



# Appraisal Environmental and Social Review Summary

## Appraisal Stage

### **(ESRS Appraisal Stage)**

Date Prepared/Updated: 03/19/2022 | Report No: ESRSA02039



**BASIC INFORMATION**

**A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
Afghanistan	SOUTH ASIA	P178758	
Project Name	Education Emergency Response in Afghanistan (EERA)		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	3/14/2022	4/1/2022
Borrower(s)	Implementing Agency(ies)		

Proposed Development Objective

The Project Development Objective (PDO) is to maintain basic education service delivery and learning continuity for girls and boys in primary and secondary education.

Financing (in USD Million)	Amount
<b>Total Project Cost</b>	<b>272.00</b>

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

Yes

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

The 18-month emergency project will support Afghan school-aged children, particularly girls, to continue attending and return to school through the provision of public school teacher stipends for around 193,000 teachers and school based staff, support to Community Based Education with special focus on girls and out-of-school-children, and gender-focused rehabilitation of schools including WASH facilities (water points, sewage system and gender-segregated toilets) and surrounding boundary walls for schools, in partnership with UNICEF and in collaboration with other key partners. This project has the following components:

Component 1: Support to teachers and school based staff in public primary and secondary schools



The objective of this component is to maintain access to basic education for all children, with a special focus on girls, through support to public school teachers.

**Component 2: Support to Community Based Education**

The objective of this component is to maintain access to basic education for all children, with a special focus on girls and out of school children, through support to Community Based Education.

**Component 3: Gender-focused rehabilitation of school infrastructure**

This component aims to provide safe and inclusive learning spaces for all children in project-supported schools through the gender-focused rehabilitation of school infrastructure. Approximately 170 girls and mixed schools out of 450 previously identified schools under EQRA will be selected to receive EERA's support for infrastructure rehabilitation to welcome girls and encourage their regular attendance. Eligible school infrastructure improvement will include WASH facilities (water points, sewage system, handwashing facilities, and gender-segregated toilets to encourage girls' enrolment), and the construction of boundary walls to guard the perimeter of schools. In addition, this component will support construction of safeguard mitigation measure for 12 schools that were identified under the EQRA project and categorized as critical.

**Component 4: Strengthening monitoring and ensuring accountability**

The aim of this component of the project is to ensure continued access to general education services for target children.

**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 geographical coverage for this project is nationwide and will target all 34 provinces in Afghanistan for teachers' stipend and Community based education components. In addition, the project aims to construct gender-focused WASH facilities and boundary walls in selected schools that were identified under the previous Bank financed Education Quality Reform in Afghanistan Project (EQRA). All the project related activities including school construction work were on-going before the August 15, 2021 political shift. Therefore, it is anticipated that the shift in the political regime would not pose any additional risk to the implementation of the proposed project.

In Afghanistan, important gender gaps remain in the education sector; only 43% of girls are enrolled in primary education, and 34% of girls in lower secondary schools, as compared to 62% in primary and 55% in lower secondary for boys, respectively. In addition, while access has improved for both girls and boys over the past 10 years, the pace of progress has been slower for girls than for boys. This is mainly due to (i) cultural norms, (ii) lack of female teachers, (iii) lack of infrastructure (including school buildings and proper WASH facilities), and (iv) insecurity (including distance to schools, lack of boundary walls in schools, etc.). The number of out-of-school children is also alarming. The recent COVID-19 crisis as well as increasing insecurity induced by FCV context has brought the estimated number of out-of-school children from 3.5 million (2016-17) to 4.2 million (2019-20). The August 15, 2021 political shift has negatively impacted education service delivery at all levels. While primary schools (grades 1-6) have officially reopened for both boys and girls, secondary schools (grades 7-12) have officially opened for boys and only partially opened for girls in 9



to 11 out of 34 provinces. In addition, many of the CBE programs, which were mainly funded through Development Partners (DPs) to support out-of-school children, are suspended in many provinces.

#### D. 2. Borrower's Institutional Capacity

The Project will be implemented by UNICEF. The agency has gained experience over the past two years in preparing and implementing environmental and social (E&S) instruments and documents in compliance with World Bank ESF requirements for projects, specifically those in emergency and FCV contexts. UNICEF has implemented three projects in Yemen related to human capital, social protection, COVID- 19 emergency response, and education, and two projects on provision of essential health services and COVID 19 emergency response and health systems preparedness in South Sudan. Through implementing these projects, UNICEF has demonstrated its capacity to comply with ESF as well as prepare and implement Environmental and Social Commitment Plans (ESCPs), Stakeholder Engagement Plans (SEPs), Environmental and Social Management Frameworks (ESMFs) and related documents. UNICEF has standard contracting documents for implementing partners and contractors, where ESF plans, measures and codes of conduct are included as part of the contract bidding processes for contractors to ensure E&S risks are addressed at all levels. This demonstrates UNICEF's ability to ensure that ESF standards are cascaded down through its implementing partners and contractors.

UNICEF's E&S policy is contained in its draft Social and Environmental Sustainability Standards and Procedures (SESSP). While these policies are mostly well aligned with the World Bank's ESF in substance, there are a few gaps. Some of the standards like those pertaining to labor, biodiversity conservation and cultural heritage have less details than that of the World Bank's ESF. Specific provisions like the requirement for a Labor Management Procedure (LMP), provisions for community workers, and chance find procedures are not included in UNICEF's standards. UNICEF's gender policies also do not provide for a specific SEA/SH risk assessment tool like the one which is used by the World Bank. They also do not mandate a Code of Conduct covering SEA/SH in projects. As the EERA project will follow the ESF, further granularity of these gaps will be described and specific measures will be included in the ESMF to ensure compliance with the ESF.

UNICEF has continued its presence and activities in Afghanistan after the collapse of the previous government administration in August 2021. Therefore, it has a very good understanding of the current situation and the ground realities in Afghanistan. It has 13 offices in Afghanistan including Kabul and provinces with 396 staff. Two hundred and fifty-eight of these staff are nationally recruited which provides UNICEF with excellent capacity to implement projects on the ground. The number of female staff is 96. Another noteworthy strength of UNICEF is that it has developed a robust mechanism through agreements with mobile service companies to use SMS text messaging termed Rapid Pro in Afghanistan to communicate with project beneficiaries. Along with strong in-country presence, UNICEF is able to leverage expertise from its headquarters, regional offices and hire consultants as required to draft the ESF documents. UNICEF at field level operates on a focal person basis for coordination of E&S implementation. However, there is no dedicated/specialized E&S experts in Afghanistan office of UNICEF. The agency will need to hire dedicated local E&S specialists who will be primarily responsible to ensure compliance with relevant E&S instruments. There is a pool of well-trained local E&S experts who worked in the previous World Bank (WB) funded projects. Thus, UNICEF will be able to mobilize required E&S staff for the EERA project implementation.

For community-based education component, local NGOs will be hired. At this point, no implementing partners have been identified. However, over the last two decades, bi-lateral and multi-lateral development partners have funded a number of NGOs to implement basic service delivery and livelihood programs including health and education support. Thus, there are NGOs and their personnel on the ground who have good capacity to implement mainly the CBE



component of the project. UNICEF will need to train the designated employees of the implementing partners to apply the environmental and social management measures covered in the ESMF as well as stakeholder engagement plans.

World Bank will engage a Third-Party Monitoring Agency (TPMA) to undertake independent results verification of subprojects funded under the project. The TPMA will report quarterly on the activity outputs, the restoration of services for the intended beneficiaries, and the fiduciary and safeguard processes followed by the local partners. The TPMA will monitor and report on implementation and compliance with the ESMF and other environmental and social risk management measures and instruments that will be prepared as part of project implementation.

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

**A. Environmental and Social Risk Classification (ESRC)**

Substantial

**Environmental Risk Rating**

Moderate

The environmental risks of the project are considered “Moderate”. The first two components of the projects (Support to public school teachers in primary and secondary schools and Support to Community Based Education) mainly include stipend for public school teachers and costs for community-based education and thus are not likely to cause any adverse environmental impacts. The project’s key environmental risks and impacts are related to minor civil works under component 3 (Gender-focused rehabilitation of school infrastructure). The potential environmental risks include: (a) issues relating to on-site storage of construction material; (b) storage and disposal of construction waste and (c) generation of noise and dust during construction. As the works are minor and confined within existing footprint, they are not likely to generate significant adverse environmental impacts. The potential impacts are predictable, and expected to be temporary, reversible, low in magnitude, site specific (limited to the immediate surroundings), and can be managed through the implementation of standard and readily available mitigation measures. The eligible school infrastructure improvement under the project will include WASH facilities (water points, sewage system and gender-segregated toilets to encourage girls’ enrolment), and the construction of surrounding boundary walls to guard the perimeter of schools and would result to positive environmental and health and safety impacts to teachers, students, support staff and visitors.

**Social Risk Rating**

Substantial

The social risks are considered “Substantial.” The key social risks include: (a) possible tension and conflicts among beneficiary communities and districts; (b) corruption and non-transparency in implementing Component 2 (CBE); (c) increased exposure to Covid 19 virus to children, teachers and communities due to lack of masks, social distancing, low vaccine coverage for teachers and students; (d) high SEA/SH risks in schools; (e) safety risks to building users (students/teachers/visitors/other support staff) during execution of construction work; (f) occupational health and safety risks to workers during construction; (g) minor labor influx affecting security and mobility of girls and women within school and larger community; (h) minor loss of assets/land; and (i) low capacity of NGOs and contractors to manage E&S risks following ESF. Possible occurrence of conflict (including armed conflict) and/or terrorist attacks on schools/project workers is also an important contextual risk that may affect safety of the project actors. Overall, the project activities are expected to have significant positive social impacts in the education sector in Afghanistan as it will safeguard education achievements obtained over the past 20 years and contribute to future nation-building efforts. This project will also ensure that learning continues, in a safe and secure environment for all children.

Public Disclosure



Moreover, the project conditionality of stipend coverage of secondary school teachers only to schools that allow girls to come to school is expected to work as an incentive for schools to enhance girls' access to education.

## **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:***

This standard is relevant. The proposed construction works will include WASH facilities and boundary walls in selected schools. Environmental social impacts would include dust, noise, work-site and community health and safety, waste generation and labor issues. The component 2 and 3 (CBE and rehabilitation work) may also have potential social risks/impacts such as loss of assets/land, child labor, forced labor and possible risks of excluding children from poor and vulnerable groups and individuals displaced by the ongoing conflict and security situation in the country.

An Environmental and Social Commitment Plan (ESCP) and a Stakeholder Engagement Plan (SEP) have been prepared and disclosed by appraisal. The ESCP outlines the commitment of UNICEF, which will be cascaded down to implementing NGOs and contractors, to screen, assess and manage E&S risks and impacts while the SEP embodies the consultation and engagement processes to be undertaken by the project throughout at all stages.

An Environment Social Management Framework (ESMF) will be prepared. The ESMF will include an E&S screening template, a generic ESMP to manage impacts of minor rehabilitation works, a simplified LMP, a simplified Resettlement Framework (RF), and measures to manage OHS and CHS risks. The ESMF will have an exclusion list for project activities that will not be supported by the project, monitoring and supervision, reporting requirements, capacity building and training, and cost estimation provision. It will also include a brief description of the UN Security Protocol and any measures necessary to ensure consistency between the Protocol and the ESF requirements. In addition, UNICEF will prepare an SEA/SH action plan. The generic ESMP will include mitigation measures to address construction waste management and pollution control, OHS, Covid-19 Infection Prevention and Control (IPC), labor issues, SEA/SH risks management and other environmental and social impacts that may arise during the project operational phase. The contractors and/or NGOs will conduct the E&S risk screening of each sub-project under component 3 and implement site-specific mitigation measures following the generic ESMP. However, as the Project is being prepared under Paragraph 12 of IPF Policy, for Projects in the situation of urgent need of assistance, the preparation of the ESMF will be deferred to the implementation stage but prior to signing of any contract between UNICEF and NGOs/contractor who will be implementing the project activities.

The implementation of E&S instruments will be regularly monitored and reported on by UNICEF. As part of broader monitoring oversight, the existing Third Party Monitoring Agent (TPMA) will be engaged for E&S risk management monitoring. The TPMA will provide quarterly reports covering the field level E&S issues.

#### **ESS10 Stakeholder Engagement and Information Disclosure**



UNICEF has prepared a SEP in accordance with ESS10 and in line with the principles outlined in UNICEF’s Social and Environmental Sustainability Standards. The SEP lays out the plan for meaningful consultations and engagement with all stakeholders throughout the project lifecycle. The SEP describes the strategy and specific methods of engagement that would facilitate effective participation of the different affected groups. The SEP delineates the roles and responsibilities for the implementation of the SEP, as well as monitoring and reporting Mechanism(s). It describes the principles, processes and structures of the project-level grievance redressal mechanism(s) (GRM).

For this project, the key stakeholders include primary and secondary school teachers, school administrators, students and their parents, community members and leaders including religious leaders (Mullah Imams) as well as relevant NGOs and CSOs and contractors. Due to the emergency situation and COVID-19 constraints, the SEP has been prepared with limited consultations. It would be a live document which shall be updated during implementation based on ongoing consultations. UNICEF will continue to identify and engage, through meaningful consultations, with all stakeholders, paying special attention to the inclusion of women, vulnerable and disadvantaged groups. The SEP acknowledges the challenges with engaging marginalized and vulnerable social groups such as internally displaced persons (IDPs), returnees, pastoral nomads, and those living in remote or inaccessible areas and proposes strategies to engage with them.

The Project will also ensure that information disclosure takes place in an on-going and satisfactory manner with clear and accessible messaging on principles of fair, equitable and inclusive access to education. While the channel of communication may be restricted to electronic/ virtual methods so that face-to-face interaction is minimized or avoided, the Project will ensure that stakeholder engagement takes place on an on-going basis, at different levels, with different partners, and in a culturally appropriate manner. UNICEF will take the advantage of its existing SMS text messaging- based grievance redress mechanism, Rapid Pro to communicate with project beneficiaries. Rapid Pro will also be a part of the project’s GRM as mentioned in the SEP.

## **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 implementation will involve direct workers and contracted workers. A simplified Labor Management Procedure (LMP) will be prepared as a part of the ESMF prior to UNICEF entering into a contract with Implementing Partners to guide minimization and mitigation of labor related risks and impacts.

The project will be conducted mainly by direct workers and contractors of the Project such as community-based educators, employees of implementing partner, and construction workers. While the number of workers may not be estimated at the current stage, no large-scale labor influx is expected. The key occupational health and safety risk is in relation to the contamination with COVID-19 because of high risk of contagion, low vaccination rates and potential exposure risks of all project actors exacerbated by poor adherence to Covid 19 safety measures (e.g., masks, social distancing). Labor related issues also include child labor, discrimination, working conditions, and risks associated with SEA/SH.



During the project implementation, labor management related risks and OHS issues affecting the workers of the implementing agency and contracted workers will be monitored and managed. As all workers will be coming into close contact with communities, the LMP will include a specific SEA/SH code of conduct as well as a general code for interacting with communities and partners. The Project GRM will be consistent with both ESS2 and ESS10 to enable workers to access it. The use of forced labor or the use of child labor for any person under the age of 18 in hazardous work situations is prohibited and will be regularly monitored by UNOPS and TPMA.

UNICEF, implementing NGOs and contractors will implement adequate OHS (including emergency preparedness and response measures), LMP and ESMP measures in line with the ESMF and the ESCP. The OHS, LMP and ESMP measures as spelled out in the ESMF will consider the World Bank Group's General Environment, Health, and Safety Guidelines (EHSs) as well as ESS2 requirements.

### **ESS3 Resource Efficiency and Pollution Prevention and Management**

ESS3 is relevant to the project due to the construction works proposed under Component 3. Activities pertaining to infrastructure improvement of the selected schools would carefully consider resource efficiency and pollution management aspects such as: (a) sanitation, (b) water availability and quality, (c) environmentally augmentative measures related to energy and water efficiency and, (d) waste management (including construction waste). The ESMF will propose measures for efficient use of resources and measures for preventing/ managing pollution, that can be incorporated into civil work designs for improvement/rehabilitation of already existing school buildings, construction, and operation and to avoid adverse impact on human health and the environment. Incorporation of these aspects into the project design and implementation will enhance the quality of physical environment in the schools, enhance health and safety and reduce the environmental footprint linked to the use and operations of buildings. It is expected that there will be minimal water requirements as well as negligible greenhouse gas emissions from the project.

### **ESS4 Community Health and Safety**

ESS4 is relevant as the proposed activities can pose community health and safety risks and impacts arising from small scale civil works in selected schools as well as Life and Fire Safety (L&FS) and preparedness and response (EPR) for students teachers and employees during an emergency. Along with transfers of other communicable diseases, there is also a potential risk of community exposure to COVID-19 infection by the Project workers during the WASH infrastructure and boundary wall construction phase. The pandemic may add to the risks for community health and safety and subsequently households whose children are attending school. The project will exercise appropriate precautions against introducing the infection to local communities. Sub-project activities will be screened and assessed for community health and safety impacts and risks such as issues related to community safety during civil works in schools situated in congested rural and urban areas; restriction of access during construction; health and safety due to works; civil works outside regular working hours etc.

The ESMF will include basic L&FS and EPR checklist to be covered in all facilities as well as applicable COVID 19 restriction measures and protocols to guide safe planning and implementation of construction works. To address the risk of spread of Covid 19 virus, the project will include dissemination of covid 19 safety information at the school level. The ESMF will also include identification of necessary measures to manage increased traffic to carry goods for





construction. Adequate safety training and safety gears will be provided for workers by the relevant contractors with whom they will be working with, and road safety issues will be addressed through appropriate provisions in works contracts.

The SEP (see ESS10) will describe respective measures, including engagement with communities when needed, regarding communication and outreach. In order to manage the contextual security risks to beneficiaries and workers, UNICEF will implement and cause the implementing NGOs and contractors to adhere to the UN security protocols and any measures necessary to ensure consistency between the Protocol and the ESF requirements including security risk assessment and any security management measures necessary for the implementation of the Project activities and for the provision of security to Project workers, sites and/or asset. The ESMF will include a description of the Protocol and any such measures.

**ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

This standard is relevant. The project will not involve any major civil work requiring land acquisition. However, under component 3, the project will involve physical work which may require use of additional land for construction of WASH facilities or boundary wall. The expectation is that any additional land will be secured via voluntary land donation or on a willing seller-willing buyer basis. The detailed process of land acquisition will be described in a simplified RF chapter of the ESMF.

**ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

This standard is not relevant as proposed civil works will take place in existing footprints/building premises.

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

This standard is not relevant as there are no Indigenous People that meet the criteria of ESS7 in the country that could potentially benefit or be adversely affected by the Project's activities.

**ESS8 Cultural Heritage**

This standard is not relevant as the project will not have any impact on the cultural heritage, as the rehabilitation of school infrastructure work will be conducted on the existing school infrastructure or proximity. However, the ESMF will include chance finds procedures.

**ESS9 Financial Intermediaries**

The standard is not relevant as the Project does not include financial intermediaries.

**C. Legal Operational Policies that Apply**

**OP 7.50 Projects on International Waterways**

No

Public Disclosure



**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:**

Use of borrower framework is not considered for this project.

**IV. CONTACT POINTS**

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**Implementing Agency(ies)**

**V. FOR MORE INFORMATION CONTACT**

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**VI. APPROVAL**

Task Team Leader(s): Tsuyoshi Fukao, Matiullah Noori

Practice Manager (ENR/Social) Christophe Crepin Cleared on 18-Mar-2022 at 12:54:14 GMT-04:00

Safeguards Advisor ESSA Pablo Cardinale (SAESSA) Concurred on 19-Mar-2022 at 23:08:38 GMT-04:00

