



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 09/22/2021 | Report No: ESRSC02277



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Iraq	MIDDLE EAST AND NORTH AFRICA	P175694	
Project Name	Support to Tertiary Education Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing		11/30/2021
Borrower(s)	Implementing Agency(ies)		
Ministry of Finance	Ministry of Higher Education and Scientific Research		

Proposed Development Objective

To develop institutional capacity for improving employability of university students in national development priority areas.

Financing (in USD Million)	Amount
Total Project Cost	5.00

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 Project is intended to support the Gol's effort in addressing employability of university graduates. It focuses on how to make tertiary education more relevant to the needs of both labor market and national development. Financial and technical support covers three main areas: (1) developing institutional capacity in disciplinary areas that support the national development priority sectors - agriculture, health and renewable energy through support to the establishment of three centers of excellence in these priority areas (Component 1); (2) improving graduates' employability by strengthening partnerships with the private sector and international universities/organizations



through a competitive fund pilot (Component 2); and (3) enhancing evidence-based policy/decision-making, project management, and monitoring/evaluation capacities of MoHESR and other project institutions (Component 3).

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 project will be implemented nationwide. The social context for the project comprises low levels of human capital development, coupled with limited opportunities to gain job-relevant skills and find a job, which have led to high youth unemployment. About 20 percent of the Iraqi population (40 million in 2020) are 15-24 years old. The unemployment for this age group of youth stands at an alarmingly high rate – 25 percent – according to International Labour Organization ILO estimates in 2019, which was a key theme of the nationwide protests prior to the Covid-19 pandemic. This is higher than the averages (22 percent) of both the MENA region. Such poor labor market outcome among youth is, among others, the results of an education system, particularly tertiary education, that is not aligned with the skills demanded by today’s labor market. Since public sector employment bumps up against fiscal realities, a weak private sector cannot create enough jobs for a young and rapidly growing population. In 2017/2018 academic year, Iraq had 44 universities (35 public, 9 private) which admitted 180,290 students. Data on female students is not available over the period, but anecdotes indicate that the number of females enrolled in tertiary education has slightly declined in recent years. MoHESR has designated University of Baghdad to implement component one at their footprint and is currently working with the University in consultation with relevant line ministries to define a focus area (specialty) for each of the three proposed CoEs.

D. 2. Borrower’s Institutional Capacity

MoHESR as the government agency responsible for tertiary education in Iraq, will be the implementing agency for the proposed project. It has the oversight role of the Project’s preparation and implementation. MoHESR will provide technical guidance to the project implementation through its appropriate technical departments and will establish a Project Implementation Unit (PIU) to coordinate and manage project-related daily activities. Component 1 will be implemented by University of Baghdad and Component 2 will be implemented by the transparently-selected CF proposal institutions. Each of these institutions will form a small team including designated members in fiduciary, safeguards and M&E for managing daily implementation activities of their approved proposals. In addition to its oversight role, MoHESR will be responsible for Component 3. The PIU will play a liaison role with all the parties involved in the implementation. This is MOHESR's first World Bank operation under the ESF and has not previously worked under the World Bank's safeguards policies. However, the extent of environmental and social risks and impacts of this project are rather limited, and the required interventions are also expected to be simple and straightforward. To manage the anticipated impacts, E&S Specialist at MOHESR is recommended to be assigned in the PIU to monitor the implementation of environmental and social aspects, to make sure that all E&S mitigation measures are correctly integrated and reported to the WB. As capacity of the MOHESR in E&S matters is considered low, the ESCP will specify the E&S training requirements for MOHESR, in building their capacity in managing environmental and social risks and impacts (in addition to technical and Financial Management/procurement expertise). Training and awareness raising on social and environment risk management will comprise topics such as Grievance Mechanism (GM), basic OHS including road safety measures, waste management, and stakeholder engagement . The above activities will be funded under component 3 (Project coordination and monitoring with proposed allocation of US\$0.5m.

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



A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Moderate

There are very limited adverse environmental impacts associated with the project. The project does not include any physical works that may generate any environmental adverse risk and impact. The project could have long-term positive environmental impacts through supporting centers of excellence (CoEs) in– agriculture, health and renewable energy s through (i) training future workers with advanced knowledge and awareness of environmental issues as well as with skills to address them; and (ii) conducting applied research to tackle environmental challenges in these three fields. The negative environmental impacts are limited and associated with procurement of office equipment and services to conduct the programs and proposals under Component 1 and 2 such as tablets, computers, and other electronics accessories, printing and translation of resources, materials and other documents, provision of training to TEIs on proposal writing, etc. These activities may result in some community and occupational health and safety risks , in particular exposure to Covid-19 at training events or in an office environment. The other expected environmental impacts associated with the installation and use of electronic are waste at end of experiments and end life of equipment, their management and disposal, in addition to non-hazardous waste, especially paper from workshops, training and meetings throughout the project. MOHESR capacity to address environmental and social risk and impacts in accordance with the ESF is limited. The project will therefore provide institutional capacity building through, for example, the competitive fund pilot from which the sense of social responsibility among business communities can be improved through the established partnerships with project institutions. The project does not involve analytical, advisory or other activities which could have or lead to downstream physical, social or environmental impacts. The provision of project interventions is unlikely to result in adverse E&S risks.

Social Risk Rating

Moderate

The development objective of the Project is to develop institutional capacity for improving employability of university students in national development priority areas (Agriculture, Health and Renewable Energy). The social risk rating of this project is classified as “moderate” primarily related to the borrower’s limited experience in managing social risks in accordance with the ESF across a range of soft interventions aimed at beneficiaries including women and youth, and other groups who may be considered vulnerable. There are limited direct adverse social impacts resulting from project activities since there no civil works and it does not involve any land acquisition. The initial screening of project’s likely social risks and impacts indicated the following potential indirect social risks and impacts: 1) potential perception of exclusion amongst vulnerable groups (women, persons with a disability (PWD), youth and poor communities, and internally displaced persons (IDPs)) that would need to be mitigated through ensuring that project benefits, such as access to training and job and financial support opportunities, are transparent,2) exclusion of some intended beneficiaries due to weak outreach or communication plans; 3) weak grievance mechanism which is not able to capture and address concerns in a timely or responsive manner 4) risks related to labor and working conditions 6) Occupational Health and Safety (OHS) and Community Health and Safety Risks due to exposure to COVID-19 contagion during project activities. The project does not affect indigenous peoples.

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

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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:

There are very limited environmental impacts associated with the project. The project does not include any physical works. The project could have positive impacts through developed institutional capacity for improving employability of university students in national development priority areas. The project does not involve analytical, advisory or other activities which could have or lead to downstream physical, social or environmental impacts. The provision of programs and training through piloting the center of excellence (CoE) concept in three national development priority areas – agriculture, health and renewable energy will have very limited E&S risks and minor adverse impacts as mentioned in the ESRC section above.

For establishing partnerships with the private sector and international institutions to improve programs and skills training relevance for their students via a competitive fund pilot (CF), 30 full proposals have been submitted based initial selection criteria but have not been selected as the proposal evaluation protocols will be developed with the assistance of the project. Furthermore, the proposed project will support MoHESR's effort in piloting three CoEs in three priority areas agriculture, health and renewable energy, however the exact interventions in these three areas are not yet estimated. For the above reasons, an ESMF will be prepared. The ESMF will include the principles, rules guidelines and procedures to assessment potential environmental and social risks and impacts as well as the mitigation measures and plan.

Given that the limited number of project workers and labor risks, labor management procedures will be incorporated into ESMF (rather than a stand-alone document) and will entail provisions to ensure labor aspects, including child labor and labor influx, are properly addressed in the documents. Amongst the social risks identified the risk of exclusion of vulnerable groups including women, Person with Disability (PWD) and other poor communities, the perception of inadequate prioritization or delays in addressing stakeholders' needs. The SEP will ensure proper consultation with project beneficiaries and other vulnerable groups. The ESMF will also include proper assessment to get a better understanding of the profiles of the vulnerable groups being targeted under this project, and the challenges they face and the needed mitigation measures to address the potential risk. The SEA/SH related risks is also highlighted, the screening tool gave a low-risk rating for SEA/SH. The Client will need to ensure that the relevant mitigation measures are implemented including but not limited to the signing of codes of conduct by project actors and workers, training and raising awareness of SEA/SH, and having a GM sensitive to SEA/SH-related complaints. This risk rating will be revisited during project appraisal.

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

"Use of Borrower Framework" is NOT considered under this project.

ESS10 Stakeholder Engagement and Information Disclosure

The project will undertake a process of meaningful and inclusive consultation with stakeholders throughout project preparation and implementation. Stakeholders that have been identified for this project include: i) project-affected parties (PAPs) who might be positively and adversely affected by the project, such the students, graduates and faculty members (including females) who will benefit from the project ii) other interested parties such as TEIs, private sector, civil society and international institutions and (iii) vulnerable groups, including youth, women, and persons with disabilities. Stakeholder engagement activities will serve as a platform for all affected persons and other



interested parties to engage in discussions about the project preparation and implementation activities. Due to current nationwide general mobility restrictions as a result of COVID-19 pandemic, virtual consultations could be another acceptable modality to be adopted as per the guidelines of the World Bank Technical note in this regard (Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings March 20, 2020),. The PIU needs to clearly communicate the project activities to all affected parties through meaningful and inclusive consultation sessions during project preparation as well as active stakeholder engagements throughout the project implementation.

Stakeholder engagement requirements will be documented in the Stakeholder Engagement Plan (SEP), which will be prepared by Project appraisal. As part of the SEP, the PIU also needs to introduce a feedback mechanism through the development of a functional and robust grievance mechanism (GM) that should be accessible to all. The dedicated staff of the PIU will need to monitor closely and address all grievances including anonymous complaints. This project GM will help close the feedback loop on all citizens' and beneficiaries' concerns and questions about the project activities and will allow for transparency. It is recommended that the client ensures that the assigned E&S specialist follows up closely on this aspect throughout project implementation and to document accordingly. The GM will also include referral pathways in the event of any sexual exploitation and abuse and sexual harassment (SEA/SH) related complaints with the adoption of the principles of confidentiality and anonymity.

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. The project will involve civil servant, direct workers, and contracted workers. The direct workers will be the project implementing unit (PIU) and or consultants who could be hired. Civil Servant include staff at the MoHESR, CoEs and University of Baghdad, and CF pilot institutions. Contracted workers will include those specialized CSOs and NGOs who may be contracted by the MOHES to deliver expertise support.

The MoHESR, will prepare a labor management procedure as part of ESMF. These procedures will set out the way project workers will be managed in accordance with the requirements of national laws and ESS2. The procedures will include requirements for: working conditions and terms of employment; nondiscrimination and equal opportunity; worker's organizations; child labor and minimum age; forced labor; grievance mechanisms; maintenance of training records and documentation and reporting of occupational accidents, diseases and incidents, emergency prevention and remedies for injuries, disability and diseases. The MoHESR will incorporate the requirements of ESS2 into contractual agreements with contractors together with appropriate noncompliance remedies.

Through its Code of Conduct, PIU will set itself a framework of ethical standards and rules, which is going to be binding for all staff, the contractors that might supply materials/equipment, and CSO's/NGOs that might involve in training youth, women and other vulnerable groups. The Code of Conduct lays down provisions that help to deal with conflicts of interests and to prevent corruption at an early stage, and also covers prohibitions for any type of gender-based violence and sexual harassment. PIU staff must agree to adhere to the Code of Conduct under the terms of their employment contracts. A separate grievance mechanism system will be set up for all direct workers, civil servant, and contracted workers to raise and resolve workplace-related concerns.



The LMP as part of the ESMF will be cleared by the bank and disclosed by project appraisal. The LMP, which is a living document, can be updated throughout project implementation as needed.

ESS3 Resource Efficiency and Pollution Prevention and Management

This standard is relevant as the project electronic devices, electronic devices that might using under certain activities especially in component 1 (Developing institutional capacity in disciplinary areas that support the national development priority sectors) and component 2 (Improving graduates' employability by strengthening partnerships with the private sector and international institutions), after their lifetime, will generate some e-wastes in addition to consumed COVID-19 PPEs. The anticipated environmental impacts associated with the project activities are likely to be limited. However, the implementing agencies need to address the e-waste and consumed covid-19 PPEs, and other domestic waste especially paper waste in an appropriate manner, relative to their management and disposal. The implementing agencies will also promote the resource efficiency tools during the capacity building and training. The potential issues related to the project components such as water consumption, energy efficiency and waste management (if any) will be mitigated through implementation of ESMF which should include analysis of alternatives to reduce energy consumed by electronic devises and subsequently eliminate the EHS impacts.

ESS4 Community Health and Safety

The relevance of ESS4 is mainly from risks of exposure to COVID-19 for project workers and beneficiaries during the training programs, workshops, meetings with stakeholders, etc.. To mitigate these risks, the project will follow the precautions and measures in accordance with the Iraqi supreme committee for health and national safety and the World Health Organization WHO recommendations. The project will provide adequate facilities and PPEs to the project workers and beneficiaries as appropriate. These measures will be described in the project ESMF. A Gender Based Violence Action Plan (GAP) will be prepared for the project as part of ESMF to address risks in a way that is commensurate to the Low risk level and will include primarily the need to have a code of conduct for all staff involved in the project, training/awareness raising of SEA/SH, and a GM channel for SEA/SH grievances. No new infrastructure is being constructed under the project, however accessibility of training facilities for the disabled will be considered where technically and financially feasible to select the convenient places, and accessible curriculum for students with disabilities. Service providers shall specify the accessibility for disabled, of their facilities in their bids, and accessibility will be incentivized.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

This ESS is not relevant. The project will not support activities that require land acquisition or land use restrictions.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources



This ESS is not relevant at this stage as the project will not support rehabilitation, construction activities, civil works or procurement of major equipment and accordingly will not result in any risks or impacts to biodiversity or living natural resources.

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

There are no Indigenous Peoples as defined under this standard in the project area, and therefore this ESS is not considered relevant to the project.

ESS8 Cultural Heritage

This ESS is not relevant at this stage as the project will not support activities that might affect cultural heritage.

ESS9 Financial Intermediaries

ESS9 is not currently relevant. There are no financial intermediaries involved in the project.

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

None

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

Actions to be completed prior to Bank Board Approval:

The Implementing Agency (MOHESR) will prepare and disclose the following instruments prior to appraisal: (1) Environmental and Social Commitment Plan (ESCP) (2) Stakeholder Engagement Plan (SEP) (3) ESMF integrated with Labor Management Procedures (LMP), GBV Action Plan (GAP) as part of ESMF.

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

(1) Assign an E&S consultants with experience and skills to support the MOHESR E&S in preparation and implementation of the E&S instruments. (2) Implement SEP and update if necessary; (3) Establish a GM (4) Implement

Public Disclosure



ESMF and update if necessary; (4) Delivering ESS-related training programs to the relevant staff as required, including front-line implementers.

IV. CONTACT POINTS

World Bank

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Borrower/Client/Recipient

Borrower: Ministry of Finance

Implementing Agency(ies)

Implementing Agency: Ministry of Higher Education and Scientific Research

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s):	Xiaonan Cao
Practice Manager (ENR/Social)	Pia Peeters Recommended on 16-Sep-2021 at 09:29:40 GMT-04:00