



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 05/25/2021 | Report No: ESRSA01507



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Madagascar	AFRICA EAST	P176811	
Project Name	Madagascar Road Sector Sustainability Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Transport	Investment Project Financing	5/27/2021	6/29/2021
Borrower(s)	Implementing Agency(ies)		
Republic of Madagascar	Road Agency		

Proposed Development Objective

To improve the longevity, safety and climate resiliency of selected paved primary roads in Madagascar.

Financing (in USD Million)	Amount
Total Project Cost	200.00

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 aims at supporting the Government's long-term efforts toward enhancing transport connectivity in select priority areas, while supporting institutional reforms to strengthen the sustainability of the roads in Madagascar. The program is fully aligned with the World Bank's CPF for FY17–21 which aims to build on the current relative political stability to help address structural fragilities that hamper the sustainable development in Madagascar. The project supports the two focus areas of the CPF which are: (a) promoting inclusive growth and (b) increased resilience and reduce fragility.

The World Bank will provide US\$ 200 millions to finance the project to be executed in 4 years. It will contribute to the national transport vision and multimodal investment plan, and will act as an important platform to leverage additional and important financing from donor, government, and the private sector.

The proposed project has the following components:



Component 1. Improving Road Condition and Resilience (US\$180 million)

This component will finance works and consultancy services to support periodic and routine maintenance on paved primary roads in different regions of Madagascar. It is estimated that about 1,200 km of paved roads that are in fair to poor condition – representing 20% of the paved national network - will benefit from periodic maintenance under this project. While a long list of paved roads has been identified as a priority, the exact roads to be retained for financing under this project, and the exact sections on those roads are yet to be defined following the ongoing engineering studies. The type of works under this project would all take place within the existing right of way and include light and routine maintenance on roads in good to fair condition (crack sealing, filling potholes, cleaning drainage, signage, fencing etc.) and periodic maintenance on roads in fair to poor condition (typically a 5 cm pavement overlay, with maintenance of supporting structures). Roads in very poor condition will be outside the scope of this project as they need heavy rehabilitation to be financed through other projects such as the MPA under preparation.

As part of increasing the sustainability of the investments, all roads to be financed through this project will use the recently developed resilient road construction and maintenance norms and standards for Madagascar. The road construction and maintenance norms and standards will be road civil works to incorporating climate change resilient features. The project will use the « Norme nationale pour des Infrastructures routières Résistantes aux Inondations et aux Phénomènes Géologiques (NIRIPG) ». These approved norms include revisions of existing road infrastructure construction and maintenance norms to increase the climate resilience of roads such as improving drainage requirements and road surface treatment. These norms will be used in the design of the periodic maintenance works of the project and will be reflected in the bidding documents. In addition, all roads will have road safety audits (audits of designs as well as audits of works) to ensure proper safety measures are incorporated. The project will finance the introduction and piloting of performance-based contracts for the maintenance of select road sections.

Component 2. Technical Assistance and Support to Roads and Transport Sectors Reforms (US\$20 million)

This component will primarily support consultancy services and goods aimed at capacity building and institutional-strengthening activities of the roads and transport sector to ensure sustainability of connectivity, among other things, in the following areas: (a) strengthening the institutional, regulatory, and planning capacity of the MTPPW and the newly created RA and RF (US\$ 3 million); (b) strengthening the institutional, regulatory, and planning capacity of the Ministry of Transport (MOT) and depending agencies (US\$ 3 million) (c) building capacity and trainings for testing and adopting new maintenance regimes (micro-enterprises, performance-based contracts, new resilience standards) for better planning and management of road infrastructure (US\$1 million); (d) continue support to the lead road safety agency, under creation, for improving road safety and implement the road safety strategy and action plan under preparation (US\$10 million); (e) continue the development of a road asset management system for the prioritization of road maintenance and investments, including sustainability, climate resilience, road safety and socio-economic variables such as poverty and access to markets and services (US\$ 1 million); (f) support training programs and capacity building to improve gender aspects and increase women participation in transport sector labor force (US\$1 million). This component will also provide support and build capacity for the project preparation, management, implementation, supervision, including audit of the project, and social and environmental safeguard activities, and will finance a well-staffed PIU to support the project implementation (\$1 million).

Component 3. Contingency Emergency Response Component



This component will facilitate access to rapid financing by allowing for the reallocation of uncommitted project funds in the event of a natural disaster, either by a formal declaration of a national emergency or upon a formal request from the government. Following an eligible crisis or emergency, the government may request from the World Bank to re-allocate project funds to support emergency response and reconstruction. This component would draw from the uncommitted resources under the project from other project components to cover emergency response. A Contingent Emergency Response Component (CERC) Manual and an Emergency Action Plan, acceptable to the Bank, will be prepared and constitute a disbursement condition for this component.

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 proposed Project aims to improve the maintenance and sustainability of Madagascar's road network. The project will improve road condition and resilience in different regions and will give support to transport sector reforms in Madagascar. At this stage, the exact locations of projects activities are still not well defined. The project will finance periodic and routine maintenance on paved primary and national roads in Madagascar. Thus, the project might affect the five major regions which are the North region, the Highlands, the East region, the West, the South and South-West region. The paved primary and national road will be selected during implementing period following a cost-benefit analysis on a typical road section from among the national roads in Madagascar. All works to be undertaken in the component 1 will be carried out on entirely within the existing Right of Way (ROW) of primary national roads. Most environmental and social risks and impacts associated with the project are limited to the construction phase and Site-specific risks and impacts. The relevant standards that have been identified via the environmental and social risk screening at concept stage of the project are: ESS1: Assessment and Management of Environmental and Social Risks and Impacts; ESS2: Labor and Working Conditions; ESS3: Resource Efficiency and Pollution Prevention and Management; ESS4: Community Health and Safety; ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement; ESS6: Biodiversity Conservation and Sustainable Management of Living Natural resources; ESS8 Cultural Heritage; ESS10: Stakeholder Engagement and Information Disclosure.

The literature review showed that the environmental profile and biological richness along of the national roads within the framework of this project are mainly constituted of grasslands, reforested areas, agriculture parcels and bushes without any critical habitats. In addition, there are sufficient old quarries and deposits opened during previous civil works and could be reused for this proposed operation.

D. 2. Borrower's Institutional Capacity

All components will be implemented by the Road Agency (RA) in line with the ongoing sector reforms to empower the RA as the implementing agency on all national roads. The Road Agency, as the successor of the formerly Autorité Routière de Madagascar (ARM), has extensive experience with donor-financed projects, including World Bank projects. The RA is supported by the Road Fund and the Ministry of Land Planning and Public Works (MPW) which have a satisfactory experience with the Bank in the ongoing Transport Connectivity Project (P166526) in Madagascar. A dedicated PIU will be created at the RA shouldering overall responsibility for preparing and implementing the project, including technical, operational, environmental and social, procurement, financial management, and communication activities. Following ESMF assessment, the PIU will include an Environmental specialist, a Social specialist and a GBV specialist to support the implementation of the project to be hired no later than 03 months after Effective date of the project. During the preparation phase, this PIU was supported by E&S safeguard focal point



(currently supporting the ongoing Transport connectivity project) of lines ministries who have good experiences in the preparation and implementation of World Bank safeguard policies with the previous and ongoing Bank’s financing in the sector, and have already benefitted from basic training on ESF standards. The E&S focal point will continue to support the PIU during the transition phase. The Bank team has also reviewed the environmental and social capacity of the agency, and identified additional capacity needs, or additional training as mentioned in the project ESCP. Given the limited skills of the RA in handling the ESF, environmental and social risk management capacity building activities have been built in the project design.

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

A. Environmental and Social Risk Classification (ESRC)

Substantial

Environmental Risk Rating

Moderate

The environmental risk classification is Moderate under the World Bank’s Environmental and Social Framework based on the location, type, sensitivity and scale of the project intervention, nature and magnitude of potential ES risks and impacts, and client capacity and ownership. The key environmental risks are associated with the maintenance of paved road in different regions under component 1 and the proposed operations is nationwide. All works to be undertaken in this component will be carried out on existing primary national roads. There will be no expansion of the Right of Ways (ROWs). Negative impacts are limited, entirely within existing footprints of national roads. The road sections to be rehabilitated are not yet fully defined. Most environmental risks and impacts associated with the project are limited to the construction phase. The main environmental risks and impacts of the project are related to civil works that induce land disturbance, erosion and accidents could occur; soil degradation and erosion; potential collisions with wildlife; limited loss of vegetation and pollution from construction (dust, noise and vibration, wastewater, solid wastes and used oil), use of construction materials such as soil, gravels, and water consumption for the construction, poor working conditions including traffic safety, occupational health and safety risks, traffic disruptions and management of larger quantities of construction waste.

Social Risk Rating

Substantial

The social risk classification is Substantial. The Project’s key interventions will relate to periodic maintenance of existing local paved roads (component 1) and technical institutional support to implementing entities (component 2). The scope of those operations is nationwide. The proposed project activities to be financed through Component 1 will entail physical works, whose potential impacts are temporary loss of land (for the implementation of potential temporary labor camps, and during road shoulders maintenance and development), asset loss, access restrictions and disruption to livelihoods and economic activities on the selected corridors during maintenance activities, possible impacts on physical and cultural resources, labor influx due to the use of labor from outside of the project areas and the associated risks arising from this including social conflict and disruptions to local communities, pressure on social amenities, increase in local inflation, disease transmission and spread of HIV and Covid-19, and potential for Gender Based Violence and Sexual Exploitation and Abuse. Other risks relate to the safety of workers due to civil works, the protection of the labor force and failure to comply with the labor standards of non-discrimination, child and forced labor, as well as the potential for exploitation and abuse of workers. The GBV risk screening has classified the GBV/SEA/SH risk as moderate which is mainly linked to labor influx in targeted regions, but upgraded as substantial because of unavailability of adequate services to support GBV case, the existence of GBV/SEAH-related factors linked to cultures and traditions in the areas of intervention, and the needs to create new

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GBV skills within the project implementation agency. It is expected that road maintenance activities will not affect tangible or intangible cultural heritage. Nevertheless, the project took specific measures described in the ESMF if any cultural resources will be discovered during the implementation of the project activities. The project's worksites will generate construction related health and safety concerns for both workers and the surrounding communities. In addition, potential social risks under the component 2 might be related to TA activities engagement with local communities and other relevant stakeholders (including with most vulnerable and disadvantaged groups) and ensuring their genuine participation in decision-making processes of the project and avoidance of potential risk of elite capture. Other risks related to insecurity in general in Madagascar, and in the south particularly (NR7) are also identified but not induced by the project activities (but mainly associated with cattle robbers, theft and violence related to persistent poverty and fragility). However, in general, all those impacts are expected to be reversible and the physical footprint is site specific and localized making these impacts manageable within the confines of the instruments to be developed during project preparation. The Borrower has previous and current engagement with Bank-financed investments under Bank policies, and have already received basic training on the ESF. The capacity for social risk management under the ESF is limited for the implementation agency (RA); however the RA will be supported by experienced Social specialist of the ongoing Transport connectivity project during the first phase of the implementation of the project. It is considered that this capacity could be reinforced through targeted capacity building measures.

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:

ESS1 is relevant to the project. The project will finance, in component 1, maintenance of primary road infrastructure across Madagascar as well as TA support to strengthen the institutional capacity of lines ministries and agencies in transport sector in component 2. The maintenance of existing national roads and bridges in their current right of way (RoW) include medium scale civil works which will more than likely generate adverse site-specific risks and impacts. No new road construction is expected for the project. The proposed works could generate risks and impacts such as disposal of material excavated during civil works/rehabilitation activities, limited loss of vegetation, labor and working conditions including traffic safety, labor influx; the occupational health and safety of workers during construction and operational phases, increased levels of dust and noise and community health and safety risks including temporary traffic blockages, in particular; generation of solid and liquid waste, soil degradation and erosion, potential collisions with wildlife and the social risks associated with that such as disease transmission and spread of STDs/HIV and Covid-19, potential for GBV risks and SEAH; and impacts on land that may lead to temporary physical or economic displacement, including loss of assets and livelihoods. Clearing, site preparation and construction will also lead to loss of vegetation and associated fauna, soil disturbance and erosion.

Other risks relate to the safety of workers due to civil works, the protection of the labor force and failure to comply with the labor standards of non-discrimination, child and forced labor, as well as the potential for exploitation and abuse of workers. The potential for the spread of COVID-19 as a result of the project activities has been identified as another transversal risk for all project components involving face-to-face interactions. The GBV risk screening has classified the GBV/SEA/SH risk as moderate which is mainly linked to labor influx in targeted regions, but upgraded as substantial because of unavailability of adequate services to support GBV/SEA/SH case, the existence of GBV/SEA-



related factors linked to cultures and traditions in the areas of intervention, and the needs to create new GBV skills within the project implementation agency. Based on preliminary information, project activities are not expected to affect any cultural heritage and the ESMF describes specific measures if any cultural resources would be discovered during the implementation of the project. In addition, potential social risks under the component 2 might be related to the project TA activities engagement with local communities and other relevant stakeholders (including with most vulnerable and disadvantaged groups) and ensuring their genuine participation in decision-making processes of the project and avoidance of potential risk of elite capture. The project has developed a Stakeholder Engagement Plan (SEP) which provides the stakeholder mapping and details regarding the consultations undertaken for this project to date. However, social risks relate to the protection of the labor force and failure to comply with the labor standards of non-discrimination, child and forced labor, as well as the potential for exploitation and abuse of surrounding communities and workers, will be addressed in the Labor Management Procedure (LMP) in preparation.

The proposed Project aims to improve the maintenance and sustainability of Madagascar's road network. Because the national roads are not yet selected at this stage, the Borrower has prepared an Environmental and Social Management Framework (ESMF). The instruments to be prepared when the subproject locations are identified and defined include site-specific Environmental and Social Impact Assessments (ESIAs), Environmental and Social Management Plans (ESMPs) prepared in compliance with the World Bank Group's Environment, Health, and Safety Guidelines, and Resettlement Plans (RPs). The ESMF has described the overall project, its baseline conditions, applicable policies and legislation, and overall key environmental and social considerations and potential impacts. It proposes the overarching environmental and social management guidelines, this will include the identification of potential risks and impacts of proposed activities in the identified components, proposed mitigation measures as well as the development of environmental and social screening tools and protocol to be adopted by the project and applied to identify risks and impacts of road maintenance and civil works activities and subsequent preparation of appropriate sub-project Environmental and Social Assessment (ESA) instruments mainly a specific ESMP for the each selected national road. The project will apply the requirements of the Environmental Health and Safety Guidelines (EHSOs) such as General EHSOs, EHSOs for roads, and relevant good practice notes (GPN) such as a GPN for road safety, life and fire safety. Construction contractors will be required, as a condition of their contracts with the Project, to implement and comply with ESMP on the ESS1 requirements and develop and implement their Contractor ESMP (C-ESMP). The preparation of the ESIAs/ESMPs will be initiated in parallel of technical engineering studies and will be submitted for Bank's review and clearance. The approved ESMP, with the E&S clauses, will be included in the bidding documents and enterprise contracts to allow the latter to prepare the specific C-ESMP before commencement of civil works including the requirements of the Bank Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups and those arising from SEA/GBV, STD and/or COVID 19.

The project will develop as part of the operation manual of the project a strategy to ensure the security of the community benefitting from the project, and the security of Bank supervision, Client supervision and support team (PIU, NGO).

To ensure that the Contingency Emergency Response Component (CERC) Component complies with the requirements of the World Bank Environment and Social Standards, the ESMF will be revised to include the list of negative activities, potential environmental and social impacts and process to be followed for a rapid environmental and social assessment. A section indicative of the CERC-based activities will be included in the CERC-ESMF. The CERC-ESMF specific section will include (i) a screening process for the potential activities, (ii) the institutional arrangements for



environmental and social due diligence and monitoring, (iii) any needed capacity-building measures and, (iv) a generic guidance on emergency on small-scale civil works and any procurement-related activities.

For all activities that will be designed and executed during Project implementation, an Environmental and Social Commitment Plan (ESCP) has been developed before project appraisal to define and recommend the type of assessment, mitigation plans, timeframe and resources to implement to avoid, reduce and mitigate possible negative risks and impacts induced by the project activities. This ESCP, drawn and agreed upon with the borrower, has also set out the substantive measures and actions that will be required for the project to meet environmental and social requirements over the project's lifetime and the status of implementation will be reviewed as part of project monitoring and reporting. The ESCP could be adjusted during the project life keeping with the evolution of environmental and social risks and impacts.

In addition, the project has developed a draft Stakeholder Engagement Plan (SEP) including a Grievance Mechanism prior to appraisal which will propose a list of training sessions to be included in the capacity-building program. The Labor Management Procedure will be prepared within two months after Project effectiveness to contain provisions to ensure that potential labor risks, including child and forced labor, discrimination and sexual harassment, are properly addressed in practice as well as throughout all the project documentation, including ESMPs, bidding documents, and civil works contracts. This LMP will also include a worker GM.

The PIU E&S specialists will also share the bi-annual E&S reports and seek for advice and guidance on critical and significant issues that arise and/or reported during the project implementation. The ESCP, draft ESMF and draft SEP should be disclosed in-country and on the World Bank's external website prior appraisal. No later than 2 months after the project effectiveness date, the Borrower will finalize and disclose all these documents, and develop, and disclose the Labor Management Procedures (LMP) and the Resettlement Framework (RF) of the project.

ESS10 Stakeholder Engagement and Information Disclosure

ESS10 is relevant to the project. A draft Stakeholder Engagement Plan (SEP) has been prepared for the project. It includes a stakeholder mapping and provides details regarding the consultations undertaken for this project to date, the latest ones undertaken in May 2021, as part of the preparation of the ESMF and the RF. The SEP has identified and analyzed key stakeholders (i.e., affected parties, other interested parties and disadvantaged and vulnerable groups) and described the process and modalities for sharing information on the project activities, incorporating stakeholder feedback into the Project and reporting and disclosure of project documents. The identified stakeholders include, but are not limited to: the Ministry of Transport, Tourism and Meteorology (MOT), the Ministry of Land Planning and Public Works (MPW), the Ministry of Economy and Finance (MEF), Ministry of Environment, the Road Agency (RA), the Road Fund (RF), authorities in project affected communes and regions, project beneficiaries, private sector, NGOs and civil society, media and project affected persons.

The SEP has followed a precautionary approach in the context of the COVID-19 pandemic and proposes engagement methods that minimize the risk of transmission of the virus during stakeholder mobilization.

The reports for the consultations for the ESMF include lists of stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was considered. Major stakeholder suggestions consist of job creation, transparency for the recruitment of workers, equal opportunities for all to access project benefit, resettlement issue, respect of work duration, and safety and security of the local inhabitants which have been



addressed through establishment of Grievance Mechanism (GM). Suggestions to prevent GBV in the area of the project has been also discussed during the consultations. Such inputs will finally be addressed through the Contractor bidding process, code of conduct, continuous monitoring of environmental and social risks and impacts by Implementing Agency consultants and adherence to ESCP.

This SEP includes a project level grievance mechanism (GM) to respond to complaints, concerns, queries, clarifications and feedback from and give voice to stakeholders including beneficiary communities, project affected parties and vulnerable groups (including those affected by GBV/SEA) to ensure complaints and concerns of stakeholders are adequately managed. The draft SEP should be disclosed before appraisal, and the final version shall be produced and disclosed no later than 2 months after effectiveness date.

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

ESS2 is relevant to the project. The project workers for this project include (i) direct workers (PIU staff including workers hired by the project); (ii) contracted workers (consultants supporting technical studies, civil works contractors and supervising engineers); (iii) primary supply workers such as people employed by Borrower's primary suppliers and materials suppliers for road maintenance (component 1); and (iv) civil servants from MPW and MOT. Risks identified under ESS2 include (i) OHS induced by civil works, community/workers health and safety affected by waste/debris transportation to dump site, air and water pollution; (ii) disease transmission (HIV/COVID19) during the implementation of project activities such as the road maintenance in component 1; (iii) risks associated with working conditions and management of worker relationships, which includes terms and conditions of employment, nondiscrimination and workers organizations and the protection of the work force; (iv) risks associated with presence of worker's camp; and (v) negative impacts of migrant workers, and the possibility of child labor and sexual harassment.

The Republic of Madagascar has a clear legal framework governing the right of workers (Law 2003-044 of July 28, 2004 which established the Labor Code). This code preserves the worker's essential interests (trade union rights, employment contract, health and safety, intimidation, sexual harassment). Various laws and regulations (decrees, orders, decisions) supplement the Labor Code, mainly the Law n° 66-003 of July 2nd, 1966 on the General Theory of Obligations (in particular, the contracts of employment of consultants not subject to Labor Code are governed mainly by this Law on TGO and the provisions relating to the obligations of the French Civil Code of 1960 applicable to Madagascar) to provide a system in which to raise workers' concerns.

The Borrower is currently developing the draft LMP and shall finalize and disclose the document no later than two months after the effectiveness date of the project. The Labor Management Procedures (LMP) will outline labor risks, labor policies and procedures, detailing the work terms and conditions for labor including explicit prohibition of forced and child labor. The LMP will also outline the inclusion of vulnerable groups in the work force. Part of this LMP, the PIU will develop and implement (i) a worker's Grievance Mechanism (GM) which will address all workers complaints and provide details about the roles and responsibilities of contractors and PIUs in managing ESS2; (ii) sensitization related to the availability of worker's Grievance Mechanism (GM) and to the respect of code of conduct to prevent and address potential harassment, child labor, gender discrimination or GBV/SEA issues, intimidation



and/or exploitation during the implementation of the activities financed under this project; and (iii) a GBV action plan that will prevent GBV/SEAH among workers. Because of increase of insecurity in general in Madagascar, the project has developed in the ESMF, and also in the Operational Manual, specific security management procedures. These will be also integrated into all C-ESMPs.

The current draft ESMF has considered OHS risks and promotes employee well-being and a safer work environment. To mitigate impacts on contracted workers during construction/rehabilitation, the OSH measures described in the ESMF are subdivided into 2 types: avoidance measures such as raising awareness among workers and surrounding communities on site accident risks, and mitigation measures such as the use of protective vehicle barriers, the installation of visual markers to delimit the work area, etc. Mitigation measures to manage potential risks of GBV/SEA/SH as a result of the project has been included as part of the ESMF, and will be included into ESIA and subsequent ESMPs, and the SEP as well as in the bidding documents, contractors contracts, into OHS plans and C-ESMP to be developed by contractors.

The project will require the management of contracted workers (both local and international) to develop their own labor management procedure that is acceptable to the project and the World Bank. It will also be the responsibility of the Contractor to ensure that all workers are fully aware on the terms of employment, remuneration, and grievance and other relevant factors as per the ESS2 and relevant national laws. The signing of codes of conduct (COC) will be a condition for employment for all workers, temporary or full time. The project will need to ensure that regular trainings in local languages are conducted by the Contractor to the benefit of the workers on labor provisions, codes of conduct, and the grievance mechanisms.

ESS3 Resource Efficiency and Pollution Prevention and Management

ESS3 is relevant to the project. Water consumption is expected primarily in the mixing plants and campsites during the construction phase. As the project activities mainly involve rehabilitation/maintenance works of existing roads, it is not expected to consume very large amounts of energy and raw materials for the routine maintenance civil works nor use or procure pesticides. However, water resources must be used as efficiently as possible.

The physical interventions at the selected national roads will generate construction debris and hazardous or non-hazardous waste such as wastewater, fuel, asphalt, chemicals, wood and building materials, among others. The choice and use of quarries for raw material must also be carefully assessed as potential impacts include potential loss of habitat for fauna, degradation and fragmentation of natural habitat, and degradation of water quality at or near the site. The ESMF demontres that there are sufficient old quarries and deposits opened during previous civil works that could be reused for this proposed operation. The literature review showed that the environmental profile and biological richness along of the national roads within the framework of this project are mainly constituted of grasslands, reforested areas, agriculture parcels and bushes without any critical habitats. The ESMF has well described the typical pollution generated from road improvement activities including: (i) dust and other forms of air pollution from construction sites, transportation and auxiliary facilities; (ii) noise and vibration; (iii) solid waste (domestic waste and construction waste including used oil and lubricants); and (iv) wastewater from workers camps. It was characterized that these impacts are expected to be temporary, site-specific and can be managed through a set of mitigation measures to be include in the ESIA and ESMP when the national roads will be selected during implementing phase. The project will promote proper waste management practices as part of the ESMPs to help



minimize hazardous and nonhazardous waste production and appropriate management of wastes. Appropriate waste management measures will be reflected in the contract documents to ensure the requirements to manage waste from construction operations, including identification of the end location of the waste removed.

Road improvement may require clearance of vegetation and may lead to soil loss and erosion especially in areas with steep terrain. Soil erosion can lead to blockage of drainage or change of surface water flow or sedimentation. The ESIA and ESMF will provide guidance to screen and assess impacts and provide mitigation measures including application of good practice and close supervision of works to: (i) ensure that cutting of trees and vegetation is limited to a minimum and justified by technical requirements and that relevant national legislation is followed, and replacement where vegetation clearance is unavoidable; and (ii) soil loss and erosion is avoided/minimized.

ESS4 Community Health and Safety

ESS4 is relevant to the project. The project impacts on community health and safety are associated with (i) typical civil works under Component 1 that produce dust, noise, vibrations, waste, traffic and road safety risks such as the risk of accidents to surrounding communities when transporting road maintenance materials and equipment, and (ii) the influx of labor which might increase exposure of risk to communities such as disease transmission, spread of HIV and Covid-19, potential for GBV/SEAH, Child Labor and Violence Against Children. Gender-based violence (GBV), sexual exploitation and abuse (SEA), and the spread of sexually transmitted and communicable diseases may occur especially as the communities are rural and remote. To reduce those identified risks and impacts, the ESMF has proposed the adoption of : (i) vehicles speed limitation in the works sites, (ii) code of conducts for all direct and workers; (iii) GRM system.

GBV risk screening has classified the GBV/SEA/SH risk as moderate which is mainly linked to labor influx in targeted regions, but upgraded as substantial because of unavailability of adequate services to support GBV/SEA/SH case, the existence of GBV/SEAH-related factors linked to cultures and traditions in the areas of intervention, and the need to create new GBV skills within the project implementation agency. The project has developed a GBV action plan as part as the ESMF and a GBV specialist shall be hired as part of the PIU.

The E&S procedures in the ESMF identified all project related risks and impacts (including precautions related to the Covid-19 pandemic that will be taken) and has proposed mitigation measures and appropriate management plans such as the environmental and social management plans (ESMPs) for managing such risks and impacts that will provide more site-specific and detailed mitigation measures, monitoring indicators, budget and roles and responsibilities. Community health and safety risks will be addressed through related community awareness, public service enhancements including health, partnership with health projects, etc. The PIU will develop and implement a road safety management plan to manage potential road safety risks and risks to workers, nearby communities and other road users.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement



ESS5 is relevant to the project. In component 1, the proposed project does not entail the creation of new roads but rather the maintenance of existing roads within their current right of way. However, this operation is still likely to cause some level of temporary land loss (for the implementation of potential temporary labor camp, and during road shoulders maintenance and development) and economic displacement, loss of assets, livelihoods and access restrictions to make way for construction, associated to civil works of road infrastructure. However, the extent of informal activities and / or the presence of illegal structures on these rights-of-way is not significant. The full extent of land acquisition, disruption of livelihoods will be known after a socio-economic impact assessment of subprojects has been conducted as part of the related ESIA and Resettlement Plan (RP).

The Government has clear regulations regarding land acquisition (Law n°2005-019 of October 17, 2005) laying down the principles governing the statutes of lands and Law n°2006-031 of November 16, 2006 laying down the legal regime of private land ownership), however there are limited regulations regarding involuntary resettlement (Ordinance n°62-023 of September 19, 1962 relating to expropriation for public benefit, to the amicable acquisition of immovable property by the State or the secondary public authorities and to the land gains).

To avoid, minimize and to manage any land acquisition issues at the level of roads right of way, and in compliance with ESS5 (and ESS10 for consultation and mobilization), as the project locations and scope are not yet defined and identified, the Borrower is currently preparing a Resettlement Framework (RF) which should be finalized no later than two months after project effectiveness date to guide the process of preparation of subproject specific Resettlement Plans (RP). The RF will clarify resettlement principles, organizational arrangements, consultation modalities and information as well as design criteria to be applied to subprojects once defined. All PAPs identified during technical preparation (including preparation of E&S documents) shall be compensated, and in addition transparent adequate Grievance mechanism shall be in place to capture all complaints linked directly by the project activities. The requirement to prepare subproject specific resettlement documentation has been outlined in the ESCP.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

ESS 6 is relevant for the project. The project will not finance road improvement that would provide access to critical habitats. It is anticipated that any potential impact on flora and fauna will be limited to the construction sites along the selected national roads in their current rights of ways and the exploitation of quarries. However, the road may take place near protected areas and natural habitats and will increase the presence of traffic heavy vehicles which may increase the risk of wildlife collision during construction and road exploitation. The ESMF has proceed to the identification of existing natural habitats and protected areas with due regards to the mitigation hierarchy (e.g., avoid, minimize, mitigate and compensate). It was defined that there are degraded natural habitats along the existing national roads in the country. Nevertheless, as the location of all road works are not identified, the site-specific impacts will be identified during project implementation when specific construction activities are known and it will be assessed in the specific ESIA/ESMP.

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

ESS7 is not relevant for the project. There are no Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities that meet the criteria of IP/SSHAUTLCs, per the requirements of this Standard, in the project area.



ESS8 Cultural Heritage

ESS8 is relevant to the project. The proposed project interventions will not require the creation of new roads, physical works excavations, movement of earth, quarrying and impounding associated with civil works. However, the road maintenance under component 1 may lead to contact with both known and unknown physical and cultural resources. The borrower will avoid impacts on both tangible and intangible cultural heritage and where such avoidance is not possible, the project has identified specific measures to address these impacts in accordance with the mitigation hierarchy. The treatment of Physical and Cultural Resources including archaeological relics, fossils, human graves, sacred trees or groves that may be encountered will follow Chance Finds Procedures has been elaborated in the ESMF, and will be considered into all subsequent ESMPs that will be prepared; they will also be included as a requirement in civil works bidding documents.

ESS9 Financial Intermediaries

ESS9 is not relevant to the project.

B.3 Other Relevant Project Risks

Other risks related to insecurity in general in Madagascar, and in the south particularly, are also identified but not induced by the project activities (mainly associated with cattle robbers, theft and violence related to persistent poverty and fragility). Insecurity in the South has increased significantly in recent years with gangs of dahalo (cattle robbers), composed mainly of young men, clashing with local communities and police forces. Given the persistent poverty and fragility, the traditional practice has shifted to the monetary value of the cattle and become a culture of organized gangs, theft, and violence. Recent years have also seen the emergence of a trafficking economy centered around gem stones, gold, and cattle, accompanied by a rise in criminality and insecurity. The project will develop a strategy to ensure the security of the community benefitting from the project, and the security of Bank supervision, Client supervision and support team (PIU, NGO) and the security situation will be discussed in the ESMF and the associated risk will be assessed in the ESIA at a later stage of the project once the specific sites are known.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

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:

Public Disclosure



The Borrower's E&S Framework is not being considered for this project, either in whole or in part.

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Republic of Madagascar

Implementing Agency(ies)

Implementing Agency: Road Agency

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s):	Ziad Salim EL Nakat
Practice Manager (ENR/Social)	David Seth Warren Cleared on 25-May-2021 at 22:57:51 GMT-04:00