



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 01/27/2022 | Report No: ESRSA01868



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Senegal	AFRICA WEST	P175325	
Project Name	Casamance Economic Development Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Social Sustainability and Inclusion	Investment Project Financing	1/4/2022	2/25/2022
Borrower(s)	Implementing Agency(ies)		
Ministry of Finance and Budget	Ministry of Territorial Communities, Development and Land Management (MCTDAT), Project Implementing		

Proposed Development Objective

The development objective of the project is to build inclusive local governance systems that deliver climate resilient local services and infrastructure, in targeted communities in Casamance.

Financing (in USD Million)	Amount
Total Project Cost	45.00

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 builds on previous World Bank engagement in Casamance (PPDC, P125506). The Project’s components will cover investments in strengthening the capacity of local institution and communities for climate resilient inclusive local governance, enhancing access to climate resilient local services through community/small infra in lagging areas with emphasis on social inclusion (e.g. women and youth), improve connectivity through rehabilitating secondary and



tertiary roads and broadening livelihood opportunities by enhancing the productivity and resilience of rice-growing areas and supporting collective climate resilient productive activities.

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 operate in the three regions of Casamance, namely Ziguinchor, Sédhiou and Kolda. The Ziguinchor region is located between the Republic of the Gambia to the north, the Republic of Guinea Bissau to the south, the Sédhiou region to the east and the Atlantic Ocean to the west. The Ziguinchor region covers an area of 7,339 km². The region of Sédhiou was created by law 2008-14 of 18 March 2008 and corresponds to the Middle Casamance. It covers an area of 7,330 km², or 3.7% of the national territory. In terms of administrative organization, the decree 2008-747 of July 10, 2008 specifies the division of the region into 03 departments: Bounkiling, Goudomp and Sédhiou. The Kolda region acquired its current configuration by Law 2008-14 of March 18, 2008. It occupies an area of 13,721 km² (7% of the national territory) and is bordered to the north by the Republic of Gambia, to the east by the region of Tambacounda, to the west by the region of Sédhiou and to the south by the Republic of Guinea Conakry. This position gives it an important geostrategic potential in the economic, social and cultural dynamics of the sub-region. In terms of administrative division, the region has three departments (Kolda, Medina Yoro Foula and Vélingara).

In Casamance, conservation issues are important and this justifies the surface area occupied by protected areas. Thus, the protected zones includes more than fifty entities including: 47 classified forests, 1 national park (PN Basse Casamance), 2 community forests (Diafolon and Diafolo Dionguéré), 1 ornithological reserve (Kalissaye) and 4 marine protected areas (Kaaloolay Blouf Fogny, Abéné, Kassa Balanta, Niamone Kalounaye). The department of Ziguinchor has an area of 1,153km², which corresponds to a classification rate of 8.7%. Even if this rate is high, it is even higher in Bignona, 19.05%, while it is low in Oussouye, 7.22%. The classification rate at the regional level is estimated at 15.9%.

In the Sédhiou region, the forest estate of the region is rich in 12 classified forests with an area of 84,493 hectares and community forests. The Kolda region is one of the largest forest regions in the country due to the extent of its classified area (a classification rate of 24.4% for an area representing 7% of the national territory) overlapping part of the Niokolokoba National Park in the administrative department of Vélingara. Its forest estate covers an area of 334,333 ha distributed in 14 classified forests. Most of the area of the domain is in the department of Vélingara which has 5 classified forests for a corresponding area of 154 583 ha. In terms of forest area, the department of Medina Yoro Foula comes second with 3 classified forests for an area of 144,167 ha. As for the department of Kolda, it concentrates 06 classified forests with a total area of 35 583 ha for a classification rate of 9.4%.

The State of Senegal loses 40,000 hectares of forest each year, especially in Casamance where international illegal timber trafficking has developed. This corresponds to a loss of income of 117 billion CFA francs according to the Senegalese forestry services. This phenomenon, in addition to seriously degrading the country's forest resources, contributes to land degradation. This situation is at the origin of the decrease in the population's income.

The regions of Ziguinchor, Sédhiou and Kolda are among the six regions with the highest levels of prevalence of gender-based violence in Senegal (see National Action Plan to Combat Gender-Based Violence and Promote Human Rights in Senegal, Ministry of Women, the Family and Children, October 2019).



The three administrative regions of Casamance (Ziguinchor, Kolda, and Sédhiou) are among the poorest in the country, with poverty levels considerably higher than the national average. According to Oxford University's Multi-Dimensional Poverty Index (MPI), Kolda (0.50), and Sédhiou (0.44) MPIs are significantly higher than the national MPI of 0.288. Impacts are also felt at the community level where social bonds are ruptured by forced displacement and informal institutions that regulate many parts of village life are disrupted, leaving them less able to prepare for and respond to other shocks and stressors. Finally, perceptions of unfairness and inequality, which helped fuel the conflict in Casamance, were also exacerbated by it, undermining trust in government institutions amongst the local population.

In terms of security, the specific context of the Casamance crisis has been marked by a structural lull for over 15 years. Various peace talks and the implementation of development and reintegration projects for the independents have led to a revival of the regional economy and a gradual demobilization of armed groups. Also, various localities are marked by the presence of anti-personnel mines, which often limit communities' access to land for productive use and cause accidents in these areas.

Based on the above contextual elements, project investments will target communes identified according to their vulnerability to climate and conflict risks. Vulnerability is based on a commune's exposure, sensitivity, and adaptive capacity and will be estimated using spatially explicit and publicly available datasets (including indicators on projected climate change, water availability, and land cover change/forest loss). This approach will ensure that communities most exposed to climate change are prioritized to benefit from the project.

Within these three (3) regions, the PDEC project will cover 60 communes out of a total of 115. PDEC interventions will be concentrated in rural communes, as the 9 urban communes are covered by the PACASEN project which is currently being implemented and will be targeted according to their vulnerability to climate and conflict risks and through a participatory process with national, regional and local stakeholders.

The total number of beneficiaries (direct and indirect) is the population of these communes, estimated at 750,000 people. Special attention will be given to vulnerable populations in the selected intervention areas, namely women, youth and people with disabilities. The targeting of beneficiaries will be based on gender disaggregation to better monitor the inclusiveness of the approach.

D. 2. Borrower's Institutional Capacity

The project already has a Coordinator, and the following specialists will be recruited to support the management of environmental and social risks: an Environmental Safeguard Specialist with expertise in OHS and a Social Safeguard Specialist with solid experience in stakeholder mobilization, the operationalization of a PMM and GBV/ESA/HA issues. Most of the PPDC staff (P125506) will be retained for the PDEC project (for example The Coordinator and the Environmental specialist) and it should be noted that the PPDC has been completed with satisfactory management of environmental and social aspects.

The E&S specialists received training as soon as the ESF was set up in November and December 2018. They set up a functional Grievance Mechanism (GM) throughout the project. This experience will promote the effective implementation of the present project. Some project activities such as road rehabilitation and maintenance will be carried out with technical support from regional agencies such as the Agence de Gestion des Routes (AGEROUTE) which has experience with World Bank procedures.

The Project Implementation Unit (PIU) will be established in Ziguinchor under the supervision of the Ministry of Territorial Collectivities for Development and Land Use. It will be fully equipped and staffed with personnel covering all relevant areas of the project, including experts in environmental and social safeguards who are key personnel. In



the other intervention regions of the Project (Kolda and Sédhiou) the team will rely on the relevant decentralized technical services.

In addition, the Project will also rely on the Direction de l'Environnement et des Etablissements Classées (DEEC) / Directions Régionales de l'Environnement et des Etablissements Classées (DREEC) of the regions of Ziguinchor, Kolda and Sédhiou to support the PCU in the environmental selection or screening process that will allow the identification of the environmental and social work to be carried out for each sub-project. To this end, a capacity-building program will be prepared and implemented to increase their capacity in terms of Bank procedures and standards.

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 rating is estimated to be Moderate with activities planned within the framework of the project such as the rehabilitation of production centers, buildings, public infrastructure (schools, health center, 250 km of secondary and tertiary road network), rice valleys, the use of phytosanitary products to improve plant productions, the exploitation of natural protected areas. These activities could generate specific, localized negative environmental impacts and moderate risks. These include nuisances such as dust, noise, poor management of construction waste and probably a slight loss of vegetation. Risks related to the use of agrochemicals products and fertilizers will be managed with measures on hazardous waste management included in the ESMF. In addition, there are health and safety problems for the populations living near the roads but also for workers during construction/rehabilitation. Some project activities will also aim to promote the sustainable use of natural resources as sources of livelihood as well as important cultural and natural heritage sites. The Environmental and Social Management Framework already developed and under review, includes measures to address potential environmental risks as well as improved sustainable management of natural resources.

Social Risk Rating

Substantial

While the project will be taking place in the Casamance region which has a history of civil unrest and violence, the implementation of the PPDC (P125506) has set a precedence – with no reported cases of violence or unrest threatening the project. The project aims i) to strengthen the social inclusion of vulnerable groups within target communities; (ii) will support both the government’s reconciliation process and economic development goals outlined by the national strategy by targeting agricultural production, improvements in accessibility through infrastructure initiatives, and citizen engagement; and (iii) will reinforce social cohesion and resilience of target communities and their institutions. However, the social risk of the project is rated to be Substantial because of : 1) the project intervention area is subject to latent conflict, with recent interventions by state military forces; 2) the project will involve the active participation of women with a potential risk of gender-based violence (GBV) given the liabilities of the area; 3) the risk of GBV is likely to be exacerbated by the potential influx of labour related to the rehabilitation of the roads and rice valleys. The strengthening of social cohesion and community resilience in Casamance are the main objectives of the Project through a multidimensional and inclusive approach. To this end, the CEDP promotes an integrated approach to local development through complementary investments focused on the most vulnerable communities in Casamance. In each beneficiary commune, communities will identify and prioritize their most urgent needs for socio-economic infrastructure and livelihood support. In addition, the risk



related to elite capture, i.e., the control of the process by politicians, influential groups such as socio-professional associations already structured and benefiting from productive means, to the detriment of the normal targets, i.e., vulnerable groups, was noted. Also, to better manage the risk related to the absence of clear criteria for the selection of eligible areas and vulnerability criteria, the project will work towards a consensus on the notion of vulnerability, on the criteria that define it and the rating of these criteria in order to minimize any social risk inherent in the strategy of targeting youth and vulnerable groups. Potential social risks include physical and economic displacement, risks to contractor's labor working in conflict areas/low security zones, and other labor risks (including child labor), as well as risks of the exclusion of vulnerable individuals and groups to receive project benefits, such as exclusion from employment opportunities in the project, and from consultation. Similarly, the introduction of a skilled workforce into project areas may heighten risks of SEA/SH, exacerbate social conflicts), disrupt social cohesion and increase risks related to the transmission of communicable diseases to and from local communities.

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

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The planned project activities present moderate environmental risks due to types of activities such as rehabilitation of production centers, buildings, public infrastructure (schools, health center, 250 km of secondary and tertiary road network), rice valleys, the use of phytosanitary products to improve plant productions, the exploitation of natural protected areas.

For the rehabilitation of school buildings, health facilities and roads, contractors will have to take into account in their ESMP-OHS plan (after the E&S screening) certain provisions such as: signage and safety of intervention areas, implementation of emergency intervention procedures, mandatory wearing of personal protective equipment by workers, raising awareness of the population about the works and the associated risks and mitigation measures in place, management of waste resulting from the works, management of hydrocarbon products to avoid any form of pollution or contamination.

The impact on the flora will also have to be managed with the development of a reforestation plan in collaboration with the Water and Forestry services of the regions concerned and the sensitization of the personnel on the prohibition of tree cutting.

The risks linked to the degradation of the mangrove will be taken into account with the avoidance of these sensitive areas as much as possible and the integration of a plan for the recolonization of the mangrove with the compensatory reforestation program.

The management of rice valleys areas will be supported by the limited use of pesticides and homologated chemical fertilizers and the promotion of organic fertilizers. Risks related to the use of agrochemicals products and fertilizers will be managed with measures on hazardous waste management included in the ESMF. These measures will also take into account the risks related to the health and safety of the communities. The ESMF should also include pest management measures. Regarding health aspects, producers will be trained in the safe use of chemical products and the maintenance of treatment equipment with the use of appropriate personal protective equipment. The waste from these activities will be managed in accordance with the Safety Data Sheets of the products.



ESMF has been developed by PIU and it defines the screening mechanisms and provides guidelines to be followed during project implementation for the preparation of a subproject-specific environmental and social assessment, including an ESMP once the route alignments and production center sites are known. The ESMF will be disclosed prior to project Appraisal.

The ESMF also presents mitigation measures for potential environmental and social risks during the different phases of the project. Thus, for the planning and design phase, it will be necessary to put in place certain measures such as the definition of selection criteria for priority areas to be opened up and their disclosure to stakeholders, particularly at the level of local authorities, for approval and appropriation, the development of selection criteria for eligible areas and vulnerability criteria, the development of environmental and social exclusion criteria in order to avoid critical natural habitats, the development of hydrological reports as part of the technical studies to identify the points of passage of runoff water and the integration in the design of projects of hydraulic structures to maintain the axes of runoff of rainwater.

The ESMF also includes an assessment of risks related to Sexual Exploitation and Abuse/Harassment (SEA/SH) , and proposed mitigation measures. A summary of the specific measures is included in the Environmental and Social Commitment Plan (ESCP), prepared by the Borrower, in collaboration with the Bank. The project LMP proposes measures to address avoid any form of Sexual Exploitation and Abuse/Harassment (SEA/SH) risks for all workers. The project/PIU staff must also sign Codes of Conduct with clear and unambiguous language as to what constitutes SEA/SH, its prohibition, and the sanctions for breaching this conduct. The LMP also proposes a GM which will be accessible to all workers.

Potential social risks include physical and economic displacement, risks to contractor’s labor working in conflict areas/low security zones, and other labor risks (including child labor), as well as risks of the exclusion of vulnerable individuals and groups to receive project benefits, such as exclusion from employment opportunities in the project, and from consultation. Similarly, the introduction of a skilled workforce into project areas may heighten risks of SEA/SH, exacerbate social conflicts), disrupt social cohesion and increase risks related to the transmission of communicable diseases to and from local communities.

The risk assessment is carried out and will continue to be carried out in a participatory and inclusive manner by the Client during the project implementation. Based on the SEP, stakeholders are identified and frameworks for exchange are established and the monitoring and evaluation system is set up. The SEP also incorporates a GM for the project including a GM for workers. Particular attention is paid to vulnerable people and groups, including women, women's groups, youth, returning Internally Displaced Persons (IDPs), demobilized people, etc. and will be further developed through a social and security assessment at project inception and before the start of activities.

ESS10 Stakeholder Engagement and Information Disclosure

The Borrower has prepared a Stakeholder Engagement Plan (SEP) that aims to ensure that the views and interests of all stakeholders, including local communities and vulnerable individuals and groups, are taken into consideration throughout the project cycle. The SEP is proportional to the nature and scale of the project and its associated risks and impacts. The SEPs will be disclosed prior to appraisal.



The Borrower will continue and strengthen the meaningful consultations already initiated with all stakeholders throughout the project life cycle, ensuring the inclusion of all groups to enable them to participate in the planning and decision making stages, so that the production infrastructure provides equal opportunities for men, women and youth, and takes into account the special needs of people with disabilities and other vulnerable groups.

The main stakeholders are: the Ministry of Economy and Finance, the Ministry in charge of the Environment, local governments, local producer groups (agriculture, artisan, ecotourism, etc.), small-scale farmers and traders, the village committee with representatives of different social groups; women and youth-led groups, local communities and communes. Borrower will provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, without manipulation, interference, coercion, discrimination, and intimidation.

Regarding the convergence and divergence of regulatory frameworks, stakeholder engagement as designed by the World Bank is integrated into all stages of the project cycle while national regulations limit it to the environmental assessment phase.

Stakeholders likely to be directly affected by the project could include the following individuals or groups local authorities, economic interest groups (EIGs), networks of associations and EIGs led by women and young people, women's promotion groups (GPFs), regional, departmental and communal federations of women processors, grassroots community organizations (CBOs) producer organizations for rice and any other commodity chain, cooperatives of horticultural farms and mini-platforms, economic units for production, processing, market access services using NICTs and other exchange platforms, federations for support to local development (e.g., FADDO), and the private sector, youth associations and movements (ASC), the "Bajenu gox" (sisters of the head of the family or godmothers of the children who ensure the community's commitment to the health of the mother, newborn, child and adolescent.

Vulnerable people and/or groups likely to be most affected by the project's activities are: young people and women living in border areas where access to productive resources is threatened by security issues, people living with disabilities, women victims of discrimination, social exclusion, gender-based violence (GBV), sexual abuse and exploitation (SEA), sexual harassment (HS), rape etc., people displaced by the Casamance conflict and who are in the process of returning to their homelands, islanders (populations of the Casamance islands), Bassari communities living in isolation in Vélingara, demobilized ex-combatants/rebels, households dependent on rice-growing land due to salinization.

The interested parties are : Technical and financial partners (World Bank), Ministries and attached services at national level (Ministry of Environment and Sustainable Development, Ministry of Agriculture and Rural Equipment, Ministry of Livestock and Animal Production, Ministry of Health and Social Action, Ministry of Women, Family, Gender and Child Protection, Ministry of Infrastructure, Land Transport and Opening Up, Ministry of Territorial Communities, Development and Territorial Planning; Ministry of Community Development, Social and Territorial Equity, Ministry of Trade and Small and Medium-sized Enterprises, Ministry of Employment, Vocational Training, Apprenticeship and Integration), the deconcentrated public and administrative authorities (Regional Governors, Departmental Prefects), the regional and departmental technical and administrative services, the agencies and other similar structures, the



media: regional or community audiovisual and written press, intergovernmental agencies (including humanitarian agencies) etc.

The Borrower has engaged and will maintain a meaningful, inclusive and culturally appropriate consultations with all stakeholders throughout the project life cycle, paying attention to the inclusion of vulnerable and disadvantaged groups. Stakeholders will receive timely, relevant, understandable and accessible information, and consult them in a culturally appropriate and gender-sensitive manner free of manipulation, interference, coercion, discrimination and intimidation.

A project-level grievance mechanism has been designed and will be implemented throughout the project cycle. This includes consulting local communities (and in particular women and girls) on an SEA/SH reporting mechanism that is accessible, safe and appropriate to the context. The GM will include channels/procedures for SEA/SH complaints, including multiple and accessible entry points, referral to GBV service providers, and the management of complaints in a confidential and survivor-centered manner as indicated on the SES/SH response plan. If major changes occur in the scope of activities during implementation, a revised SEP is required and should be publicly disclosed.

A GM with a dedicated SEA/SH channel is included in the LMP, will specifically manage employer/employee- related grievances, including but not limited to: misconduct, wages, overtime, injuries/accidents, neighboring-community issues and SEA/SH incidents.

In view of the health situation due to COVID 19, the activities previously undertaken by the Borrower in the preparation of the CEDP Project were limited to: (i) restricted virtual meetings with various internal stakeholders and a stakeholder pre-identification workshop, (ii) discussion and validation of project component activities, identification of activities with a positive impact on vulnerable communities, and (iii) better engagement of administrative and community actors for better project ownership and identification.

However, consultations were conducted at the institutional level and were chaired by the Secretary General of the Ministry of Territorial Collectivities, Development and Land Use. The following participated in these activities: the services of the Ministry of Public Works, Transport and Decentralization, the Ministry of Territorial Communities, and the Ministry of Agriculture. Other video-conference meetings were held with the regional livestock services of Ziguinchor and Kolda, ISRA, Agropole Sud, the AgriJeunes and Provale-CV projects, etc., the Association of Mayors, PPDC beneficiaries (Bignona platform, etc.), and World Bank experts in charge of supervising preparation. The SEP contains the identification and analysis of stakeholders as well as all the actions that will be carried out throughout the implementation of the project activities for a good mobilization of stakeholders.

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

The project footprint is envisaged as relatively large. The project will focus on communities in selected intervention areas of the three regions of Casamance: Ziguinchor, Sédhiou, and Kolda. The project is expected to cover 60 communes (out of a total of 115). It will focus on rural municipalities, as the 9 urban municipalities are covered by the



PACASEN project. The Project will include the recruitment and employment of direct workers hired in PIUs, such as environment and social specialists); contracted workers (skilled and non-skilled workers hired by contractors of each subproject); primary supply workers (workers engaged for essential construction materials to be purchased on an ongoing basis, as defined in ESS2) and community workers.

Potential risks related to labor and working conditions, such as labor influx, child labor, forced labor, work-related discrimination and OHS risks, minimum wage and payment of social security contributions, as provided for in the Senegal labor codes, were assessed and addressed through the preparation of the LMP prepared by Borrower, and will be disclosed prior to project to the board date. LMPs set out the requirements of national law, the principles of ESS2 regarding child labor, and the minimum age of workers, and forbids the use of forced labor and child labor. Contractors, primary suppliers and subcontractors shall also commit to not using child labor or forced labor. This commitment will be explained to communities affected by the project during consultations regarding the preparation and implementation of the SEP. LMPs will include a grievance mechanism for labor-related complaints, with a dedicated channel for incidents of SEA/SH affecting workers.

The project will require contractors (both local and international) to develop their own LMPs aligned with the LMPs prepared by the Borrowers, which have been approved by the Bank. Their provisions apply to all workers on the project, including full- and part-time direct workers, contracted workers and primary suppliers, and community workers hired for Labor Intensive Public Works' (LIPW) activities. It will be the contractors' responsibility to ensure that all workers are fully aware of the terms of employment, remuneration and grievance mechanisms, ensure access to a dedicated SEA/SH channel and other relevant requirements under ESS2 and relevant provisions of national law.

As a condition of employment for all workers, temporary or full-time, contractors will ensure codes of conducts explicitly prohibiting among other acts, acts of SEA/SH and all sexual activities with anyone under the age of 18, and outlining sanctions for any breach will be signed by workers. The hiring entity will also will verify and record the age of all workers. The project must ensure that regular training in local languages is conducted by contractor for workers going into detail on labor provisions, codes of conduct, SEA/SH risks and mitigation measures, including the SEA/SH dedicated channels with grievance mechanisms.

Occupational Health and Safety (OHS): The ESMF includes sections on OHS and guidance for the preparation of specific instruments to be prepared by the Client or contractor prior to the start of work. These include OHS checklists, codes of conduct, safety training, requirements for job hazard analysis, and procedures to manage key OHS risks such as the Focus Four Hazards--falling, struck by, caught between, and electrocution. The C-ESMP will include measures to address these risks. As part of the ESMP and Contractor-Environmental & Social Management Plan (C-ESMP), an OHS plan will be developed with detailed requirements for general worker health and safety, including measures related to COVID-19. The OHS plan will include procedures for incident investigation and reporting, the recording and reporting of noncompliance, emergency preparedness and response procedures, and continuous training on OHS for workers.

The Borrower will ensure that ESS2 requirements are incorporated into: (a) the contracts between the Recipient and the Contractor and any entity (including the Owner's Engineer) supervising the Project's civil works; and (b) the contracts between the Contractor and any Contractors' subcontractors. In other words, civil works' contracts will incorporate social and environmental mitigation measures based on the World Bank's EHS Guidelines and the ESMF;



other referenced plans, including the SEP, RPF, RAPs, and Security Management Plan (SMP), as well as specific language referring to setting priorities for hiring local, unskilled labor.

Workers Accommodation: C-ESMP will include adequate measures to manage E&S risks and impacts related to the installation and use of the workers' accommodation, including land requirements, worker's safety and waste management. The project will ensure that workers' freedom of association and movement is not restricted, as movement and association are an important part of the well-being and dignity of project workers. Contractors should also provide adequate transportation in cases where accommodation is provided.

ESS3 Resource Efficiency and Pollution Prevention and Management

Air emissions: During the rehabilitation works of buildings, health structures and roads, the expected air emissions are the exhaust gases of heavy vehicles and machinery, and the dust generated by construction activities. The relatively short and small-scale nature of the work suggests that the level of air emissions will not be excessive or cause long-term nuisance. The ESMF has taken this risk into account with mitigation measures, such as runway watering and vehicle maintenance, to minimize the impact of air emissions.

Waste management: waste is mainly expected from rehabilitation works sites. Waste can be solid, liquid, non-hazardous and hazardous, such as hydrocarbon oils from construction machinery and vehicles. The site specific ESMFs will determine the source, type and risks associated with the wastes likely to be generated by the project and, if such wastes cannot be avoided, appropriate measures will be proposed to minimize, reduce and, where this is not possible, mitigate the risks associated with the waste.

Use of raw materials: The rehabilitation works of secondary and tertiary roads will require the supply of materials such as laterite, the materials will be procured in accordance with the measures specified in the international good industrial practices.

The project intends to use sustainable techniques (limited use of pesticides and homologated chemical fertilizers) however the use of certain products for the improvement of production will be managed with appropriate measures to avoid any form of pollution. Risks related to water pollution with inadequate use of agrochemicals will be managed by pest management measures which will be included in the ESMF.

The risk of exposure to asbestos will be managed with the development of a specific procedure if ever a sub-project presents this particularity.

ESS4 Community Health and Safety

Civil works will have an overall risk and impact on community health and safety. The mitigation measures, including the enforcement of a code of conduct for the civil works will be clearly stipulated in the contractor's ESMP (C-ESMP) and based on the project's ESMP, which the contractor will be fully responsible to implement. An SEA/SH risk assessment has been carried out for each participating region and mitigation measures proposed in all prepared documents. A code of conduct, including SEA/SH risk mitigation measures for ensuring community health and safety, is prepared and will be included in all bidding documents. The project's GM will be designed to safely and ethically



register complaints, and to address and document complaints and allegations, and include a dedicated channel for SEA/SH allegations during the project implementation.

Additional risks to the community include traffic and road safety (particularly during construction), or community exposure to nuisances (such as dust or noise), and public health issues (such as exposure to communicable diseases from an influx of labor). Heavy machinery and fleets of small trucks used for civil works could pose traffic hazards and road safety risks to local communities. The site-specific ESIA/ESMPs include COVID-19 transmission mitigation measures that are in line with World Bank guidance and World Health Organization (WHO) guidelines, national and international guidelines and best practices. They include clear incident-reporting and response procedures, for example, incidents related to worker and community interactions and accidents. Procedures related to the ethical, safe and survivor-centered approach to reporting SEA/SH incidents will be addressed in the SEA/SH engagements or Action Plans. Prepare, adopt and implement, as necessary, a stand-alone security Management Plan in accordance with the requirements of ESS4 in a manner acceptable to the Bank. The Analysis on security risk will be done during project implementation before the beginning of activities.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Project areas in Components 1, 2, and 3 include: Urban, peri-urban and rural areas. Farming, pastoralism and agro-pastoralism are the main livelihood activities in these areas. Some project activities, such as the maintenance of local roads (for the unclassified network which is under the purview of commune authorities), Water connections, rehabilitation works of secondary and tertiary and road network (250 km) could lead to physical and economic displacement, due to land requirements.

Given the insecurity in some areas, the mitigation hierarchy will be applied and avoiding involuntary resettlement will be the preferred option. If this cannot be avoided, measures to minimize involuntary resettlement will include livelihood improvement plans for people affected by economic displacement. In some contexts that are conflict prone, resettlement risks will also be guided by the Security Management Plan and/or security assessments. Resettlement Policy Framework (RPF) has been prepared, reviewed and approved by the Bank before project Appraisal. As soon as the locations and activities are known, site-specific resettlement action plans will be prepared (if necessary) in accordance with the provisions outlined in the RPF.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

It is likely that some project activities such as the rehabilitation of roads, trails or rice valleys could impact biodiversity or natural habitats. Therefore, the environmental and social screening that will be carried out for each sub-project will allow to see the impact of the activities on biodiversity and will propose the appropriate tool for the management of the potential risks. This work will be done in close collaboration with the Ministry of Environment and Sustainable Development via the DREECs of the concerned regions.

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

This standard is not considered relevant as there are no Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities currently identified in the project area. Should the presence of



indigenous communities be confirmed through further screening during implementation, the necessary assessments, consultations and instruments will be undertaken per the requirements of this standard.

ESS8 Cultural Heritage

The risks related to the impact of project activities on cultural heritage and sacred sites have been taken into account in the ESMF with an annex that describes the procedure for cultural heritage management. These aspects will be included in the construction/rehabilitation contractors' contracts to ensure compliance with procedures in case they encounter cultural heritage during implementation.

ESS9 Financial Intermediaries

This ESS does not apply.

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:

NO

IV. CONTACT POINTS

World Bank

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Implementing Agency(ies)

Public Disclosure



Implementing Agency: Ministry of Territorial Communities, Development and Land Management (MCTDAT), Project
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VI. APPROVAL

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