GMT-05:00