

Ministry of Finance and Planning Republic of South Sudan

Environmental and Social Management Framework (ESMF)

South Sudan Enhancing Community Resilience and Local Governance Project II (ECRP-II) (P177093)

4 June 2020 – amended 9 June 2022 for Phase II

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Abbreviations and Acronyms

ASMT	Area Security Management Team
BHU	Basic Health Unit
BRACED	Building Resilience and Adaptation to Climate Extremes and Disasters
CASEVAC	Casualty Evacuation
CBCM	Inter-Agency Community-Based Complaint Mechanism
CD	Country Director
CDD	Community-Driven Development
CEDAW	Convention on the Elimination of all Forms of Discrimination Against Women
CERC	Contingency Emergency Response Component
CESMP	Contractor's Environmental and Social Management Plan
CMR	Clinical Management of Rape
CoC	Code of Conduct
CPA	Comprehensive Peace Agreement
CTA	Technical Center for Agriculture and Rural Cooperation ACP-EU
DRC	Democratic Republic of Congo
DO	Designated Official
ECD	Early Childhood development
EHS	Environment, Health and Safety
EHSG	Environmental Health and Safety Guidelines
EIA	Environmental Impact Assessment
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
EU	European Union
C-ESMP	Construction Environmental and Social Management Plan
ESCP	South Sudan Enhancing Community Resilience and Local Governance Project
ESF	Environmental and Social Framework
ESIA	Environment and Social Impact Assessment
ESS	Environmental and Social Standards
FSA	Field Security Adviser
FSCO	Field Security Coordination Officer
GDP	Gross Domestic Product
GBV	Gender-Based Violence
GoSS	Government of South Sudan
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
GOSS	Government of South Sudan
GSM	Global System for Mobile Communications
HIV/AIDS	Human Immunodeficiency Virus / Acquired Immune Deficiency Syndrome
HQ	Headquarter
HR	Human Resources
HSSE	Health, Safety, Social & Environmental

IAIG	Internal Audit & Investigations Group
IASC	Inter-Agency Standing Committee
IASMN	Inter-Agency Security Management Network
IDA	International Development Association
IDP	Internally Displaced Person
ILO	International Labour Organization
IOM	International Organization for Migration
IP	Implementing Partner
IPV	Intimate Partner Violence
IUCN	International Union for Conservation of Nature
IVA	Independent Verification Agent
LGSDP	Local Governance and Service Delivery Project
LMP	Labor Management Plan
M&E	Monitoring and Evaluation
MAIP	Malicious Acts Insurance Policy
MEDVAC	Medical Evacuation
MIS	Management Information System
MOE	Ministry of General Education and Instruction
NGO	Non-Governmental Organization
OHP	Occupational Health Safety Plan
OHS	Occupational Health and Safety
PDO	Project Development Objective
PHCC	Primary Healthcare Center
PHCU	Primary Healthcare Unit
PMU	Project Management Unit
POM	Project Operations Manual
PPE	Personal Protective Equipment
PSEA	Prevention of Sexual Exploitation and Abuse
SA	Security Adviser
SSSNP	South Sudan Safety Net Project
SEA	Sexual Exploitation and Abuse
SEF	Stakeholder Engagement Framework
SH	Sexual Harassment
SIR	Security Incident Report
SLT	Saving Lives Together
SMT	Security Management Team
SOP	Standard Operating Procedure
SPLA	Sudan People's Liberation Army
SPLA-IO	Sudan People's Liberation Army -in-Opposition
SPU	Police Special Protection Unit
SRM	Security Risk Management
SMSG	Special Representative of the Secretary-General
SSAFE	Safe and Secure Approaches in Field Environments
SSPDF	South Sudan People's Defense Force
STI	Sexually Transmitted Infection
TDS	Total Dissolved Solids

TTL	Task Team Leader
UN	United Nations
UNDP	United Nations Development Programme
UNDSS	UN Department for Safety and Security
UNFPA	United Nations Population Fund
UNHAS	UN Humanitarian Air Services
UNHCR	United Nations High Commissioner for Refugees
UNICEF	United Nations Children’s Fund
UNOPS	United Nations Office for Project Services
UNSMS	United Nations Security Management System
USAID	United States Agency for International Development
VHF / HF	Very High Frequency / High Frequency
WB	World Bank

Executive Summary

The South Sudan Enhancing Community Resilience and Local Governance Project Phase II (ESCP-II) fills the critical gap between emergency response and recovery by addressing immediate service needs in areas with a high concentration of returnees while strengthening local institutions to better manage their own development in the future.

The project activities are expected to have an impact on the country's socioeconomic and natural environment. The holistic impact is expected to be overwhelmingly positive, however, in order to ensure that risks of negative environmental or social impacts emerging from the complexities of this project in South Sudan are being addressed, the Environmental and Social Management Framework (ESMF), which had been prepared for ECRP-I has been updated to cover the additional project activities.

The Project Development Objective (PDO) is to improve access to basic services and to strengthen the service delivery capacity of local institutions.

The proposed project aims to address immediate needs for basic services in selected areas of the country, while strengthening local institutions' capacity to better manage its own development and intercommunal tensions over services. The project maximizes its impacts and sustainability through a strong focus on operation and maintenance (O&M) of the infrastructure built along with local institution strengthening. Priority will be given to areas with high vulnerability as defined by the World Bank's composite vulnerability index.

The project is divided into four components: 1) Community Infrastructure and Services; 2) Institution Strengthening; 3) Project Management and Learning; 4) Contingency Emergency Response.

To comply with the World Bank's ESS1 and other relevant ESSs, the borrower has amended the ECRP-I Environmental and Social Management Framework (ESMF), and prepared a Resettlement Policy Framework (RPF), an Environmental and Social Commitment Plan (ESCP), a Stakeholder Engagement Plan (SEP), and a Security Risk Assessment and Security Management Plan (SRA/SMP).

The ESMF sets forth the basic principles and prerogatives the project will be following during project implementation once the physical footprints are known, including the preparation of site-specific ESMPs. All environmental and social (E&S) instruments will be the subject of consultation with the beneficiaries and institutional stakeholders. All E&S instruments will be publicly disclosed both in-country and on the project website prior to the physical start of project or activity implementation.

This ESMF is prepared in compliance with the ESSs of the World Bank (WB), as well as the South Sudan E&S management regulations.

Per the ESF classification, the ECRP-II has been categorized as a High Risk project based on the expected potential environmental and social impacts and risks, including contextual risks.

The ECRP-II will be led by a PMU, which will be established within the Ministry of Finance and Planning (MoFP) with representation of LGB civil servants. The ECRP-II proposes to adopt an implementation arrangement where the Government PMU contracts a specialized UN agency through output agreement as technical lead partner to implement the project activities given their capacity

constraints. The project will build in necessary measures to establish/restore the Government's project implementation capacity. The proposed project will also build in various capacity-building measures for county governments that have the legal mandate to provide local services under Component 2. The PMU will engage IOM to implement activities for Component 1 and 2 to leverage the experiences gained under ECRP-I, ensure continuity in the implementation approach, and maximize the investments made to set-up field offices. The PMU and IOM will be contracting construction companies directly. The MoFP is the 'borrower' and staffs and runs the Project Management Unit (PMU). The PMU will be based in Juba.

The PMU has the overall responsibility for the management of the ECRP-II. It will be responsible for all technical planning, financial management, procurement, social and environmental risk management, and communications vis-à-vis the World Bank. It will cascade down responsibilities in these areas to IOM and contractors and sub-contractors, and will maintain overall monitoring and supervisory responsibility in regards to these activities. For security arrangements, the PMU will be responsible for the monitoring of security and safety measures by all implementers. This includes responsibility for the implementation of this ESMF, Security Risk Assessment (SRA) and Security Management Plan (SMP).

Generally, the project beneficial features outweigh the adverse risks. The targeting of the poor and vulnerable to reduce shocks, restore social cohesion and integrate excluded groups is likely to have beneficial impacts on parts of South Sudan's populations. The project will target the most severely affected, such as IDPs, refugees host communities and others.

The environmental risk rating is *High*. CDD-led infrastructure is generally associated with low-to-moderate environmental risks with potential adverse environmental impacts that are reversible, temporary in nature and scope, and ones that can be easily and cost effectively mitigated. However, the flood risk reduction activities being considered (which may range from dykes, levies, embankment strengthening, drainage etc of small to medium size) will have significant to high risks depending on the selected type of control, their design and location. This is further compounded by the low capacity of the national and county government to enforce and supervise environmental compliance including that of local communities to manage natural resources sustainably in the backdrop of pervasive conflict, which extends to the control of natural resources that are largely undisturbed and under-managed. Further, the legal and institutional arrangements to manage, supervise and enforce compliance are equally dysfunctional with low capacity in controlling and monitoring environmental performance during implementation.

Otherwise, the potential adverse environmental impacts are reversible, temporary in nature and scope, and can be easily mitigated. As such, the potential risks and impacts are likely to have the following characteristics: Be predictable and expected to be temporary and/or reversible; low in magnitude; site-specific, without likelihood of impacts beyond the actual footprint of the project; low probability of serious adverse effects to human health and/or the environment (e.g. do not involve use or disposal of toxic materials, routine safety precautions are expected to be sufficient to prevent accidents, etc.); risks and impacts can be easily mitigated in a predictable manner.

Some of the subprojects, like construction or repair of health and educational facilities, markets, roads, drainage, water and sanitation facilities among others, could potentially have adverse environmental impacts that may range from: contamination of ground water due to proximity of latrines and waste disposal sites or inappropriate location of pit latrines, use of limited or sensitively located local construction material, such as aggregate and timber; noise and dust emissions from civil works; generation and dumping of debris (excavated soils); occupational health and safety hazards from handling of equipment by workers; pollution of local surface water resources; loss of vegetative cover causing

erosion of loose soils and waste; pollution of soil and water resources due to inappropriate collection and disposal of market refuse and waste; and health hazards due to poor storage of market good providing breeding ground for disease carrying rodents and vectors; injuries from use of the facilities; health hazards due to inadequate cleaning and maintenance of sanitary facilities; safety hazards due to collapsing pit latrines; health hazards due to inappropriate storage and disposal of medical and other general waste including electronic waste from decommissioned water borehole solar panels; health hazards due to bacterial contamination of water resources. These risks and impacts can be mitigated through the measures listed in this ESMF.

The substantial security issues, fragility, conflict and violence (FCV) and serious challenges regarding GBV, render the social risk to be *high*. Social risks are above all the result of the country FCV context in the project area. This include risks resulting from (i) weak grievance redress mechanism on targeting , (ii) social exclusion and elite capture; (iii) insufficient community engagement;(iv) intra-communal tensions over implementation issues, (iii) assets becoming targets of violent groups, (iv) and adverse results from construction and labor activities. Violence (political, criminal, ethnic, etc.)sexual harassment and Gender based violence(SH/SEA/GBV . Further, as the project will engage in psychical construction including dykes, involuntary land acquisition is another risk that need to be properly managed. However, the extent of these works and the footprint are unknown at this stage and hence, the extent of involuntary resettlement and construction-related social impacts (including those linked to worker influx, SEAH & GBV, community health and safety and labor management) cannot be accurately scoped. Potential tension between host and refugee communities which might lead to conflict due to the potential perception by host communities that refugees are receiving advantages that should go to the South Sudanese citizens will be another social risk.

These risks and impacts will be managed through the mitigation hierarchy approaches (avoid, minimize, mitigate and compensate) included in this ESMF, in the Resettlement Policy Framework (RPF) and the Security Management Plan (SMP), and subsequently in all sites-specific operational management plans, such as ESMPs and/or RAPs to be developed during the implementation stage once the detailed characteristics of sub-project sites are confirmed. No irreversible adverse environmental impacts are foreseen since most of these risks and impacts are small in scale, localized, mostly site specific and easily manageable through these proposed mitigation measures.

A grievances redress mechanism (GRM) has been developed to manage potential complaints from the beneficiaries and the affected communities. A set of specific procedures have been set up to handle workers grievances as part of the labor management procedures. A dedicated channel to address GBV/SEA//SH cases has been set up as part of the GBV Action Plan (See Annex 3). A stand-alone Stakeholder Engagement Plan (SEP) has been prepared.

A comprehensive monitoring and evaluation system to monitor progress towards the project development objective and expected results has been developed. A capacity building and training program for both the beneficiaries and the E&S staff has been elaborated and will be implemented early on in the project.

The estimated costs for the implementation of this ESMF are 2,012,000 USD. The security risk management and potential resettlement costs are budgeted separately.

Table 1 Estimated Costs

	Required Resources	USD
Risk Management Unit / PMU – Monitoring of ESMF		
1.	Human Resources:	
	Social Specialist	Incl. in PMU staff costs
	Environmental Officer	Incl. in PMU staff costs
	Gender Specialist (IOM)	Incl. in IOM staff costs
	Community Development Specialist (IOM)	Incl. in IOM staff costs
2.	Logistics / Travel for monitoring and supervision	200,000
Grievance Redress Mechanism hotline (implemented by IOM)		
3.	Hotline and other mechanisms	300,000
Implementation of Risk Mitigation Measures IOM		
	Risk Mitigation Measures	490,000
5.	SEP implementation	742,000
8.	Trainings and Capacity Building	180,000
10.	Implementation of GBV Action Plan	100,000
	TOTAL	2,012,000

1. Introduction

Development in South Sudan has been marred by decades of political strife and violence. However, the Revitalized Peace Agreement signed in 2018 provides some hope for movement forward. Nearly a third of the country has been displaced with 8 out of 10 people living below the poverty line and 60 % suffering from some level of food shortage. These challenges are compounded by a lack of institutional readiness to undertake the development needed. The South Sudan Enhancing Community Resilience and Local Governance Project (ESCP II) fills the critical gap between emergency response and recovery by addressing immediate service needs in areas with a high concentration of returnees while also strengthening local institutions to better manage their own development in the future.

The project activities are expected to have some impact on the country's socioeconomic and natural environment. The holistic impact is expected to be overwhelmingly positive. However, in order to ensure that there are no negative environmental or social impacts emerging from the complexities of this project in South Sudan, the ESCP I Environmental and Social Management Framework (ESMF) has been updated. The framework assesses environmental and social risks and prescribes mitigation measures and a management structure to ensure implementation of these measures.

The proposed project aims to address immediate needs for basic services in selected areas of the country, while also strengthening local institutions' capacity to better manage inter-communal tensions and resources. Priority will be given to areas with a high concentration of returnees that are also likely to experience increased demands for services. To ensure flexibility and adaptability to accommodate changing population dynamics and fluctuations in the status of the local government and conflict dynamics, block grants will be allocated on a yearly basis and activities will be implemented in a phased manner. The project will finance the activities described below with a preliminary budget estimate of US\$65 million. A project period of 36 months is proposed – short enough so as not to perpetuate direct third-party implementation, but long enough to allow sufficient time for community mobilization, new patterns of interaction to emerge, and local institutional strengthening.

1.1 Project Components

The Project Development Objective (PDO) is to improve access to services, reduce floods risks, and enhance institutional capacity for local service delivery and integrated disaster risk management at the national and sub-national levels.

The project aims to address immediate needs for basic services and flood risk reduction in selected vulnerable areas of the country, while strengthening community institutions and local governments' capacity to better manage local development and intercommunal tensions over services and supporting the national government to provide oversight. The project seeks to maximize its impacts and sustainability through a strong focus on operation and maintenance (O&M) of the infrastructure. To ensure flexibility and adaptability to evolving population, political, and conflict dynamics, the project builds in continuous conflict assessment and possible replacement counties.

Component 1. Infrastructure and Services for Community Resilience

Subcomponent 1.1: Community Infrastructure and Services. This subcomponent will support eligible investments in community-level infrastructure and services in selected vulnerable areas through a participatory planning process. Eligible investments include construction or rehabilitation of public goods such as water supply and sanitation facilities, footpaths and community roads, dykes for flood protection, health and education facilities, among others, to ensure maximum community benefit.¹ Selection will be made from an open menu (subject to a short exclusion list) from which communities will choose in a participatory manner, based on their needs and priorities. Selected community infrastructure will utilize renewable energy sources (solar panels) and adopt disaster and climate resilient approaches including risk assessments to identify safe locations and elevated building structure options to reduce flood and other disaster risks. The participatory planning process will be supported under Component 2. All *payams* and *bomas* within the target counties will be eligible for funding.

Table 2 Indicative list of subprojects

Sector	Items	Technical Complexity
Water	Construction or repair of non-motorized hand-pumps and boreholes (boreholes will be improved or changed to an existing water scheme)	Medium
	Tanks	High
	Dug wells	Medium
	Haffirs for cattle and human consumption	High
Sanitation	Provision or repair of VIP latrines for public use	Medium
	Construction of flood protection infrastructure	Medium
Flood Risk Protection	Repair of flood protection infrastructure Dykes Levees Stormwater drainage Nature-based solutions	Low
Roads	Rehabilitation of community roads	High
	Repair of community roads	Low
	Footpaths	Low
	Culverts	Medium
	Bridges	Medium
Health	Repair or extension of existing PHCC or PHCU	High
	Purchase of furniture for existing	Medium

¹ Under the predecessor project with similar scope, over 70 percent of the funding was allocated for infrastructure related to water, sanitation, and hygiene (WASH). Funding for subprojects that necessitate recurrent financing such as schools and health clinics will be limited to construction/rehabilitation of facilities where services exist, that is, schools that have teachers but lack proper facilities.

	PHCC or PHCU	
Education	Repair or extension of existing primary schools	High
	Purchase of furniture or equipment for existing primary Schools	Medium
Other	General buildings with local materials	Low
	Markets	Medium
	Livestock dips	Medium

Subcomponent 1.2: Flood Risk Reduction Investments. This subcomponent will finance technical assessments including feasibility studies, detailed engineering designs and safeguards assessments and physical infrastructure for flood risk reduction and prevention. The proposed interventions would focus on physical investments such as levees, dykes, stormwater drainage, nature-based solutions and integrating green infrastructure solutions in riverine flood management in defined areas. The geographic targeting for this subcomponent is guided by the following criteria, which have been agreed with the Government: (i) flood affectedness and exposure, (ii) concentration of physical assets and economic activities, (iii) operational considerations such as accessibility and security. Areas that meet the targeting criteria and those that overlap with ECRP-II counties will be prioritized. WHR resources would also allow flood risk reduction and prevention activities to be conducted in Maban County, to benefit refugees and host communities. The final list of physical investments in flood risk reduction will be defined based on detailed studies in the prioritized locations. Large-scale investments in flood risk reduction and water management infrastructure (such as dams or water diversion channels) will not be financed under ECRP-II. During project implementation, further hydraulic/hydrological analysis and technical including exposure and vulnerability assessments will be undertaken to determine the exact target areas, investments, beneficiary streams, and implementation modality.

1.3: Operations and Maintenance (O&M). The ECRP-II envisions hybrid O&M approaches based on the types of infrastructure built under the project as well as the local contexts. In urban or peri-urban areas, or where demand for services and willingness to pay is high, a market-based O&M approach will be pursued. It is expected that the emphasis will be more on conventional, non-market-based O&M strategies in most rural areas. A detailed O&M study undertaken under the ongoing ECRP-I will elaborate context specific O&M approaches. O&M committees will be established for priority subprojects that have been selected for funding as well as for flood risk reduction infrastructure, as required depending on the type of investments. These committees will be trained in bookkeeping, finance, and planning, to develop boma-level maintenance plans and budgets. The committees and IOM will also map existing value chains and suppliers, in-kind and local contribution options, expected government contributions, and options for combining O&M needs among several bomas for better negotiating strength and cost advantages. O&M performance will factor into performance assessments for the performance-based subproject allocations and for eligibility for sub-national transfers for O&M support.

Geographic targeting. The selection of counties is guided by four principles: (a) vulnerability, (b) feasibility, (c) equity, and (d) continuity. The project will continue to target the 10 counties where ECRP I

started implementation to consolidate envisioned development gains in these locations.² The ECRP-II will scale-up to include refugees in the two refugee-hosting counties that were already targeted under ECRP-I³ and a few more flood-prone vulnerable counties to support subcomponent 1.2 activities. Five counties have been shortlisted for flood risk reduction subcomponent based on pre-determined selection criteria (see para.36). However, final selection will be made upon conclusion of detailed hydraulic/hydrological and technical analyses to be undertaken during project implementation. Based on budgetary availability, additional counties may be added based in consultation with the government. It was confirmed that the project will use the administrative division of ten states, 79 counties, and 2008 *payams* just as under the ECRP in the absence of more recent official boundaries.⁴ Any discrepancies on the ground will be resolved in consultation with the government

To the extent possible, the project will encourage labor-intensive public works approach in the construction or rehabilitation of the infrastructure. Emphasis will be placed on the inclusion of various social groups facing marginalization or barriers to participation (for example, women, youth, and the displaced) and ensuring their access to daily wage labor opportunities.

Table 3 Possible target Counties under ECRP-II

No.	State	County	Remarks
1	Upper Nile	Maban	ECRP-I county, refugee-hosting county
2	Upper Nile	Baliet	ECRP-I county
3	Upper Nile	Renk	ECRP-I county
4	Upper Nile	Fashoda	ECRP-I county, possible flood risk reduction county
5	Western Bahr-el-Ghazal	Raja	ECRP-I county
6	Western Bahr-el-Ghazal	Wau	ECRP-I county
7	Unity	Leer	ECRP-I county
8	Unity	Rubkona	ECRP-I county, possible flood risk reduction county
9	Unity	Pariang	ECRP-I county, refugee-hosting county
10	Jonglei	Pibor	ECRP-I county, possible flood risk reduction county
11	Jonglei	Fangak	Possible flood risk reduction county
12	Jonglei	Twic East	Possible flood risk reduction county

Component 2. Institution Strengthening

This component will also be led by IOM as it leverages ECRP-I activities. The component supports the participatory planning process for the identification of subprojects to be financed under Component 1,

² The 10 counties were originally selected based on a composite vulnerability index that the World Bank team developed and which the Government agreed to. The index included: (a) concentration of returnees, (b) access to basic services, (c) food insecurity, (d) incidents of violence, (e) remoteness, and (f) exposure to natural disasters.

³ As refugees are exclusively in refugee camps, ECRP-I only targeted host communities and not the refugees. Under ECRP-II, the project will target both refugees and host communities in the two refugee hosting counties of Maban and Pariang.

⁴ Such practice is in line with how the national budget is being allocated and how other development partners are operating.

monitoring of the construction of subprojects, as well as capacity building of relevant national and local institutions. Both WHR and CRW funds will support this component.

Subcomponent 2.1. Community Institution Strengthening. This subcomponent will build on the activities undertaken under ECRP-I and follow broadly the same approach with some adjustments. Key elements of this approach include: (a) community mobilization into boma development committees (BDCs)/payam development committees (PDCs)⁵ in line with the Local Government Act (LGA) 2009 which are inclusive of all socio-economic groups that exist, including refugees, IDPs, host community, youth, women, people with special needs, etc.; (b) participatory conflict-sensitive disaster risk mapping/analysis and disaster preparedness training for BDCs/PDCs; (c) support for BDCs/PDCs on participatory development planning, infrastructure construction, rehabilitation, monitoring; (d) facilitation of constructive interaction between BDCs/PDCs and the county government; (e) gender transformative training/GBV training for men and women at *boma* and *payam* levels; and (f) psychosocial training to address trauma for women and men at *boma* and *payam* levels where deemed important and feasible. BDCs/PDCs will serve as umbrella local governance institutions that play a larger role in local development and resiliency planning for their communities, as well as serve as an interface between the community and the county government that other development partners can utilize.

Gender and youth considerations will be integrated throughout the project cycle. BDCs/PDCs will not only have a minimum of 40% female representation, but a 50% representation in leadership roles. All project sites will receive a core minimum package of activities that forward women's meaningful participation and employment opportunities under the project. Youth will be constructively engaged in the project in a number of ways. Separate constituencies will be established for male and female youth in the community mobilization process so as to promote the distinct voices of each. Youth's role in operations and maintenance will be promoted through the provision of opportunities, training and tools.

Conflict-sensitive and disaster and climate risk sensitive approaches will be mainstreamed throughout the project cycle. LGSDP and ECRP have laid a foundation of rigorous conflict analysis and mapping at both county and local levels, as well as the integration of findings into operational processes and training. The scope of this analysis will be expanded to include disaster, climate risks and other social risks. In refugee-hosting areas, specific efforts will be made to ensure strong inclusion of refugees and cross-refugee-host institutions in the identification and oversight of ECRP-II sub-projects.

Subcomponent 2.2. County Government Strengthening. This subcomponent will support county governments to fulfil their responsibilities for local service delivery and disaster risk management. Specific activities include: (a) county government functionality assessments to assess staffing, equipment, core function capacities, local service mapping capability; (b) based on the results of the functionality assessments, technical assistance for county government officials will be offered on local service delivery planning, participatory development planning, subproject implementation monitoring, BDCs/PDCs' performance monitoring, providing O&M support, EP&R and DRM, and periodic reporting on ECRP-II implementation. The nature of the training will be tailored to each county based on the findings of the functionality assessments; (c) eligibility for one-time performance-based grants worth approximately US\$30,000 to improve basic facilities and equipment that support ECRP-II implementation contingent on county governments' performance measured by the government along the pre-agreed performance

⁵ BDCs comprise of about 10-15 people selected from different socioeconomic groups (e.g.- women, youth, refugees, IDPs, people with special needs, etc.) that exist in a community. 50% of the members will be women, and 50% of the leadership will also be women. 2 BDC representatives (1 male, 1 female) from each boma within a payam will then form a PDC. It is at the PDC where members discuss and prioritize different boma's priority subprojects that can be financed from the payam allocation. Not all bomas will receive subprojects due to budget constraints.

indicators; and (d) peer learning from well-performing county governments will be provided. The nature of technical assistance will be tailored to each county based on the findings of the functionality assessments.

Subcomponent 2.3 National and State Government Strengthening. This sub-component will support the capacity building of the PMU, the MoFP, and the Local Government Board (LGB) based on an assessment of their technical competencies in the areas of financial management (FM), procurement, project planning, monitoring and evaluation (M&E), community engagement methods, and safeguards. ECRP-II will adopt a “buddy system” where civil servants will be coupled with each of the technical consultants hired at the PMU to facilitate on-the-job learning. The MoFP and LGB will be supported to lead the county government performance evaluation, allocation of performance-based grants across counties, and oversight of subproject implementation. Basic office facilities and equipment will be provided as needed to Aid-Coordination Unit of MoFP and LGB to enhance their basic functionality. Further, this sub-component will provide capacity support for DRM and flood management to MHADM, MoWRI and other relevant government entities at the national and state level. The government authorities will be supported through a range of technical assistances including i) geo-data analysis and field data collection for flood risk assessment and post-disaster needs assessment, ii) investment programming for flood risk reduction, and iii) contingency planning and emergency preparedness and response (EP&R).

Component 3: Project Management and Learning

This component will be led by the PMU to be established within MoFP with representation of LGB. This component will support (a) project management including technical planning, FM, procurement, environmental and social (E&S) risk management, and communications; (b) project monitoring which includes a geo-enabled monitoring system and beneficiary feedback/grievance redress mechanism (GRM) which will be accessible by refugees, IDPs and host communities; (c) impact evaluation; (d) continuous conflict analyses; (e) just-in-time studies as and when needs arise; (f) financing for a third-party monitoring agent (TPMA); and (g) PMU operating costs. The PMU will be shared with the planned PFMIS project with shared functions of FM, procurement, E&S risk management and M&E. ECRP-II will facilitate linkages between the PMU and the CCTs at the county level to establish protocols and regularized support for constructive county engagement in local resource management and service delivery improvement and maintenance activity.

Component 4: Contingency Emergency Response

A contingency emergency response component (CERC), initially without a budget allocation, will allow for the rapid reallocation of project funds in the event of natural or man-made crisis and major disease outbreaks of public health importance during the implementation of the project, in accordance with the World Bank Investment Project Financing (IPF) Policy, paragraphs 12 (Projects in Situations of Urgent Need of Assistance or Capacity Constraints). Activation of the CERC is triggered by (a) a declaration of a state of emergency by the Government and (b) Government request to the World Bank for activation of the CERC (see Annex 9).

1.2. Project Beneficiaries

The project is expected to benefit over 950,000 people in about 12 vulnerable counties in South Sudan including the most vulnerable people such as IDPs and refugees. ECRP-II targets counties that are heavily conflict affected, more food insecure, exposed to flooding, and facing increased demand for basic services due to high concentration of IDPs and refugees. Taken together, over 550,000 people (about 50 percent of whom are women) across four states, 10 out of 79 counties, are expected to directly benefit from project investments and support. In the two refugee-hosting counties of Maban and Pariang, which are a part of the 10 target counties, an additional 182,000 refugees (compared to about 85,000 host community members) are expected to benefit from ECRP-II, of whom approximately half are women. The proportion of refugee beneficiaries is higher at 63% compared to that of the host communities at 37% given that refugee population outnumber the host communities in these counties. The figure was derived using the ECRP-I's experience, where on average 35,000 persons per county benefitted from project activities – either from the subprojects or institutional strengthening or both. Given that ECRP-II's budget allocations are larger, it is estimated that about 55,000 persons per county could benefit from project activities. This figure corresponds to a conservative estimate of approximately 50 percent of the target counties' population. This seems reasonable given that while all *payams* and *bomas* within target counties will be eligible for funding, not all *bomas* will receive subprojects due to budget constraints. Nevertheless, all *payams* and *bomas* will benefit from various trainings and participatory planning processes to be provided by the project.

For flood risk reduction investments, while exact locations or investments are yet to be identified, given that the scale would be larger, it is expected that about 100,000 people (80% of the county population on average) could benefit per county. This includes people within the target county that can use the dry area for evacuation. With 2 new counties that do not overlap with ECRP-I, an additional 200,000 beneficiaries are likely to benefit from flood risk reduction investments.

1.2 Objective of the ESMF

The main purpose of this ESMF is to establish procedures and methodologies for environmental and social assessments as well as to review, approve and implement investments to be financed under the project as the nature, scope and locations of activities becomes known during the implementation of the project.

This ESMF has been developed as the E&S instrument for assessing, managing and monitoring E&S risks and impacts of the project given that the full nature, scope and geographical locations were not exactly known at the time of preparing the ESMF. The ESMF establishes the screening processes and tools to be directly implemented by Implementing Partners (IPs) and contractors in assessing the risks and impacts of the sub-projects. This will facilitate the recommendation of appropriate mitigation and monitoring measures for each subcomponent and/or activity.

The ESMF describes the policy and legal framework in which the E&S Standards are embedded, including national legislation and policies, international commitments of South Sudan, and the World Bank Environmental and Social Framework (ESF) and supporting instruments. It further lays out an environmental and socio-economic baseline; classifies the E&S risks and tables E&S risks and mitigation measures in the format of an Environmental and Social Management Plan (ESMP). The document then explains the institutional and implementation arrangements for the project and for the ESMF and lays out

the Monitoring Plan for the ESMF. It also lists the Project Grievance Redress Mechanisms (GRM) and explains anticipated trainings and capacity development initiatives. Specific E&S instruments, designed for the risk mitigation of the ECRP are annexed to this ESMF. These include the Cultural and Chance Find Procedures, GBV/SEA and Child Protection Action Plan, Labor Management Procedures, an Environmental and Social Screening Report Format, and an E&S Screening Report format.

1.3. Approach and Methodology

The methodology used to develop this ESMF was based on literature review, stakeholder consultations, and a review of lessons learnt from the implementation of ECRP-I.

The literature review aimed to review relevant documentation and understand the context in which the ESMF is applied. The literature reviews included the review and consultation of the following:

- Review of the ECRP-I ESMF
- Review of ESMF of similar projects in the region financed by the WB;
- Review of South Sudan's policies, laws, procedures, regulatory and administrative frameworks to determine the relevant legal requirements for the project;
- Environmental and Social Standards of the WB in order to determine their applicability to the project;
- Existing documents related to the ECRP-II, such as the Environmental and Social Commitment Plan - ESCP, Stakeholder Engagement Plan - SEP, the appraisal ESRS, the draft Project Appraisal Document (PAD);
- Documents and literature on environmental and social aspects of the project areas for the preparation of the Environmental and Social Baseline;
- IBAT, IUCN, IBAs, Ramsar databases to obtain/confirm information on sensitive habitats and species.

In view of the preparation of the initial ECRP-I, broad stakeholder consultations were conducted in December/January 2019/2020 by IOM and UNOPS, which led to the initial design of ECRP project activities. For the preparation of this ESMF, the stakeholder consultation results were reviewed again, in the light of the lessons learnt from the implementation for the ECRP-I.

Specific stakeholder consultations were undertaken for the preparation of the ECRP-II E&S documents, including this amended ESMF.

High-Level Consultations

From November 8-20th, 2021, the World Bank met with representatives from the Ministry of Finance and Planning (MoFP), Local Government Board (LGB), Ministry of Gender, Child and Social Welfare (MGCSW), Ministry of Humanitarian Affairs and Disaster Management (MHADM), Relief and Rehabilitation Commission (RRC), development partners and NGOs engaged in local service delivery, community engagement, local conflict mitigation and disaster risk mitigation (DRM). The team also undertook a field trip to Malakal, Fashoda and Wau, where the team met with Governors, county governments, community members and Internally Displaced Persons (IDPs) along with field visits to ECRP-I sites.

The results of the meetings included agreements on key design elements for the ECRP-II, on the target counties, on the division of labor between the government and IOM, and on the required preparatory works related to procurement, fiduciary, and environmental and social safeguards.

Consultations with Refugee and Host Communities

IOM, with assistance from UNHCR and in coordination with the Government, undertook consultations with refugees and host communities in Maban County (Upper Nile State) and Jamjang (Parian County) in November 2021. Consultations included members of the refugee community and host communities, as well as NGOs and CSOs present in the area. The results are presented in the next section.

In addition, IOM prepared a comprehensive paper on lessons learnt from the implementation of the ECRP-I. The paper covered programmatic, operational as well as E&S issues. The paper was reviewed and considered for the preparation of this ESMF.

ECRP-I

Departing from the ECRP-I, the ECRP-II will scale-up to include refugees in the two refugee-hosting counties that were already targeted under ECRP-I. As refugees are exclusively in refugee camps, ECRP-I only targeted host communities and not the refugees. Using the WHR resources, ECRP-II will scale-up activities in the two refugee-hosting counties of Pariang and Maban to include larger numbers of refugees in prioritization of, and benefits from, infrastructure. Coupled with institutional strengthening activities, ECRP-II will help promote a transition from humanitarian dependence to a more development-focused approach to displacement challenges in both areas.

Furthermore, a few more flood-prone vulnerable counties will be included to be supported under subcomponent 1.2 activities. Five counties have been shortlisted for flood risk reduction subcomponent based on pre-determined selection criteria. A detailed O&M study undertaken under the ongoing ECRP-I will elaborate context specific O&M approaches. As a result, O&M committees will be established for priority subprojects that have been selected for funding as well as for flood risk reduction infrastructure, as required depending on the type of investments. Subcomponent 2.1. will build on the activities undertaken under ECRP-I and follow broadly the same approach with some adjustments.

2. Policy and Legal Framework

This section provides a discussion of the policy and legal framework for environmental and social management and conservation in South Sudan under the auspices of this project.

2.1 National Regulatory and Policy Framework

Since attaining Independence in July 2011, the Government of the Republic of South Sudan has adopted a new constitution, as well as policies and legislation related to environmental and social standards. Some legislation from the previous 'Southern Sudan' remains in place. At the same time, other laws and regulations are still being drafted, with the ultimate aim of enhancing sustainable socio-economic development. The policies and laws provide procedures to be followed in the planning and implementation of activities in order to utilize resources and execute programs to maximum benefit.

Transitional Constitution of the Republic of South Sudan of 2011: The Transitional Constitution of the Republic of South Sudan of 2011 includes numerous provisions that have a bearing on the environment. Article 41 (1) provides that the people of South Sudan shall have a right to a clean and healthy environment and (2) that every person shall be obliged to protect the environment and (3) that future generations shall have the right to inherit an environment protected for the benefit of present and future generations. Specific measures to ensure the objectives above include: The prevention of pollution and ecological degradation, the promotion of conservation and the securing of ecologically sustainable development and the use of natural resources while promoting rational economic and social development to protect the bio-diversity of South Sudan. Furthermore, Article 166 (6) expects local governments to involve communities in decision-making in the promotion of a safe and healthy environment.

The purpose of the **South Sudan Draft Environmental and Protection Bill (2013)** is to protect the environment and to promote ecologically sustainable development that improves the quality of life for both the present and future generations. Section 18 of the South Sudan Draft Environmental and Protection Bill introduces the requirement for Environmental Impact Assessments. An Environmental Impact Assessment (EIA) is defined as a systematic examination conducted to determine whether or not a project will have any adverse impact on the environment and prescribe mitigation measures. The objective of the EIA is to ensure that environmental considerations are explicitly addressed and incorporated into the development decision-making process and to anticipate and avoid, minimize or offset the adverse significant biophysical, social and other relevant effects of development proposal, among others.

In addition, Section 32, Cap 5, intends to introduce the requirement for Environmental Audits. An Environmental Audit is defined as the systematic, documented, periodic and objective evaluation of how well environmental organization, management and equipment are performing in conserving the environment and its resources. The main objectives of an Environmental Audit are to: Assess how far project activities and programs conform with the approved environmental management plans as well as with the required environmental quality standards. To provide mechanisms for coherent implementation procedures of a project so as to mitigate adverse environmental impacts and provide regulatory bodies with a framework for ensuring compliance with, and the performance of an environmental management plan.

Section 20, Cap 5, intends to introduce the requirement for Environmental Monitoring. Which is defined as the continuous determination of actual and potential effects of any activity or phenomenon on the environment, whether short or long term. The bill mandates the line ministries to: Monitor environmental phenomena with a view to assessing possible changes in the environment and their possible impacts. In addition, they must monitor the operations of any industry, project or activity with a view to determining its immediate and long-term effect on the environment. They need to compel the proponent to carry out a baseline survey to identify basic environmental parameters in the project area before implementation (except where a baseline survey has been carried out) Finally, they have to determine the parameters and measurable indicators to be used in monitoring of projects and conduct measurement of environmental changes that have occurred during implementation.

The Land Act of 2009 (State of Southern Sudan): One of the key objectives of the Land Act is to promote a land management system, which can protect and preserve the environment and ecology for the sustainable development of South Sudan. It also provides for fair and prompt compensation to any person whose right of occupancy, ownership or recognized long-standing occupancy or customary use of land is revoked or otherwise interfered with by the Government.

The Land Act reinforces the Government's recognition of customary land tenure: 'Customary land rights including those held in common shall have equal force and effect in law with freehold or leasehold rights.' Community land can be allocated to investors as long as investment activity 'reflects an important interest for the community' and 'contributes economically and socially to the development of the local community'. It also requires that state authorities approve land acquisitions above 250 feddans (105 hectares) and create a regulated ceiling on land allocations.

The Land Act requires the Government to consult local communities and consider their views in decisions about community land. The Act also gives pastoralists special protection: 'No person shall without permission to carry out any activity on the communal grazing land which may prevent or restrict the residents of the traditional communities concerned from exercising their grazing rights'.

However, the project team has to be cognizant of the fact that there are elements of this act that do not function as stated.

The South Sudan Forest Policy (2012) was formulated to broadly protect the roles forests play in the ecological stability of rivers, lakes, swamps and agricultural production systems. It also ensures that there are optimal benefits from forestry and agro-forestry activities for food security and poverty alleviation among our rural communities. The policy integrates forest sector actions with rural development efforts to ensure that the rural population of South Sudan shall have access to basic needs such as sustainable household food security, shelter, wood fuel, safe clean water, sanitation and health facilities, primary education, good local governance, empowerment and self-reliance.

The Agriculture Policy Framework (2012-2017) of the Ministry of Agriculture, Forestry, Cooperatives and Rural Development emphasizes the need to transform agriculture from a traditional/subsistence system to achieve food security through a science-based, market oriented, competitive and profitable agricultural system without compromising the sustainability of the natural resources for generations to come. In order to achieve the above, it developed key strategic objectives that include: Priority policies that quickly boost agricultural production, the availability of agricultural inputs (including a credit facility at affordable cost) the rehabilitation and expansion of rural infrastructure including feeder roads and markets, the development and provision of research and extension services and market linkages.

The Wildlife Conservation and National Parks Act (section 5) recognizes that wildlife constitutes an important national natural wealth and is part of the heritage of South Sudan and therefore needs to be conserved, protected and utilized for the benefit and enjoyment of all its people. Section 6 vests the administration and execution of the policy to the Secretariat headed by the Director General of the Secretariat of Wildlife Conservation, Environment Protection and Tourism. The Secretariat's objectives and functions are as follows: The conservation, management and administration of parks, controlled areas and other protected game reserves. The development, in cooperation with other competent authorities, of Tourism (based on the wildlife in South Sudan) and the development of other forms of rational utilization of the wildlife and environment resources. The control of hunting and management and preservation, conservation and the protection of wildlife and environmental resources along with the control of trade in protected animals and trophies. The promotion of education and dissemination of information about wildlife resources in South Sudan (In cooperation with competent authorities). The training of wildlife officers, non-commissioned officers and game scouts and other personnel of the Secretariat. The development and carrying out of research on wildlife and environmental resources with a view to their optimum preservation, conservation, management and protection. The management and administration of zoological gardens. Finally, the administration and enforcement of the provision of this Act and the attainment of its objectives.

The Public Health (Water and Sanitation) Act (2008) emphasizes the prevention of the pollution of air and water and also encourages improvement in sanitation. Key provisions include the protection of the sanitation of the environment and it encompasses the measure to address the pollution of water and air. The following are measures geared towards control of pollution of water: Measures to prevent pollution of water for consumption; Measures destined to prevent pollution of potable water; Anyone who offers the public water to drink or human food, and which includes frozen food should ensure that the water conforms to the portability regulations; Management and disposal of hazardous wastes; and storage of wastes on the premises of waste generators. The Public Health Act (2008) also provides the need for the protection of pollution of water through the enforcement of regulations and measures necessary to combat all elements of pollution and protect the natural level of the environment and public health.

As per Section 12 of the Labor Act, the general minimum age for work is 14 (which is in accordance with ILO standards on minimum age where a country's economy and educational facilities are insufficiently developed) _Section 10 spells out that forced labor is prohibited.

Article 12(2) allows children between the ages 14 and 18 to engage in the worst forms of child labor, violating international standards._Compulsory education age (13) is inconsistent with minimum age for work (14).

The Child Act (Act No. 10 of 2008): The Child Act regulates the prohibition on child labor, the protection of children and young persons and hazardous child labor.

The Labour Act (Act No. 64 of 2017): The Act establishes a legal framework for the minimum conditions of employment, labor relations, labor institutions, dispute resolution and provisions for health and safety in the workplace. It further reinforces the right to equal remuneration for work of equal value as guaranteed by the constitution. Section 6(1) of the Labour Act provides that 'No person shall discriminate, directly or indirectly, against an employee or job applicant in any work policy or practice'. Section 6(2) also forbids discrimination by any Trade Union, Employers Association or Federation. Section 6(3) defines discrimination as 'any distinction, exclusion or preference with the effect of nullifying or impairing equality

of opportunity or treatment in employment or occupation' based on a series of grounds including sex and pregnancy or childbirth. However, implementation of the act is weak.

While the Labour Act provides additional protections for children, it lacks clarity on prohibitions on the worst forms of child labor. The national army continues to recruit, sometimes forcibly, children to fight opposition groups. Children are further engaged in other worst forms of child labor, including in commercial sexual exploitation. The government has failed to bring any perpetrators to justice.⁶ Children between the ages of 10 and 14 are further employed in agriculture and industry and services, including in rock-breaking, construction (building and transporting materials) and brick-making.

2.2 International Conventions Signed and Ratified by South Sudan

The 1992 United Nations Framework Convention on Climate Change. The primary purpose of the Convention is to establish methods to minimize global warming and in particular the emission of greenhouse gases. The Convention was adopted in 1992 and came into force in 1994. The main authority for the implementation is the Ministry of Environment, Water and Climate. South Sudan acceded to the convention on 17 February 2014 .

United Nations Convention on Biological Diversity. The Convention has three main goals which are: The conservation of biological diversity or biodiversity, the sustainable use of its components and the fair and equitable sharing of benefits arising from genetic resources. South Sudan acceded to the Convention on 17 February 2014.

Vienna Convention on the Protection of the Ozone Layer: The Vienna Convention was an intergovernmental negotiation for an international agreement to phase out ozone depleting substance in March 1985. It ended in the adoption of the Vienna Convention for the Protection of the Ozone Layer. The Convention encourages intergovernmental cooperation on research, systematic observation of the ozone layer, the monitoring of CFC production and the exchange of information. The GoSS acceded to the convention on 12 January 2012.

The Ramsar Convention for the Conservation and Sustainable Utilization of Wetlands: The Convention is an international treaty for the conservation and sustainable utilization of wetlands, recognizing the fundamental ecological functions of wetlands and their economic, cultural, scientific and recreational value. South Sudan has been party to the Convention since 10 October 2013. South Sudan has currently one site designated as Wetlands of International Importance.

Convention on the Rights of the Child: The Convention on the Rights of the Child from 1989 is the most comprehensive compilation of international legal standards for the protection of the human rights of children. It acknowledges children as individuals with rights and responsibilities according to their age and development, as well as members of a family or community. This includes non-discrimination, the best interest of the child, the right to life, survival and development and the right to participation. South Sudan has been party to the Convention since 23 January 2015.

⁶ South Sudan – on advancement – efforts made but complicit in forced child labor, accessed at: <https://www.refworld.org/pdfid/5bd05af20.pdf>

ILO 182 Worst Forms of Child Labor Convention (1999). The convention calls for immediate action to prohibit and eliminate the worst forms of child labor. The predefined forms of child labor include all forms of slavery, trafficking of children, debt bondage or any other form of bonded labor, forced or compulsory labor, commercial sexual exploitation of children, prostitution and the production of pornography, as well as work that is likely to harm the health, safety or morals of children. South Sudan ratified the convention in 2012.

ILO Convention 138, Minimum Age. The convention provides for the possibility of initially setting the general minimum age at 14 (12 for light work) where the economy and educational facilities are insufficiently developed. South Sudan has informed the ILO that it has set the general minimum age at 14 years. South Sudan ratified the convention in 2012.

Constitution of the International Labor Organization: The constitutional principle is that universal and lasting peace can be established if it is based on social justice. The ILO has generated such hallmarks of industrial society as the eight-hour work day, maternity protection, child labor laws, and a range of other principles. South Sudan has been a member of the ILO since 29. April 2012.

ILO Convention 098 on Right to Organize and Collective Bargaining. South Sudan ratified the convention in 2012.

ILO Convention 029 on Forced Labor. The Objective of the convention is to suppress forced labor in all its forms. South Sudan ratified the convention in 2012.

ILO Convention 100 on Equal Remuneration. The convention aims at equal remuneration for work of equal remuneration between men and women. South Sudan ratified the convention in 2012.

ILO Convention 111 on Discrimination. The convention calls upon states to enable legislation prohibiting all forms of discrimination and exclusion on any basis, including race, sex, religion, etc. South Sudan ratified the convention in 2012.

Convention on the Elimination of all forms of Discrimination against Women. CEDAW places explicit obligations on states to protect women and girls from sexual exploitation and abuse. South Sudan ratified the Convention on 3 September 2014.

Convention on the Elimination of all forms of Discrimination against Women. CEDAW places explicit obligations on states to protect women and girls from sexual exploitation and abuse, among other issues. South Sudan ratified the CEDAW in 2014. The accession to CEDAW enabled the country to address issues of customary law involving women's right to inherit and own productive assets, as well as their lack of voice and decision making in family and community matters and the denial of their right of choice to found a family especially in rural settings.

Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa in October 2017 and the African Convention for Protection and Assistance of Internally Displaced Persons in Africa (The Kampala Convention). South Sudan made several reservations to key provisions including Article 6 that discourages polygamous marriages and Article 14 on reproductive rights - family planning and abortion.

UN Security Council Resolution 1325/2000 on Women, Peace and Security. The Government of South Sudan developed the National Action Plan 2015-2020 for the implementation of the UN Security Council Resolution 1325 on Women, Peace and Security.

2.3 World Bank Environmental and Social Management Framework and Relevant Standards (ESS)

The Environmental and Social Framework (ESF) sets out the World Bank's commitment to sustainable development through a Bank Policy and a set of Environmental and Social Standards (ESSs) that are designed to support borrowers' projects with the aim of ending extreme poverty and promoting shared prosperity. The short summary of several relevant Environmental and Social Standards (ESSs) from the Bank's ESF are presented below.

The ESSs set out the requirements for borrowers relating to the identification and assessment of environmental and social risks and impacts associated with projects supported by the Bank through Investment Project Financing. The Bank believes that the application of these standards, focusing on the identification and management of environmental and social risks, will support borrowers in their goal to reduce poverty and increase prosperity in a sustainable manner for the benefit of the environment and their citizens.

The standards will:

- (a) support borrowers/clients to achieve good international practice relating to environmental and social sustainability;
- (b) assist borrowers/clients to fulfil their national and international environmental and social obligations;
- (c) enhance nondiscrimination, transparency, participation, accountability and governance;
- (d) enhance the sustainable development outcomes of projects through ongoing stakeholder engagement.

The ten Environmental and Social Standards establish the standards that the borrower and the project will meet through the project life cycle, as follows:

ESS 1: Assessment and Management of Environmental and Social Risks and Impacts. ESS1 sets out the client's responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of a project supported by the Bank through Investment Project Financing, in order to achieve environmental and social outcomes consistent with the Environmental and Social Standards (ESSs).

The E&S assessment will be based on current information, including a description and delineation of the project and any associated aspects and environmental and social baseline data at an appropriate level of detail sufficient to inform characterization and identification of risks and impacts and mitigation measures. The assessment will evaluate the project's potential environmental and social risks and impacts, with a particular attention to those that may fall disproportionately on disadvantaged and/or vulnerable social groups; examine project alternatives; identify ways of improving project selection, siting, planning, design and implementation in order to apply the mitigation hierarchy for adverse environmental and social impacts and seek opportunities to enhance the positive impacts of the project. The

environmental and social assessment will include stakeholder engagement as an integral part of the assessment, in accordance with ESS10.

According to ESS1 the client will manage E&S risks and impacts of the project throughout the project life cycle in a systematic manner, proportionate to the nature and scale of the project and the potential risks and impacts. The client is thereby responsible for cascading compliance with standards along the chain of implementing partners, contractors and subcontractors.

ESS 2 – Labor and Working Conditions. ESS 2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. ESS2 applies to project workers including fulltime, part-time, temporary, seasonal and migrant workers.

The Borrower will develop and implement written labor management procedures applicable to the project. These procedures will set out the way in which project workers will be managed, in accordance with the requirements of national law and this ESS. The procedures will address the way in which this ESS will apply to different categories of project workers including direct workers, and the way in which the Borrower will require third parties to manage their workers in accordance with ESS 2. ESS 2 requires also a grievance redress system which allows workers to raise their grievances.

ESS 3 – Resource Efficiency and Pollution Prevention and Management. ESS 3 recognizes that economic activity and urbanization often generate pollution to air, water and land, and consume finite resources that may threaten people, ecosystem services and the environment at the local, regional and global levels. The current and projected atmospheric concentration of greenhouse gases (GHG) threatens the welfare of current and future generations. At the same time, more efficient and effective resource use, pollution prevention and GHG emission avoidance, and mitigation technologies and practices have become more accessible and achievable. This ESS sets out the requirements to address resource efficiency and pollution prevention and management throughout the project life cycle consistent with GIIP.

The ESMF should include sections on resource efficiency and pollution prevention and management. Assessment of risks and impacts and proposed mitigation measures related to relevant requirements of ESS3, including raw materials, water use, air pollution, hazardous materials and hazardous waste are included within scope of the ESMF, and ESMPs as relevant.

ESS 4 – Community Health and Safety. ESS4 recognizes that project activities, equipment and infrastructure can increase community exposure to risks and impacts. In addition, communities that are already subjected to impacts from climate change may also experience an acceleration or intensification of impacts due to project activities.

ESS 4 addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of borrowers to avoid or minimize such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable. While not explicitly mentioned, prevention and mitigation of different forms of gender-based violence, specifically Sexual Exploitation and Abuse, is being covered by ESS4.

ESS 5 – Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement. ESS 5 recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities

and persons. Project-related land acquisition or restrictions on land use may cause physical displacement (relocation, loss of residential land or loss of shelter), economic displacement (loss of land, assets or access to assets, leading to loss of income sources or other means of livelihood), or both. The term “involuntary resettlement” refers to these impacts. Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in displacement.

Experience and research indicate that physical and economic displacement, if unmitigated, may give rise to severe economic, social and environmental risks: production systems may be dismantled; people face impoverishment if their productive resources or other income sources are lost; people may be relocated to environments where their productive skills are less applicable and the competition for resources greater; community institutions and social networks may be weakened; kin groups may be dispersed; and cultural identity, traditional authority, and the potential for mutual help may be diminished or lost. For these reasons, involuntary resettlement should be avoided. Where involuntary resettlement is unavoidable, it will be minimized and appropriate measures to mitigate adverse impacts on displaced persons (and on host communities receiving displaced persons) will be carefully planned and implemented.

The ESS does not apply to voluntary, legally recorded market transactions, as will be relevant for the ECRP. Voluntary, legally recorded market transactions are those in which the seller has the opportunity to retain the land (as well as to refuse to sell it) and is fully informed about their options. However, ESS 5 will apply where such voluntary land transaction may result in the displacement of persons other than the seller, who occupy, use or claim rights to the land in question.

ESS 6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources. ESS 6 recognizes that protecting and conserving biodiversity and sustainably managing living natural resources are fundamental to sustainable development. Biodiversity is defined as the variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are a part; this includes diversity within species, between species and of ecosystems. Biodiversity often underpins ecosystem services valued by humans. Impacts on biodiversity can therefore often adversely affect the delivery of ecosystem services.

ESS 6 recognizes the importance of maintaining core ecological functions of habitats, including forests, and the biodiversity they support. Habitat is defined as a terrestrial, freshwater or marine geographical units or airways that supports assemblages of living organisms and their interactions with the non-living environment. All habitats support complexities of living organisms and vary in terms of species diversity, abundance and importance.

This ESS also addresses sustainable management of primary production and harvesting of living natural resources.

ESS 6 recognizes the need to consider the livelihood of project-affected parties, including Indigenous Peoples, whose access to, or use of, biodiversity or living natural resources may be affected by a project. The potential, positive role of project affected parties, including Indigenous Peoples, in biodiversity conservation and sustainable management of living natural resources is also considered.

ESS 7 - Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities. This ESS applies to distinct social and cultural groups. The terminology used for such groups

varies from country to country, and often reflects national considerations. ESS 7 uses the term “Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities,” recognizing that groups may be referred to in different countries by different terms. Such terms include “Sub-Saharan African historically underserved traditional local communities,” “indigenous ethnic minorities,” “aboriginals,” “hill tribes,” “vulnerable and marginalized groups,” “minority nationalities,” “scheduled tribes,” “first nations” or “tribal groups.”

ESS 7 contributes to poverty reduction and sustainable development by ensuring that projects supported by the Bank enhance opportunities for Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities to participate in, and benefit from, the development process in ways that do not threaten their unique cultural identities and well-being.

Key requirements under ESS7 include that the World Bank determines whether indigenous peoples/Sub-Saharan African historically underserved traditional local communities are present in, or have collective attachment to the project area; and that the borrower develops a rigorous consultation strategy and identifies means through which the borrower undertakes effective consultation with people identified for purposes of ESS 7 on the project design and implementation. Furthermore, in circumstances where the project has adverse impacts on land, natural resources, as well as tangible and intangible cultural heritage, causes relocation of indigenous peoples, or has other significant impacts on them, free, prior and informed consent (FPIC) from the affected groups is required. The ESS proposes different methodologies for obtaining such consent.

ESS 8 – Cultural Heritage. ESS 8 recognizes that cultural heritage provides continuity in tangible and intangible forms between the past, present and future. People identify with cultural heritage as a reflection and expression of their constantly evolving values, beliefs, knowledge and traditions. Cultural heritage, in its many manifestations, is important as a source of valuable scientific and historical information, as an economic and social asset for development, and as an integral part of people’s cultural identity and practice. ESS 8 sets out measures designed to protect cultural heritage throughout the project life cycle.

The requirements of ESS 8 apply to cultural heritage regardless of whether or not it has been legally protected or previously identified or disturbed. The requirements of ESS8 apply to intangible cultural heritage only if a physical component of a project will have a material impact on such cultural heritage or if a project intends to use such cultural heritage for commercial purposes.

The borrower will implement globally recognized practices for field-based study, documentation and protection of cultural heritage in connection with the project, including by contractors and other third parties.

A chance finds procedure is a project-specific procedure which will be followed if previously unknown cultural heritage is encountered during project activities. It will be included in all contracts relating to construction of the project, including excavations, demolition, movement of earth, flooding or other changes in the physical environment. The chance finds procedure will set out how chance finds associated with the project will be managed.

The procedure will include a requirement to notify relevant authorities of found objects or sites by cultural heritage experts; to fence-off the area of finds or sites to avoid further disturbance; to conduct an assessment of found objects or sites by cultural heritage experts; to identify and implement actions

consistent with the requirements of this ESS and national law; and to train project personnel and project workers on chance find procedures.

ESS 9 – Financial Intermediaries. ESS 9 recognizes that strong domestic capital and financial markets and access to finance are important for economic development, growth and poverty reduction. The Bank is committed to supporting sustainable financial sector development and enhancing the role of domestic capital and financial markets.

FIs are required to monitor and manage the environmental and social risks and impacts of their portfolio and FI subprojects and monitor portfolio risk as appropriate to the nature of intermediated financing. The way in which the FI will manage its portfolio will take various forms, depending on a number of considerations, including the capacity of the FI and the nature and scope of the funding to be provided by the FI.

FIs are required to develop and maintain, in the form of an Environmental and Social Management System (ESMS), effective environmental and social systems, procedures and capacity for assessing, managing, and monitoring risks and the impacts of subprojects, as well as managing overall portfolio risk in a responsible manner.

ESS9 is the only non-relevant standard for ECRP.

ESS 10 – Stakeholder Engagement and Information Disclosure. This ESS recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance and make a significant contribution to successful project design and implementation.

The client will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.

Stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process and is an integral part of early project decisions and the assessment, management and monitoring of the project's environmental and social risks and impacts.

In consultation with the Bank, the borrower has prepared a Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts. The SEP also outlines the establishment of a functioning GRM.

OP 7.50 Projects in International Waters: This is not an ESF standard but part of the safeguards policies. The objective of this policy is to ensure that Bank financed projects affecting international waterways would not affect: (i) relations between the Bank and its borrowers and between states (whether members of the Bank or not); and (ii) the efficient utilization and protection of international waterways. The policy

applies to: (a) Hydroelectric projects, irrigation, flood control, navigation, drainage, water and sewerage, industrial and similar projects that involve the use or potential pollution of international waterways; and (b) Projects that support detailed design and engineering studies of projects under (a) above, include those carried out by the Bank as executing agency or in any other capacity. This policy is triggered if (a) any river, canal, lake or similar body of water that forms a boundary between, or any river or body of surface water that flows through two or more states, whether Bank members or not; (b) any tributary or other body of surface water that is a component of any waterway described under (a); and (c) any bay, gulf strait, or channel bounded by two or more states, or if within one state recognized as a necessary channel of communication between the open sea and other states, and any river flowing into such waters.

This policy is triggered because Component 1 of the project may include rehabilitation and/or drilling of new community boreholes within the Nile basin catchment and the rehabilitation of existing community irrigation schemes with sources of water sought from water supply schemes already developed. Notification to all riparian countries have been sent.

A gap analysis between national legislation and World Bank ESS is presented in Annex 6.

2.4. WBG Environmental, Health and Safety (EHS) Guidelines and Technical Notes

The ECRP-II will further apply the WBG General EHS Guidelines from 2007, which are guidelines that contain the performance levels and measures that are acceptable to the WB. Where the national regulations differ from the levels and measures presented in these guidelines, the ECRP-II will aim for whichever is more stringent.

The following Good Practice Notes will also be consulted to ensure that mitigation measures developed are aligned with best industry practices : Addressing sexual exploitation and abuse and sexual harassment (SEA/SH) in investment; Projects financing involving in major civil works, 2020; Addressing Gender based violence in Investment Project Financing involving major civil works, 2018; Gender, 2019; Road safety, 2019; Assessing and managing the risks and impacts of the use of security personnel, 2018; and Managing the risks of adverse impacts on communities from temporary project induced labor influx, 2016.

The WB Technical Note “Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints of conducting public meetings” (2020), will also be applied. This Technical Note makes due reference to the WHO technical guidance in dealing with COVID-19, including: Risk Communication and Community Engagement Action Plan Guidance Preparedness and Response; Risk Communication and Community Engagement (RCCE) readiness and response; COVID-19 risk communication package for healthcare facilities; Getting your workplace ready for COVID-19; and a guide to preventing and addressing social stigma associated with COVID-19.

3. Environmental and Socio-Economic Baseline

This section presents the environmental and social baseline compiled for the country from a literature survey and socioeconomic surveys. Key locations of interest have been identified and future screening for more subprojects will involve collection of further environmental and social data if needed.

3.1 Environmental Baseline

The following section describes key environmental features of the country as the project activities shall be carried out over a broad area. The sensitive ecosystems and protected areas have been identified and the screening needed will be carried out before subproject execution is defined.

3.1.1 Geography and Climate

South Sudan is a landlocked country that falls almost entirely (96 per cent) within the Nile River Basin in East-Central Africa. It is bordered to the north by Sudan, by Ethiopia and Kenya to the east, Uganda and the Democratic Republic of the Congo (DRC) to the south and in the west by the Central African Republic. It occupies an area of 658,842 km². The country is covered by extensive grasslands, wetlands and tropical forests. Its natural assets include significant agricultural, mineral, timber and energy resources. The climate is mostly hot and dry, with seasonal rains that allow for two or three harvests a year in the country's green belt. Apart from oil, however, its natural resources are largely unexploited and only 4.5 per cent of its potential arable land is cultivated.

The major geographical features of South Sudan are the White Nile, which flows north from Central Africa's uplands and dominates the center of the country and the vast Sudd swamp, one of the world's largest wetlands. The Sudd swamp is fed by the White Nile and covers over 100,000 km², more than 15 per cent of the country's area. Rising out of the northern and central plains are the southern highlands along the border with Uganda and Kenya. The Ethiopian highlands border the country to the east, and the Congo River basin highlands are on the southern and western margins.

The climate of South Sudan is characteristically hot and dry, with seasonal rains brought on by the annual migration of the Inter-Tropical Convergence Zone. Temperatures range from 25 to 40°C. The growing season is generally between 100 to 250 days, depending on the agro-ecological zone (MOE, 2014). Rain typically falls unevenly across the country and the northeast is drier and precipitation increases towards the southwest.

There is a wetter green belt along the southern border that includes Western, Central and Eastern Equatoria, which has bimodal rainfall regimes from April to June and from August to October, enabling two or three harvests a year.⁷ Annual rainfall in the green belt ranges from 800 mm to 2,500 mm⁸ Rain in the rest of the country occurs between April and October. It is often heavy and continual, leading to

⁷ BRACED, 2016

⁸ MOE, 2014.

beneficial seasonal floods that improve soil fertility, grass and pasture growth and create fish ponds.⁹ Rainfall in the arid zone can be as low as 300 mm per year.¹⁰

Climate and Environmental Trends: Although South Sudan contributes very little to global greenhouse gas emissions and its development trajectory promises to focus on clean energy, it is highly vulnerable to the impacts of rising temperatures and increased rainfall variability due to climate change. Between the 1970s and the 2000s, the country's central and southern regions experienced one of the world's highest increases in temperatures (as much as 0.4°C per decade). By 2060, South Sudan overall will get warmer by about 1°C over and above 2020 values.

This warming trend has already affected the country's rainfall patterns. Since the mid-1970s, its average precipitation declined between 10 to 20 per cent and the variability in the amount and timing of rainfall from year to year also increased. Average rainfall is expected to decline by 10-20 per cent for any observed warming of more than 1°C.

These changes make South Sudan one of the five countries in the world most vulnerable to the impacts of climate change, which are likely to be devastating. Almost 80 per cent of households depend on crop farming or animal husbandry as their primary source of income, and these farmers and pastoralists rely heavily on seasonal rains, but if the current climate change trend continues, rain-fed agriculture may become unsustainable. In turn, loss of livelihoods will increase conflict over rights and access to water and natural resources. South Sudan needs to achieve political stability and legalize and implement its draft policies and plans so that it can act on its climate change adaptation and mitigation priorities.

The meteorological data shows that temperatures in South Sudan are rising and the weather is becoming drier¹¹ and it is likely that these changes are related to global climate change. Since the mid-1970s, average temperatures have increased by 1°C, while some regions have experienced temperature rises of up to 0.4°C per decade.¹² Warming trends lead to decreased evapotranspiration and declining precipitation. Since the mid-1970s, South Sudan has experienced a decline of between 10 to 20 per cent in average precipitation as well as increased variability in the amount and timing of rainfall from year to year.¹³ There is also some evidence that the onset of rain now occurs one month later.¹⁴

If the trend continues, by 2025 it is likely that the drying experienced in the north-eastern regions of Upper Nile, Jonglei and Eastern Equatoria will extend across the country, potentially affecting Bahr el Ghazal, Tonj and Unity in the North and Central Equatoria in the South.¹⁵ The Intergovernmental Panel on Climate Change regional models suggest that by the end of the 21st Century, most of Uganda, Kenya and South Sudan will experience drier weather in August and September.¹⁶

It is projected that average temperatures in South Sudan will rise by 1°C by 2060, with lower increases in the south (USAID, 2016). Climate changes can, besides its direct impact on food production, also lead to

⁹ BRACED, 2016

¹⁰ MOE, 2014

¹¹ Richardson, 2011; USAID, 2016.

¹² BRACED, 2016.

¹³ USAID, 2016.

¹⁴ BRACED, 2016.

¹⁵ BRACED, 2016.

¹⁶ IPCC, 2014a.

increased conflicts over scarce resources: pastoralists are forced to move to where there is pasture and water, often leading to conflicts with other groups of pastoralists or with farmers. It is not known how climate changes will affect the Nile.

South Sudan recently prepared its first National Adaptation Plan for Climate Change in 2021. The Plan's primary objectives are to reduce vulnerability to the impacts of climate change by building adaptive capacity and resilience; and to facilitate the integration of climate change adaptation into relevant new and existing policies, programmes, and activities.¹⁷

3.1.2 Disaster Vulnerability

South Sudan is susceptible to natural hazards, especially drought and floods but climate change is exacerbating their intensity, frequency and duration. In addition, multiple socioeconomic stressors, including the ongoing conflict, poverty, famine and economic and political instability, create a state of extreme fragility and vulnerability to the impacts of these natural hazards. Given the population's dependence on seasonal rains to support their livelihoods, the severe disruption of rainfall patterns combined with increased vulnerability will jeopardize the capacity of huge numbers of people to sustain themselves, a situation that is already occurring in several parts of the country.

Floods and droughts have always been a part of life in South Sudan and people have developed strategies to cope with them. However, anthropogenic global warming is contributing to increased climate changes at present. The changes will bring forth frequent extreme rainfall and flooding, and long-term stressors, including the gradual increases in temperature and changes to seasonal precipitation patterns. These stresses have already had increased impacts on the socio-economic health of South Sudan, including through loss of pasture and livestock, reduction of critical habitats, and reduction in river flows.¹⁸

3.1.3 Agriculture

Agriculture is the backbone of the subsistence economy of South Sudan, accounting for one-third of GDP in 2009. About 81 per cent of households cultivate land, about 22 per cent of the population is engaged in fishing and 74 per cent of the population keeps livestock. There is an estimated total of 38 million livestock in the country, compared to its human population of 12.3 million. A huge variety of crops are grown in South Sudan, where the diversity of soil and climatic conditions provide multiple options for different cereals, legumes, fruits and vegetables.

Climate and soils are primary determinants of the type of agricultural occupations that can be undertaken along with how, where and when they occur. Generally, mixed cultivation takes place in the Green Belt, and livestock rearing and extensive cultivation are practiced in the Iron- stone Plateau and semi-arid zones.¹⁹

In South Sudan about 80 per cent of the population lives in rural areas where subsistence agriculture is the mainstay of people's livelihoods. The agriculture sector is characterized by small, hand-cultivating

¹⁷ Republic of South Sudan, First National Adaptation Plan for Climate Change, Juba, 2021.

¹⁸ Republic of South Sudan, First National Adaptation Plan for Climate Change, Juba, 2021, p.13

¹⁹ EU, 2016.

household units belonging to larger family aggregations practicing different combinations of rain-fed agriculture, livestock grazing and pastoralism, wild food harvesting and fishing.²⁰ About 81 per cent of households cultivate land, 74 per cent own livestock and 22 per cent engage in fishing.²¹

Although agriculture is the backbone of the subsistence economy of South Sudan²² production is very low. A 2012 analysis showed that the total value of agricultural production (or “realized potential”) was about US\$800 million (US\$600 million from crops) or less than US\$300 per hectare which is much lower than production in neighboring countries. In 2009, the agriculture sector contributed one-third of the country’s GDP.

Individual households cultivate an average of between 0.84 and 2.4 hectares of cereals and other crops²³ which are usually grown in mixed and / or sequential plantings (mixed cropping and inter-planting). Sorghum and millet, the main cereal crops, are usually grown with sesame while root crops such as cassava are often inter-planted with groundnuts, maize, pumpkins or other vegetables. Most farmers practice shifting cultivation²⁴ an agricultural system based on field rotation rather than crops. Typically, crops are grown for several years or until yields decline appreciatively, and then the land is left to fallow.

3.1.4 Livestock

In addition to rain-fed farming, livestock keeping is the other dominant agricultural land use in South Sudan. Livestock are a productive livelihood asset, providing pastoralists with milk, which constitutes their main diet, but they also play a key role in socio-cultural life, especially for pastoralist peoples such as the Dinka, Nuer, Shilluk and Mundari.²⁵ For those who keep cattle, the animals are traditionally the most significant source of prestige, providing the currency for marriage dowries, fines and other societal dealings, which account for about 80 per cent of cattle transactions.

3.1.5 Forests

The total area of forest cover in South Sudan is thought to be almost 20,000,000 ha, which represents about 30 per cent of the country’s total land area. Of this total, gazetted forest reserves account for 3.1 per cent and plantation forests represent 0.1 per cent. Plantations consist mostly of teak forests thought to be the oldest such forests in Africa and the largest plantations of its kind in the world. Acacia plantations for Gum Arabic are also important.

South Sudan’s forests are in danger of disappearing; the annual deforestation rate is likely between 1.5 and 2 per cent. The main drivers and pressures are population growth and the increased demand for fuelwood and charcoal, the conversion of forests to urban areas and uncontrolled fires and timber harvesting. This has led to the degradation or deforestation of parts of the country’s natural forest areas and woodlands, localized soil erosion, biodiversity loss and altered hydrological and nutrient cycles.

²⁰ MOAF, 2013; EU, 2016.

²¹ RSS, 2015.

²² BRACED, 2016,

²³ UNDP, 2012

²⁴ EU, 2016; UNDP, 2012,

²⁵ USAID, 2014; MOE, 2014.

Generally, land degradation in South Sudan shows that 4.32 percent out of the country's land was degraded.²⁶

Sustainably managing its forest resources offers South Sudan the opportunity to provide jobs and income and to maintain the ecological goods and services they provide. The Government aims to set aside about 20 per cent of natural forests as reserve forests to protect them from deforestation and it has an ambitious afforestation program, amongst other plans and strategies. It has also made ambitious commitments related to forests under its Intended Nationally Determined Contributions for climate adaptation and mitigation. However, on-going conflicts prevent the forests from being developed and sustainably managed to provide goods and services for future generations.²⁷

3.1.6 Biodiversity and Protected Areas

South Sudan is covered in a rich diversity of ecosystems which are dynamic complexes of plant, animal and microorganism communities and their non-living environment, interacting as functional units. South Sudan's large range of ecosystems is most commonly divided into the following categories: Lowland forest; Mountain forest; Savannah woodland; Grassland savanna; Sudd swamps and other wetland, and Semi-arid region.

South Sudan's wide range of habitats supports a very rich diversity of both animal and plant species. However, the variety and number of different species is unknown. A glimpse of the richness of species is provided in a 2015 study by biologists who took 105,000 motion-controlled photos in an area of about 7,770 km² of dense forest in former Western Equatoria State. They found a total of 37 species, including four species never before documented in South Sudan: the African golden cat (*Caracal aurata*), water chevrotain (*Hyemoschus aquaticus*), red river hogs (*Potamochoerus porcus*), and giant pangolin (*Manis gigantea*). It also captured chimpanzees, bongos, leopard, forest buffalo, honey badger and the rare forest elephant.²⁸ Forest elephants (*Loxodonta cyclotis*) are smaller than savannah elephants and tend to inhabit densely wooded rain forests. They play a crucial role in the ecosystem because they are voracious fruit eaters whose dung spreads tropical fruit tree seeds extensively. Numbers have declined dramatically over the last two decades however, primarily due to ivory poaching for international wildlife trafficking, and the species is critically endangered. Their presence in Western Equatoria is far to the north and east of forest elephants' previously known range.²⁹

The IUCN Red List of Threatened Species for South Sudan lists 4 critically endangered species and 11 endangered species. The hooded vulture (*Necrosyrtes monachus*), Rüppell's griffon (*Gyps rueppellii*), white-backed vulture (*Gyps africanus*) and white-headed vulture (*Trigonoceps occipitalis*) are all critically endangered. Endangered species include three mammals: The Cape hunting dog (*Lycaonpictus*), common chimpanzee (*Pan troglodytes*) and the Nile lechwe (*Kobus megaceros*); six birds: Basra reed warbler (*Acrocephalus Griseldis*), Egyptian eagle (*Neophronpercnopterus*), lappet-faced vulture (*Torgostracheliotos*), Natal thrush (*Geokichla guttata*), Saker falcon (*Falco cherrug*) and Steppe eagle (*Aquila nipalensis*). Two plants, *Aloe erensii* and *Aloe macleayi*, while currently not threatened, are restricted to South Sudan (IUCN, 2016).

²⁶ Republic of South Sudan, Land Degradation Neutrality Target Setting. Final Report, March 2020.

²⁷ RSS, 2016.

²⁸ Howard, 2015; Patinkin, 2015.

²⁹ Patinkin, 2015.

The protected areas in South Sudan are shown in Figure 2.

SOUTH SUDAN PROTECTED AREAS AND PROPOSED EXTENSIONS

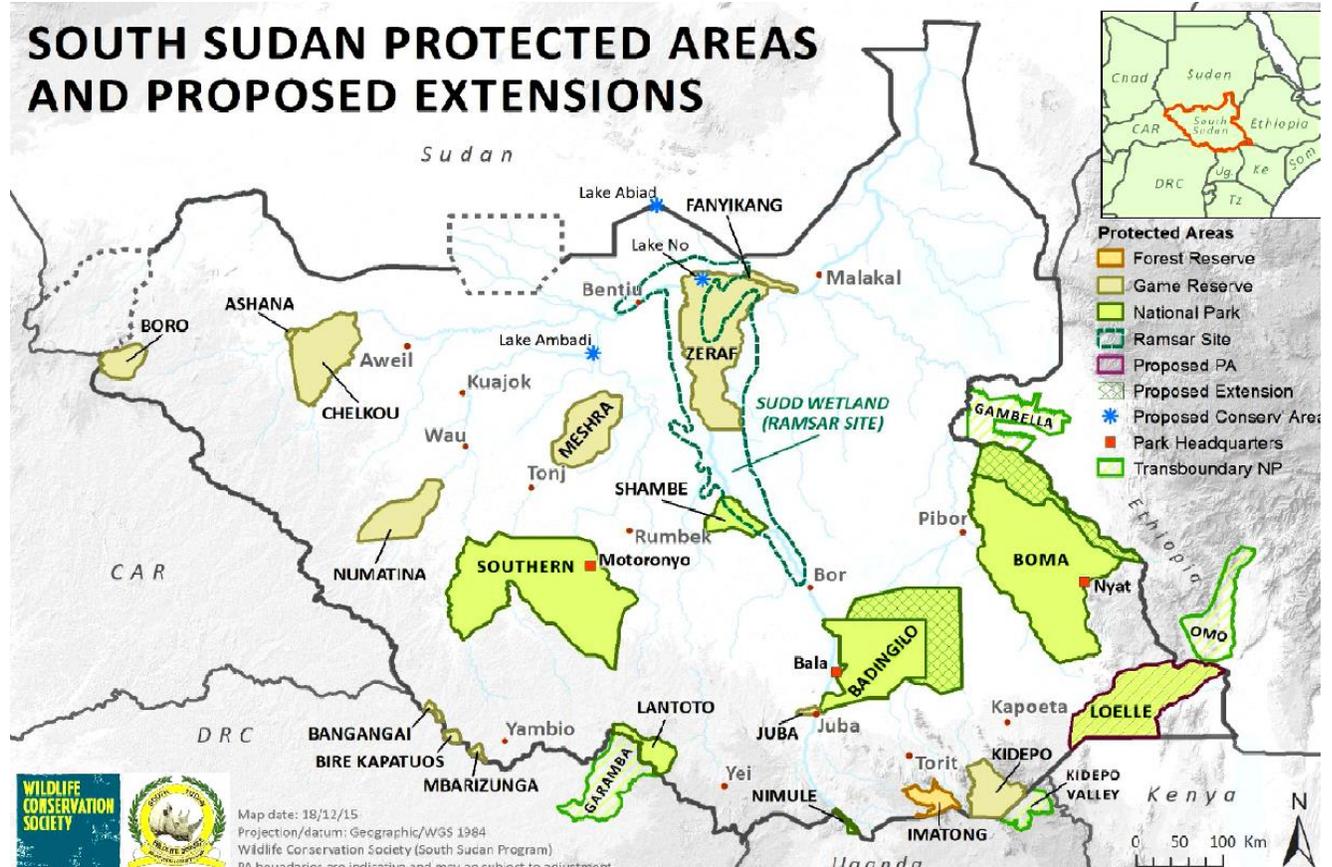


Figure 1 Protected Areas in South Sudan (source: Ministry of Environment, 2015)

South Sudan’s remarkable biodiversity is of global significance – the Sudd swamp is one of the world’s largest tropical wetlands and the country is home to one of the planet’s greatest circular wildlife migrations. Biodiversity is also of extreme national importance since the country’s ecosystem goods and services are the foundation of South Sudan’s socioeconomic development.

3.1.7 Water Resources and Wetlands

South Sudan’s water resources are unevenly distributed both spatially across the country, and temporally, since water quantities vary substantially between years depending on periodic major flood and drought events. The Nile River hydrological basin covers most of the country. Water is held in perennial rivers, lakes and wetland areas, in seasonal pools, ponds, rivers, streams and extensive flood plains. Water demand is still low given the country’s relatively small population, density and the lack of industrial development but it is expected to increase rapidly in the future with projected population growth and economic development. In 2007, the Ministry of Water Resources and Irrigation reported that the impact of human activities on the availability and quality of water resources was already evident and a growing concern. There is increased pollution, reduced river flows, declining water tables in urban areas and both surface and ground waters are becoming contaminated.³⁰

³⁰ MWRI, 2007.

About 7 per cent of South Sudan is covered by vast expanses of tropical freshwater wetlands that occur at the confluence of the White Nile's main tributaries. They have a significant influence on the Nile's hydrologic regime, storing and releasing water, retaining suspended solids, decreasing dissolved oxygen concentrations, increasing acidity and dissolved carbon dioxide concentrations, reducing sulphate concentrations, increasing total dissolved solids concentrations and losing water to evapotranspiration (NBI, 2012).

The Sudd, an inland delta of the White Nile, is the country's largest wetland, covering about 5 per cent of the country's land area. It is made up of lakes, swamps, marshes and extensive flood plains. It includes the Bahr el Jebel swamps, the Bahr el Ghazal swamps, the wetlands at the Baro-Pibor-Akobo confluence and the Machar marshes.³¹

In 2016, South Sudan's Ministry of Environment and Forestry reported that over the past two decades, water flow in a number of previously perennial rivers along the border with the Central African Republic had become seasonal. One of the main ecological impacts of decreased water flow is river siltation. A large part of the sediment created in the White Nile headwaters becomes confined in the Equatorial Lakes, held in the Sudd marshes or deposited along the river course downstream of the Sudd; thus, over its low-gradient course, the Nile's flow is very sluggish.³² Other impacts include the congestion of irrigation channels, water-table declines, receding wetland areas and the loss of vegetation due to the lack of water. In turn, the loss of ecosystem goods and services is having adverse effects on the livelihoods of people who depend on wetlands within South Sudan.³³

It is thought that large areas of South Sudan are underlain by rich aquifers that are recharged by seasonal rainfall and river flooding, with some of these underground water reservoirs extending across international boundaries. There is little information on the distribution and hydrology of these underground waters, or about the rates of water extraction and the impacts of human activities, such as potential over-abstraction and pollution.³⁴

Water quantity and quality in South Sudan have declined in the past two decades. In a number of previously perennial rivers, for example, water flow has become seasonal. Lower water flows can lead to siltation. Large quantities of sediment are held in the Sudd marshes or deposited along the river course downstream of the Sudd. With municipal wastewater, sewage and industrial effluents running straight into water sources due to a lack of wastewater and sanitation management, water quality is declining in urban areas and contaminated water is responsible for recurring incidences of gastrointestinal diseases. Other significant threats to water resources include the construction of large hydroelectric dams and other related development schemes within the Nile Basin, the overuse of agrochemicals and spillage during oil exploration, which risk polluting the Sudd wetlands.

For three consecutive years, since 2019, South Sudan has been experiencing severe flooding. In November 2021, 800,000 people had been affected by the flooding across 10 states since May 2021.³⁵ Mainly affected were Jonglei and Unity States. Jonglei is the worst affected with 278,000 people, followed by

³¹ NBI, 2012.

³² NBI, 2012.

³³ MOE, 2016.

³⁴ MWRI, 2007.

³⁵ OCHA, Situation Report, South Sudan Floods: The Cost of Inaction as of November 2021, accessed at: <https://reliefweb.int/report/south-sudan/south-sudan-floods-cost-inaction-november-2021>

Unity with 208,000 people. Other people were affected in Upper Nile, northern Bahr el Ghazal, Lakes, Warrap, Western Bahr el Ghazal and Central Equatoria.³⁶ In Jonglei State the wetlands and tributaries of the White Nile overflowed as seasonal rains arrived earlier than usual. The earlier rains resulted in the Nile river, Sudd wetlands, the Lol and Sobat rivers to overflow, flooding vast areas of land and settlements. The floods have been impacting livelihoods, schools, health facilities and private houses. Community members have moved to higher grounds without new houses being constructed in the new sites.³⁷ According to OCHA, the humanitarian response is ongoing, but it is inadequate in meeting the diverse needs of the affected communities.³⁸

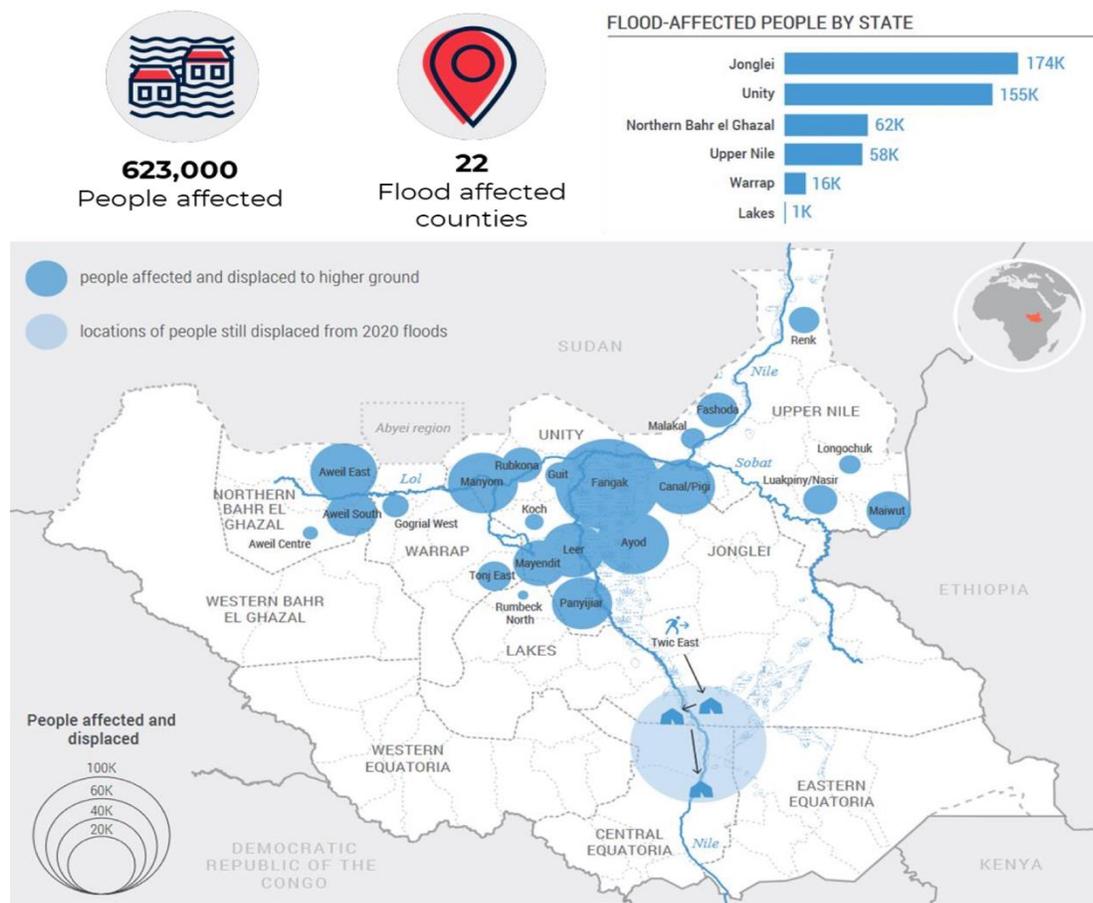


Figure 2 Flood-Affected People by State

³⁶ OCHA, Situation Report, 12 November 2021, South Sudan Flooding Situation Report: Inter-Cluster Coordination Groups as of 12 November 2021, accessed at <https://reliefweb.int/report/south-sudan/south-sudan-flooding-situation-report-inter-cluster-coordination-group-12>

³⁷ IFRC, Emergency Appeal, South Sudan, Africa / 2021 Floods, accessed at: <https://reliefweb.int/sites/reliefweb.int/files/resources/MDRSS010ea.pdf>

³⁸ OCHA and WFP, 4 November 2021, accessed at: <https://reliefweb.int/report/south-sudan/south-sudan-flooding-snapshot-4-november-2021>

3.2 Socioeconomic Baseline

South Sudan became independent from Sudan in 2011, following protracted war with the neighbor country. However, in 2013 additional civil war among internal factions – along ethnic and clan lines - left the country shattered. In September 2018 a peace agreement was signed between the warring factions. The peace deal moved forward in 2020, when the key opponents agreed to form a unity government. The ceasefire between the two has since held. However, the agreement has otherwise proven extremely fragile. An insurgency in the nation’s south has continued and local violence has continued to flare up. Potential elections in 2022 may threaten elements of the peace deal from 2018.³⁹

South Sudan remains one of the least developed countries in the world. High levels of vulnerability arising from two decades of civil war have forced a sizeable proportion of the population to rely on humanitarian relief assistance to meet their livelihood needs. Key education and health indicators are among the lowest in the world. Infrastructure is virtually non-existent and a public administration system has to be developed almost from scratch. Low levels of income and purchasing power, together with disruption associated with conflict and very limited infrastructure, have constrained economic activity and market development.

As of 2020, South Sudan has a total population of 11,193,729. 49.9 per cent of the population is female, and 50 per cent is male. The total labor force consists of 4,581,565 people. International migrants number 824,122.⁴⁰ South Sudan also has an extremely young population, with 73 per cent of the population aged under 30.⁴¹

South Sudan is a socio-culturally, politically and economically very diverse country, which makes it difficult to make generalized statements about the whole country. As locations of implementation are not known yet, it is very important that more detailed contextual analysis is conducted when entering a specific project area (see Annex 9).

3.2.1 Economic Outlook and Macroeconomic Performance

The country’s economy has essentially collapsed since 2016. According to the World Bank, it depends on crude oil, which accounts for 90 per cent of government revenue and 60 percent of GDP. The crude oil made up 95 percent of total exports from South Sudan in 2016. Oil production is considered the key for economic growth in the short and medium term.⁴² Exports of goods and services otherwise declined to 61.1 percent of GDP in 2017, from 66.3 in 2016. A World Bank economic brief estimates that the economy contracted by 3.5 percent during 2018 due to mismanagement and conflict. Due to conflict and economic shocks, the economy had negative GDP growth for five of the past seven years. Inflation has left food prices high. The cost of the minimum expenditure basket increased by 489 percent between May 2016

³⁹ International Crisis Group, Towards a Viable Future in South Sudan, February 2021, accessed at: <https://www.crisisgroup.org/africa/horn-africa/south-sudan/300-toward-viable-future-south-sudan>

⁴⁰ The World Bank, accessed at: <https://data.worldbank.org/indicator/SP.POP.DPND?locations=SS>

⁴¹ Office of the Secretary-General’s Envoy on Youth, UN Secretary-General’s Envoy on youth visits South Sudan, accessed at: <https://www.un.org/youthenvoy/2020/02/un-secretary-generals-envoy-on-youth-visits-south-sudan/>

⁴² The World Bank, South Sudan. Economic Brief, April 2019, p. 3.

and May 2018.⁴³ Foreign investment has been volatile due to the conflict situation. Since then a decline in the oil and non-oil sectors and several concurrent shocks, such as Covid-19, have led to predications by the World Bank that the economy will contract by -4.1 per cent. Declining exports and private consumption, as well as the effects of Covid-19, floods, locust invasion and higher subnational conflict intensity have contributed to this outlook. The oil sector now accounts for more than one-third of the GDP (90 per cent of central government revenue and more than 95 per cent of the country's exports).⁴⁴

Covid-19 has severely affected the country's economy, as it impacts economic growth and development, while further driving vulnerabilities. In December 2021, 12,873 cases of coronavirus have been recorded in South Sudan, as well as 133 deaths.⁴⁵ Increased incidents in security and the Covid-19 containment measures have put additional strain on the already weak healthcare system in the country. Furthermore, jobs have been lost due to Covid-19, especially in the non-farming self-employment sector. This has come along with a loss of revenue and income.⁴⁶

South Sudan ranks last (180 out of 180 economies)⁴⁷ on Transparency International's Corruption Perception Index 2021.⁴⁸

3.2.2 Human Development

South Sudan ranks 185 out of 189 countries on the Human Development Index, with a score of 0.433. However, the 2020 HDI Index did not yet reflect the outcomes of the COVID-19 pandemic.⁴⁹

South Sudan has further one of the world's worst health indicator outcomes globally. The maternal mortality ratio is 789 per 100 000 live births, and the mortality rate of children under five is 99.2 per 1000 live births.⁵⁰ 1.4 million children are expected to suffer from acute malnutrition in 2021.⁵¹ Life expectancy

⁴³ The World Bank, South Sudan, Linking the Agriculture and Food Sector to Job Creation Agenda, Sustainable Development Group World Bank, June 2019, p. 1

⁴⁴ The World Bank, South Sudan, Economic Update, Socio-Economic Impacts of Covid-19, July 2021, accessed at: <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/440961614950205838/south-sudan-economic-update-socioeconomic-impacts-of-covid-19>

⁴⁵ Worldometer Covid-19, South Sudan, accessed at: <https://www.worldometers.info/coronavirus/country/south-sudan/>

⁴⁶ The World Bank, July 2021, p. vi-vii.

⁴⁷ The World Bank, South Sudan, Linking the Agriculture and Food Sector to Job Creation Agenda, Sustainable Development Group World Bank, June 2019, p. 1

⁴⁸ Transparency International, Corruption Perception Index 2021, accessed at: <https://www.transparency.org/en/cpi/2021/index/ssd>

⁴⁹ UNDP, Human Development Report 2020, Inequalities in Human Development in the 21st Century. Briefing Note for countries on the 2020 Human Development Report: South Sudan, 20120.

⁵⁰ WHO, WHO Country Cooperation Strategy 2014-2019, 2017, accessed at: https://apps.who.int/iris/bitstream/handle/10665/136881/ccsbrief_ssd_en.pdf;jsessionid=A0FFDD30D766E4F600740FF703903B85?sequence=1

⁵¹ UNICEF, South Sudan, accessed at: <https://www.unicef.org/southsudan/all-together-prevent-child-malnutrition>

at birth is 58 years for men and 60 years for women.⁵² 8.3 million people in South Sudan are in need of humanitarian assistance, and 2 million are internally displaced, with 2.3 million refugees that originated from South Sudan and 329,000 refugees in South Sudan.⁵³

The conflict situation further undermines any attempts of establishing sustainable services or simply delivering health and other services. For example, a World Bank study shows that there is perceived non-neutrality in service delivery across areas held by the government or opposition forces, as well as limited oversight and ability by the government to provide satisfactory justification and evidence of supplies, drugs, and services arriving at their intended destinations.⁵⁴

Education in South Sudan has been similarly undermined by displacement, hyperinflation, civil conflict and food insecurity. The average duration of schooling is 4.8 years.⁵⁵ According to a UNICEF report, there has been a significant increase in out-of-school children from 2.2 million in 2018 to 2.8 million in 2021. In addition, school closures due to Covid-19 and non-payments of salaries for teachers increased the risk of drop-outs for teachers.⁵⁶

3.2.3 Social Structure

South Sudan consists of a broad variety of ethno-linguistic groups. Those entail three sub categories of speakers of the Nilo-Saharan language family: speakers of *West Nilotic* languages (Dinka, Nuer, Atuot); speakers of *Western Nilotic / Luo* languages (Shilluk, Annual, Maban in Upper Nile and Ethiopian borderlands; Acholi in Eastern Equatoria; and Jur-Luo in Western Bahr el-Ghazal); and speakers of *Eastern Nilotic* languages (Eastern and Central Equatoria: Bari, Lotuho and Teso). Furthermore, there are speakers of the *Niger-Congo* language family, including the Zande in Western Equatoria.⁵⁷

For pastoralists, such as the Nilotic Dinka, Nuer and Atuot the search for pasture shapes most of their socio-cultural life. They may migrate from homesteads on high grounds in the wet season to mobile cattle camps on the dried-out swamps in the dry season. Closely linked to this lifestyle is a social structure, which gives preference to an 'acephalous' ('headless') socio-political organization rather than a central authority. Similarly, systems of exchange are based on social connections established through marriage rather than open markets.⁵⁸

⁵² World Health Organization, Situation Report issue #25, 9-15 July 2018, accessed at:

[https://www.afro.who.int/sites/default/files/2018-](https://www.afro.who.int/sites/default/files/2018-07/South%20Sudan%20Situation%20Report%20Issue%20%23%2025_8-15%20July%202018%20.pdf?ua=1)

[07/South%20Sudan%20Situation%20Report%20Issue%20%23%2025_8-15%20July%202018%20.pdf?ua=1](https://www.afro.who.int/sites/default/files/2018-07/South%20Sudan%20Situation%20Report%20Issue%20%23%2025_8-15%20July%202018%20.pdf?ua=1)

⁵³ OCHA, South Sudan, Humanitarian Snapshot, November 2021, accessed at:

https://reliefweb.int/sites/reliefweb.int/files/resources/south_sudan_humanitarian_snapshot_november_0.pdf

⁵⁴ The World Bank, HNP Knowledge Brief on Strengthening Service Delivery Resilience in FCV Settings. Case: South Sudan, January 2019, p.1.

⁵⁵ The World Bank, South Sudan, Linking the Agriculture and Food Sector to Job Creation Agenda, Sustainable Development Group World Bank, June 2019, p. 1

⁵⁶ UNICEF, Education in South Sudan, Briefing Note, September 2021, accessed at:

https://www.unicef.org/southsudan/media/7946/file/Education%20Briefing%20Note_2021%20Q3.pdf

⁵⁷ Joseph H. Greenberg (ed), *Universals of Human Language*, Cambridge Mass. MIT Press, 1963

⁵⁸ Naomi Pendle, Marco Pfister, Martina Satschi, Mareike Schomerus, Danielle Stein, Eddie Thomas, Craig Valters, *Local Socio-Political Organization and Implications for Community-Driven Development in South Sudan An Analysis of Existing Literature*, prepared for the World Bank, unpublished, 2012, p. 14.

Farming communities, on the other hand, present a settled lifestyle. This usually goes along with central authority and/or hierarchical leadership structure, such as kingdoms or provincial chiefs (the latter were often instated by foreign rulers). For example, early accounts of the Zande kingdom around Yambio showed state-like elements, such as tribute paying, taxation or the death penalty. Both, the Shilluk and Anuak (Luo speakers) had systems of sacral kingship, which differed from the secular authoritarianism of the Zande state.

In many cases 'traditional' authorities were invented or established by outsiders in order to act as intermediaries for taxation, labor mobilization, and other forms of coercion. This was especially instrumental vis-à-vis the acephalous societies, as they were otherwise difficult to engage with or to rule over. This means that there needs to be a careful contextual analysis before entering a new area to create understanding about the actual representativeness of 'traditional authorities' for a community. Alongside these instated authorities existed other and older forms of authorities, which were based on local concepts of origin, power and authority.⁵⁹ Many of the different forms of social structures in South Sudan are therefore based on the kinship concepts of a 'segment' or a lineage. Wealth is still a major marker in the social strata and the size of cattle herds – among the pastoralist societies - is a significant indicator for wealth.

'Civil society', however, is a difficult term in South Sudan, as most people belong to communities defined by lineages. Markets, on the other hand are poorly developed and most societies have been militarized so that distinctions between civilian and combatant young men are difficult. Literature mostly treats 'civil society' as organizations that are dependent on foreign resources and deploying foreign rhetoric of rights and development.⁶⁰

Furthermore, it is important to understand that ethnic groups can be heterogenous. As different experiences in the recent civil war have shown, those differences can even occur in the same localities. Many of the recent clashes have taken place in an intra-ethnic manner, such as among Nuer clans in Unity State.

In the context of ESS 7, the overwhelming majority of the ethnic and social groups in South Sudan meet the criteria of ESS 7 as 'Sub-Saharan African Historically Underserved Traditional Local Communities'. The only exclusions are recent immigrants from other countries. This means that the entire project is embedded in the principles of ESS7, rather than the targeting of a few selected groups. Key identified risks include social ills, SEA/SH, land conflicts, equity issues/targeting as well as elite capture, ethnicity of project staff, exclusion of pastoralists, intercommunal conflicts, violent attacks, and grievances of non-beneficiaries especially pertaining to exclusion of IDPs/returnees. Mitigation measures encompass, among others, awareness campaigns, transparent disclosure of project activities, analysis of risks throughout the project lifecycle, meaningful consultations and participatory approach towards project activities on the ground including site selection, Codes of Conduct, integration of women into committees, transparent procedures on benefit sharing, and ensuring availability of a functional GRM.

3.2.4 Formal and Informal Governance Structures

⁵⁹ Pendle et al, 2012, p. 15.

⁶⁰ Pendle et al, 2012, p. 25.

After a general agreement in the 2005 Comprehensive Peace Agreement (CPA) that governance in South Sudan needs to be decentralized, the 2009 Local Government Act decentralized and devolved decision-making powers from the national level to the states, to county and sub-county (payam) levels and to bomas. County commissioners and county legislative councils are elected representatives. Participation at the county level in decision-making fora must therefore be as inclusive as possible, representing the different interest groups at the payam level. At the county level citizens' development committees are formed for this reason.⁶¹ However, since 2011 many powers have been moved back to the central level in order to create a strong executive government model. Furthermore, the states also exercise a significant amount of power as they appoint state governors and control resources.⁶²

In 2015 the national government decided to form an additional 18 states to the existing 10 states. It added another 4 States in 2017, making it a total of 32, from an initial number of 10 at the signing of the CPA (2005) and independence (2011). The move was perceived to expand the patronage network of the President's Dinka tribe and his supporters.⁶³

Traditional authorities, in their various forms, have been integrated into local governance structures in order to improve service delivery, access to justice and eradicate poverty. The Local Governance Act deals with the distribution of powers between county, payam and traditional leaders. Chiefs can be elected conventionally or according to traditional practice. However, in addition to the fact that many traditional authorities historically had been appointed and empowered by outside sources, their power was further eroded in the recent civil war. Massive displacement of populations saw new chiefs emerging, factions of the conflict appointed their own chiefs, and existing traditional chiefs often had to side with the dominant political and militant groups in a given area.⁶⁴

Other organizations outside of the government structures exist. These associations can include women's groups, youth or ethnicity-based urban groups, providing support systems for rural – urban migrants. However, especially youth groups can also turn into militant organizations at times. Town politicians can mobilize rural constituencies around ethnicities of clan lines for support.⁶⁵ This is repeated at the national level, where there are general fears of domination of Dinka and Nuer influence in government.

IOM conducted a series of consultations in preparation for the ECRP-I. Results showed that in some cases local governments are overburdened with their tasks. They receive little support from the center, especially as there is no devolution of resources from the state to the local level. Economic collapse has undermined stability, while local governments have to deal with the aftermaths of conflict in society, and with catering for returnees or IDPs.

The lack of resources from the center means that local governments have to help themselves through taxation: 'Formal institutions associated with the state have continued to govern based on extraction, unable to deliver the services that populations... so desperately need'.⁶⁶ Instead of accountability, governments have generally prioritized security.

⁶¹ Iffat Idris, Local governance in South Sudan: an overview, K4D Helpdesk Report, November 2017, p.2

⁶² Iffat Idris, Local governance in South Sudan: an overview, K4D Helpdesk Report, November 2017, p.2

⁶³ Iffat Idris, Local governance in South Sudan: an overview, K4D Helpdesk Report, November 2017, p.2

⁶⁴ Iffat Idris, Local governance in South Sudan: an overview, K4D Helpdesk Report, November 2017, p.3

⁶⁵ Pendle et al, 2012, p. 25

⁶⁶ IOM, Case Study Wau, unpublished, 2019

This has resulted in a division where development partners deliver services, and the governments deliver security. Humanitarian partners, in turn, face a perception of bias if they serve particular areas over others. People interpret the contours of aid delivery as favoring one side over the other. On the other hand, the military factions thereby have experience in manipulating aid flows.⁶⁷

Local Governance in Wau, Rubkona and Bor

In Wau, for example, the administration has no capacity to respond to the needs of the IDPs and returnees. Previous urbanization has provided opportunities in Wau, but the Ministries claim that they lack the means to communicate with their counterparts in Juba, or other areas outside of town – even those which should be under their administration. In this scenario, most service concerns by the population are raised with the chiefs. The chiefs sit at the juncture of customary authorities, government and humanitarian partners. They usually pass reports to the relevant municipal authority in town, or to the country commissioner in rural areas. IDPs report to block leaders, who raise concerns directly with humanitarian partners, as they claim they have no government they can trust – especially as many originally have fled government perpetrated violence and have maintained negative relations with the governments. Traditionally in Wau, which is ethnically very diverse, traditional leaders have played a crucial role in mediating between different groups. However, as elsewhere in South Sudan, the role of chiefs and traditional leaders has been questioned in relation to their degrees of impartiality and accountability by their own constituencies.⁶⁸

Similarly, IOM consultations in Rubkona and Bentui counties have shown that county governments and customary authorities have little capacity to service their populations. In addition, governmental appointments have been highly politized and people – especially some of the youth – do not feel represented by their governmental institutions. People generally feel they have nowhere to voice their requests for services or other concerns.

This picture was confirmed in Bor Town, where formal and informal institutions do not have the capacity to respond to the needs of displaced and returning populations, and cannot deliver services to the overall population in their areas. There is little health care or education available, nor do people have access to clean water. Some services are supplied through the private sector, but these do not reach the large population. Respondents say that this has decreased the accountability of government institutions vis-à-vis citizens, and that the misuse of public funds is common.

3.2.5 Livelihoods, Labor and Employment

Livelihoods in South Sudan are largely influenced by the ecology of a region. For example, the Sud swamps and southern clay plains with their water-logged soils of the flood region of the Upper Nile and the eastern Bahr el-Ghazal are better for cattle herding rather than farming. Farming, on the other hand, is a prominent lifestyle in the waterlogged territory of the Nile's west bank, the Congo-Nile watershed and the forests of the border to the Democratic Republic of Congo (DRC).

⁶⁷ IOM, Case Study Rubkona, unpublished, 2019.

⁶⁸ IOM, Case Study Wau, unpublished, 2019

Livelihoods in South Sudan have therefore been relying on agricultural production, cattle rearing, fishing, gathering of wild foods as well as trade. Cattle have particular economic and cultural significance among some specific groups.

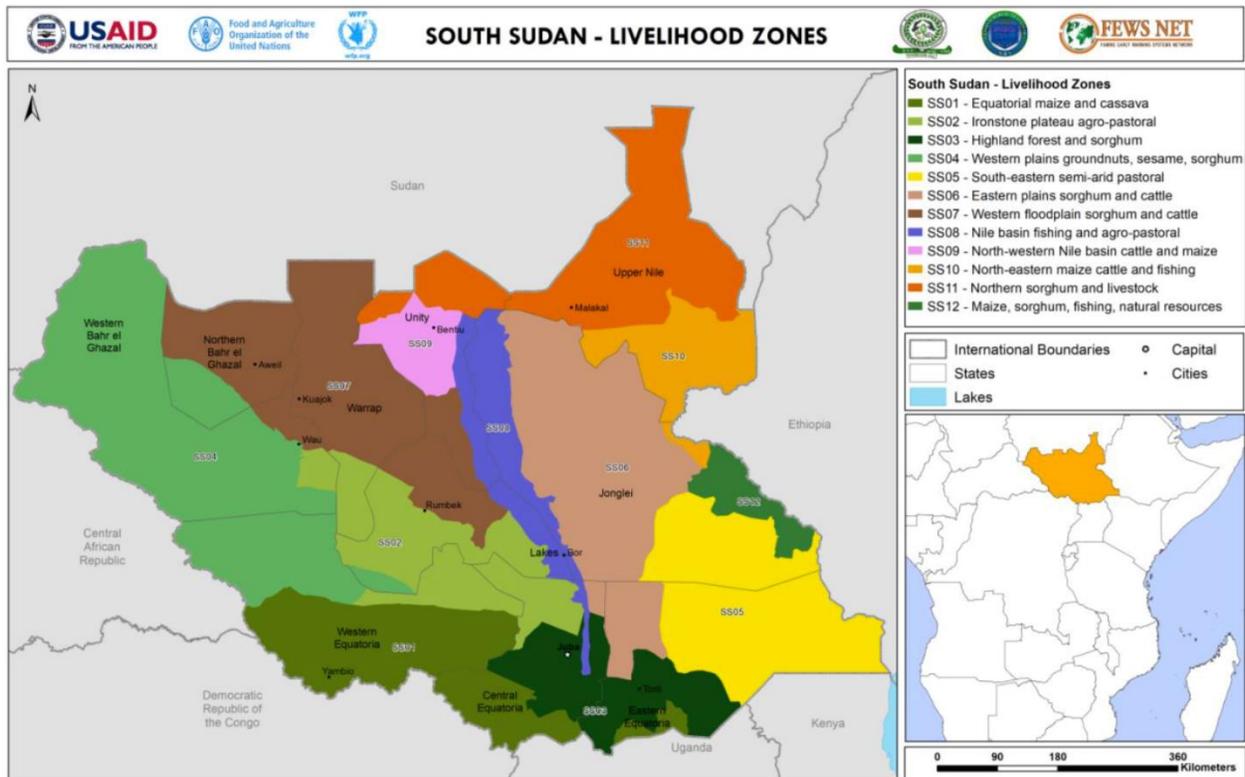


Figure 3 Livelihood zones in South Sudan

The livelihood system in South Sudan is predominately subsistence small-holder agriculture, among which about 12-15% of the population depends on fishing for their livelihoods.⁶⁹

Livestock production also provides an important livelihood base for large groups of people but is hampered by disease and environmental degradation. Localized conflict is therefore driven by politics, control of livestock and cycles of retribution rather than competition over land and water resources, as one research by the Secure Livelihood Research Consortium claims. The research shows that attempts to link livelihoods to peacebuilding were based on incomplete analysis, and livelihoods reconstruction should be based on more contextual analysis.⁷⁰ It is key to better understand the links between conflicts and livelihood before engaging in programming in a particular local context.

For example, in Jonglei State cattle-raiding remains the primary reason for constraints to livelihoods through a decline in livestock ownership. Raiding was rampant in 2012-2013. Traditional cattle raiding became a commercial and political activity. Conflict was less about directly controlling grazing lands and access to water than it was about ownership of cattle and the relevance this plays in many other cultural aspects such as marriage, age sets and emphasizing masculinity. But it was also about power and ethnic competition and cycles of revenge. This insecurity became the cause of poor livelihoods outcomes.

⁶⁹ UNDP, 2012

⁷⁰ Secure Livelihoods Research Consortium, Livelihoods and conflict in South Sudan, October 2016, p. 1.

However, these social dynamics were overlooked as a cause of conflict. Livelihoods were severely stressed, but it was political disagreements and power struggles as well as unresolved leadership issues from the previous civil war era that led to the re-emergence of widespread violence in 2013.⁷¹

In addition, the road network is poor and many areas of the country are not accessible by road, particularly in the wet season, which provides a major obstacle for marketing and commercialization of agricultural production. Inadequate transport infrastructure poses a major problem for movement of people and commodities within and between states. Although efforts have been made to rehabilitate some of the main trunk roads, the conditions of most of the main roads, especially in the wet season, hinder transportation of goods particularly perishable products. High transportation cost is a disincentive to farmers in potential surplus production areas from expanding production.

While there are plenty of natural resources, grazing land, water, timber and oil, South Sudan is one of the poorest and least developed countries in the world. Conflict has constrained food production, trade and access to markets. Livelihoods have been largely destroyed in years of conflict.⁷² There had been a key assumption that after the civil war recovery would take off. However, this did not happen and the outbreak of renewed armed conflict in 2013 and continued local level conflicts prevented any growth.

Livelihoods have further been determined by rapid urbanization, especially by youth and returnees; by influx of foreign workers looking for economic opportunities; and the limited capacity of major demands placed on the government.⁷³ Employment opportunities both in the public and private sector are few but are increasing due to urbanization. Employment in South Sudan is underpinned by low-productivity, unpaid work in the agricultural sector, with informal employment as the main source of income. Petty trading also provides a source of income for many households in the rural towns and around market centers.

Poverty escalates during the dry season and in most parts of the country periods of 3-6 months per year of food deficit is common. During these periods, most families move around for income generation, i.e. selling of charcoal, doing casual labor etc. The World Bank estimates that more than half of South Sudan's population is currently facing a food crisis.

Impacts of civil war on livelihoods

IOM's recent consultations show the concrete effects of the recent civil war on livelihoods in South Sudan. In Wau, for example, 'the violence that spread to Wau in 2015 laid ruin to peoples' livelihoods and destroyed their assets. Humanitarian assistance is strategically denied to some populations, which live close to starvation. The blocking of key roads, as well as the fact that cultivation had come to a halt due to fighting, has escalated prices for food. General economic decline has made it very difficult for people in Wau to meet their basic needs. In Wau town – which used to be based largely on subsistence farming - 59% of surveyed households rely on casual employment as main source of income and only 16% rely on subsistence farming.⁷⁴ Women sell charcoal or grind ground nuts into a paste, sell tea, and men hope for deployment in construction or trade. Constant insecurity has made farming at the outskirts of town

⁷¹ Secure Livelihoods Research Consortium, Livelihoods and conflict in South Sudan, October 2016, P.3

⁷² The World Bank, South Sudan, Economic Brief, April 2019, p.3.

⁷³ Daniel Maxwell, Kirsten Gelsdorf and Martina Santschi, Livelihoods, basic services and social protection in South Sudan, Feinstein International Center, July 2012, p. ii.

⁷⁴ IOM, Case Study Wau, unpublished, 2019

impossible, and employment has been politicized as everything else in Wau. Jobs are perceived to be awarded on the basis of ethnic identification.⁷⁵

In Rubkona and Unity State, IOM consultations showed that livestock trade and other forms of commerce have broken down in flow with the general economic decline in the country. This has divided people not only into ethnic lines, but also according to wealth. While livelihood opportunities have become scarce, some societal groups, such as the youth, search for resources through criminal activities. Agricultural activities are not seen as a solid livelihood anymore, given the security risks associated with attending to agricultural fields. Attacks and offenses and displacement have made attending fields and waiting for harvests a non-option for most farmers. By and large, people in Rubkona either stayed in rural areas with their cattle, or those who had their cattle raided moved to IDP camps and adopted a pseudo-urban lifestyle.

The only attractive jobs in Rubkona - with a perspective of regular salaries - are in the humanitarian sector, with international or national partners. Humanitarian partners increasingly provide aid, but also protection and jobs. Government positions are less attractive options, as salaries are often delayed and there are no resources from the center to perform well in the government work. The oil fields are slowly reopening, but may not yield the expected jobs. These jobs are also considered to be subject to ethnic divisions.⁷⁶

Similar patterns were shown in Bor, where unemployment and food prices are high, and infrastructure is underdeveloped. Here crop farming and livestock are key livelihoods for many, but insecurity puts a strain on those, and people often cannot meet their needs. In addition, flooding has demolished crop production.

3.2.6 Land Issues

There are multiple customary tenure systems, as well as formal legislation regulating access and ownership to land. The Land Act of 2009 lists customary tenure as a legal form of land tenure. It allows communities to register their collective interests in the land.

The situation has been under duress through the militarization of South Sudan, the outside investment that needs clarity on land ownership, the returning diaspora, frequent land grabbing and the drawing of administrative boundaries. For CDD-type programming it is key to be aware of the various interests in land in the different counties, and the legitimate rights of the communities over the land.

A distinct set of land issues stems from returnees, who return to find their land occupied. Disputes can further arise from double selling of land, illegal occupation, military land-grabs, unauthorized building, and attempts to reclaim land without documentation.⁷⁷

The CPA has further changed dynamics around land by bringing about incentives for communities to claim their own administrative units/land rather than encouraging them to share resources with neighboring

⁷⁵ IOM, Case Study Wau, unpublished, 2019

⁷⁶ IOM, Case Study Rubkona, 2019

⁷⁷ Pendle et al 2012, p. 78.

communities. The emergence of the state and a Land Commission has motivated communities to secure their territorial claims.⁷⁸

3.2.7 Security and Conflict Environment

In July 2011 South Sudan declared its independence from Sudan. However, conflict continued in different ways. In 2012, widespread intra-communal conflicts, including cattle raids and militia activity continued to divide the country and prevent peace and development. In December 2013 a civil war broke out in the northern parts and Juba, causing major displacement of people as well as increasing food insecurity. Continued cross-border conflict with Sudan further led to the exit of traders from Sudan, while insecurity also affected trade routes from Uganda. Due to rising political disputes, in 2016, conflict intensified and expanded to the southern parts of South Sudan, resulting in mass displacements to Uganda and Sudan and the closure of the Sudanese border. This period rendered over half of the total population to dependence on humanitarian assistance. The government declared a state of emergency.⁷⁹

After five years of protracted civil war, a peace agreement was signed in September 2018, which was expected to reinforce a permanent ceasefire, create an enabling environment for the delivery of humanitarian aid and support reforms for social and economic reconstruction as well as the creation of a new transitional government of national unity by May 2019. Conflict has persisted since and little reform activities have taken place as the government has focused on security. This has severely hampered any positive development, including in the economic sector. As the World Bank economic brief describes 'Peace and reconciliation are required to achieve macroeconomic stability and support a return to positive economic growth.'⁸⁰ On February 22, 2020, a new Unity Government was formed that represents the key conflict parties, and Riek Machar was sworn in as the first vice president sealing the peace deal in Juba. Since, localized conflicts have continued to flare up.

In addition, since the 2018 peace deal, a rebellion has flared up in the southern multi-ethnic Equatoria region. The region's leader has been rejecting the agreement on the basis that it does not reflect the core grievances of the population, and has been calling for greater autonomy of the region. On and off fighting, including south and west of the capital Juba, has caused internal displacements as well as people fleeing to neighbor countries.⁸¹

Conflict dynamics in the last five years have varied in the different areas of South Sudan and it is difficult to distill a common narrative. Different types of conflict prevail throughout South Sudan. Inter-communal conflicts are mostly based on tensions between pastoralist groups and relate to cattle raiding and competition over pasture; tensions between pastoralists and agriculturalists about land use/natural resources and tensions between neighboring communities over administrative or communal boundaries (state resources).⁸² Added to these key types of conflicts are nowadays the spread of weapons,

⁷⁸ Pendle et al 2012, p. 39.

⁷⁹ FEWS Net, Livelihoods Zone Map Descriptions for the Republic of South Sudan (updated), Washington DC, 2018, p.5-6.

⁸⁰ The World Bank, South Sudan. Economic Brief, April 2019, p. 3.

⁸¹ International Crisis Group, South Sudan's Other War: Resolving the Insurgency in Equatoria, 2021, accessed at: <https://www.crisisgroup.org/africa/horn-africa/south-sudan/b169-south-sudans-other-war-resolving-insurgency-equatoria>

⁸² Pendle et al 2012, p.37.

militarization of society following decades of civil war, strategies of warlords to mobilize support along ethnic identities, and the impacts of war on inter-community relations.⁸³ These types of inter-communal, and not necessarily political, conflict can pose significant risks for project implementation, as it may temporarily destabilize a project area, and as it may fuel underlying tensions between communities, which can play out over development or aid resources.

Furthermore, since the signing of the CPA state resources have increased. That means that competition over those resources increases as well. Access to these resources is usually defined through a patronage system, including through membership in the government or army system. The weak government further exacerbates this phenomenon.

Another significant risk for conflict and insecurity is the increased formation of youth gangs, which is described in the section on youth below. These gangs are responsible for the rapid spread of criminal activity, which has begun to destabilize some areas of South Sudan. Criminality can similarly pose risks on project activity, for example where it heightens general violence or GBV crimes, or in the theft of people’s assets.

South Sudan has been undergoing rapid urbanization. This is where numerous ethnic groups come together, causing cultural change and disintegration. Tensions in towns emerge due to different social and economic strata rather than between members of different ethnic groups. However, others have observed that there are significant tensions between different ethnic groups in towns. In any case, this mix of society has led to the erosion of conflict resolutions mechanisms usually applied within the group, while in some cases those mechanisms have been able to adjust, in many they leave conflicts unresolved.⁸⁴ The World Bank categorized the key features of the conflict in South Sudan as follows⁸⁵:

Table 4 Key features of conflict

Geography of Violence	Since 2016, the conflict has spread throughout the entire territory, particularly the formerly peaceful Equatorial states, although some locations are more stable than others.
Multi-actor	There has been a proliferation of armed groups and a weakening of command and control, meaning power-sharing, security commitments, rule of law and access is uncertain.
Control of territory	There are many different parts of the territory under influence of different groups; however, armed groups are not able to rigidly control territory or battle-lines.
Conflict at multiple levels	There are a number of different armed conflicts in the country – some relate to the fragmentation of the elites but many are local-level (e.g. over water or pasture resources)
Predation	Armed groups predate on resources from either the local population, such as livestock, or from aid agencies such as food stocks, vehicles or equipment.
Seasonality	The pattern is for the main warring parties to slow down offensives in the rainy season, although at the local level skirmishes and banditry can

⁸³ Pendle et al, 2012, p.38.

⁸⁴ Pendle et al, 2012, p. 33

⁸⁵ The World Bank, South Sudan. Approaches to Targeting in South Sudan, June 2019, p. 26

	increase.
Ethnic identity	There are some 64 different ethnic groups in South Sudan; ethnic identity is instrumentalized by elites and has become part of inter-group armed conflict, making it a critical factor for determining equity.
Gender-based violence	Gender-based violence at the hands of both armed groups and partners/family members has reached epidemic levels, affecting as many as 65 percent of women and girls with great impunity.

Conflict and Security in Wau

Wau has been at the intersection of different ethnic groups, including the Fertit, the Luo and the Dinka, as well as at the intersection of pastoralism and agriculturalists. These form the backdrop to tensions and violence in the Wau area. Tensions include competing claims over ownership of the town as well as the land on the town’s periphery. These tensions have underpinned the situation in Wau since the start of the conflict in December 2013, and developed into a full-blown ethnic conflict in 2016.

In 2015 armed cattle herders, operating under the Gelweng (a Dinka cattle camp youth-based militia), arrived south of Wau and instigated conflicts with local farmers. In 2016 this developed into battles between the SSPDF (South Sudan People’s Defense Force) and the SPLA-IO (Sudan People’s Liberation Army-in-Opposition) outside of town. By March 2016, 60,000 people had been displaced in the Wau area. Armed clashes continued, and violence in Wau town was marked by ethically targeted killings against Fertit and Luo civilians.

Tensions reinforced the perceptions that the Dinka were trying to take control of Western Bahr el Ghazal, including Wau town – a perception that is based on grievances dating back to the previous civil war. Peace talks between the government and opposition were held in 2018 and led to some cautious optimism, but violence still flares up and displacement continues.⁸⁶

Consultations in Wau have shown that people generally feel victimized as civilians and peace is in the hands of the fighting parties. They also feel that politicians put their own interests first instead of catering for the people and this makes them feel continuously unsafe in the heavily militarized environment.

These sentiments are underpinned by widespread impunity and a non-functional formal justice system. Criminality is on the rise coupled with a lack of accountability for government officials. Criminalized youth gangs (‘nigga groups’), often armed, operate in the Wau area and contribute to the general sense of insecurity.

The government has started to charge taxes in order to provide security to a limited degree. IOM describes ‘the town is now contending with the cumulative effects of militarization, economic collapse and an almost complete absence of trust between communities’⁸⁷. There is continuing localized violence between pastoralist and agricultural communities around town.

Conflict and Security in Rubkona and greater Unity State

⁸⁶ IOM, Case Study Wau, unpublished, 2019

⁸⁷ IOM, Case Study Wau, unpublished, 2019

Unity State used to be considered the site of the ‘Nuer civil war’, with different Nuer clans fighting against each other – some backed by Khartoum. Following independence, deeply entrenched divisions in Unity State were further fostered through disarmament attempts, and clan identities among the Nuer have been further politicized.

In 2014 and 2015, government forces and allied militias including from the Bul Nuer groups attacked SPLA-IO strongholds. The violence had a significant impact on the population with at least 10,000 people left dead, raped or abducted during this period. The SSPDF (still SPLA at the time) and militias engaged in large-scale raiding of livestock in order to devastate the livelihoods of Nuer in the southern parts, and punishing those perceived allied to the SPLA-IO. A split within the SPLA-IO provoked further competition over resources in a humanitarian crisis and economic decline. It also increased the formal military entities in Unity state to four, including the government under the SPLA (now SSPDF), the SPLA-IO under Machar, and the SPLA-IO under Deng Gai.

A large number of armed male youth started associating itself with these different groupings, while maintaining some fluidity and therefore making the environment even less predictable. Many of them are now engaged in banditry and other criminal activities.

Most importantly, cattle raiding has deprived people of their assets, but has also exacerbated and created new tensions. In addition, mass displacement and continued insecurity contributed to food insecurity. A famine was declared in southern Unity State in 2017.

Another government offensive was launched in the south in 2018 creating further displacement and insecurity. Especially the female population have been a key target in the continued attacks.⁸⁸

Conflict and Security in Bor

IOM consultations show that Bor has been relatively peaceful since 2014. Bor town has developed into a somewhat bustling center again. It is said that growth was further spurred by the return of displaced populations. However, returnees and IDPs have placed additional strains on the government, which already lacks the capacity to service the population.

Since many do not return to their original rural lands, but seek opportunities in the urban center, land ownership questions have become an issue. The concentration of urban areas has further created increased diversity in town, which places greater challenges on a peaceful co-existence.

Generally, Bor and greater Jonglei State have a mixed ethnic make-up, consisting of Dinka, Nuer, Murle, Anuak and others. Identities are also still underpinned by the conflict during the civil war between Riek Machar and John Garang in the 1990s. In the recent war in 2013, old wounds were re-opened. The Bor Dinka populations that have returned to town continue to have a memory of the old events as well as the violence suffered in the current war by the SPLA-IO. Bul Nuer populations have also been impacted by the current war, through attacks on Bor IDP sites where angry Dinka youth killed many inhabitants. Bor has also been the focal point for divisions between the Bor Dinka and the Bahr El Ghazal Dinka, who dominate the central government.

People generally feel that the peace process is not complete. There are still high levels of localized violence in Bor often supported by national politicians. Sources of violence include cattle raids with the

⁸⁸ IOM, Case Study: Rubkona, unpublished 2019

neighbouring Murle and Lou Nuer. Abductions by the Murle are a threat often mentioned by the Bor Dinka. However, the Bor Dinka and Nuer also practice selling children out of wedlock to the Murle. Most of the violence, however, has taken place between the Lou Nuer and Murle. Murle and Dinka have also been implicated in clashes over livestock. In 2017, even humanitarian aid workers were killed in clashes between the Murle and Bor Dinka youth in Duk.

Further conflict prevails between sections of the Bor Dinka, including through tensions over grazing land. This is indicative for other conflicts across the country, which have been aggravated by the redrawing of boundaries - especially with payams transitioning into counties and counties transitioning into States – resulting in a rush by politicians to increase influence and power at the local level.⁸⁹

Conflict can lead to the cancelation of programming, which has happened in South Sudan. Such cancelation can have negative effects on those expecting assistance. The World Bank study on the canceled ‘Youth Startup Business Program in South Sudan’ researched youth grant recipients, and the impacts of the cancelation of the program due to the outbreak of violence in late 2015. It found a strong reduction in beneficiaries’ trust levels. Some of the beneficiaries that experienced cancelation were also less likely to migrate in order to escape from conflict activities, probably because they expected assistance.⁹⁰

It is therefore important that the Project maintains strong communication links to explain to communities why project activities may be canceled. This can be done by targeting different population groups through different kinds of media, as laid out in the SEF. It will also depend on what type of communication may be possible in the case of conflict or ongoing violence. For example, it is more likely that it is possible to transmit messages through the radio rather than organizing community meetings.

Furthermore, the country is planning to hold General Elections in 2023, which could potentially lead to violence and insecurity again, given that the national factions are still in place.

3.2.8 Displacement and Integration

The conflicts in South Sudan have led to significant displacement of populations. 2 million are internally displaced; 2.3 million refugees originated from South Sudan and 329.000 refugees remain in South Sudan.⁹¹ However, there has been displacement throughout South Sudan’s conflicted history. Displacement has mostly taken place from the rural areas, where people are unprotected, to towns, where there is increased provision of services and humanitarian aid delivery. Displacement has also been an important tactic of war used by different sides.

The movement of populations complicates the appearance of a community and shifts the dynamics in a given place. Often parallel administrative structures develop where ‘returnees’ settle in a place.⁹² Furthermore, displacement and returns put significant questions on the tenure, ownership and use of

⁸⁹ IOM, Case Study Bor, unpublished, 2019.

⁹⁰ Angela Müller, Utz Pape and Laura Ralston, Broken Promises. Evaluating and Incomplete Cash Transfer Program, Policy Research Working Paper 9016, The World Bank, Washington DC 2019.

⁹¹ OCHA, South Sudan, Humanitarian Snapshot, November 2021, accessed at:

https://reliefweb.int/sites/reliefweb.int/files/resources/south_sudan_humanitarian_snapshot_november_0.pdf

⁹² Pendle et al, 2012, p. 77.

local lands. The remaining insecurity therefore keeps populations mobile and often does not allow for new permanent settlements and for the reconstruction of livelihoods.

One coping mechanism that has developed is that people often split family members to assess situations on the ground and to diffuse risks. While part of the family remains in a camp, another part may explore returning to the rural community site. In addition, for many returning means to entirely rebuild their lives, as often all assets have been destroyed and resources lost. For some, houses have been completely destroyed or they are still occupied by others.

Furthermore, there are numerous ex-combatants among the returnees in South Sudan, which are not always easily accepted back into communities. Thinking about ‘interest groups’ in view of returnees and ex-combatants in the payam in CDD-type projects is therefore important, as there is high risk that communities have diverse interests and do not all feel included and catered for.

In most areas of South Sudan returns are currently reported, although the numbers do not yet match the numbers of displacement. Many returns are partial in order to ‘test the ground’, while returnees retain strong connections to their families in refugee camps. Other returns are driven by the difficult conditions in displacement sites. Urban areas appear as a key transit point for returnees, given the availability of information, economic opportunities, and provision of services. Given the recent peace agreement in 2018 and the new unity government, increased returns are anticipated.

IDPs and Returnees

Wau County: In Wau political conflict and conflict about land is likely to continue to impact an already highly mobile population. An estimated 80,000 returnees have moved back to Wau County since the peace agreement in September 2018. In the same period 26,487 new IDPs were displaced. Both are now populating the two urban payams, Wau North and Wau South. Security is relative, and returnees do not feel fully secure as yet. People who had returned to Jur River, for example, were expelled again through continued fighting. ‘It functions to create a sense of skepticism around the sustainability of home, creating necessarily short-time horizons’.⁹³

Bentiu / Unity State: Unity State also has large numbers of displaced people. Since the government offensive in 2015, Bentiu has hosted around 100,000 IDPs. Families have started spreading across different camps and town sites in order to diffuse some of the risks and to test ‘waters’ outside – while inside the camps the necessary means to survive are provided through humanitarian aid.

Bor Town: IDPs are also often traumatized by past experiences of having to flee repeatedly. Only 2,000 IDPs live in Bor town’s IDP camp. While people have been returning to Bor, returns are not linear. People have gone back to their original residences, or have been continuously on the move due to the continuation of inter-communal clashes.⁹⁴ Some violence was even geared at preventing people from returning, which has put additional burdens on the town and camps. Those who have returned outside of towns have experienced a dearth of services. Cattle raids may even become more significant, as people return and try to make a living and recover their assets. IOM reports that the burdens on towns – such as in Bentiu and Rubkona, have become impossible.⁹⁵

⁹³ IOM, Case Study Wau, unpublished, 2019

⁹⁴ IOM, Case Study Bor, unpublished, 2019.

⁹⁵ IOM, Case Study Rubkona, unpublished, 2019.

3.2.9 Refugees

Although South Sudan has more than 2.3 million refugees abroad, it also hosts some 329,406 refugees⁹⁶. The vast majority – roughly 95 percent – are Sudanese refugees living in the northernmost parts of South Sudan, in Jamjang County in the Ruweng Administrative Area and Maban County in Upper Nile State, while Pochalla in Pibor Administrative Area also hosts some. South Sudan also hosts refugees from DRC, CAR, Ethiopia, and Eritrea, primarily in Western Equatoria and Central Equatoria.

Location name	Source	Data date	Population
Upper Nile	UNHCR	31 Oct 2021	52.7% 173,470
Unity	UNHCR	31 Oct 2021	37.8% 124,433
Central Equatoria	UNHCR	31 Oct 2021	5.2% 17,134
Western Equatoria	UNHCR	31 Oct 2021	3.7% 12,146
Jonglei	UNHCR	31 Oct 2021	0.7% 2,223

Figure 4 Refugees in South Sudan by Location

Country of origin	Source	Data date	Population
Sudan	UNHCR, Government	31 Oct 2021	92.4% 304,341
Dem. Rep. of the Congo	UNHCR, Government	31 Oct 2021	5.4% 17,663
Ethiopia	UNHCR, Government	31 Oct 2021	1.4% 4,526
Central African Rep.	UNHCR, Government	31 Oct 2021	0.7% 2,425
Eritrea	UNHCR, Government	31 Oct 2021	0.1% 321
Burundi	UNHCR, Government	31 Oct 2021	0.0% 125
Somalia	UNHCR, Government	31 Oct 2021	0.0% 3
Others	UNHCR, Government	31 Oct 2021	0.0% 2

Figure 5 Refugees in South Sudan by Country of Origin

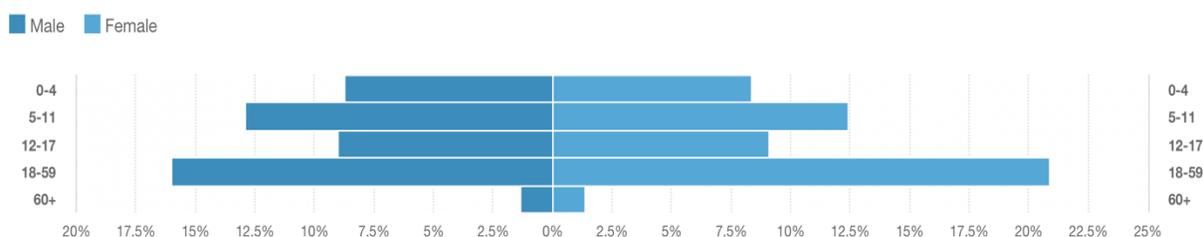


Figure 6 Refugees in South Sudan by Age and Gender

3.2.10 Gender-Based Violence

⁹⁶ UNHCR, Operational Data Portal South Sudan, 31 October 2021, accessed at: <https://data2.unhcr.org/en/country/ssd>

About 65 per cent of women and girls in South Sudan have been the victim of physical and sexual violence at some point in their lives, with the majority of them experiencing it for the first time before the age of 18.⁹⁷ In 33 percent of the cases, the violence was experienced during military raids from a non-partner while in 51 percent cases it was from an intimate partner. Early and forced marriage is another expression of GBV in South Sudan. About 52 percent girls get married before reaching 18. This practice is also linked to poverty and ongoing conflict. Many families receive a bride price, which makes men think of their wives as commodities and thus the wives lose the rights to speak up for themselves⁹⁸.

The patriarchal norms prevailing in South Sudan - especially among the rural population – are an expression of inequitable gender attitudes. South Sudanese women and men think that a husband is justified in beating his wife. The majority of male respondents (77 percent in Rumbek), and female respondents (73 percent in Juba City and 93 percent in Rumbek) agree that violence is justified in at least one of the following circumstances: If a woman goes out without telling her husband, neglects the children, argues with her husband or refuses to have sex.⁹⁹ Although there are signs of women being less accepting of GBV, the normalization of violence against women and men and existence of gender inequitable norms minimize the impact of observed attitudes¹⁰⁰.

The culture of violence and impunity that has emerged from decades of conflict continues to provoke violent behavior toward women inside and outside their home¹⁰¹. Across the country, law enforcement services remain weak and police are under-trained and under-resourced. Aside from the Police Special Protection Units (SPUs) that handle SGBV, police are given little training on how to handle cases of GBV and for the most part, they have little knowledge of women's rights¹⁰².

The economic downturn and loss of livelihoods caused by the conflict forced many women and girls to engage in sex to making a living. Even many female members of the armed groups report physical abuse or rape by fellow group members. Also, conflict and violence exacerbate the exposure and vulnerability of women to GBV. In particular, the proliferation of young male group gangs presents a high-level risk for women, as these groups target women and men in their attacks.

Sexuality issues and domestic violence are considered confidential and are not openly discussed, which promotes a culture of silence around GBV. In general, women and girls who experience sexual and domestic violence do not speak up. When they do report GBV incidents, findings indicate that most GBV cases are reported to community leaders (78.9%) and clan heads/members (71.5%) while few people report GBV cases to NGOs (14.7%), government (47.1%) and to religious leaders (38.3%). Qualitative findings indicated that community and clan leaders are nearer to the people and hold high levels of trust with community members. However, most social and government institutions that handle sexual and domestic violence cases are male-dominated,¹⁰³ which discourages women and girls from reporting for fear of retaliation or social ostracism.

⁹⁷ (UNICEF, 2018)

⁹⁸ World Bank (2019), Strengthening Gender Outcomes in Social Protection and Poverty Focused Programs in South Sudan.

⁹⁹ World Bank (2019)

¹⁰⁰ The Global Women's Institute. (2019). Violence Against Adolescent Girls: Trends and Lessons for East Africa.

¹⁰¹ World Bank (2019)

¹⁰² UNECA (2019), National Review of the Implementation of the Beijing Declaration and Platform for Action (1995). Republic of South Sudan.

¹⁰³ Kenwill International Limited (2015). Gender Assessment Report Summary, Feed Fortifying Equality and Economic Diversification (FEED), Improved Livelihoods in South Sudan. World Vision South Sudan.

There are common GBV-related issues in all three areas where IOM conducted case studies and consultations. First, women are more exposed and vulnerable to GBV due to conflict and poverty. Also, customs such as early marriage and bride price negatively affect women and position them in a subordinate manner vis-a-vis men. Second, lack of employment and sense of worth among young men is another factor that increases violence against women via armed groups. Women often experience a double burden as a result of the change in gender roles, while they have to fulfil traditional gender roles, they are also becoming heads of households and the main breadwinners for their families. Finally, land is a huge issue affecting South Sudan and IDPs in particular. Female returnees face particular GBV vulnerabilities related to claiming land rights without a male counterpart.

Bor Town / Jonglei State

Women are subordinated to men and discrimination and violence against women and girls is culturally accepted in the region. The practice of bride price is common in Bor, even more than in other areas of the country, especially among the Dinka Bor. Early marriage is also common and results in girls being pulled out of school at an early age.

Employment and livelihood opportunities are very small for rural youth in Jonglei State. This situation is causing young men to join gangs as a means to access resources and empower themselves. Youth gangs are growing in the area and are known to use violence against women and girls as a means of re-asserting a lost sense of identity¹⁰⁴.

General insecurity is an issue and child abductions, cattle-raiding and rape are mentioned as the main security concerns in the area. The proliferation of light arms in rural areas make women feel even more insecure, they refer in particular to the risks associated with domestic chores, such as fetching water or fire wood. This highly affects the ability to provide livelihoods for their families.

According to IOM, women experience a change in gender roles. Due to conflict and displacement women increasingly find themselves in male roles, such as working outside the home. This change is not necessarily positive, women declare that even though they work as much as men, they still have to fulfil traditional reproductive tasks.

Women are also disadvantaged against the backdrop of issues of mobility and return, which are closely linked to land property claims. In 2019 Bor County was hosting 54,694 returnees¹⁰⁵. Generally speaking, the land issue is greatly affecting the ability of returnees and IDPs to relocate to their areas of origin. In the case of the Nuer in IDP camps, the IDPs have seen how their houses and neighbourhoods have been demolished by the local authorities (to construct roads) or simply taken by others. This issue affects the ability of women to reclaim their rights to land. When claiming their rights to land, women find themselves more exposed to physical insecurity and sexual assaults, and, furthermore, their rights are often not protected in court¹⁰⁶.

Rubkona/Unity State

Unity State was one of the hardest hit areas by the recent conflict. Intra-Nuer clan conflicts are common and exacerbate the general conflict dynamics. Attacks on Southern Unity in 2018 greatly impacted women

¹⁰⁴ IOM South Sudan, Bor Case Study

¹⁰⁵ IOM DTM's Mobility Tracking, June 2019

¹⁰⁶ Ibid.

and girls' wellbeing; 40 villages were attacked, during which 120 girls and women were raped and gang raped, 232 civilians killed and 19,995 people displaced.

GBV is widespread in the area and seemed to be aimed not only at displacing civilians, but at explicitly preventing their return. In November 2018 there was a spike in sexual violence against women and girls traveling to access aid by armed youth. The attacks took place along the footpaths near Guit and Nhialdieu. Women were hit when traveling to or from Bentiu or Rubkona Towns. The Bentiu camp site was subject to attacks on female populations by armed elements between September and December 2018, with reported 134 cases of rape and gang rape and 41 cases of other forms of physical and sexual violence.

The feeling of insecurity and criminality experienced by women has worsened through the economic situation and underpinned the humanitarian crisis. Livelihoods, mainly cattle and agriculture, are completely dismantled in the area due to high incidents of cattle raiding as a strategy to displace people and devastate their livelihoods. In fact, camp sites are used as a way to access resources for people's survival.

Lack of livelihoods vastly affects young men and women. As in Bor, young men turn to violence and crime as a way to increase their access to resources and create a sense of empowerment. At the same time, women are more exposed to sexual assaults while trying to cater for their families. Agriculture is not a practical option due to the existing cattle raiding practices and jobs with humanitarian partners seem the most attractive.

In this context, women and girls have taken on many of the roles associated with male members of the households, specifically in providing for their families while also fulfilling their traditional role. On top of that, early child and forced marriages are common in the area, which reinforces the subordination and sense of ownership of women by men: A group of women in Nhialdieu explain male entitlement over female bodies, "We are being married by men and then they will own you. Men are beating us. If you tell a man to cook, he will beat you"¹⁰⁷. In such an environment, sexual violence against women and girls has been almost entirely normalized with rape and other related offenses being prolific.

Wau/Western Bahr el Ghazal

Insecurity in Wau has become a threat exacerbating the risk of GBV among women and girls. Conflict and crisis have increased the number of young people joining local gangs who have reportedly become more violent, as in other parts of the country.

The environment of insecurity has placed women and girls at more risk. They face dangers in carrying out daily survival tasks, or through early and forced marriages, which constitute a critical negative coping mechanism for families and communities. Also, food insecurity and lack of employment opportunities in rural areas has pushed some women into survival sex as a way to provide basic needs for them and their families making them vulnerable to other forms of sexual violence, exploitation and abuse.

Land issue: Women are also more vulnerable when reclaiming their land as IDPs and heads of households. IOM reports show that women are frequently denied access to land with some reportedly facing threats when trying to reclaim. Chiefs at the Wau Town Court described a case where a woman was living with

¹⁰⁷ IOM South Sudan, Rubkona Case Study, 2019.

her children after her husband had died in the conflict. Despite having the right documentation, the husband's relatives removed her from the house and appropriated all of her assets in the process¹⁰⁸.

Women lack agency, protection and decision-making at the community level and they report not feeling protected or empowered enough to raise issues through customary authorities and be taken seriously.

The COVID-19 pandemic has increased the GBV risks across the country, as the restrictions on movement have confined women to their homes and camps with their abusers.¹⁰⁹

3.2.11 Gender Dynamics

Statistics on WASH indicators are calculated relative to the population living in settlements where these indicators are available. 90 percent of IDPs in host-community settings and 94 percent of returnees live in settlements without gender-separated latrines, compared to 35.2 percent of IDPs living in camps and camp-like settings. Similarly, 71.4 percent of IDPs living in host community settings and 66 percent of returnees live in settlements where bathrooms / latrines cannot be locked from the inside, against 46.6 percent of IDPs living in camps and camp-like settings¹¹⁰.

GBV, including early marriage, together with conflict greatly affects women and girls' education. Secondary net enrolment rates are the lowest in the region at 6 percent for boys and 4 percent for girls. Similarly, only 18 percent of girls and 33 percent of boys complete primary education. Almost 31 percent of the schools have suffered attacks since 2013 and of all schools that were open since then, a quarter became non-functional by 2016¹¹¹.

Women often face inaccessibility to health facilities for fear of conflict-related GBV. Many survivors of GBV continue to suffer from the physical and psychological impact of violence, and report feelings of depression, hopelessness, anxiety, and suicide and have difficulty focusing, sleeping, and performing routine tasks. Existing health services across South Sudan offer inadequate medical and psychosocial support to survivors¹¹². In a CARE study it was found that among GBV survivors only 37% reported the incident to police or hospitals and received any psychological support¹¹³. Besides, GBV further entails the risks of becoming infected with HIV among women who have experienced violence maybe up to three times higher than among those who have not.

GBV is a key challenge for women during displacement and return. More than 4.5 million South Sudanese have been forcibly displaced inside and outside their country. Almost 90 per cent of the displaced are women and children.¹¹⁴ More than 1.8 million South Sudanese are internally displaced (IDPs), data shows that more women are displaced and on the move than men and up to 80 percent of displaced households

¹⁰⁸ IOM, South Sudan Wau Case Study, 2019

¹⁰⁹ Ministry of Gender, Child and Social Welfare, A Rapid Gender Analysis of Covid-19, Juba 2020.

¹¹⁰ IOM (2019) Mobility Tracking Round 5

¹¹¹ World Bank, 2019. Strengthening Gender Outcomes in Social Protection and Poverty Focused Programs in South Sudan

¹¹² OHCHR (2019), Report of the Commission on Human Rights in South Sudan

¹¹³ CARE (2014), The girl has no Rights, GBV in South Sudan.

¹¹⁴ World Bank (2019)

are female-headed¹¹⁵. Basic needs, insecurity and lack of housing turn survival sex into a coping mechanism during displacement and return for women. Also, women and girls are exposed to GBV at IDP camps when sharing accommodation and bathing facilities with men and boys.

Conflict-induced displacement has also altered family structures and affected the livelihoods of South Sudanese households. With very limited or no access to livelihood or productive assets and isolation from their kinship network, women face even higher levels of insecurity and marginalization. At the same time, and depending on the nature of displacement, women may struggle to fulfil both traditional male and female roles within the family in the absence of male relatives¹¹⁶.

Economic dependence of women vis-a-vis their abusers in the case of domestic violence can perpetuate the abuse. A recent study by IOM found that 75 percent of women reported having experienced some form of physical, sexual or psychological violence by their intimate partners.¹¹⁷ Women and girls often stay because of economic dependence on their abusers, which compromises their safety, health, well-being and personal agency. Intimate Partner Violence (IPV) remains the most common form of GBV, which means women and girls are most at risk in their own homes, from their husbands and other family members¹¹⁸.

Rural and conservative areas are often more biased against women, which curtails female participation in productive and decision-making activities in the community. This situation is a challenge for the empowerment of women and can further exacerbate their position of exclusion in society. Project activities need to ensure that women are informed and participate in community based-mechanisms. In this regard, men need to be involved in project activities with a transformational approach to encourage gender equal attitudes.

The Covid-19 crisis has further impacted gender equality, as pre-existing differences were further exacerbated. For example, women who are the majority of the frontline health workers, carers at home and in the community, were overwhelmed with the responsibilities under the pandemic. Restrictions imposed by the government were experienced differently by different genders. Despite lockdowns, women continued to go to the markets to sell their produce for fear of loss of livelihood, placing themselves at greater risks.¹¹⁹

3.2.12 Youth as a Vulnerable Group

Years of conflict have provided distinct motivations for youth and their livelihoods choices, including engagement in conflict and violence.¹²⁰ 30 percent of young people between the age of 15 and 35 identify themselves as currently 'inactive' – neither engaged in education or economic activities. In turn, farming, hunting and fishing are major modes of employment for youth. In urban areas, some youth operate some

¹¹⁵ World Bank (2019)

¹¹⁶ Strengthening Gender Outcomes in Social Protection and Poverty Focused Programs in South Sudan

¹¹⁷ IOM GBV KAPs survey, 2017.

¹¹⁸ UNICEF, South Sudan GBV Briefing Note, 2019

¹¹⁹ Ministry of Gender, Child and Social Welfare, A Rapid Gender Analysis of Covid-19, Juba 2020.

¹²⁰ Roz Price and Anna Ormert, youth in South Sudan: livelihoods and conflict, K4D, 2017, p.2.

form of businesses, with only 11 percent of the overall employment force counting as 'youth'.¹²¹ In urban areas there is a serious lack of opportunities, which forms the biggest constraint to livelihood security for youth. There is a lack of financial capital, education, relevant marketable skills and work opportunities.

Many young people suffer from the lack of fulfilled expectations after independence. Many hopes and aspirations for them have not materialized. Aspirations of a modern lifestyle bring many young people into the urban areas. However, in urban areas they have to compete with more educated returnees and often fail to secure income.¹²²

Youth has largely been excluded from political life, including through the age-based systems of authority that prevail in some of South Sudan's ethnic groups. In these groups 'age sets' are an important socio-cultural feature, which denotes formalized community groups in which members are of the same age. These go through the same stages of life together, often emphasized through rituals. Age seniority thereby underpins political and military structure as well, often defining young men as subordinated. This may have partly resulted in urban gang culture, and has made some young people vulnerable to recruitment into military services.

Another reason for youth violence has been the government's inability to provide security. With the eruption of conflict in 2013, different ethnic and youth militia emerged such as the White Army, Gelweg and others. Those groups were established to protect communities, where there was no state protection.¹²³

Post-conflict and conflict situations have further interrupted the ability of young men to establish financial independence and to start a family. This has left them in a stage where they are more prone to engage in violence as a form of empowerment. Violent conflict produces 'militarized masculinities', which in South Sudan is closely connected to underlying values around cattle raiding - a distinct cultural feature of some ethnic groups.¹²⁴ The lack of ability to pay dowries can contribute to decisions by young men to engage in militias or cattle raids. This also means that politicians and military leaders have easy game to recruit young men for their purposes.

A World Bank study on youth education found that there is a lack of capacity in Ministries, NGOs and youth organizations to meet the challenges of engaging youth in high quality education programs. At present a mix of secondary education and Accelerated Learning Programs exists across the country with mixed quality. Both institutional and capacity building support are required to remedy the situation, including a focus on the incorporation of socio-emotional and psychological capacities. Youth programs can be strengthened by linking sites and services, including in youth centers through sports, drama, media and other elements. Youth participation can further help investments and general programming. The

¹²¹ Pape, U. *South Sudan Poverty Profile 2015: Findings from the 2015 wave of the High Frequency South Sudan Survey*, Washington DC: International Bank for Reconstruction and Development/ The World Bank, 2016.

<http://microdata.worldbank.org/index.php/catalog/2778/download/39504>

Pape, U. *Poverty, Livelihoods, and Perceptions in a High Inflation Environment: Findings from the 2015-2016 waves of the High Frequency South Sudan Survey*, Washington DC: International Bank for Reconstruction and Development/ The World Bank, 2017. http://www.thepulseofsouthsudan.com/wp-content/uploads/sites/3/2017/06/Poverty-Livelihoods-and-Perceptions-in-a-High-Inflation-Environment_v3.pdf

¹²² Roz Price and Anna Ormert, youth in South Sudan: livelihoods and conflict, K4D, 2017, p.3.

¹²³ Roz Price and Anna Ormert, youth in South Sudan: livelihoods and conflict, K4D, 2017, p.4.

¹²⁴ Roz Price and Anna Ormert, youth in South Sudan: livelihoods and conflict, K4D, 2017, p.5

report further found that there is general lack of trust between youth and the government. Youth organizations have emerged in difficult contexts.¹²⁵

Wau County

IOM consultations have shown that youth in Wau are ostracized from institutions, and have little ability to participate in decision-making fora and voice concerns for their future. Being left voiceless and without access to livelihoods, the key access to resources for young people is through violence and crime. Violent groups or political or military organizations can therefore capitalize on them by providing an identity and access to resources. Youth gangs are one result of the powerless situation of young men in Wau. Furthermore, there are armed rural youth groups which have been a key driver in the conflict. For example, the Dinka Gelweng, and the Luo Yaakoor Ballam, which are responsible for attacks in the Jur River conflict.¹²⁶

Rubkona

In Rubkona, in Greater Unity State, many young people have been left dispossessed by the conflict. This has been exploited by the different parties to the conflict. Clan-based youth militia have been recruited to bolster the conflict. For example, young Nuer are recruited into the ad hoc militia groups, including the Gojam (replacing the White Army).

However, the loyalties of pastoralist youth are fluid, and they only ever remain weakly integrated into formal military hierarchies. Their main aim is to increase their personal material wealth, i.e. through cattle. This means that they don't really feel subject to peace agreements and often feel free to continue with hostilities. Especially in Unity State, armed youth have reverted to cattle raiding, which helps them to cut dependencies on their home communities and political structures, as they access resources on their own.

Bor Town

Similarly, in Bor town there are only few opportunities for young people. Formal employment is limited, government jobs have lost their appeal given the slow payment of salaries. As in the other examples, criminality, and also cattle raiding have become prime mechanisms to access resources. In town, there are youth gangs, including 'Ganja Talent' and 'OG'.

3.2.13 Beneficiary Targeting and Conflict

The targeting of project beneficiaries in South Sudan is an important process, as it needs to reduce shocks, restore social cohesion, and integrate excluded groups – rather than drive local conflicts. In this complex environment, it needs to be understood who the most severely affected are, such as IDPs, youth, ex-combatants, and others. At the same time, a delicate balance needs to be established by ensuring that whole political or ethnic groups are not left out, as that could further promote conflict. Methodologies for targeting in South Sudan will need to account for challenges of working in conflict.¹²⁷

¹²⁵ The World Bank, Youth Education in South Sudan, Current Opportunities and Challenges, June 2013, Washington DC, 2019.

¹²⁶ IOM, Case Study Wau, unpublished, 2019

¹²⁷ The World Bank, South Sudan. Approaches to Targeting, June 2019, p.7

Community tensions can undermine project activities in many ways. For example, the selection of beneficiary communities in the first place can be a highly politicized process, especially as government forces have played a partial role in the conflict of the last five years. If government is seen in the driver's seat of selecting beneficiary communities, that alone can raise tensions. However, international organizations – often ignorant of key local dynamics – may also not be best placed in the selection process. This is especially the case as conflict dynamics have developed around different lines of identity and have taken many different shapes throughout the different areas in South Sudan.

Once beneficiary states, counties and payams or communities are selected, interactions between project staff (who may be from differing local identities to the beneficiary community) and/or involvement of local government officials (often seen as partial in the preceding conflicts) pose risks of making beneficiaries fundamentally suspicious of project modalities and how resources are distributed, or how labor inputs, construction contracts and employment opportunities are designed and partners selected. As shown above, the development and aid sector has become a distinct resource and provider of employment – in some areas the only one. This turns development resources and aid into highly desired 'goods', for which people may remain in IDP camps rather than returning to their home communities. And it may provide the only employment in the area, dominated by gatekeepers. Employment through development partners also standing for access and power over resource distribution. Access to resources in turn, can be an enabler for dominance in conflict.

Elite capture of project resources is a serious risk with 'elites' occurring at different levels, either in the form of a distinct ethnic group, clan, or simply as a wealthy network in a town – as IOM consultations have shown.

While elite capture of project resources needs to be avoided in any way, even more worrisome is the use of project resources in conflict. Consultations have shown how returnee and IDP dynamics have been politicized. There is a similar risk that that project resources can be politicized and can be used by local government, politicians or military leaders and militias to dominate in conflict dynamics.

Local and regional conflict dynamics will further underpin cultural differences in areas where different groups with distinct cultures meet. For example, many areas, especially towns, can contain members of competing clans or competing ethnic groups. When these need to share resources, such as infrastructure (e.g. buildings or boreholes), conflict may ensue again. In addition, basic differences in cultural dynamics may bring up tensions where none existed, for example where a settled agricultural community decides to build a borehole, which may then be frequented by the adjacent pastoralist groups.

In addition, there is the often-misunderstood civil society sector. As pointed out above, there is no real 'civil society'. Associations or organizations may form around certain identities or groupings that present partial entities to a conflict. Organizations may also form for the sole purpose of access to development or humanitarian resources. All of which has the potential to further fuel local divisions when outsiders select key local partners or beneficiaries.

Another risk is the exposure of staff, either from other areas of South Sudan or internationals, to local conflict groups and to environments of insecurity, including GBV. This includes risks through the above-mentioned youth gangs or youth armed militias. Physical security of project staff may be compromised in different ways, especially as they can be seen as opponents in a conflict (e.g. representing the government or an opposed ethnic group or clan), or as they can be seen as having taken project resource decisions

favoring the opponent group. Furthermore, staff may be threatened in advance in order to take decisions favoring certain groups.

Prevailing insecurity has also put female project workers at risk of GBV, including sexual abuse or rape. Past experience has shown that even international female staff may not be fully secure, even in the capital Juba.

In view of Location targeting, IOM faced some challenges during the implementation of the ECRP-I in regards to administrative boundary complication. There is significant discrepancy between administrative boundaries as outlined by national government authorities and those understood by county officials and local communities. This created complications during entry activities when staff experiences on the ground did not match what was outlined in project design based on national government data. In these situations, IOM has worked closely with local community members and county officials (whose understandings of payam and boma administrative boundaries typically align) to develop a list of payams and bomas falling under ECRP programming that match realities on the ground and ensure inclusivity to the greatest extent possible under the scope of the project. This has at times included merging bomas or replacing one location with another in cases where communities have migrated away from one location to another, with the former having become uninhabited. For ECRP II, it has been determined that national, state, and county government officials, with IOM to assist as a facilitator, should come together to mutually agree on a list of payams and bomas from each county on which IOM can base its selection and interventions. Additionally, where there is disagreement between the county and national level, IOM should tend to defer to counties' lists of administrative boundaries, while also keeping in mind that localities have and will continue to expand into many bomas to maximize resource delivery / development aid intervention.

Furthermore, when where boundaries have been established, ECRP-I staff have often been confronted by officials and community members who claim that certain payams and bomas have been left out while they are in equal need of assistance. This is an inevitable issue, as resources are not unlimited. However, this makes the selection of target areas, as well as justifications regarding selection, extremely sensitive. When determining selected areas for ECRP-II, discussions around expanding to new areas needs to be approached with great thoughtfulness, and, where possible, efforts should be made to include payams and bomas left out of ECRP-I. Furthermore, those bomas that were merged should be reviewed to determine whether it is most sensible to keep them merged or to separate them under ECRP-II.

4. Environmental and Social Risk Classification

4.1 Risk and Impacts Assessment Methodology

The assessment of impacts is an iterative process underpinned by four key questions:

Prediction: what change to the physical, chemical or social environment will occur if the project is implemented?

Evaluation: what are the consequences of this change? How significant will its impact be on human and biological receptors

Mitigation: if it is significant can anything be done about it?

Residual Impact: is it still significant after mitigation?

Where significant residual impacts remain, further options for mitigation will be considered and where necessary impacts are re-assessed until they are reduced. The figure below shows the methodology that will be used to assess impacts.

		Effects/Consequences						
		Negligible	Small	Medium	High	Very high		
Probability of occurrence	Very likely							
	Likely							
	May occur (50% of the time)							
	Unlikely							
	Very unlikely							
Overall risk rating of the impact	High		Substantial		Moderate		Low	

Figure 7 Risk assessment methodology

4.2 Identification and Assessment of Risks and Impacts

The project is classified as *high risk*.

Generally, the project beneficial features outweigh the adverse risks. The targeting of the poor and vulnerable to reduce shocks, restore social cohesion and integrate excluded groups is likely to have beneficial impacts on parts of South Sudan's populations. The project will target the most severely affected, such as IDPs, refugees host communities and others.

The environmental risk rating is *High*. CDD-led infrastructure is generally associated with low-to-moderate environmental risks with potential adverse environmental impacts that are reversible, temporary in

nature and scope, and ones that can be easily and cost effectively mitigated. However, the flood risk reduction activities being considered (which may range from dykes, levies, embankment strengthening, drainage etc of small to medium size) will have significant to high risks depending on the selected type of control, their design and location. This is further compounded by the low capacity of the national and county government to enforce and supervise environmental compliance including that of local communities to manage natural resources sustainably in the backdrop of pervasive conflict, which extends to the control of natural resources that are largely undisturbed and under-managed. Further, the legal and institutional arrangements to manage, supervise and enforce compliance are equally dysfunctional with low capacity in controlling and monitoring environmental performance during implementation.

Otherwise, the potential adverse environmental and social impacts are reversible, temporary in nature and scope, and can be easily mitigated. As such, the potential risks and impacts are likely to have the following characteristics: Be predictable and expected to be temporary and/or reversible; low in magnitude; site-specific, without likelihood of impacts beyond the actual footprint of the project; low probability of serious adverse effects to human health and/or the environment (e.g. do not involve use or disposal of toxic materials, routine safety precautions are expected to be sufficient to prevent accidents, etc.); risks and impacts can be easily mitigated in a predictable manner.

Some of the subprojects, like construction or repair of health and educational facilities, markets, roads, drainage, water and sanitation facilities among others, could potentially have adverse environmental and social impacts that may range from: contamination of ground water due to proximity of latrines and waste disposal sites or inappropriate location of pit latrines, use of limited or sensitively located local construction material, such as aggregate and timber; noise and dust emissions from civil works; generation and dumping of debris (excavated soils); occupational health and safety hazards from handling of equipment by workers; pollution of local surface water resources; loss of vegetative cover causing erosion of loose soils and waste; pollution of soil and water resources due to inappropriate collection and disposal of market refuse and waste; and health hazards due to poor storage of market good providing breeding ground for disease carrying rodents and vectors; injuries from use of the facilities; health hazards due to inadequate cleaning and maintenance of sanitary facilities; safety hazards due to collapsing pit latrines; health hazards due to inappropriate storage and disposal of medical and other general waste including electronic waste from decommissioned water borehole solar panels; health hazards due to bacterial contamination of water resources. These risks and impacts can be mitigated through the measures listed in this ESMF.

The substantial security issues, fragility, conflict and violence (FCV) and serious challenges regarding GBV, render the social risk to be *high*. Social risks are above all the result of the country FCV context in the project area. This include risks resulting from (i) weak grievance redress mechanism on targeting , (ii) social exclusion and elite capture; (iii) insufficient community engagement;(iv) intra-communal tensions over implementation issues, (iii) assets becoming targets of violent groups, (iv) and adverse results from construction and labor activities. Violence (political, criminal, ethnic, etc.)sexual harassment and Gender based violence(SH/SEA/GBV . Further, as the project will engage in psychical construction including dykes, involuntary land acquisition is another risk that need to be properly managed. However, the extent of these works and the footprint are unknown at this stage and hence, the extent of involuntary resettlement and construction-related social impacts (including those linked to worker influx, SEAH & GBV, community health and safety and labor management) cannot be accurately scoped. Potential tension between host and refugee communities which might lead to conflict due to the potential perception by host communities that refugees are receiving advantages that should go to the South Sudanese citizens will be another social risk.

A key risk of the project - given the history of civil war and ongoing conflict in South Sudan - is the unintended sustaining of armed conflict through aid and development funding. This is a real and substantial risk, since the project will engage with a variety of local communities that have experienced significant violence and displacement throughout the country and will provide subproject resources at the local level. This can have impacts on the dynamics between local factions, drive existing tensions and conflicts, where implemented in IDP locations foster the consolidation of mass displacement, and allow for elite capture of project resources. As typical in these types of projects, winners and losers are created at the local level. Especially given that the conflict in South Sudan is based on identity and ethnicity, this can further spark violence and promote conflict. Furthermore, tensions can arise between local, county and state-level governments, which have in some areas been part of the conflict, and opposition entities that do not recognize the legitimacy of the government and have established parallel structures. Project funds can also exacerbate tensions between refugees and host communities, as host community members experience the increased humanitarian aid and access to services provided to refugees.¹²⁸ Furthermore, in the light of current socio-political realities throughout South Sudan, there is a high risk of GBV and a lack of referral mechanisms or institutional preparedness to handle GBV cases.

Generally, the risk of suspicion between conflicted communities over project implementation is likely to be high. There is perceived non-neutrality in service delivery across areas held by the government or opposition forces; as well as limited oversight and ability by the government to provide services arriving at their intended destinations.¹²⁹ Tensions can also arise between project implementers and beneficiary communities, which may differ in their clan or ethnic identities and originate from different groups of the warring factions. Interventions can become subject to political economy/manipulations, rent-seeking activities. Furthermore, the security of staff and beneficiaries is a risk given previous experiences in South Sudan.

It is crucial to fully consider all adverse risks and potential impacts and allow the project to operate in an iterative and adaptive manner and based on in-depth local assessments and understanding of local conflicts and political economies. Project approaches will be designed based on such insights, including considerations of the project staff as actors in themselves. Project implementation will adopt conflict sensitive and 'do-no-harm' modalities rather than strictly following formal processes. This means that local procurement processes, human resource processes, 'local ownership' through close cooperation with local governments will be closely oriented on results of initial contextual assessments conducted at the state and county levels of areas to be engaged. The creation of 'local ownership' through exclusive engagement of government actors will be questioned and defined in a broader and more inclusive way. Procurement processes will allow for better coverage of contracts among the diversity of local implementers.

To this extend, a beneficiary targeting SOP is included in the Project Implementation Manual (PIM) (see Section 1.5. and Annex 3); Labor Influx Procedures describe transparency measures for the enrollment of workers (See PIM Section 4.5); as well as communication and inclusion of stakeholders in project implementation (see PIM Section 4.3.).

Furthermore, the project will prepare contextual analysis at the subproject level in order to gain detailed understanding of these types of risks in a particular environment. The contextual analysis will be prepared

¹²⁸ Community consultations undertaken for the preparation of ECRP-II, November 2020.

¹²⁹ World Bank, Beneficiary Targeting report South Sudan

during sub-project preparation, following the E&S screening process (see Section 7). The results of the contextual analysis will be included in the respective subproject specific E&S instrument, e.g. the ESMP and/or the RAP, and the specific mitigation measures aiming to prevent communal tensions and conflict will be implemented as part of the ESMP/RAP compliance.

In order to avoid the risks of conflict, key mitigation measures for the equitable distribution of assistance efforts will be implemented to ensure that all vulnerable populations are reached across different identities and across different areas of control. Assistance will need to cover all the key regions (and by definition the areas of origin of the main identity groups in South Sudan), including government and opposition areas, as well as refugees and their host community members. Equitable targeting at the local level will include all ethnic identities in program assistance at the location of the sub-projects. Furthermore, ongoing analysis of the local context will contribute to avoiding doing harm. This includes ensuring that project resources neither directly drive nor contributes to armed aggression, displacement, aid dependency or elite capture.¹³⁰ A solid grievance redress mechanism will allow for popular feedback and grievance redress and will also function as a conflict early warning system.

Furthermore, significant risks of GBV persists throughout the country and institutions and referral pathways to handle such are scarce in some areas

¹³⁰ World Bank, Beneficiary Targeting report South Sudan

4.4 Identification of Risks and Impacts

Table 5 Potential E&S Risks and Impacts

Component	Sub-Component/Activity	Potential Risks and Impacts	Risk Assessment
<p>Component 1</p> <p>Infrastructure and Services for Community Resilience</p>	<p>Subcomponent 1.1: Community Infrastructure and Services</p> <p>Construction or rehabilitation of public goods such as water supply and sanitation facilities, footpaths and community roads, dykes for flood protection, health and education facilities.</p> <p>Adoption of disaster and climate resilient approaches including risk assessments to identify safe location and elevated building structure to reduce inundation risk</p>	<p><i>Environmental Risks:</i></p> <p>Water resources activities:</p> <ul style="list-style-type: none"> • Quality of the ground water may be degraded with the intrusion of saline water due to over pumping. (ESS 3) • Irrigation water with high Total Dissolved Solids (TDS) may lead to salinization of the soils. Acceptable limit is 1,500 ppm. (ESS 3) • A shallow water table is commonly contaminated with coliforms, fecal coliforms, fluorides, and nitrate. These contaminants can cause moderate to high significance health impacts on the communities. (ESS 3 and ESS 4) • Water tanks without practicing frequent cleaning may lead to bacterial contamination of water. (ESS 4) • Open wells can be contaminated with coliforms, fecal coliforms, fluorides, and nitrate. These contaminants cause moderate to high significance health impacts on the communities. (ESS 4) • Most of the open wells are without parapet wall. This can cause safety risks for the users and cattle. (ESS 4) • Rainwater harvesting ponds have risk of contamination by human pathogens, animal manure, agricultural chemicals, algae growth, or they can serve as mosquitoes breeding areas. These contaminants and vectors cause moderate to high significance health impacts on the communities. (ESS 4) <p>Sanitation:</p> <ul style="list-style-type: none"> • Groundwater contamination due to proximity of latrines or unlined septic tanks. (ESS 3) 	

		<ul style="list-style-type: none"> • Depth of oxidation pond determines the type of treatment process happening in the pond.¹³¹ The lining of all types of ponds is essential to eliminate the possibilities of groundwater contamination due to seepage. (ESS 3 and ESS 4) • Latrines can spread the contact of pathogens and other pollutants to humans at the household level. (ESS 4) • In open drains the possibility of human-pollution contact remains high, these drains only serve the purpose of conveyance, and throughout conveyance human-pollution interaction remain active. This interaction causes serious negative impacts on community health. (ESS 4) • Latrine usage and maintenance can be at risk should communities fail to recognize the health benefits linked to such technology. (ESS 4) • Proliferation of vectors which increase the risk of epidemic outbreaks. (ESS 4) • Air pollution. (ESS 4) • Health hazards due to inadequate cleaning and maintenance of sanitary facilities (ESS 4) • Safety hazards due to collapsing pit latrines (ESS 4) <p>Construction:</p> <ul style="list-style-type: none"> • Contamination of groundwater through waste disposal (ESS 3) • Use of limited or sensitively located local construction material, such as aggregate and timber (ESS 3) • Generation and dumping of debris (excavated soils) (ESS 3) • Pollution of local surface water sources (ESS 3) • Loss of vegetative cover causing erosion of loose soil (ESS 3) • Encroachment into any sensitive habitat and/or protected areas. (ESS 6) • Blasting without proper arrangements and safeguards can lead to injuries and loss of life. (ESS 2) 	
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¹³¹ Normally facultative ponds are 3-4 ft deep, and treatment happens through anaerobic conditions at the bottom and aerobic conditions at the surface. Anaerobic ponds are 10 to 15 ft deep, and treatment happens through anaerobic conditions. Anaerobic ponds more or less function as septic tank.

		<ul style="list-style-type: none"> • Construction of roads can lead to serious land erosion and landslides. (ESS 3) • Noise and dust emissions from civil works (ESS 4) • Risks of traffic and road safety (ESS 4) • Occupational Health and Safety risks from handling equipment (ESS 2) • Community health and safety risks (ESS 4) • Overexploitation of resources (timber, water, sand, stones) (ESS 3) • Construction rubble, asbestos containing materials (ESS 3) <p>Health Care Facilities:</p> <ul style="list-style-type: none"> • Health facilities due to poor working practices are one of the important sources of spread of different diseases in the community. Most significant poor practices are: Improper sterilization of equipment, reuse of used needles & syringes and unsafe disposal of hazardous waste. (ESS 4) • Health hazards due to inappropriate storage of medical waste (ESS 4) . (ESS 4) • Health care waste water and air emissions (ESS 4) • Physical hazards; electrical and explosive hazards; chemical use, ergonomic hazards; radioactive hazards (ESS 2 and ESS 4) • Inadequate PPE for health care workers (ESS 2) • Poor sanitation conditions at health care facility leading to discomfort and poor aesthetic values (ESS 4) • Risk of infection among health professionals (ESS 2) • Risk of infection among handlers (ESS 2) • Risk of contaminating the surrounding environmental, the workers and the community (ESS 2 and ESS 4) <p>General:</p> <ul style="list-style-type: none"> • loss of precious ecological assets if they are inappropriately located they could cause secondary encroachment into forests/swamplands or historical/cultural buildings/areas, disrupt hydrology of natural waterways, regional flooding, and drainage hazards (ESS 6) • Soil and water contamination and degradation of water bodies caused by discharge of waste (ESS 3) 	
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		<ul style="list-style-type: none"> • Generation of a wide range of waste effluents (waste water from cleaning, oil spills, waste effluent discharges from the processing operations, animal waste, and others). (ESS 3 and 4) • Uncontrolled discharge of waste and other effluents can contaminate the soil, pollute the nearby water bodies and degrade their value for communities and the ecology. (ESS 3) • Discharges can potentially affect the soil fertility, pollute drinking water sources, contaminate irrigation water affecting the crops and degrade wetlands and thus negatively affect the ecology of the area including natural flora and fauna (ESS 3 and 6) • Generation of solid waste, including human and animal secreta, wastage from packing operations and other things. (ESS 3) • Vehicular traffic during facility construction and operation may potentially cause congestion on the local routes, generate noise, and pose safety hazards for the local population, particularly for children and elderly people (ESS 4) • Soil erosion, soil and water contamination, noise and air pollution, and safety hazards for the nearby population. These issues in turn can potentially affect the cultivation fields, soil fertility, and human health, and cause ecological degradation and public nuisance. (ESS 4) • Pollution of soil and water resources due to inappropriate collection and disposal of market refuse and waste (ESS 3) • Health hazard due to poor storage of market good providing breeding ground for disease carrying rodents and vectors (ESS 4) • Injuries form use of the facilities (ESS 4) • Health hazards due to inappropriate storage of general waste including electronic waste from decommissioned water borehole solar panels (ESS 4) 	
		<p><i>Social Risks:</i></p> <ul style="list-style-type: none"> • Occupational health and safety (OHS) risks for workers during construction. (ESS 2) • Blasting without proper arrangements and safeguards can lead to injuries and loss of life (ESS 2) 	

		<ul style="list-style-type: none"> ● Occupational Health and Safety risks from handling equipment (ESS 2) ● Inadequate PPE for health care workers (ESS 2) ● Community safety risks during construction in the vicinity of project works (ESS 4) ● Safety risks for workers and community (notably children) during construction, in the vicinity of project works (such as ponds) ● Risk of Child labor (ESS 2) ● Risk of Forced Labor (ESS 2) ● Risks of labor influx (ES 2) ● Discriminatory hiring practices (ESS 2) ● Conflicts over provision of employment or contracts - the selection of project partners, local project staff, contractors or other local implementers can lead to grievances, including through perceptions of being left out due to clan, ethnic, gender, or other affiliations. (ESS 2 and 4) ● Labor influx heightens risks of GBV/SEA. (ESS 4) ● Impacts on right to land use and assets through permanent land acquisition (small portions); ● Impacts on right to land use and assets through temporary land acquisition (small portions); ● Impacts on residential and commercial houses as well as auxiliary domestic structures such as waterholes, extra rooms, latrines etc...); ● Impacts on crops, economic and non-economic tress (in small quantities); ● Impacts on community assets, such as water points; ● Impacts on cultural properties, such as graves; public infrastructure (relocation of powerlines during infrastructure construction); and ● Loss of mobility and accessibility to individual land/asset (temporary). ● Risks associated with hiring security personnel (ESS 4) ● Chance Finds (ESS 8) 	
	Subcomponent 1.2.	<i>Environmental Risks:</i>	

	Flood Risk Mitigation Investments Levees, dykes, stormwater drainages	<ul style="list-style-type: none"> • infrastructure may traverse sensitive environmental receptors, such as swamps, bogs, thick vegetation, causing potential habitat fragmentation (ESS 6) • Risk of introduction of invasive species (ESS 6) • Environmental impacts due to unqualified O&M activities (e.g. leakages) (ESS 6 and ESS 4) • Risk of significant adverse impacts as a result of potential failure of the dam structure to local communities and assets (ESS 4) • During rescue of people from flooded areas: lack of safety during canoe rescue/travel • Disruption of hydrology of natural waterways, regional flooding, and drainage hazards (ESS 6) • Generation of solid waste (ESS 3) • Generation of dust and noise (ESS 4) • Pollution from construction wastes (ESS 3 and ESS 4) • Erosion and sedimentation of rivers from earth works and run-off during the construction phase (ESS 3 and ESS 6) • Increased levels of vibration from moving of construction vehicles and machinery (ESS 4) • Disturbance of flora and fauna (terrestrial and aquatic) during construction (ESS 6) • Large-scale destruction of properties, injuries and fatalities should flood risk mitigation measures break (ESS 4) • Pools of water pose drowning hazards for children (ESS 4) • Pools of water act as breeding grounds for disease and illness (mosquitoes) (ESS 4) • Trip hazards resulting from deep excavations at crossing points (ESS 4) • <p><i>Social Risks:</i></p> <ul style="list-style-type: none"> • The TOR for the respective TA initiatives shall ensure compliance with the ESF requirement in cases where the envisaged activities have direct or indirect relationship with the respective ESS standard (ESS 1) • Labor management standards may not be adhered to. (ESS 2) 	<div style="background-color: red; height: 600px; width: 100%;"></div> <div style="background-color: yellow; height: 140px; width: 100%;"></div>
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		<ul style="list-style-type: none"> ● Occupational health and safety (OHS) risks for workers at construction sites. (ESS 2) ● Occupational Health and Safety risks from handling equipment (ESS 2) ● Community safety risks during construction in the vicinity of project works (ESS 4) ● Conflicts over provision of employment or contracts - the selection of project partners, local project staff, contractors or other local implementers can lead to grievances, including through perceptions of being left out due to clan, ethnic, gender, or other affiliations. (ESS 2 and 4) ● Labor influx heightens risks of GBV/SEA. (ESS 4) ● Impacts on right to land use and assets through permanent land acquisition (small portions); ● Impacts on right to land use and assets through temporary land acquisition (small portions); ● Impacts on residential and commercial houses as well as auxiliary domestic structures such as waterholes, extra rooms, latrines etc...); ● Impacts on crops, economic and non-economic tress (in small quantities); ● Impacts on community assets, such as water points; ● Impacts on cultural properties, such as graves; public infrastructure (relocation of powerlines during infrastructure construction); and ● Loss of mobility and accessibility to individual land/asset (temporary). ● Encroachment into any sites of archeological, cultural, historical, or religious significance. (ESS 8) ● Risks associated with hiring security personnel (ESS 4) 	
	<p>Subcomponent 1.3. Operations and Maintenance (O&M)</p> <p>O&M strategies, establishment of O&M committees, training, planning mapping of suppliers...</p>	<p><i>Environmental Risks:</i></p> <ul style="list-style-type: none"> ● risks of medical waste management (ESS 3 and 4) ● Lack of plan development (ESS 3 and ESS 4) ● Lack of training on equipment use and maintenance leads to accidents (ESS 4) ● Lack of adequate budgets for O&M (ESS 3 and ESS 4) 	

		<ul style="list-style-type: none"> Lack of proper monitoring of O&M activities leads to environmental pollution and accidents (ESS 3 and ESs 4) Lack of knowledge on dealing with accidental releases, impacts and contamination leads to environmental pollution (ESS 3) 	
		<p><i>Social Risks:</i></p> <ul style="list-style-type: none"> The TOR for the respective TA initiatives shall ensure compliance with the ESF requirement in cases where the envisaged activities have direct or indirect relationship with the respective ESS standard (ESS 1) Disagreements in community-led initiatives lead to conflict (ESS 4) 	
Component 2 Institution Strengthening	Subcomponent 2.1. Community Institution Strengthening Community mobilization into BDCs/PDCs; Participatory conflict sensitive disaster risk mapping/analysis and disaster preparedness training; Support for community institutions on participatory development planning, infrastructure construction, rehabilitation, monitoring; Facilitation of constructive interaction between communities and the county government; Gender transformative training/GBV training for both men and women;	<p><i>Environmental Risks:</i></p> <ul style="list-style-type: none"> Lack of understanding of EHS risks and impacts and of mitigation measures leads to accidents and health impacts (ESS 2, ESS 3, ESS 4) Lack of knowledge on monitoring risks and impacts and mitigation measures leads to accidents and health impacts (ESS 2 and ESS 4) Lack of knowledge on how to handle unplanned events (contingency/emergency plans, etc.) leads to environmental and health impacts (ESS 3 and ESS 4) Lack of proper consideration of EHS impacts/risks in community planning, studies, etc. (ESS 4) 	
		<p><i>Social Risks:</i></p> <ul style="list-style-type: none"> The TOR for the respective TA initiatives shall ensure compliance with the ESF requirement in cases where the envisaged activities have direct or indirect relationship with the respective ESS standard (ESS 1) Lack of inclusion leads to grievances over subproject selection and benefits. There is a risk that some groups are not included in decision making fora and that they do not end up benefitting from the subprojects. This can lead to grievances over the decision-making fora, those in decision-making powers and the sub projects. (ESS1/ESS 7/ESS10) Destruction of sub project investments through renewed conflict. There is a risk that renewed conflict between local groups will lead to the destruction of project outcomes, for example infrastructure, housing or boreholes. (ESS1/ESS 7/ESS10) 	

	<p>Psychosocial training to address trauma</p>	<ul style="list-style-type: none"> ● Conflicts over the allocation of project resources. This is a risk at all levels, even at the community level beneficiary targeting creates winners and losers and can fuel grievances leading to violence. (ESS1/ESS 7/ESS10) ● Project staff could be seen, justified or not, as biased and partial leading to tensions and grievances over subproject implementation. This could spark grievances and tensions in the beneficiary community over perceived biases in the selection of subproject locations, beneficiaries or project partners. (ESS1/ESS 7/ESS10) ● Lack of safety of local staff, as they engage in highly volatile environments, including where they are perceived by local populations to have specific biases. (ESS2) ● Firming up local authority structures through cooperation with the project may lead to tensions or conflict where those structures are contested.¹³² (ESS1/ESS 7/ESS10) ● Manipulation of subprojects by political or military factions. There is a risk that subproject resources will be captured and certain groups will be excluded from benefitting, or resources will be used in the conflict. Interventions become subject to political economy/manipulations and rent-seeking risks, as with any other resource. (ESS1/ESS 7/ESS10) ● Subproject can be diverted at point of delivery. Given that monitoring in conflict situations can be difficult, there is a likelihood that project resources and subprojects get diverted at different stages of project implementation. (ESS1/ESS 7/ESS10) ● Misunderstanding of cultural issues leads to increased conflict. Given South Sudan's great variety of different socio-cultural systems, project staff may not fully comprehend local cultural settings and may foster conflict rather than reduce it through specific actions.¹³³ (ESS1/ESS 7/ESS10) 	
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¹³² Since the government forces have been an integral party to the conflict in some areas, close cooperation of the project with local governments, for example, may further entrench existing population divides. In many cases, parallel administrative structures have developed among IDPs or returnees, given that the local governments are not acceptable to them. Project modalities could run the risk of firming up those parallel structures, or could promote tensions when those structures are disregarded and government structures are the only interlocutor.

¹³³ For example, local traditional authority structures may vary widely and engagement with the 'inappropriate' traditional authorities (which do not have legitimacy) may lead to project implementation on sites that are

		<ul style="list-style-type: none"> • Cancellation of programming can reduce the trust of beneficiaries. As local level conflicts still flare up regularly, it is possible that subprojects need to be canceled after beneficiaries have been selected. In the past this has led to the development of mistrust among beneficiaries. (ESS1/ESS 7/ESS10) • Public or private security personnel engaged by the project/project contractors for safeguarding project personnel and property might use disproportionate or inappropriate force against project workers or member of affected communities (ESS1/ESS4/ESS10) • There are significant risks various aspects of forms of gender-based violence (GBV) occurring in relation to the project. These include increased risks of intimate partner violence through project employment opportunities for women which ignore gender dynamics and roles between men and women. (ESS2/ESS4) • Conflicts through local targeting. There is significant discrepancy between administrative boundaries, as outlined by national government authorities and those understood by county officials and local communities. This could potentially lead to conflicts. (ESS 4) • Risk of lack of participation. Transport issues, essential livelihood issues, or exclusivity in decision making can inhibit meaningful participation in project decisions. (ESS 4) • Instability through youth unrest can lead to delays in project activities (ESS 4) • Conflicts between refugees and host communities. Given that refugee communities often receive more attention from aid providers, conflicts can arise between refugees and host communities. (ESS 4) • Intentional disruption of project activities by local authorities 	
	Subcomponent 2.2 County Government Strengthening	Environmental Risks	

inappropriate, to a lack of legitimacy of the sub project, or to a lack of sustainability of sub projects as nobody feels obliged to maintain a piece of infrastructure. Distinct cultural features, for example, can be expected from pastoralist cultures that conduct a partially nomadic lifestyle and have different concepts of land tenure and land use to sedentary populations. Non-sedentary lifestyle can impact subprojects, especially where they are focused on service delivery or local infrastructure.

	<ul style="list-style-type: none"> - county government functionality assessments - provision of technical assistance for county government officials 	<ul style="list-style-type: none"> ● Lack of safety of local staff, as they engage in highly volatile environments, including where they are perceived by local populations to have specific biases. (ESS2) ● Lack of understanding of EHS risks and impacts and of mitigation measures leads to accidents and health impacts (ESS 2, ESS 3, ESS 4) ● Lack of knowledge on monitoring risks and impacts and mitigation measures leads to accidents and health impacts (ESS 2 and ESS 4) ● Lack of knowledge on how to handle unplanned events (contingency/emergency plans, etc.) leads to environmental and health impacts (ESS 3 and ESS 4) ● Lack of proper consideration of EHS impacts/risks in community planning, studies, etc. (ESS 4) <p><i>Social Risks:</i></p> <ul style="list-style-type: none"> ● Risk of conflict over provision of assistance (ESS 4) ● Risk of failing (ESS 4) 	
	<p>Subcomponent 2.3 National and State Government Strengthening</p> <ul style="list-style-type: none"> - capacity building of the PMU, MoF, LGB 	<p><i>Environmental Risks</i></p> <ul style="list-style-type: none"> ● Lack of knowledge on monitoring risks and impacts and mitigation measures leads to accidents and health impacts (ESS 2 and ESS 4) ● Lack of knowledge on how to handle unplanned events (contingency/emergency plans, etc.) leads to environmental and health impacts (ESS 3 and ESS 4) ● Lack of proper consideration of EHS impacts/risks in community planning, studies, etc. (ESS 4) 	
<p>Component 3</p> <p>Project Management and Learning</p>		<ul style="list-style-type: none"> ● Feasibility studies, technical design, policies, plans and strategies developed or conducted may have significant E&S impacts or risks ● Capacity Building support to institution that implement or oversee E&S standards and compliance may lack focus on E&S impacts and risks 	
<p>TA</p>	<p>whenever needs arise</p>	<ul style="list-style-type: none"> ● The MoFP and PMU will ensure that the ToR for respective TA initiatives provides for compliance with the ESF requirement should the envisaged activities have any direct or indirect relationship with the respective ESS standards 	

5. Project Mitigation Measures and Management of Risks and Impacts

In line with WB ESS 1, for the elaboration and implementation of the environmental and social mitigation measures, the project is adopting the following mitigation hierarchy approach:

1. Anticipate and avoid risks and impacts;
2. Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels;
3. Once risks and impacts have been minimized or reduced, mitigate;
4. Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible.

The below Environmental and Social Management Plan (ESMP) lists the prevention, minimization, mitigation and compensation activities for each activity's risks and impacts. It disaggregates them by ESS. The ESMP should serve as a reference on risks and impacts during construction and operational phases and in regards to the associated international industry best practices and mitigation measures that can be planned and implemented throughout the project life cycle.

In the context of ESS 7, the overwhelming majority of the ethnic and social groups in South Sudan meet the criteria of ESS 7 as 'Sub-Saharan African Historically Underserved Traditional Local Communities'. The only exclusions are recent immigrants from other countries. This means that the entire project is embedded in the principles of ESS7, rather than the targeting of a few selected groups. Key identified risks include social ills, SEA/SH, land conflicts, equity issues/targeting as well as elite capture, ethnicity of project staff, exclusion of pastoralists, intercommunal conflicts, violent attacks, and grievances of non-beneficiaries especially pertaining to exclusion of IDPs/returnees. Mitigation measures encompass, among others, awareness campaigns, transparent disclosure of project activities, analysis of risks throughout the project lifecycle, meaningful consultations and participatory approach towards project activities on the ground including site selection, Codes of Conduct, integration of women into committees, transparent procedures on benefit sharing, and ensuring availability of a functional GRM, please refer the SEP.

5.1 Environmental and Social Management Plan (ESMP)

Table 6 Project ESMP and Monitoring Table

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
ESS 1: Environmental and Social Assessment										
Lack of understanding of risks and impacts of sub-projects	Screen each subproject prior to implementation Prepare all relevant additional E&S instruments to mitigate risks and impacts		X		% of subprojects that have been screened # of additional E&S instruments prepared	X	X		Contractor / IOM	
The TOR for the respective TA initiatives shall ensure compliance with the ESF requirement in cases where the envisaged activities have direct or indirect relationship with the respective ESS standard (ESS 1)	Ensure that all TOR for TA are reviewed by the E&S Specialists on the team	X			% of TOR that have been reviewed by E&S Specialists	X			PMU / IOM	
ESS 2: Labor and Working Conditions										
Blasting without proper arrangements and safeguards can lead to injuries and loss of life	If there is disruption in local transportation activity, temporary safe alternate routes are provided to the commuters to avoid inconvenience		X		% of subprojects that screened	X	X		Contractor / IOM	

¹³⁴ The costs cannot be fully determined at this stage. They will be calculated for each activity in the activity-specific ESMPs.

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	<p>Provide and instruct the contractor about the schedule of on-site and alternate route water-sprinkling schedule</p> <p>No blasting should be done for road construction. Except in exceptional circumstances when a blasting management plan will be prepared and cleared by the PIU</p> <p>Inform the concerned communities about detailed activity plan including alternate routes during construction, secure community consent and implement all the safeguards agreed with the community Contractor to prepare C-ESMP</p>									
Occupational Health and Safety risks from handling equipment	<p>The facility workers will be appropriately trained on OHS risks, hazards and safe working procedures, based on EHS Guidelines on OHS¹³⁵</p> <p>Provide appropriate PPE, continuous reminders to use PPE, use of signage and continuous</p>		X		<p># of safety incidents</p> <p># of GRM grievances filed</p> <p># and type, and timeliness in response in relation to worker</p>		X		Contractor / IOM	

¹³⁵ IFC, Environmental, Health and Safety Guidelines, accessed at: https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	<p>supervision, based on EHS Guidelines on OHS</p> <p>Communicate and implement GRM/workers' GRM</p> <p>Develop and implement C-ESMP including OHS</p> <p>Implement LMP / especially in regards to OHS</p> <p>Include OHS requirements into bids and contracts</p> <p>Report and assess significant OHS accidents</p> <p>Contractor bid and contract to include various OHS requirements</p> <p>Report significant OHS incidents</p>				grievances received through GRM established to handle project worker grievances					
Inadequate PPE for health care workers	<p>The facility workers will be appropriately trained on OHS risks, hazards and safe working procedures, based on EHS Guidelines on OHS¹³⁶</p> <p>Provide appropriate PPE, continuous reminders to use PPE, use of signage and continuous</p>			X	<p># of safety incidents</p> <p># of GRM grievances filed</p> <p># and type, and timeliness in response in relation to worker</p>		X		Relevant Authority	

¹³⁶ IFC, Environmental, Health and Safety Guidelines, accessed at: https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	supervision, based on EHS Guidelines on OHS Communicate and implement GRM/workers' GRM				grievances received through GRM established to handle project worker grievances					
Risk of infection among health professionals	The facility workers will be appropriately trained on OHS risks, hazards and safe working procedures, based on EHS Guidelines on OHS ¹³⁷ Provide appropriate PPE, continuous reminders to use PPE, use of signage and continuous supervision, based on EHS Guidelines on OHS Communicate and implement GRM/workers' GRM			x	# of infection incidents # of GRM grievances filed # and type, and timeliness in response in relation to worker grievances received through GRM established to handle project worker grievances			x	Relevant Authority	
Risk of infection among handlers	Provide appropriate PPE, continuous reminders to use PPE, use of signage and continuous supervision, based on EHS Guidelines on OHS Communicate and implement GRM/workers' GRM			X	# of infection incidents # of GRM grievances filed # and type, and timeliness in response in relation to worker		X		Relevant Authorities	

¹³⁷ IFC, Environmental, Health and Safety Guidelines, accessed at: https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
					grievances received through GRM established to handle project worker grievances					
Occupational health and safety (OHS) risks for workers	The facility workers will be appropriately trained on OHS risks, hazards and safe working procedures, based on EHS Guidelines on OHS ¹³⁸ Provide appropriate PPE, continuous reminders to use PPE, use of signage and continuous supervision, based on EHS Guidelines on OHS Communicate and implement GRM/workers' GRM Implement LMP Reference OHS requirements in bidding documents and contracts Contractor to develop C-ESMP that contains OHS measures		X		# of safety incidents # of GRM grievances filed # and type, and timeliness in response in relation to worker grievances received through GRM established to handle project worker grievances		X		Contractor / IOM	
Risk of Child labor Risk of Forced Labor	Comply with the labor management procedures of the project namely :		x		# of worker's violations (child, forced labor)			x	Contractor / IOM	

¹³⁸ IFC, Environmental, Health and Safety Guidelines, accessed at: https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	<ul style="list-style-type: none"> Set a minimum age for all types of work (in compliance with national laws and ESS2) and document age of workers upon hiring Conduct a track record search of the contractors at the bidding process (record of health and safety violations, fines, consult public documents related to workers' rights violations etc.) <p>Raise awareness of communities/suppliers to not engage in child labor</p>				<p># of existence/maintenance of a labor registry of all contracted workers with age verification</p> <p># of awareness campaigns</p>					
Risks of labor influx	<p>Set up local workforce minimum content for the contractors</p> <p>Disclose to communities local workforce content requirement</p> <p>Investigate possibility of providing training to local communities on general jobs during the planning phase</p> <p>Maximize the use of local suppliers (for food, water, services etc.)</p>		x		<p>% of local workforce hired</p> <p>N#umber of sensitization/awareness events within communities</p> <p># of local suppliers used</p>		x		Contractor / IOM	
Discriminatory hiring practices	<p>Ensure Project GRM are accessible</p> <p>Provide workers' GRM</p>		x		# of GRM grievances filed		x		Contractor / IOM	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
					# of workers' grievances filed					
Conflicts over provision of employment or contracts - the selection of project partners, local project staff, contractors or other local implementers can lead to grievances, including through perceptions of being left out due to clan, ethnic, gender, or other affiliations	<p>Conduct in-depth contextual analysis / conflict mapping before entering new counties, including detailed understanding of the previous and current conflict modalities and resulting different groupings and interests</p> <p>Ensure that the selection of local staff, contractors and other service providers or local implementers is highly inclusive and covers a broad array of different clans, ethnic groups, pastoralist, agriculturalists and IDPs. Develop a map demonstrating inclusiveness as per state/county, including specific measures to ensure non-discrimination in recruitment and employment, in particular in relation to women and persons with disabilities</p> <p>Ensure that job advertisements and calls for proposals are widely disseminated, including in minority languages, and selection processes are made as public as possible</p>		x		# of workers that signed CoC		x		Contractor / IOM	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	Implement GRM and workers' GRM									
Labor influx heightens risks of GBV/SEA	Implementation of LMP (including CoC) Implementation of GBV Action Plan		x		% of workers that signed CoCs GBV Action Plan implemented		x		Contractor / IOM	
Lack of understanding of EHS risks and impacts and of mitigation measures leads to accidents and health impacts	Ensure training on EHS to all workers		x		# Number of trainings provided to workers			x	Contractor / IOM	
Lack of knowledge on monitoring risks and impacts and mitigation measures leads to accidents and health impacts	Ensure contractor deploys qualified EHS staff		x		CV of contractor's EHS staff			x	Contractor / IOM	
Lack of safety of local staff, as they engage in highly volatile environments, including where they are perceived by local populations to have specific biases	Implement Project SMP		x		Project SMP implemented			x	Contractor / IOM	
ESS 3: Resource Efficiency and Pollution Prevention and Management										
A shallow water table is commonly contaminated with coliforms, fecal coliforms, fluorides, and nitrate. These contaminants can cause moderate to high significance health impacts on the communities Irrigation water with high Total Dissolved Solids (TDS) may lead to salinization of the soils. Acceptable limit is 1,500 ppm	To avoid conflict and overuse of resources check that no major water source that can meet the population demands for safe drinking water supply is functioning within 100 meters diameter in the irrigated areas, and 250 meters diameter in arid areas of the proposed location of a new hand pump		x	x	% of subprojects that have been screened			X	Contractor / IOM / Relevant Authority	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
<p>Quality of the ground water may be degraded with the intrusion of saline water due to over pumping</p> <p>Groundwater contamination due to proximity of latrines or unlined septic tanks</p> <p>Pollution of local surface water sources</p>	<p>Make sure the proposed hand pump (BH) is located at least 60 meters away from the latrines and solid/liquid waste dumps</p> <p>Make sure the design and construction of the BH meet the minimum standards to ensure the water quality (gravel pack, casing etc)</p> <p>If a safe distance is not maintained, conduct water testing at the borehole stage and confirm that the water is not contaminated by coliform, fecal coliform, nitrate or fluoride.</p> <p>Make sure the hand pump is located at least 10 meters away from cultural and environmentally sensitive sites</p> <p>Make sure there's no conflict over the source/land</p> <p>Make sure the new proposed water tank is located at least 100 meters away from all the sources of surface contamination such as latrines and solid waste dumps</p> <p>For water tanks, conduct testing of intake water to the tank and confirm that the water is not contaminated by coliform, fecal</p>									

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	<p>coliform, nitrate, or fluoride</p> <p>Water tanks must be adequately covered and manholes provided for cleaning and maintenance</p> <p>Inform the community about the frequency of cleaning the tank; most tanks are cleaned every three months</p> <p>All open wells must have a parapet wall. Preferably cover the well with an appropriate roofing structure to avoid contaminants in the well and to minimize instances of people/animals falling into the well</p> <p>The method of drawing water from open wells should not be labor intensive</p> <p>Physical features should be added to the design of the open pond to ensure that surface contaminants do not mix with the pond water</p> <p>Make sure the proposed rain water harvesting pond is located 100 meters away from the latrines and solid waste dumps and agricultural fields;</p> <p>Prepare pond management plan and train the community accordingly</p>									

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	<p>Ensure water agitation in ponds to avoid mosquitoes breeding e.g., rowing, boating etc</p> <p>“Safe yield” information of existing tube wells located within 500 meters of any new tube well should be collected to establish that enough subsurface water is available. In case existing tube wells are not running at the level of safe yield then for the proposed tube well feasibility needs to be carried out. Safe yield shall be determined for all new wells constructed and daily abstraction limits determined and set to prevent over abstraction</p> <p>Daily water table logs shall be kept to monitor abstraction volumes</p> <p>Tube wells are installed at suitable sites so that it is protected from possible sources of contamination. Minimum safe distances from possible source of contamination i.e. 100 meters from garbage dumps/refuse piles, car repair or fuel (petrol) sales outlets industrial operations/storage facilities etc.</p>									

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	50 meters from a seepage pit or cesspool, 30 meters from pit toilets, animal pens, barns, fields fertilized with dung, 15 meters from septic tanks, surface water bodies and 7 meters from drains, ditches and houses. Ensure the solar panels are properly decommissioned and valuable components recycled and the rest of the waste safely disposed;									
Depth of oxidation pond determines the type of treatment process happening in the pond. ¹³⁹ The lining of all types of ponds is essential to eliminate the possibilities of groundwater contamination due to seepage	For oxidation ponds or septic tanks, linings should be at least 6 inches of puddle clay, if not concrete or brick lining		X		# of tanks with correct lining applied		X		Contractor / IOM	
Contamination of groundwater through waste disposal	Untreated waste effluents from the construction sites will not be released into drinking water sources, cultivation fields, irrigation channels or critical habitats. GRM in place		X		# of GRM cases field		X		Contractor / IOM	

¹³⁹ Normally facultative ponds are 3-4 ft deep, and treatment happens through anaerobic conditions at the bottom and aerobic conditions at the surface. Anaerobic ponds are 10 to 15 ft deep, and treatment happens through anaerobic conditions. Anaerobic ponds more or less function as septic tank.

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
Generation and dumping of debris (excavated soils)	Prepare waste management plan Contractor to prepare C-ESMP		X		# of waste management plans available # of C-ESMPs available		X		Contractor / IOM	
Use of limited or sensitively located local construction material, such as aggregate and timber Overexploitation of resources (timber, water, sand, stones)	Avoid or minimize clearing of vegetation during preparation for rehabilitation and construction works in the targeted areas, to reduce chances of soil erosion Proceed to revegetation when possible with native trees and vegetation after vegetation removal		X		# of trees planted		X		Contractor / IOM	
Loss of vegetative cover causing erosion of loose soil	Avoid or minimize clearing of vegetation during preparation for rehabilitation and construction works in the targeted areas, to reduce chances of soil erosion Proceed to revegetation when possible with native trees and vegetation after vegetation removal Careful design siting of the sub-project site to avoid soil erosion Rehabilitation of borrow pits sites after extraction				# of ha of vegetation cleared % of vegetation rehabilitated # of rehabilitation of borrow pits					

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	Install anti-erosion dykes if needed									
Construction of roads can lead to serious land erosion and landslides	If there is the risk of soil erosion it should be mitigated by up and down stream slope stabilization, thick vegetation, and by using lightweight rollers or other manual means of compaction		x		Slope stabilization applied		x		Contractor / IOM	
Construction rubble, asbestos containing materials	Develop an asbestos management plan, including the identification of its presence, its condition, procedures for monitoring its condition Avoid damage and prevent exposure Repair and removal only to be performed by specially trained personnel following international recognized procedures (see IFC EHS Guidelines, Asbestos Containing Material)		x		# of sAsbestos management plan developed		x		Contractor / IOM	
Soil and water contamination and degradation of water bodies caused by discharge of waste	The design of the facility and appropriate construction planning will ensure that construction activities do not cause any soil erosion or degradation. Spoils and excess soil if generated will be disposed of appropriately. Borrow areas will be dressed to minimize safety		x		Appropriate designs prepared		x		Contractor / IOM	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	hazards and soil erosion									
Generation of a wide range of waste effluents (waste water from cleaning, oil spills, waste effluent discharges from the processing operations, animal waste, and others	<p>The subprojects will be designed employing technologies that are least polluting and technically feasible</p> <p>Settling/retaining tanks will be constructed at the site as appropriate to minimize contaminants leaving the subproject facilities</p> <p>Recycling of waste effluents will be carried out as far as possible and practical</p> <p>It will be ensured that the wastes are not released into any drinking water source, cultivation fields or critical habitat</p> <p>Waste effluents will be not be released into irrigation channels – based on EHS Guidelines on Wastewater and Ambient Water Quality</p> <p>All wastewater discharges are to meet applicable country laws/regulations and WB EHSGs (General and sector specific</p>		x		<p># of Logs for vehicle maintenance</p> <p># incidents of waste effluents release into water</p>		x		Contractor / IOM	
Uncontrolled discharge of waste and other effluents can contaminate the soil, pollute the nearby water bodies and degrade their value for communities and the ecology	<p>The subprojects will be designed employing technologies that are least polluting</p> <p>Settling/retaining tanks will be</p>		x		# of discharges reported		x		Contractor / IOM	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
Discharges can potentially affect the soil fertility, pollute drinking water sources, contaminate irrigation water affecting the crops and degrade wetlands and thus negatively affect the ecology of the area including natural flora and fauna	constructed at the site as appropriate to minimize contaminants leaving the subproject facilities Recycling of waste effluents will be carried out as far as possible and practical It will be ensured that the wastes are not released into any drinking water source, cultivation fields or critical habitat Waste effluents will be not be released into irrigation channels – based on EHS Guidelines on Wastewater and Ambient Water Quality				Appropriate tanks constructed Recycling of waste carried out					
Generation of solid waste, including human and animal secreta, wastage from packing operations and other things	Use of non-biodegradable substances (e.g. for packaging) will be minimized. Recycling of solid waste will be carried out as far as possible and practical. Composting of biodegradable waste will be considered and adopted if practicable. Disposal of solid waste will be carried out in a manner that does not negatively affect the drinking water sources, cultivation fields, irrigation channels, natural		x		% of subprojects with design and completion of daily monitoring report on all construction activity % of relevant subprojects with Waste Management Plan available % of subprojects with C-ESMP available		x		Contractor / IOM	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	drainage paths, wetlands and critical habitat, the existing waste management system in the area, local routes or the general aesthetic value of the area Solid waste management will be based on EHS Guidelines on Waste Management Prepare waste management plan Contractor to prepare C-ESMP									
Pollution of soil and water resources due to inappropriate collection and disposal of market refuse and waste	Prepare waste management plan for market refuse			x	% of subprojects with Waste management plan prepared			x	Community / relevant authorities	
Erosion and sedimentation of rivers from earth works and run-off during the construction phase	Avoid or minimize clearing of vegetation during preparation for rehabilitation and construction works in the targeted areas, to reduce chances of soil erosion Proceed to revegetation when possible with native trees and vegetation after vegetation removal Careful design siting of the sub-project site to avoid soil erosion Install anti-erosion dykes if needed		x		N#umber of ha of vegetation cleared % of vegetation rehabilitated			x	Contractor / IOM	
Lack of plan development	Provide training in planning, contingency and emergency			x	# of trainings provided			x	IOM / Relevant authorities	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
Lack of knowledge on how to handle unplanned events (contingency/emergency plans, etc.) leads to environmental and health impacts	planning to communities and local authorities									
Feasibility studies, technical design, policies, plans and strategies developed or conducted may have significant E&S impacts or risks (lack of quality of ESMPs, RAPs)	Monitoring of field research for ES Assessments Review of ESMPs Review of C-ESMPs	x			% of field research for assessments that have been monitored % of ESMPs and C-ESMPs that have been reviewed			x	IOM	
ESS 4: Community Health and Safety										
Water tanks without practicing frequent cleaning may lead to bacterial contamination of water.	Make sure the new proposed water tank is located at least 100 meters away from all the sources of surface contamination such as latrines and solid waste dumps For water tanks, conduct testing of intake water to the tank and confirm that the water is not contaminated by coliform, fecal coliform, nitrate, or fluoride Water tanks must be adequately covered and manholes provided for cleaning and maintenance Inform the community about the frequency of cleaning the tank; most tanks are cleaned every		X	X	Water tank is located in right distance Water tank is cleaned regularly			x	Contractor / IOM / Relevant Authority	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	three months									
Open wells can be contaminated with coliforms, fecal coliforms, fluorides, and nitrate. These contaminants cause moderate to high significance health impacts on the communities Most of the open wells are without parapet wall. This can cause safety risks for the users and cattle	All open wells must have a parapet wall. Preferably cover the well with an appropriate roofing structure to avoid contaminants in the well and to minimize instances of people/animals falling into the well The method of drawing water from open wells should not be labor intensive		X		Wells have a parapet wall			X	Contractor / IOM	
Rainwater harvesting ponds have risk of contamination by human pathogens, animal manure, agricultural chemicals, algae growth, or they can serve as mosquitoes breeding areas. These contaminants and vectors cause moderate to high significance health impacts on the communities	Physical features should be added to the design of the open pond to ensure that surface contaminants do not mix with the pond water Make sure the proposed rain water harvesting pond is located 100 meters away from the latrines and solid waste dumps and agricultural fields; Prepare pond management plan and train the community accordingly Ensure water agitation in ponds to avoid mosquitoes breeding e.g., rowing, boating etc		X		Physical features are added Pond is located 100 meters from latrines and solid waste dumps		X		Contractor / IOM	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
<p>Latrines can spread the contact of pathogens and other pollutants to humans at the household level</p> <p>Latrines - Proliferation of vectors which increase the risk of epidemic outbreaks</p>	<p>Conventional or flush latrines should be linked with P-traps</p> <p>The health improvement impact of effective latrines is only realized if the community is also trained on better hygienic and sanitation practices e.g. washing hands with soap after defecation, no open defecation in and outside house, and daily or twice a day cleaning of latrines</p>		X		<p>% of latrines linked with P-traps</p> <p># of Community members that have been trained</p>		X		Contractor / IOM	
<p>In open drains the possibility of human-pollution contact remains high, these drains only serve the purpose of conveyance, and throughout conveyance human-pollution interaction remain active. This interaction causes serious negative impacts on community health</p>	<p>Whenever drains are improved or lined they must be converted into covered drains. During the construction of drains, an alternative drainage system is provided to reduce the inconvenience to the community and reduce the possibility of human-pollution interaction</p>		X		Drains are covered		X		Contractor / IOM	
Dust Emission (Air quality)	<p>Suppress dust during construction by water spraying and dampening where necessary</p> <p>Practice good general housekeeping at the work site; sweep off the drilled-out materials</p> <p>Provide fit to work PPEs (dust masks) for all workers involved</p>		X		<p># of complaints on dust emissions</p> <p>Percentage of use of dust masks by workers</p> <p># of trucks covered with a tarpaulin</p>		X		Contractor / IOM	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	in the construction/rehabilitation Implement speed limit for the heavy machinery Cover trucks carrying soil, sand and stone with tarpaulin sheets to dust spreading									
Health hazards due to inadequate cleaning and maintenance of sanitary facilities	Provide cleaning staff with adequate cleaning equipment, materials and disinfectant. Provide adequate facilities to disinfect the cleaning equipment and dispose of the used consumables in a safe manner; Review general cleaning systems, training cleaning staff on appropriate cleaning procedures and appropriate frequency in high use or high-risk areas. Train cleaners in proper hygiene (including handwashing) prior to, during and after conducting cleaning activities; how to safely use PPE (where required); in waste control (including for used PPE and cleaning materials)				Adequate cleaning equipment provided % of subprojects in which review of cleaning system has taken place					
Safety hazards due to collapsing pit latrines	Use of round pits Introduction of pit linings Reduction of pit dimensions		x		Round pits applied in design Pit linings introduced		x		Contractor / IOM	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
					Pit dimensions reduced					
Noise emissions from civil works	Community consultations will be carried out before commencing the construction activities, informing the nearby population regarding the construction activities and possible impacts such as noise and additional vehicular traffic.		x		# of consultations implemented		x		Contractor / IOM	
Vehicular traffic during facility construction and operation may potentially cause congestion on the local routes, generate noise, and pose safety hazards for the local population, particularly for children and elderly people	Depending upon the traffic volume and the condition/nature of local routes, a traffic management plan may need to be prepared, based on EHS Guidelines on Traffic Safety Community consultations will be carried out before the facility establishment Community liaison will be maintained Safety signage will be erected at appropriate places Safe driving practices will be promoted among the drivers GRM will be put in place		x		#. of traffic safety incidents		x		Contractor / IOM	
Health facilities due to poor working practices are one of the important sources of spread of different diseases in the	Complete set of sterilization equipment should be provided to the BHU/dispensary. The			x	Sterilization equipment was provided			x	Relevant authority	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
<p>community. Most significant poor practices are: Improper sterilization of equipment, reuse of used needles & syringes and unsafe disposal of hazardous waste.</p> <p>Health hazards due to inappropriate storage of medical waste</p> <p>Health care waste water and air emissions</p>	<p>management of BHU/dispensary should be trained on the scientific method of sterilization</p> <p>Used needle and syringe crushing equipment should be provided and it is essential that management should be instructed to practice the crushing of used needles and syringes</p> <p>Hazardous waste generated by health facilities should be safely disposed of by providing a disposal pit located within the facility. A lined and covered pit is constructed with a capacity to accommodate six months to one-year of hazardous waste. The pit should be designed so that it is sealed and only a small hole with a cap is available for disposing and compacting the hazardous waste. Once the pit is full to its capacity it must be completely sealed and a new pit constructed within the premises</p> <p>For each three health subprojects an incinerator shall be provided at one of the project sites</p>				Crushing of needles and syringes is practiced					

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	<p>Provision of latrines is essential for construction of new health facilities. Conventional or flush latrines with P-traps should be constructed. This will substantially reduce the possibility of the spread and contact of pathogens and other pollutants. Latrines should be linked with the septic tanks to avoid dispersal of pollutants in the community. It is recommended that lined septic tanks should be constructed for latrines</p> <p>The location should be accessible to all, especially women</p> <p>Ensure the training of the participants on the operation and maintenance of the sanitation facilities</p> <p>Ensure the design and construction of placenta pit and incinerator. The design and construction should meet the minimum standards related medical waste management</p>									
Physical hazards; electrical and explosive hazards; chemical use, ergonomic hazards; radioactive hazards	Ensure a local risk assessment (identification of risks at work) is conducted for each process step		x		# of risk assessments prepared			x	Contractor / IOM	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	specific hazards and for each identified risk, appropriate risk control measures must be defined. Provide safety training in the management of hazards identified									
Poor sanitation conditions at health care facility leading to discomfort and poor aesthetic values	Train relevant hospital staff in cleaning system Ensure regular cleaning takes place			x	Sign-in sheet for cleaning		x		Relevant Authority	
Health hazard due to poor storage of market good providing breeding ground for disease carrying rodents and vectors	Apply appropriate storage system that keeps rodents away, including closing and sealing of all entry points, train staff in handling pest infestations, execute sanitation checks			x	Appropriate storage system applied		x		Community, shop owners, relevant authorities	
Health hazards due to inappropriate storage of general waste including electronic waste from decommissioned water borehole solar panels	Aim to recycle solar panel waste Segregate from non-hazardous waste Involve licensed contractor in the handling and treating of the panels			x	Solar panel waste recycled			x	Relevant authorities	
Labor influx heightens risks of GBV/SEA	Implementation of LMP (including CoC) Implementation of GBV Action Plan		x		% of workers that signed CoCs GBV Action Plan implemented			x	Contractor / IOM	
Risks associated with hiring security personnel	Implement the SMP		x		SMP implemented		x		PMU / IOM	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	<p>Adopt and enforce standards, protocols and codes of conduct for the selection and use of military and security personnel, and screen such personnel to verify that they have not engaged in past unlawful or abusive behavior, including sexual exploitation and abuse (SEA), sexual harassment (SH) or excessive use of force;</p> <p>Ensure that such personnel is adequately instructed and trained, prior to deployment and on a regular basis, on the use of force and appropriate conduct (including in relation to civilian-military engagement, SEA and SH, and other relevant areas), as set out in the Project Implementation Manual, Security Management Plan and LMP.</p>									
Security risks for project workers	Implement SMP		x		SMP implemented			X	Contractor / IOM	
Risk of significant adverse impacts as a result of potential failure of the dam structure to local communities and assets	Implement E&S assessment to confirm that there will be no or negligible risk		x		# of E&S assessments available			x	Contractor / IOM	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
Large-scale destruction of properties, injuries and fatalities should flood risk mitigation measures break	Dam safety designed and implemented by qualified engineers				CV of engineer that designs dam safety measures					
During rescue of people from flooded areas: lack of safety during canoe rescue/travel	Passengers to wear life jackets at all times Carry emergency kits			x	# of Life jackets are available in canoes Emergency kits are available in canoes			x	Relevant Authority	
Increased levels of vibration from moving of construction vehicles and machinery	Select equipment with lower sound power levels Install suitable mufflers on engine exhausts and compressor components in cases where the service provider uses generators Provide fit to work PPEs (ear plug/earmuffs) for all workers involved in the areas with elevated noise levels Coordinate with the office users/staff as to determining timing and more importantly what specific noise controls and mitigations may be needed at the site Install acoustic enclosures and/or use vegetation as sound buffer for equipment casing radiating noise i.e. generator				# of complaints by the project workers and					

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	The contractor should use equipment that is/are in good working condition and are periodically maintained									
Pools of water pose drowning hazards for children	Fence off relevant area Apply signage		x		Area fenced off Signage installed			x	Contractor / IOM	
Pools of water act as breeding grounds for disease and illness (mosquitoes)	Prepare pond management plan and train the community accordingly Ensure water agitation in ponds to avoid mosquitoes breeding e.g., rowing, boating etc				# of pond management plans prepared					
Trip hazards resulting from deep excavations at crossing points	Control site-specific factors which may contribute to excavation slope instability Provide safe means of access and egress from excavations		x		Excavation slope instability controlled			x	Contractor / IOM	
Lack of training on equipment use and maintenance leads to accidents	Provide sufficient training to workers		x		# of Trainings provided			x	Contractor / IOM	
Lack of adequate budgets for O&M	Train communities in cost-effective O&M measures			x				x	Relevant authorities	
Lack of proper monitoring of O&M activities leads to environmental pollution and accidents	Ensure set-up of community structures to monitor O&M			x	# of community structures set-up			x	Relevant authorities	
Lack of knowledge on dealing with accidental releases, impacts and contamination leads to environmental pollution	Training to local communities			x	# of trainings provided			x	Relevant authorities	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
Disagreements in community-led initiatives lead to conflict	Conduct contextual analysis and conflict mapping prior to activity		x		# of context analysis conducted			x	IOM	
Lack of proper consideration of EHS impacts/risks in community planning studies, etc	Ensure community trainings in EHS issues prior to community planning exercises		x	x	Number of training conducted			x	IOM	
Lack of inclusion leads to grievances over subproject selection and benefits. There is a risk that some groups are not included in decision making fora and that they do not end up benefitting from the subprojects. This can lead to grievances over the decision-making fora, those in decision-making powers and the sub projects	Transparency and communication of beneficiary selection criteria (SEP) Conduct Political Economy Analysis (PEA) as part of contextual analysis prior to entering new project locations to understand and avoid possible elite capture Communicate and implement GRM		x	x	# of context analysis developed per country prior to implementation Communication as per SEP implemented # of Subprojects that have had an implementation plan developed prior to implementation # of GRM cases filed			x	Contractor / IOM	
There are significant risks various aspects of forms of gender-based violence (GBV) occurring in relation to the project. These include increased risks of intimate partner violence through project employment opportunities for women which ignore gender dynamics and roles between men and women	Implementation of GBV Action Plan and LMP CoC		x	x	GBV Action Plan implemented		x		Contractor / IOM	
Conflicts through local targeting. There is significant discrepancy between	Conduct in-depth contextual analysis / conflict mapping		x	x	# of Context analysis developed per country		x		IOM	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
<p>administrative boundaries, as outlined by national government authorities and those understood by county officials and local communities. This could potentially lead to conflicts</p> <p>Instability through youth unrest can lead to delays in project activities</p> <p>Conflicts between refugees and host communities. Given that refugee communities often receive more attention from aid providers, conflicts can arise between refugees and host communities</p> <p>Intentional disruption of project activities by local authorities</p>	<p>before entering new counties, including detailed understanding of the previous and current conflict modalities and resulting different groupings and interests</p>				prior implementation to					
<p>Lack of proper consideration of EHS impacts/risks in community planning, studies, etc.</p>	<p>Ensure institutional strengthening component contains EHS risks and impacts in capacity building program</p>		x	x	# of training programs with EHS included i			x	IOM	
<p>Community risks in related to Infrastructure and Equipment Design and Safety</p>	<p>Inclusion of buffer strips or other methods of physical separation around project site to protect community</p> <p>Engineers responsible for designing constructing facilities, buildings should certify the applicability and appropriateness</p>		x		Buffer strip included at construction site			x	Contractor / IOM	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	of the structural criteria employees									
Community safety risks in the vicinity of project works	Set up appropriate signage Fence construction site where applicable		X		# of signs available at construction site # of fences available at site		X		Contractor	
ESS 5: Involuntary Resettlement										
Impacts on right to land use and assets through permanent or temporary land acquisition	Avoid impacts through identification of alternatives Prepare and implement RAP, based on RPF or obtain Voluntary Land Donation (VLD Ensure access to GRM Implement SEF	X	X		# of RAP prepared and implemented # of VLDs # of Consultations undertaken # of GRM cases filed		X			
Impacts on residential and commercial houses as well as auxiliary domestic structures such as waterholes, extra rooms, latrines etc...	Avoid impacts through identification of alternatives Prepare and implement RAP, based on RPF or obtain VLD (see RPF) Ensure access to GRM o Implement SEF		X		# of Analysis conducted # of Consultations undertaken # of GRM cases filed		X		IOM	
Impacts on crops, economic and non-economic tress (in small quantities)	Avoid impacts through identification of alternatives		X		RAP prepared and implemented		X		IOM	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
Impacts on community assets, such as water points	Prepare and implement RAP, based on RPF or obtain VLD (see RPF) Ensure access to GRM ○ Implement SEF				# of Consultations undertaken # of GRM cases filed					
Impact on cultural properties, such as graves; public infrastructure (relocation of powerlines during infrastructure construction)	Avoid impacts through identification of alternatives Prepare and implement RAP, based on RPF or obtain VLD (see RPF) Ensure access to GRM ○ Implement SEF		X		RAP prepared and implemented # of Consultations undertaken # of GRM cases filed		X		IOM	
Loss of mobility and accessibility to individual land/asset (temporary).	Avoid impacts through identification of alternatives Prepare and implement RAP, based on RPF or obtain VLD (see RPF) Ensure access to GRM Implement SEF				RAP prepared and implemented # of Consultations undertaken # of GRM cases filed					
ESS 6: Biodiversity Conservation and Sustainable Management of Living Resources										
Encroachment into any sensitive habitat and/or protected areas	It will be ensured that the local routes are not blocked by such schemes It will be ensured that natural drainage paths are not blocked by the establishment of subprojects If trees are to be cut for any subprojects, the implementing		X		# of Community consultations completed Survey of any plants to be cut down have been completed at design		X		Contractor / IOM	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	agency will carry out compensatory plantation of appropriate indigenous tree species. Trees thus planted will be at least four times the number of trees felled for establishing the subproject				stage and completion stage					
loss of precious ecological assets if they are inappropriately located they could cause secondary encroachment into forests/swamplands or historical/cultural buildings/areas, disrupt hydrology of natural waterways, regional flooding, and drainage hazards Disruption of hydrology of natural waterways, regional flooding, and drainage hazards	The use of firewood for fuel on any construction camps or areas will be banned The hunting of and consumption of game meat on construction sites shall be banned The cutting of flora for project purposes should be avoided where possible No removal of flora or wildlife in protected or sensitive areas shall be allowed For any plant removal or tree felling, four replacement plants should be replanted	X	X		Design and completion of daily monitoring report on all construction activity Design and completion of daily monitoring report on all construction activity		X		Contractor / IOM	
infrastructure may traverse sensitive environmental receptors, such as swamps, bogs, thick vegetation, causing potential habitat fragmentation	General avoidance of sensitive environmental receptors Keep increase in pollution level as small as possible		x		tbd		x		Contractor / IOM	
Risk of introduction of invasive species	Prevent introduction of invasive species, verify that plants		x	x	# of communities trained in the detection of invasive species		x		IOM	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	brought in are not invasive, don't release any animals Detect invasive species early by training the community Respond rapidly to the invasion of invasive species and contain them									
Environmental impacts due to unqualified O&M activities (e.g. leakages)	Train community members in O&M Set up cost-efficient O&M system at community level		x	x	# of community members trained in O&M system		x		IOM / relevant authority	
Disturbance of flora and fauna (terrestrial and aquatic) during construction	Careful siting of the sub-project area to avoid any impacts on natural or critical habitats and wildlife Maintain the same route corridor for the machinery/trucks Enforce speed limit/safe driving for the truckers to avoid any wildlife collisions Install warning signs on the road where wildlife had been observed Minimize the size of waste collection area Develop a restoration plan if needed		x		# of awareness campaigns conducted			x	Contractor / IOM	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	Awareness and sensitization campaign among workers on illegal hunting									
SS 7: Indigenous Peoples and Historically Underserved Communities										
Destruction of sub project investments through renewed conflict. There is a risk that renewed conflict between local groups will lead to the destruction of project outcomes, for example infrastructure, housing or boreholes	<p>Conduct in-depth contextual analysis before entering new communities with project investments, including a detailed analysis of different interest groups (Including women, IDPs living in host communities, persons with disabilities, and members of minority ethnic and clan groups) as per community / county</p> <p>Communication as per SEP implemented and FPIC as required.</p> <p>Develop a detailed subproject implementation plan based on the context analysis for each community / county, including how different interest groups will safely be included in decision making fora</p> <p>Implement GRM</p> <p>Conflict monitoring</p>		x		<p># of Context analysis developed per county prior to implementation</p> <p># of Community consultations implemented prior to implementation – as per SEP</p>	X		x	IOM	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
Conflicts over the allocation of project resources. This is a risk at all levels, even at the community level beneficiary targeting creates winners and losers and can fuel grievances leading to violence	Conduct in-depth contextual analysis / conflict mapping before entering new counties, including detailed understanding of the previous and current conflict modalities and resulting different groupings and interests Conflict monitoring		x		# of Contextual analysis conducted			x	IOM	
Project staff could be seen, justified or not, as biased and partial leading to tensions and grievances over subproject implementation. This could spark grievances and tensions in the beneficiary community over perceived biases in the selection of subproject locations, beneficiaries or project partners	Implement GRM at community level		x		# of GRM cases filed			x	IOM	
Firming up local authority structures through cooperation with the project may lead to tensions or conflict where those structures are contested Manipulation of subprojects by political or military factions. There is a risk that subproject resources will be captured and certain groups will be excluded from benefitting, or resources will be used in the conflict. Interventions become subject to political economy/manipulations and rent-seeking risks, as with any other resource	Conduct in-depth contextual analysis / conflict mapping before entering new counties, including detailed understanding of the previous and current conflict modalities and resulting different groupings and interests		x		# of Context analysis conducted			x	IOM	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
Subproject can be diverted at point of delivery. Given that monitoring in conflict situations can be difficult, there is a likelihood that project resources and										
Misunderstanding of cultural issues leads to increased conflict. Given South Sudan's great variety of different socio-cultural systems, project staff may not fully comprehend local cultural settings and may foster conflict rather than reduce it through specific actions	Conduct contextual analysis in each county, including the key socio-cultural features of the local ethno-linguistic groups Ensure that Project Implementation Manual allows project teams sufficient flexibility to adjust project implementation to locally important features		x		# of Context analysis developed per country prior to implementation PIM provides flexibility			x	IOM	
Cancellation of programming can reduce the trust of beneficiaries. As local level conflicts still flare up regularly, it is possible that subprojects need to be canceled after beneficiaries have been selected. In the past this has led to the development of mistrust among beneficiaries	Implement Stakeholder Engagement Plan (SEP)		x		SEP implemented			x	IOM	
Lack of benefit sharing between communities	Implement Stakeholder Engagement Plan (SEP) Follow respective Standard Operating Procedures (SOP) in the PIM	X	X		SEP implemented Relevant SOPs in the POM implemented			X	IOM	
Lack of consultation of specific social groups and lack of their free, prior and informed consent (FPIC)	Implement Stakeholder Engagement Plan (SEP)	X	X		FPIC obtained where applicable			X	IOM	

ESS 8: Cultural Heritage

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
Chance Finds	Implement chance find procedures		X		# of Chance find procedures implemented		X		Contractor / IOM	
Encroachment into any sites of archeological, cultural, historical, or religious significance	Use of historical/scientific data and inclusive stakeholder engagement to ensure that subprojects will not be located in graveyards or on land of spiritual or other cultural significance The 'chance find' procedures will be included in the scheme agreements for use where applicable		x		# of Chance find procedures implemented		x		Contractor / IOM	
SS 10: Stakeholder Engagement and Information Disclosure										
Risk of lack of participation. Transport issues, essential livelihood issues, or exclusivity in decision making can inhibit meaningful participation in project decisions	Implement SEF		x		SEF implemented			x	IOM	
Exclusion of vulnerable groups in project activities and consultations	Implement SEF Identify minority, marginalized and disadvantaged communities in each of the participating districts. Establish and maintain continuous liaison with the communities including		x		# of Marginalized communities assessed Local languages used in communication			x	Contractor / IOM	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ¹³⁴ (USD)
		Planning	Construction	Operation		Continuous	Monthly	Quarterly		
	<p>marginalised groups to sensitize them on the project objectives and design.</p> <p>Use innovative communication means to reach the communities with information on the project.</p> <p>Establish GRM structures in the communities and sensitize the communities on the project GRM.</p> <p>Apply local languages in communication</p>									

6. Institutional and Implementation Arrangements

Management Structure: While the ECRP-I has been implemented by UNOPS as a Project Manager, and IOM as a sub-implementer, the ECRP-II will be based on different institutional arrangements. It will be led by a PMU, which will be established within the Ministry of Finance and Planning (MoFP) with representation of LGB civil servants. The ECRP-II will adopt an implementation arrangement where the Government PMU contracts a specialized UN agency, the International Organization for Migration (IOM), through an output agreement as technical lead partner to implement the project activities given their capacity constraints. IOM will be the key implementer of the project activities, and with that will also be responsible for compliance with all of the project's E&S instruments. The project will build in necessary measures to establish/restore the Government's project implementation capacity. The proposed project will also build in various capacity-building measures for county governments that have the legal mandate to provide local services under Component 2. The PMU will engage IOM to implement activities for Component 1 and 2 to leverage the experiences gained under ECRP-I, ensure continuity in the implementation approach, and maximize the investments made to set-up field offices. The PMU and IOM will be contracting construction companies directly. The MoFP is the 'borrower' and staffs and runs the Project Management Unit (PMU). The PMU will be based in Juba.

The project will be implemented by MoFP in collaboration with the LGB on behalf of the Republic of South Sudan in line with the renewed focus on institution building with a gradual shift away from third-party implementation arrangements to government-led implementation. However, due to the scope and complexity of the project and inherent capacity gaps in government that could impact its implementation, MoFP and LGB have agreed to engage IOM, which already has experience implementing the ECRP-I and existing geographical footprint in the 10 target counties, to implement the high-risk decentralized components, mainly component 1 and 2. The Legal Agreement will be signed between the World Bank and the MoFP, while an output agreement will be signed between the MoFP and IOM and the PMU set up within the MoFP will oversee IOM's activities. Since the institutions have not commenced yet, the PMU is not formed yet, it is difficult to conduct an institutional assessment at this point. However, the planning process for the project that taken into account all the relevant staff required for the PMU and IOM, to have sufficient capacity to implement the E&S requirements.

An inter-ministerial National Steering Committee (NSC) will be established at the national level to provide oversight and policy guidance to the project. The MoFP will serve as the chair. The committee will comprise undersecretaries from key government agencies such as the MoFP; LGB; Ministry of Gender, Child, and Social Welfare (MoGCSW); and Relief and Rehabilitation Commission (RRC) under the Ministry of Humanitarian Affairs and Disaster Management (MHADM) and Ministry of Federal Affairs (MoFA). As the project progresses, relevant line ministries such as the Ministries of Water, Health, and Education will be invited to participate in the NSC meetings. The Country Manager of the World Bank and the Country Director of the Implementing Partner will participate in the NSC meetings. The NSC will meet biannually to discuss key policy issues with the World Bank and the Implementing Partner.

A National Technical Working Group (NTWG), which is an inter-ministerial technical working group, will also be established at the national level to discuss technical implementation-related issues of the project. The NTWG will be represented by Directors General from the same ministries as the NSC, chaired by the MoFP. The NTWG will meet on a quarterly basis, or more often, as needed with the participation

of the task teams of the World Bank and the Implementing Partner. Just as with the NSC, the team will also examine whether the NTWG can be structured to serve other World Bank projects.

Staffing: The PMU has the overall responsibility for the management of the ECRP-II. It will be responsible for all technical planning, financial management, procurement, social and environmental risk management, and communications vis-à-vis the World Bank. It will cascade down responsibilities in these areas to IOM and contractors and sub-contractors, and will maintain overall monitoring and supervisory responsibility in regards to these activities. For security arrangements, the PMU will be responsible for the monitoring of security and safety measures by all implementers.

The PMU will establish and maintain a functional environmental and social risk management organizational structure throughout the project. This includes responsibility for the implementation of this ESMF. For that purpose, the PMU will deploy a Senior Social Specialist and an Environmental Specialist with environment and construction OHS experience. Both will be embedded in the Risk Management Unit of the PMU. The two specialists will work together and report directly to the Project Manager and will participate in management team meetings. They will jointly oversee the monitoring of the ESMF. Both operate under the responsibility of the PMU Project Manager. Their main task is to offer E&S advisory to the PMU, oversee the implementation and monitoring of the ESMF and the associated ESMPs, Resettlement Action Plans or similar instruments, SEF, etc... and the implementation of the GRM project-wide. They will be shared with the Public Financial Management Project at the central level and focal points at the local level.

The PMU's Risk Management Unit will further be responsible for the regular monitoring and supervision of the implementation of all risk mitigation measures. The PMU is responsible for the guidance on and clearance of correctional activities required, on the basis of monitoring activities. The Risk Management Team will report such to the PMU Project Manager and will, in an appropriate timely manner, send a request for correction to IOM. Requests for corrections will then be added by the PMU staff to the monitoring schedule. It is expected that the Risk Management Team will regularly, at least every second month, visit project sites on a sample-base. The PMU will review IOM's E&S performance on a quarterly basis.

At the same time, IOM will deploy one Community Development Specialist and one Environmental Safeguards Specialist with expertise in OHS, one Social Safeguards Specialist for the implementation of E&S measures, including the preparation of further E&S instruments, such as ESMPs, RAPs, etc... It will mobilize additional staff as needed to ensure the sound environmental and m=social management o fthe project, in particular relating to construction OHS risks, operation phase EHS risks, community-based needs and ESMF institutional capacity. Additional capacities may include subject matter specialists in GBV/SEA, labor conditions, social inclusion and land and resettlement. The E&S Specialists will also assume basic monitoring and training activities for contractors. The Environmental Safeguards Specialist will be responsible for the preparation of E&S screening reports, which will be submitted to the PMU. The Social Safeguards Specialist, will be responsible for the preparation of the contextual analysis and for the implementation of the GRM (see Section 10) and stakeholder engagement (see Section 9). Both, the Environmental and Social Safeguards Specialists will be responsible for IOM monitoring and reporting tasks (see Section 8 on Monitoring and Reporting), as well as for capacity building (see Section 11). Lessons from ECRP-I have shown that the E&S capacities are generally low. IOM will deploy sufficient staff capacity in order to fill these gaps.

The PMU Risk Management team will receive all screening assessments of site-specific activities and ESMPs, review them for compliance against this ESMF prior to the commencement of all activities (see next section for screening process). It will then monitor the implementation of the ESMPs by IOM and the contractors. It will also liaise with the World Bank to obtain the necessary approvals of E&S instruments.

IOM will be responsible for direct implementation of the sub-components, including all screening activities, development and implementation of ESMPs, ensuring compliance with the approved ESMPs and the ESMF. The PMU will provide overall advisory, quality assurance, supervision and monitoring.

IOM will monitor all environmental and social issues in their activities on a daily basis and according to the below monitoring plan. It will report all ESMF-related activities and monitoring results to the PMU on a monthly basis, as well as in an overall report on a quarterly basis.

The PMU will further ensure that sufficient training is provided to all implementers on the environmental and social standards and risk mitigation measures.

Third Party Monitoring Agent (TPMA): The PMU will hire a third-party monitoring agent (TPMA) within 180 days from the Effectiveness Date. The TPMA shall among other responsibilities, monitor Environmental Social Health and Safety (ESHS) compliance in all project components, including compliance with this ESCP. Terms of reference for TPM with clear roles and deliverables for their engagement shall be prepared by the PMU and cleared by the WB.. It is expected that the TPMA will also require E&S capacity in order to verify the implementation of risk mitigation measures. This will be captured in the TOR and contract for the TPMA.

Contractors and their workers as well as community workers will be implementing E&S mitigation measures as laid out in the ESMF and subsequent ESMPs. Mitigation measures required will be included and costed in agreements with the contractors. The contractors will be obliged to ensure that staff with EHS experience and capacity is involved in construction works and can fulfill the reporting requirements on E&S (see Annex 4 for Management of Contractors).

In the long term, in the operational phase, communities will need to ensure E&S measures are taken to avoid adverse impacts of sub-projects. The focus of the project on O&M will largely prepare communities and train individuals, and set up the necessary communal mechanisms to perform the respective tasks.

7. Environmental and Social Screening Process

7.1 Screening Process

The PMU will provide oversight of all E&S screening processes. IOM will be responsible for the screening of all its respective activities. The screening will be based on a site- or project-specific Social and Environmental Screening Form (see Annex 1).

All proposed subprojects will be subjected to a screening process by the Environmental Specialist and the Social Specialist assigned to IOM to determine and assign them an environmental and social risk rating and further identify any potentially sensitive environmental and social receptors likely to be negatively impacted. The outcome of the screening will determine whether a) the activity is high or substantial risk and will be screened out (high for flood risk reduction initiatives; and high and substantial for CDD-type activities – covering all project activities) (see below for a negative activity list), b) site-specific ESMPs or other E&S instruments (e.g. RAPs) are required, c) or whether a full ESIA is required. The types of ESMPs to be prepared will depend on the complexity of the subproject, it can either be a simplified ESMP, a detailed ESMP done internally, or an ESMP that is prepared by a consultant. Internally prepared ESMPs will be prepared by IOM.

The screening report will further help to determine which ESF standards are applicable and which steps need to be taken and which provisions or procedures apply, as laid out in the ESMF. The process will also identify critical issues that might be triggered by the respective subproject and would require the updating of the ESMP and C-ESMPs to adapt to the risk and impact.

E&S Screening for CDD-type interventions: The screening process will screen/assess if the CDD subprojects are well sited, sized and designed (environmentally, socially and safety wise). The screening helps identify whether and which types of proportionate E&S assessments and tools should be prepared to ensure the mitigation of risks and impacts (ESIAs, ESMP, RAP). The identified subprojects that return a “Substantial” or “high” environmental and/or social risk including those that result in physical displacement or those that are sited within or proximal to sensitive environmental ecosystems or habitat among other are screened out.

E&S Screening for Flood Risk Mitigation interventions: In view of the flood risk mitigation activities, the screening assesses if the proposed flood risk reduction activities are of the right size and design; well sited outside sensitive environmental habitant and have minimal land displacement impacts. The screening helps to assess whether the operation and maintenance regime of such flood risk reduction activities are reviewed by experienced and qualified engineers and whether they adopt and implement GIIP of dam safety measures. Flood risk mitigation subprojects that have a “high” environmental and/or social risk will be screened out.

Exclusion/Screened Out: Exclude the following types of activities as ineligible for financing under the Project for both categories of investments:

(a) Exclusions under the CDD type of projects:

Subprojects that contain significant to high environmental and social risk impacts. These types of subprojects would require a full ESIA. They would also require an ARAP or a RAP depending on the number of Project Affected Persons (PAPs) and resettlement impact anticipated. The project will avoid such subprojects and include them in the exclusion list during screening. Examples include: Dams; power

stations; industrial installations (refineries, chemical installations); long distance roads, rail, transmission lines (water, power); waste treatment and disposal installations; large water and wastewater treatment plants; river basin or land development; large-scale irrigation ; projects in critical habitat and protected areas; projects involving significant quantities of hazardous substances; activities leading to involuntary resettlement, land acquisition and restrictions to land use; Industrial installations (refineries, chemical installations) among others. List to be updated during screening

(b) Exclusions under the flood risk reduction activities:

Screening to ensure the proposed flood risk reduction activities are of the right size and design; well sited outside sensitive environmental habitat and have minimal land displacement impacts. The process shall ensure the operation and maintenance regime of such flood risk reduction activities are reviewed by experienced and qualified engineers and adopt and implement GIIP of dam safety measure. Subprojects that have a “high” environmental and/or social risk will be screened out including large-scale flood risk reduction investments. No water management infrastructure such as dams or water diversion channels including flood risk reduction investments that may constitute a dam will be supported.

The process will involve: (i) reconnaissance of the subproject areas/routes and their surroundings (ii) identification of the major subproject activities and (iii) preliminary assessment of the impacts of these activities on the ecological, physicochemical and socio-economic environment of the subproject surrounding areas. The screening form may need to be reviewed and updated as needed during the process to accommodate other variables.

In the event that IOM needs to implement full or partial site- or activity-specific ESIA and/or prepare site-specific ESMPs, the costs are budgeted for in the budgets of the respective activity. The results of the assessments could change the assumptions made in this ESMF and thus also the justifications for some of the interventions as having moderate impact.

7.2 E&S Documentation

The main responsibility for the preparation of subproject-specific E&S instruments will rest with IOM. Following the E&S screening process, where relevant, IOM will prepare the respective E&S instruments either through its Environmental and Social Safeguards staff or through specialist consultants. ESMPs will be based on the outline presented in Annex 1; Resettlement Action Plans (RAP) will be based on the RAP outline presented in the Project Resettlement Policy Framework (RPF). Following E&S screening, where applicable, IOM will prepare the contextual analysis (see Annex 8) in addition to the other E&S instruments. The contextual analysis will be prepared by IOM’s Social Safeguards Specialist.

The World Bank disclosure standards require that the ESMF report for the project is made available to project affected groups, local NGOs, and the public at large. A summary version will be translated into the main local languages, as per the stakeholder engagement plan (see Section 9). Public disclosure of ESMP document is also a requirement of EMA’s environmental procedures. The PMU will make available copies of the ESMF and ESIA/ESMPs at strategic locations and offices of the ministries, according to the SEP. A Grievance Redress Mechanism (GRM – see Section 10) will be in place for complaints on non-compliance with the disseminated documentation. Disclosures will also be undertaken on IOM and WB websites.

Free, prior and informed consent will be required of historically underserved traditional local communities in circumstances in which the project will have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation; cause relocation of the respective

communities from land and natural resources subject to traditional ownership or under customary use or occupation; or have significant impacts on the respective communities that is material to the identity and cultural, ceremonial or spiritual aspects of the affected communities. Stakeholder consultation shall also be conducted as part of preparation of all the relevant E&S risk instruments in accordance to Section 9 Stakeholder Engagement requirements, please refer the SEP for the details.

The subproject ESMPs¹⁴⁰ will summarize the context, interested parties, compliance requirements, checks for compliance, risks and opportunities, activity-specific environmental and social objectives and specific targets, training plans, inspections, peer reviews and other monitoring actions and incidents. They will inform the actions expected from IOM and the monitoring of their performance through the PMU.

ESMPs will be prepared in line with page 26 of the WB ESF (“Indicative outline of ESMP”) and the ESCP requirements. RAPs are expected to follow the procedures and content laid out in the RPF. Stakeholder consultation shall be conducted as part of the Environmental and Social Screening and preparation of ES risk instruments (ESIAs, ESMPs, RAPs, ...)

The ESMPs or ESIAs shall be included in the procurement and contracting process including bidding documents, for potential civil works, as well as other WB standard EHS terms and conditions for procurement and any subproject-specific requirements. Codes of conduct shall be required for contractors, subcontractors, primary suppliers, and their workers.. Potential Contractors will prepare, adopt, maintain, and implement a Health and Safety Plan including community health and safety risk management as part of the C-ESMP.

7.3 Review and Approval

IOM will report the E&S screening outcomes to the E&S Specialists in the PMU for review, quality control, monitoring and reporting purposes. Subproject ESIAs and/or ESMPs, contextual analysis and other instruments will be reviewed and cleared by the PMU prior to submission to the Bank for clearance. Subproject ESIAs, ESMPs and RAPs will warrant clearance by the World Bank. The PMU will further file and disclose the instruments.

Once the instruments are cleared, IOM will roll out their implementation through its sub-contractors. IOM will ensure that contractors are bound to implement all mitigation measures set out in the instruments. The PMU will conduct monitoring and supervision of the implementation of E&S instruments through review of documentation and through site visits. IOM will further report against the mitigation measures and indicators set out in the E&S instruments on a quarterly basis, and the PMU will absorb IOM’s reports and integrate them into its quarterly progress reports to the World Bank (see Section on Monitoring and Reporting).

7.4 Subproject Risk Levels

¹⁴⁰ Environmental and Social Management Plan (ESMP) is an instrument that details (a) the measures to be taken during the implementation and operation of a project to eliminate or offset adverse environmental and social impacts or to reduce them to acceptable levels; and (b) the actions needed to implement these measures: (ESS1)

Following the screening process, the PMU and IOM will assign all the proposed sub-projects into one of the following environmental risk levels (High, Substantial, Moderate, Low), aligned with the ESF risk classification. In terms of social risks, mitigation measures will also be implemented in accordance to the stakeholder engagement activities along the SEF, GBV/SEA Action Plan, and SMP.

Table 7 sub-project risk levels

Environmental and Social Risk Category	Nature of Risk and Impact	Examples
Low	Sub-projects that do not have a physical footprint. These subprojects will not require the preparation of E&S instruments; environmental and social clauses, ESHS terms and conditions in the contract will be recommended.	Footpaths; Purchase of furniture for existing PHCC or PHCU; Purchase of furniture or equipment for existing primary Schools, Haffirs for cattle and human consumption, communication and translations, small training and workshops, management of funds and grants, management of social protection activities
Moderate	Sub-projects that have low to medium environmental and social risks and impacts, including ones that are site-specific, temporal and reversible in nature. In addition to the environmental and social clauses and ESHS terms and conditions in the contract, most if not all of these subprojects will require the preparation of either a simplified ESMP or a detailed ESMP.	Construction or repair of non-motorized hand-pumps and boreholes (boreholes will be improvements or change to an existing water scheme); Tanks; Dug wells; Provision or repair of VIP latrines for public use; Construction of flood protection infrastructure; repair of flood protection infrastructure; repair of small-scale community irrigation schemes; repair of small-scale irrigation schemes; rehabilitation of local roads; repair of local roads; culverts; bridges; repair or extension of existing PHCC or PHCU; repair or extension of existing primary schools; general buildings with local materials; markets; livestock dips; activities discriminating against certain social groups; activities causing tension at the community level.
Substantial	Subprojects that may entail some significant risks and impacts, mostly temporary, predictable and/or reversible, possibility of avoiding or reversing, medium in magnitude and/or in spatial extent (medium to large area and population), less severe, more readily avoided/mitigated cumulative and/or transboundary impacts, medium to low probability of serious adverse effects to human health and/or the environment (with known and reliable mechanisms to prevent or minimize), lower effects on areas of high value or sensitivity , more readily available and reliable mitigatory and/or	Flood Risk Reduction activities that include technical assessments, including feasibility studies, detailed engineering designs and physical infrastructure for flood risk reduction and prevention. Physical investments such as levees, dykes, stormwater drainage, nature-based solutions and integrating green infrastructure solutions in riverine flood management in defined areas. The final list of physical investments in flood risk reduction will be defined based on detailed studies in the prioritized locations. Large-scale investments in flood risk reduction and water management infrastructure (such as dams or water diversion channels) will not be financed under ECRP-II; subprojects that lead to

	compensatory measures. These subprojects require an E&S assessment that includes either an ESIA, ESMP, and/or RAP.	discrimination against certain groups; subprojects that foster tensions at the community level or even have the potential to spark violence.
High	Sub-projects that contain significant to high environmental and social risk impacts. These subprojects would require a full ESIA and a detailed ESMP. They also require a RAP depending on the level of risk for Project Affected Persons (PAPs) and the resettlement impact anticipated.	Dams; power stations; industrial installations (refineries, chemical installations); long distance roads, rail, transmission lines (water, power); waste treatment and disposal installations; large water and wastewater treatment plants; river basin or land development; large-scale irrigation ; projects in critical habitat and protected areas; projects involving significant quantities of hazardous substances; activities leading to involuntary resettlement, land acquisition and restrictions to land use; Industrial installations (refineries, chemical installations); subprojects that have the potential to lead to significant discrimination or tensions or violence at the community level.

7.5 Exclusions

There are restrictions to financing flood risk reduction and CDD types of activities categorized as “High”, and in the case of CDD also ‘Substantial’ . These will be filtered out during the screening process. Example of these include but are not limited to:

CDD Type subprojects:

- Subprojects that contain significant to high E&S risks and impacts
- Subprojects that require a full ESIA
- Dams
- Power stations
- Industrial installations (refineries, chemical installations)
- Long distance roads
- Rail
- Transmission lines (water, power)
- Waste treatment and disposal installations
- Large water and wastewater treatment plants
- River basic or land development
- Large-scale irrigation
- Subprojects in critical habitats and protected areas
- Subprojects involving significant quantities of hazardous substances
- Activities leading to involuntary resettlement
- Land acquisition and restrictions to land use

Flood risk reduction activities:

- Subprojects with the wrong size and design
- Subprojects with non-well-sited outside sensitive environmental habitat
- Subprojects with significant land displacement impact

- Subprojects not reviewed by experienced and qualified engineers
- Subprojects with high E&S risks and impacts, including large-scale flood risk reduction investments.
- Water management infrastructure (dams, water diversion channel including flood risk reduction investments)

8. Monitoring and Reporting

8.1 Regular Monitoring and Inspection for Compliance

Adequate institutional arrangements, systems and resources will be put in place to monitor the ESMF. The goal of monitoring will be to measure the success rate of the activities, determine whether interventions have handled negative impacts and to determine whether further interventions are required or monitoring is to be extended in some areas. The goal of inspection activities is to ensure that sub-component activities comply with the plans and procedures laid out in the ESMF.

The main monitoring responsibilities and inspection activities will sit with the PMU, which will administer the overall project-related E&S monitoring and implementation as laid out in this ESMF. The PMU Project Manager will be overall responsible for the implementation of the E&S mitigation measures, as well as for monitoring and inspecting for compliance. The Social Specialist and Environmental Specialist in the PMU will handle all reporting aspects.

The ESMF is the overall document that guides the development of site-specific ESMPs. While the ESMF, laying out expectation from the PMU and IOM, IOM will be responsible for its own site/activity specific screening, impact assessments, development of site/activity-specific ESMPs, monitoring of impacts, and administration of mitigation measures in regards to its respective sub-component activities. These activities may follow the internal processes of IOM, where applicable. It further commit to integrate stakeholder inputs into regular monitoring and reporting activities. As such, IOM will require sufficient personnel with appropriate expertise to conduct these tasks. (see above). IOM will allocate adequate financial, logistic and material resources to support the E&S teams in the implementation of the ESMF.

IOM is committed to report all screening results (see ANNEX 1), the results of impact assessments, site/activity-specific ESMPs to the PMU Risk Mitigation Team.

The PMU Social Specialist and Environmental Specialist will assess the compliance of IOM's activities against the ESMF, the RPF, the SEP, the SMP, ESCP and subsequent ESMPs, RAPs or other instruments, and will report any non-compliance to the PMU Project Manager. Indicators are identified in the monitoring table below, and used as a baseline for assessing progress on the ESMF implementation. The PMU will also independently conduct its own monitoring, verification and inspection of the activities to ensure activities are in compliance with this ESMF. Monitoring indicators will depend on specific activity contexts.

An Independent Verification Agent (IVA) will be engaged by the PMU as a Third Party Monitor on a competitive basis to provide independent operational review of project implementation and project results. This will include assessing adherence at all implementation levels to the procedures set out in the Project Operations Manual, ESMF and other relevant project documents and in verifying outputs of all project activities. It will serve as a management tool to provide the PMU with timely third-party information on weaknesses in implementation that require corrective actions to keep the project on track. The scope and methodology of the IVA will be reviewed with the World Bank and quarterly or bi-annual monitoring reports will be shared by the PMU. As the IVA will also monitor E&S risk mitigation implementation, the contractor needs to include an E&S Specialist on the team. The PMU Environmental and Social Specialists will submit the E&S performance reports to the WB at least on quarterly bases, as part of the general Project Progress Report.

Furthermore, contractors will be obliged to provide EHS monitoring reports to IOM on a monthly basis. The results presented in the reports will be summarized in the Quarterly Progress Report from IOM to the PMU, and from the PMU to the World Bank.

The World Bank will equally supervise and assess the environmental and social performance through the review of the quarterly monitoring reports and through regular¹⁴¹ site visits. Reporting requirements and outlines are listed in Annex 7.

The GRM will further help track complaints and effectiveness of interventions, including those with environmental and social impacts and the quarterly monitoring reports will provide summaries and statistics on the GRM.

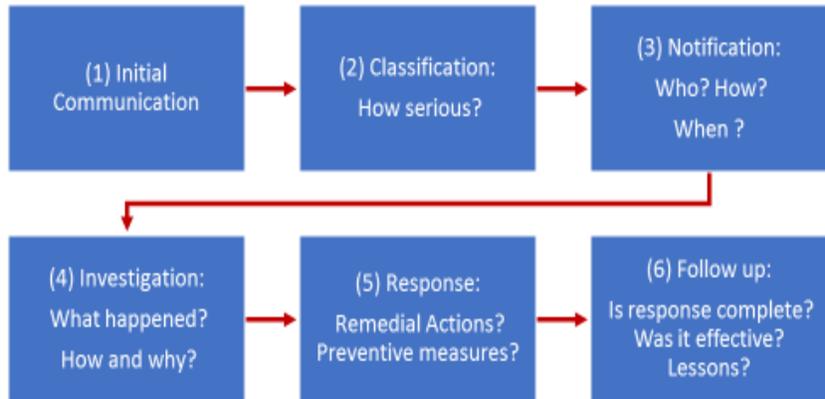
Upon completion of the project, the PMU will undertake an assessment of the success of the ESMF and include relevant information in the Implementation Completion Report (ICR). This ICR will be followed by the Bank's own ICR. If either of these assessments reveals that any key objectives of the ESMF were not achieved then follow-up measures will be developed to remedy the situation. This is also applicable for site-specific ESMPs or RAPs.

8.2 Incident and Accident Reporting

For all severe environmental, social, safety and security incidences (an incident that has *significant adverse effect on the environment, the affected communities, the public or workers*, e.g. fatality, GBV/SEA, forced or child labor, criminal or political physical violence), PMU staff will provide a report within 48 hours to the World Bank, followed by a detailed investigation report outlining a root cause analysis of the incident and related corrective actions to be undertaken. IOM will provide reports on severe incidents to the PMU within 36 hours, after learning of the incident or accident. Incident reports will be captured in the *Incident Report Form*. Any material incident will be reported to the World Bank. A detailed report of the incident shall be provided within 15 days of notifying the World Bank of the incident or accident, unless a different timeline is agreed on with the World Bank.

IOM will report severe incidents to the PMU within 48 hours. In order to save time, IOM will copy the World Bank into the message with the report. The below steps and procedures for incident management and reporting will be employed for all types of incidents.

¹⁴¹ Frequency will be determined by the need but expected to be more frequent at early stages of project implementation



9. Stakeholder Engagement

9.1 Stakeholder Engagement ECRP-II

Stakeholder engagements for the ECRP-II were undertaken in November 2021, as described above in the approaches and methodology section.

From November 8-20th, 2021, the World Bank met with representatives from the Ministry of Finance and Planning (MoFP), Local Government Board (LGB), Ministry of Gender, Child and Social Welfare (MGCSW), Ministry of Humanitarian Affairs and Disaster Management (MHADM), Relief and Rehabilitation Commission (RRC), development partners and NGOs engaged in local service delivery, community engagement, local conflict mitigation and disaster risk mitigation (DRM). The team also undertook a field trip to Malakal, Fashoda and Wau, where the team met with Governors, county governments, community members and Internally Displaced Persons (IDPs) along with field visits to ECRP-I sites.

The results of the meetings included agreements on key design elements for the ECRP-II, on the target counties, on the division of labor between the government and IOM, and on the required preparatory works related to procurement, fiduciary, and environmental and social safeguards (see Annex xxx for a list of stakeholders met).

IOM, with assistance from UNHCR and in coordination with the Government, undertook consultations with refugees and host communities in Maban County (Upper Nile State) and Jamjang (Parian County) in November 2021. Consultations included members of the refugee community and host communities, as well as NGOs and CSOs present in the area. The results are presented here.

Results from high level as well as community level engagements have fed into the project design as well as into the preparation of the E&S instruments, including this ESMF.

Host Communities

PDCs/BDCs: Host community members stated that the BDC are representative of the Boma, as members were selected from different villages. Recommendations were made to improve coordination and cooperation with the BDC. Communities articulated that it is important for the Chiefs to be involved in Boma meetings, including BDCs, as they also represent the community.

Dwellings: The group described the typical dwellings within the Boma to be thatched roof houses. These are constructed with grass and sticks and then ed with mud (two layers for insulation) and sometimes plastic sheeting. Typically, dwellings have one room and the whole family (up to 5 or 6 children plus parents) sleep in this room. The host community members gave a range of household sizes, stating that there is not a typical size of family. The reason given for the size of families was young marriage which lead to a wide age range of children within one household.

Water: available water is not sufficient for the whole community, for example, 1 borehole is accessed by 142 households and it is very overcrowded. Within the host community specifically, requests for assistance tend to focus on water.

Health: There is no clinic in the consulted Boma or nearby. The nearest clinic is located in the county headquarters, where the county health hospital is located, There is need for a broader availability of health services.

Education: Schooling in the consulted areas is not completely functional. The schools are operational (offering classes for P1-P5), but several respondents expressed that they felt the students are not progressing. There are teachers, but the community are not sure if they are trained. Only 12 out of the 22 respondents, for example, agreed that their children are attending school regularly. For those whose children are not attending regularly the reason given was lack of qualified teachers and therefore lack of quality teaching. The consulted group requested support with adult education classes, as seen in refugee settings.

Food Security: The consulted group described that the arrival of the refugees has changed their access to food. Before the refugees arrived in the area, they were secure going to the farming areas. But after refugees arrived, there have been security issues, for example in sorghum planting areas there were attacks and food was stolen and so they used to have to go in groups for safety. It was stated that since Peace Committees were set up, a lot of meetings were held between the host and refugee communities and the tensions reduced. They are now able to travel to farm alone but food is still scarce as what they produce is not enough to feed everyone fully.

Violence: Violence mostly occurs at the family or inside the household. Domestic abuse is usually arbitrated by the elders within the family. If one family is fighting, the Chief is often called to help resolve the issue.

Social Cohesion: The consulted communities agreed that there are no groups or committees in the community, and the reason given is that they concentrate more on farming because they have to access food. In Jamjam the community representatives include the County Commissioner, Executive Director, Youth Committee, Women Committee, Dialogues Committee, and Local Government Committee.

Humanitarian Assistance: In the consulted host community, food distributions are implemented by ACTED and Samaritan's Purse, funded by WFP. Community members go to the nearest town to receive them. There was also some training provided by FAO on crop growing and seeds were given out, but the seeds are not producing (which community members think is due to using manual methods and not cultivation using a tractor). The primary school is supported by WFP for school-feeding and Save the Children for school materials. Most of the teachers are volunteer teachers.

Refugee Communities:

Refugees consulted stated that their camps were set up 10 years ago, in 2011, and most participants moved to the camps of Gendrassa and Batil between September 2011 and 2012 with the variance described as being due to the repatriation schedule and as a result of the conflicts in Blue Nile around 2011. All participants originally came from the Blue Nile and most came via Jamam, where they first arrived and then were moved into the refugee camps once set up. Most participants came with their families, but also explained that some refugees left their families in Blue Nile and came alone, some even as unaccompanied children. In the Paamir Camp the refugee community has been in this area for five years from the Nubia mountains.

Administration and Governance: Within the camps a number of sector-specific committees exist. The Camp Executive Committee liaises with the Payam Administrator from the host community and if needed, he will link them with the County Commissioner/County government.

The camps in Maban have a political and military leaderships. These don't have linkages with UNHCR or other development actors, but are a reality on the ground that need to be understood/actors need to be aware of. They liaise directly with the County government and other leadership structures within the Upper Nile. In Jamjam, the refugee communities are represented by the Executive Committee or Refugee Council, Community Watch Group, Women's group, Elderly Person Committee, Culture and Art Committee, and Health Committee.

Humanitarian support: Support includes a variety of sectors: WASH – through ACTED, who is also camp manager; Health – through Relief International; Ministry of Health (vaccinations with support from Relief International); Food rations - provided by WFP (vegetables, cereals and cooking oil); Child protection – Save The Children; General protection – HDC and UNHCR; Education – LWF (primary and secondary schooling) and JRS (teacher training); DABI (scholarships for university level education); Agriculture and livelihoods – Relief International (income support activities and grants for small business e.g. planting trees) and FAO (seed distribution); General coordination – Government of South Sudan, UNHCR, ACTED; Shelter – ACTED; Veterinary services – FAO; Family reunification – Red Cross; Psychosocial Support – JRS; Mentoring and training – Mentoring Initiative.

In Jamjam, DRC provides camp management services, NFIs, and livelihood activities. IRC provides health services in Paamir camp, GBV provision, agriculture activities, especially economic recovery development, and WASH services. LWF provides education and child protection services. AAHI provides logistic, construction, and road maintenance services. AHA provides health services in the Ajuong Thok camp. Samaritans Purse / WFP – General food distribution in both camps.

Food security – WFP is the only organization providing food, and this year it has seen a 50-70% cut in funding and therefore food supply. In terms of food security, there are sustainable ways that refugees can do some of this for themselves and this is currently being done through Relief International and WFP is considering support in this area. FAO sometimes supports with agricultural inputs, but more can still be done through infrastructure to improve land tillage systems to make food security more sustainable.

Economic Activities: Refugees claimed to receive support from Relief International for small business development at the household level, where households are given 5 goats as a starter, but the coverage of the camps is not complete and the criteria for selecting participants for this and other activities is high and there is a general feeling that those selected then do not have the skills needed to manage the business well.

The respondents gave some suggestions of other types of training or support for economic activities that would be useful, included tailoring training for women and youth to build skills and make items to sell (such as face masks or school uniforms, which are often in short supply and brought in from Juba). There are tailoring courses available in the camps, but they are not sufficient. Women also suggested assistance with soap-making, as at the moment this is made on a small scale and sold, but the camps themselves buy soap from Juba or Khartoum. Respondents suggested this could be done by the community as an economic activity.

Farming is also a major economic activity for the refugee communities. They have been given land around the camps to grow and cultivate crops, but the seeds distributed are being delivered late, which means they are not able to make the most of the seasons. There is also a need for tools. Farming activities have also been jeopardized by flooding.

Violence: Respondents agreed that awareness in regards to domestic violence has helped decrease cases. Income was cited as a major trigger for domestic violence – most roles and activities within the camps are on a voluntary basis and a lack of income creates problems at the domestic level. More broadly, they claimed that there are few incidents of violence at the wider community level and the Peace Committees have helped to reduce incidents.

Social Cohesion: In addition to sector-specific camp committees and peace committees, there is a women's committee, which runs activities such as bead-making, crochet and crafts as well as supporting information sharing and awareness raising around topics such as domestic violence and gender equality. Any issues that come up and they cannot support are escalated to the relevant parties such as protection partners. The camps have a number of committees and structures that represent specific areas and also a Camp Executive Committee. Refugees also feel well-represented by Chiefs and camp leaders/chairpersons. They also explained that at any presentations or meetings, representatives of women and youth are also present across the camps.

In Jamjam, the activities that bring the community together include a monthly peace dialogue and youth sports tournament, which has promoted peace and coexistence. Youth cultural festivals and international day events also bring the community together.

Basic Services: Generally, refugees consulted felt that the levels of provision and access to basic services was good, within both camps and appreciation for the partners supporting the camps was expressed. However, there are still numerous gaps to be filled.

Health – While basic health services are available, they are largely run by nurses, not doctors. there is a need to increase the number of wards in the clinics. There is also need for power supplies to the clinics to help with running fans or a/c in the dry season as the clinics can be very hot. More can be done in terms of ensuring consistent supplies of some key drugs and sometime drugs that are less commonly needed expire without being used. The hospital could use support to be upgraded to acting as a bigger referral hospital. The most frequently cited request for community infrastructure are health facilities, including new construction and expansion of wards to accommodate the number of patients.

Education – Access to education was generally described as good, particularly at the primary level. Many children are progressing into secondary schools, but the challenges are with tertiary education, as there are very limited opportunities for attending university or further education due to lack of resources and limited scholarships. There are not a lot of vocational training opportunities, aside from teacher training, and it was commented that most completing secondary education end up as teachers or incentive workers. One priority that was mentioned was more classrooms within the schools to better accommodate the learners would help with access to education as currently class numbers are very high within one classroom.

WASH – The WASH standards were described as good, but more can still be done (the focus within the camps is more on maintenance than new construction), sustainable or clean sources for WASH, and solar power.

Communication – internet and communication services were mentioned as a service that is severely lacking within the camps (there is no phone network in the area). The respondents explained that this makes it difficult to stay connected to family and also to follow up on community members taken to the nearest hospital.

Shelter – the group felt that the chances of returning to their places of origin are low due to ongoing instability in the region. In which case, they would prefer to have more permanent shelters for families. They buy poles for making shelters currently from the host community (as well as firewood) but the locations are far away and flooding affects access.

Flood Risks: The biggest request coming from one of the refugee communities is a bridge across Yabus river. This could assist all the communities in a unique way – it will serve as a flood mitigation measure, support agricultural activities for mainly host community and also offers a sanctuary for communities needing to vacate flooded areas as they can more easily access higher ground. The communities don't want to relocate permanently from areas prone to flooding, they just want to reach higher ground during floods and return once the water has reduced. There is also fertile land on the other side of the river, which offers soil for brick making, access to trees/forest and can aid better communication between Payams.

General

Further activities that could benefit both host and refugee community could be:

- Boreholes with solar panels to assist horticultural activities and nutrition gaps through growing of more vegetables (generally speaking a typical diet is meats and starch). This has been successful previously and could help both host community and refugee community together.
- Extension of road from Doro camp to host community (approximately 5km marram road).
- Common markets – these are used by both host and refugee committees and provide a space and activity that brings them together. For example, Bunj market is accessed and used by both host and refugee committees and the host community go to markets in Batil around the camp.
- Common services – there are some shared agricultural areas (fields) and shared WASH facilities. There are also host and refugee community members using the same health facilities and schools. For example, the secondary school and hospital in Bunj are attended by refugees and host community also accesses some health facilities in or near the camps.
- The main risks include contributing to tension between refugees and host communities. Mitigation measures could consist of an inclusive prioritization process involving community groups and ensuring that the selected infrastructure is accessible to all populations.

Relations with Host Communities: The relationship between refugees and the host communities are generally described as good. They are assisted by Peace Committees, which are made up of members from the host and refugee communities and they engage in a number of joint activities, such as joint peace campaigns/tours where they visit the host community together to spread messages about peaceful coexistence and the group felt that such activities had helped a lot.

There is also a joint court made up of both communities, and any issues or crimes that arise can be taken to the joint court to be resolved and dealt with. The court building is outside the camp.

Inclusion: The biggest risk is if one or more Bomas or Payams are excluded from project benefits, as this can be seen as political and those that have been excluded would perhaps try to stop work in areas that are included. If there are areas where work cannot take place, the community leadership needs to be involved in this decision.

Operations and maintenance: Respondents pointed out, that there needs to be a strong plan on how infrastructure can be run, maintained or serviced. Sometimes good infrastructure becomes a white elephant because it cannot be maintained.

Security: The area of Maban sometimes faces instability, which may lead to the interruption of work by the seasonal violence that has characterized this area for some time (not necessarily targeting the infrastructure or the project, just general instability). The main mitigation measure would be through the County leadership and it should be noted that the current County Commissioner has been effective in calming tensions. There are no known or obvious existing tensions presently but now and then there are isolated incidents triggered by specific events, for example incidents of rape within a firewood collection area or a fight at a local drinking place where someone is killed or injured. Individual security incidents trigger tensions, which are normally referred to and resolved by the joint Peace Committees. In the past there have been more widespread tensions, for example sometimes refugees might plow in new areas that are owned by the Host community which would cause issues, but now it is more individual incidents that are generally resolved. Generally, the host community now feels that the refugee presence in Maban is mutually beneficial in terms of services being brought to the area and the business brought by refugees in trade/selling of goods.

Land: Land ownership is based on the land tenure system in South Sudan, whereby land is owned by the local communities, therefore ease of access or use depends on the negotiations that are done. There are no title deeds or formal documentation, it is a negotiation process and it is unique to each community. Land is available but generally the community needs to understand the use and potential benefit for them, for example the negotiation might allow that they will eventually be the owners of the infrastructure or there would be a clear understanding of how their children will benefit.

9.1. Lessons Learnt from ECRP-I

Lessons learnt from the implementation of the ECRP-I have been included in the risk analysis and the development of appropriate mitigation measures. Key lessons led to the following identified risks and impacts:

Potential conflicts through location targeting - There is significant discrepancy between administrative boundaries, as outlined by national government authorities and those understood by county officials and local communities. This created complications during entry activities when staff experiences on the ground did not match what was outlined in project design based on national government data, and could potentially lead to conflicts. For ECRP II, it has been determined that national, state, and county government officials, with the project team to assist as a facilitator, should come together to mutually agree on a list of payams and bomas from each county, on which the project team can base its selection and interventions.

Even where boundaries have been established, ECRP staff were often confronted by officials and community members who claimed that certain payams and bomas have been left out of the ECRP, while in equal need of assistance. This is inevitable, given that the amount of resources is limited. However, this makes the selection of target areas, as well as justifications regarding selection, extremely sensitive. When selecting areas for the ECRP-II, efforts should be made to include payams and bomas left out of ECRP I. Furthermore, those bomas that were merged should be reviewed to determine whether it is most sensible to keep them merged or to separate them under ECRP-II.

The limited budget for infrastructure and the need for multiple bomas to agree upon infrastructure at the payam level at times led to disappointment and competition under the ECRP-I. These limitations / parameters also sometimes meant that certain bomas benefited less than others within their payam when the selected projects were not in or near their bomas. Again, messaging and managing expectations will be essential to mitigate these risks. Facilitators will be advised to place increased emphasis on the value of participatory processes and capacity building. Additionally, the cross-boma issues exercise will be developed after the pilot payam workshops, during which PDC members are broken up into groups of men and women and were facilitated to discuss mutual challenges and potential solutions to those challenges and consider their conclusions in relation to the identified projects; this exercise enhances the likelihood of cross-boma agreement on top priorities.

Risk of lack of participation:

a) **Incentives:** Continuous requests for sitting allowances and refusal to participate in project activities without compensation hampered the implementation of the project. While sitting allowance can sometimes serve as a helpful motivating factor for participation, it can also taint the authenticity of the commitment of project participants who may become more motivated by the allowance than participation for the sake of bettering their communities. ECRP-I recognized that sitting allowances are also a necessary ethical method for compensating communities for the time dedicated to livelihood activities that may have been lost to participants when participating in extensive workshops. At home if they fail to return without anything to show for their day(s) long absence. However, the ECRP-II may hinge on sustainability, meaning participants need to be self-motivated to contribute to the development of their communities. The ECRP-II intends to explore additional options for in-kind contributions that serve the dual role as incentives *and* as materials that facilitate PDC and BDC members to be able to do their jobs / participate in ECRP activities (meeting space / tukul, raincoats, gumboots, etc.). Additionally, capacity building activities of interest to the community, with an emphasis on the long-term benefit of these activities, can serve as incentives to participation. Finally, strategies to acknowledge the accomplishments of PDCs and BDCs can serve as motivation (provision of certificates to committee members, public recognition). Ultimately, there will be expanded emphasis on encouraging communities to be motivated primarily by their long-term vision of community development; this will become increasingly powerful as development initiatives begin to bear fruit

b) **Lack of meaningful inclusion of women:** While women were involved in BDCs and PDCs in significant, largely equal, numbers due to ECRP requirements for BDC and PDC formation and quotas, ensuring meaningful participation was still challenging at times because of traditional norms that dissuade women from participating in decision making and because of practical issues that limited women's ability to comfortably attend workshops. During C2 activities under ECRP I, it was quickly realized that certain material items would need to be provided to women to ensure their physical participation, including dignity kits / personal hygiene items, nearby space for breast feeding, and mats for children to sit, play, and rest on during workshops; the provision of these items was immensely helpful. Addressing traditional norms that limit women's participation was more challenging. However, strategies that involve more

frequent small group discussion during workshops whereby men and women are separated into different groups have proven effective at given women more of a voice in prioritization of subprojects. For ECRP II, ECRP team has learned that it will be essential to directly engage men in the community to shift attitudes towards women's participation.

c) Lack of inclusivity: Traditional norms in many communities inhibit the meaningful and substantive inclusion of certain populations, most notably women, persons with disabilities, and youth. From the start, ECRP-II must place heavy emphasis on inclusivity and the meaningful and substantive participation of all community groups; this begins on the second day of boma entry when community members divide themselves into socioeconomic groups and a representative is nominated for each group. This strategy proved effective, particularly for women and persons with disabilities.

D) Lack of participation and subproject identification: Attendance at workshops was sometimes an issue given that farmers, cattle-keepers and other agriculturalists often had essential livelihoods work they needed to perform during the day that conflicted with workshops and meetings. While the project team took great care to try and accommodate schedules and provided sitting allowance in an effort to compensate this time, workshops participation could still be quite challenging for agriculturalists in particular. Furthermore, while participation is expected, it is important not to dismiss or marginalize certain groups simply because of their difficulty making themselves available to attend. While communities are encouraged to identify their own socioeconomic groups during the boma entry process (with certain groups being required, such as women, persons with disabilities and youth), facilitators should be more intentional about encouraging the mobilization of socioeconomic groups based on livelihood, with the recognition that this group is likely to be cross-cutting with other groups. However, where livelihood is a major personally identifying factor, facilitators should try and ensure that these groups are represented on the BDC. This will enable these groups to better advocate for themselves and thus assist the understanding of their needs so the program can better accommodate their ability to participate in activities.

e) Lack of participation due to transportation difficulties: Transportation proved to be an issue in some locations; participants involved in ECRP activities often expressed difficulty getting to the venue, with many having to travel long distances by foot, including through mud and rain during the rainy season. Even with the provision of travel allowance and best efforts to select the most central locations for workshops and meetings, participants still encountered difficulties related to transportation that are challenging for ECRP to address. Travel allowance need to be provided to PDC members and county officials who often have to travel the longest distances for workshops and county functionality assessments. Additionally, the project team should select venues at the most central locations.

Risk of abuse of women participating in project activities: Furthermore, sitting allowance might be particularly essential to provide to women who face risk of abuse. The risk faced by women who do not receive substantive allowance needs greater attention; this should include engaging directly with male community members to increase understanding of the purpose and importance of women's participation in community-development activities and to build attitudes of zero tolerance of abuse towards and violence against women overall.

Instability / youth unrest: Security issues related to youth unrest in Renk and Pibor led to delays in project activities when all humanitarian and development partners had to depart the regions until the situation was resolved. Unrest stemmed from the youths' perceived marginalization from job opportunities in aid agencies. Under ECRP II, it will be essential to expand the targeting and involvement of youth. This can be

done both by including them in employment opportunities (cash-for-work related to phase two infrastructure), DRM training and activities, and decision-making structures. While youth representatives have already been elected to each BDC, it is important to consider how their participation in the BDC and in related activities, such as community O&M work and infrastructure oversight activities, can be enhanced during ECRP II.

Flooding disrupting project activities: Exceptionally severe flooding in multiple regions of ECRP implementation, including in Rubkona, Leer, Pariang, Baliet, Fashoda, and Pibor, has created frequent inaccessibility to target communities and to many project sites; flooding has also prevented BDC and PDC members' ability to get to workshops and other ECRP activities. Flooding in Unity State, particularly in Rubkona, has disrupted activities entirely and is now preventing the construction of subprojects for the foreseeable future. For many flooded program areas, ECRP-II will consistently monitor the areas and commence activities once the water dried enough to render the area accessible. The program schedule may need to be modified accordingly and other activities in accessible regions pursued in place of those on hold in the meantime to ensure maximum use of time. Under later phases of ECRP I and under ECRP II, IOM will continue to base its schedule, particularly related to the building of subprojects, on the rainy season. The understanding that doing so requires significant time for selection and building of subprojects led to agreement that five years would be needed for ECRP II. The ECRP-II also proposes increased activities for flood mitigation.

Disruption by local authorities: ECRP-I encountered impediments to activities in the field due to insecurity and political instability and conflict. There have also been minor issues where local officials, such as boma chiefs, payam administrators, payam RRC's and heads of county line ministry departments have intentionally disrupted activities by taking actions that directly contradict the principles of ECRP. Forging strong relationships with local officials who have acted as champions of ECRP and its principles will be essential to smooth programming and ensuring conflict sensitivity in the future.

10. Grievance Redress Mechanisms

Under the World Bank ESSs¹⁴², Bank-supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project.¹⁴³ One of the key objectives of ESS 10 (Stakeholder Engagement and Information Disclosure) is ‘to provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow borrowers to respond and manage such grievances’.¹⁴⁴ This Project GRM should facilitate the project to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project. The ECRP-II will provide mechanisms to receive and facilitate resolutions to such concerns. This section lays out the grievance redressal mechanisms (GRM) for the ECRP. It is based on lessons from the GRM of the initial Local Governance Development Project (LGSDP) and the ECRP-I.

As per World Bank standards, the GRM will be operated in addition to a separate GBV/SEA and Child Protection Risk Action Plan, which includes reporting and referral guidelines (see GBV/SEA and Child Abuse Action Plan). However, the Project GRM will also cater for GBV/SEA cases. Additionally, in line with the provisions of ESS2, a grievance mechanism will be provided to all direct workers and contracted workers to raise workplace concerns. Workers will be informed of this grievance mechanism at the time of recruitment and the measures put in place to protect them against any reprisal for its use. This worker grievance mechanism is included in the project’s Labor Management Procedures (LMP) (see ESMF). Given the small-scale nature of works and focus on locally sourced labor, the intake mechanisms of the overall GRM will also allow intake of grievances under ESS2. Note that for SH at the workplace, provisions under the GBV/SEA Action Plan apply.

The GRM are designed to capture the high potential for conflict, identified in the socio-economic baseline and risks and impact sections above. There is concern that there may be disagreements over local level planning and implementation processes. Furthermore, the project itself may cause grievances, or existing community and inter-community tensions may play out through the project. The source of grievances, in regard to project implementation, can also sometimes be the local governance or power distribution itself, e.g. how local government and power holders will routinely place brokers in privileged positions or how district or subdistrict local governments are able to favor some communities and not others, for example.

It will therefore be key in the fragile environment of South Sudan to ensure that grievances and perceived injustices are handled by the project, and that the project aides mitigate general conflict stresses by channeling grievances that occur between people, groups, government actors and beneficiaries and project staff or contractors. Aggrieved parties need to be able to refer to institutions, instruments, methods and processes by which a resolution to a grievance is sought and provided. The GRMs provide an effective avenue for expressing concerns, providing redress and allowing for general feedback from community members.

¹⁴² World Bank, Environmental and Social Framework, 2018.

¹⁴³ Under ESS 2 (Labour and Working Conditions), a grievance mechanism for all direct or contracted workers is prescribed, which is laid out in the Labour Management Plan (LMP). The World Bank’s Good Practice Note on ‘Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works’¹⁴³ spells out requirements for a GBV grievance redress mechanisms, which is laid out in a separate GBV/SEA and Child Protection Risks Action Plan.

¹⁴⁴ World Bank, 2018, p. 131.

In order to guarantee that the project will have a wider impact on injustices and conflict stresses, it should address a wider range of injustices as they manifest themselves around aid and development projects. By enabling people to contest perceived unfair practices and asymmetric power distribution, power structures can be re-arranged and systems of social accountability strengthened. Especially the citizen – LG nexus is an important field for tackling conflict stresses as the government authorities mostly relate to people in regards to security and conflict.

The GRM aims to address concerns effectively and in a timely and transparent manner. It is readily accessible for all project-affected parties and does not prevent access to judicial and administrative remedies. It is designed in a culturally appropriate way and is able to respond to all the needs and concerns of project-affected parties.

A GRM has been implemented under the ECRP-I. In general, the project team received feedback and complains consistently from the different locations. The set-up of helpdesks after/during conducting community engagement activities proved very effective in gathering community feedback.

The most frequently reported grievance pertained to the lack of a payment incentive or sitting allowance for participants. The complainants argued that a full week of community entry workshops kept them away from their other obligations. Other BDC and PDC members indicated that the bomas were far apart, often several hours away by foot, and that they would need transportation to satisfy the BDC/PDC criteria of meeting on a regular basis. The ECRP teams on the ground responded to these concerns by verbally recognizing the obstacles the community members have had to overcome to participate, expressing sincere gratitude for the lengths to which participants have gone to be a part of ECRP, emphasizing ECRP commitment to ensuring commensurate transport allowance, and, on certain occasions where lack of transportation would have made attendance impossible or extremely arduous, providing transportation via IOM vehicles. Additionally, the ECRP team reiterated that the community-led nature of the project is essential and that the commitment and motivation demonstrated by PDC / BDC members will ultimately pay off once infrastructure projects are made a reality and once PDC / BDC members begin to use this knowledge and experience to continue the momentum towards locally driven community development.

The second most prevalent complaint was over low budget allocations for particular payams. Some community members hoped for more expensive infrastructure, such as water yards or schools. However, they realized during the workshops that their budget/token allocations could only cover smaller, less-costly infrastructures. The project team acknowledged the concerns raised by the community, reassuring the members that ECRP will continue to support the communities to advocate for funding and encouraged them to speak with the local authorities for the wider community needs which unfortunately cannot all be met by the ECRP.

9.1 GRM Value Chain

Step 1: Grievance Uptake: Multiple channels must be available for aggrieved parties to file their complaint, grievance, or feedback. The aggrieved party must be able to select the most efficient institution, the most accessible means of filing a grievance, and must be able to circumvent partial stakeholders in the Project, which may be implicated in the complaint. He or she must further be able to bypass some grievance channels that are perceived as potentially not responsive or biased.

Means of Filing a Grievance

There are four distinct means, at least two of which must be made available at the project locality for people to file a grievance:

1. A phone number for a hotline operator: The phone number of a grievance hotline operator must be widely disseminated among project stakeholders. The Hotline Operator is available from 8.00 am to 5.00 pm every day through a toll-free number. The hotline operator is set up and managed by the PMU. Any concerned party can call the hotline number and file a grievance with the Project.
2. A help desk must be set up by the respective IP during the implementation of sub-project activities in an area. It should be manned by the implementing staff, especially its community liaison officers, in close coordination with local authorities. At the help desk, PAPs can inquire about information in regard to project activities, or they can file a grievance directly with the person manning the desk.
3. Relevant assigned personnel available in each project site will be required to accept formal grievances and ensure that avenues for lodging grievances are accessible to the public and all PAPs. The first point of contact for all potential grievances from community members may be the contractor, implementing partner or the local government official. Such personnel will be required to accept formal grievances; or they can point out the Hotline Operator's number, the Help Desk or Suggestion Box. If no reasonable other modality of filing a grievance is available for the respective complainant, the staff has to accept and register the grievance.
4. A suggestion box must be installed at the nearest Boma or Payam office of the sub-project site. Suggestion boxes provide a more anonymous way of filing a grievance or for providing feedback. Grievances or feedback submitted to the Suggestion Box must be expressed in writing.

GBV/SEA/SH-related Grievance

Given the sensitive nature of GBV complaints, the GRM provides different ways to submit grievances. All grievance uptake channels can be used to report on GBV/SEA/SH-related grievances. No grievance uptake mechanism can reject such grievances, and all personnel directly receiving grievances will be trained in the handling and processing of GBV/SEA/SH-related grievances. Information on relevant legislation will be delivered to survivors prior to any disclosure of case details, for example through initial awareness raising sessions on the GRM. This will allow protect the survivor-centered approach from mandatory reporting.

The GBV survivor has the freedom and right to report an incident to anyone: community member, project staff, GBV case manager, local authorities. All recipients of the report should – with the survivor's informed consent – report the case to one of the ECRP's formal grievance recipients. Furthermore, a survivor can ask someone else to act as a survivor advocate and report on her/his behalf.

Cases of GBV/SEA/SH can be reported through the general Project GRM – any project staff, staff manning help desks, through the suggestion box, or through the GRM Hotline Operator

The grievance recipient will be responsible for the recording and registration of the complaint. A GRM operator cannot reject a GBV/SEA/SH complaint. At the same time, however, the project can only respond to a GBV/SEA/SH complaint if it is directed into the designated GRM channels.

Confidentiality: All grievance recipients and anyone handling the GBV/SEA/SH related grievances must maintain absolute confidentiality in regard to the case. Maintaining confidentiality means not disclosing any information at any time to any party without the informed consent of the person concerned. There are exceptions under distinct circumstances, for example a) if the survivor is an adult who threatens his or her own life or who is directly threatening the safety of others, in which case referrals to lifesaving services should be sought; b) if the survivor is a child and there are concerns for the child's health and safety. The survivors need to be informed about these exceptions.

Informed Consent: The survivor can only give approval to the processing of a case when he or she has been fully informed about all relevant facts. The survivor must fully understand the consequences of actions when providing informed consent for a case to be taken up. Asking for consent means asking the permission of the survivor to share information about him/her with others (for instance, with referral services and/or IPs), and/or to undertake any action (for instance investigation of the case). Under no circumstances should the survivor be pressured to consent to any conversation, assessment, investigation or other intervention with which she does not feel comfortable. A survivor can also at any time decide to stop consent. If a survivor does not consent to sharing information, then only non-identifying information can be released or reported on. In the case of children, informed consent is normally requested from a parent or legal guardian and the children

The respective IP at the state level will decide whether the grievance can be solved locally, with local authorities, implementers, or contractors and whether an investigation is required. The first ports of call will have in-depth knowledge of communal socio-political structures and will therefore be able to address the appropriate individuals if the case can be solved at the local level.

At all times, the IP will provide feedback promptly to the aggrieved party, for example through the phone or through the community facilitator. Feedback is also communicated through stakeholder meetings and beneficiary meetings during project activities. For sensitive issues, feedback is given to the concerned persons bilaterally.

Records of all feedback and grievances reported will be established by the implementing partner or the PMU. All feedback is documented and categorized for reporting and/ or follow-up if necessary. For all mechanisms, data will be captured in an excel spreadsheet. The information collected, where possible, should include the name of the person providing feedback as well as the boma, payam and county, cooperating partner (where applicable), the project activity and the nature of feedback or complaint.

Step 2: Sort and Process: All registered grievances will be transferred to the GRM Focal Point at the respective PMU or with IOM at state or national level – either by the Hotline Operator, local personnel, or the Help Desk Officer. The GRM focal point will categorize the complaint. Worker-related grievances will be handed over to a workers' GRM. Where grievances are of sexual nature and can be categorized as GBV/SEAH or child protection risk, the focal point has to handle the case appropriately, and refer the case to the GBV reporting protocols and referral system, defined in the GBV/SEAH and Child Protection Prevention and Response Plan. Dedicated training on how to respond to and manage complaints related to GBV/SEAH will be required for all GRM operators and relevant project staff.

For grievances handled under the general Project GRM, the GRM Focal Point will determine the most competent and effective level for redress and the most effective grievance redress approach. The focal point will further assign timelines for follow-up steps based on the priority of the grievance, and make a

judgment and reassign the grievance to the appropriate staff or institution. The person will exclude grievances that are handled elsewhere (e.g. at the court). The focal point should offer the complainant option/s for resolution of their grievance.

The GRM Focal Point will also transfer the grievance information into a more comprehensive grievance register.

GBV/SEA/SH

All reporting will limit information in accordance with the survivor's wishes regarding confidentiality and in case the survivor agrees on further reporting, information will be shared only on a need-to-know-base, avoiding all information which may lead to the identification of the survivor and any potential risk of retribution.

Data on GBV cases recorded will only include the nature of the complaint (what the complainant says in her/his own words), whether the complainant believes the perpetrator was related to the project and additional demographic data, such as age and gender, will be collected and reported, with informed consent from the survivor. If the survivor does not wish to file a formal complaint, referral to available services will still be offered even if the complaint is not related to the project, that referrals will be made, the preference of the survivor will be recorded and the case will be considered closed.

If the survivor provides informed consent, the grievance recipient should inform the GBV Focal Point. The GBV Specialist at the PMU will inform the World Bank. The report will be on the anonymized incident as soon as it becomes known to the PMU. Data shared will include the nature of the allegation; if the alleged perpetrator is associated with the ECRP; the survivor's age and sex' and whether the survivor was referred to other services.

Step 3: Acknowledgement and Follow-Up: The respective implementer or the PMU will decide whether a grievance can be solved locally, with local authorities, contractors, or NGOs, and whether an investigation is required. The first ports of call will have in-depth knowledge of communal socio- political structures and will therefore be able to recommend to the GRM Focal Point the appropriate individuals that could be addressed with the case, if the case can be solved at the local level.

At all times, the implementer or the PMU (the GRM Focal Point) will provide feedback promptly to the aggrieved party (unless the case was filed anonymously), within 5 working days after the grievance is filed. Feedback can be provided through the phone, in writing or through the community facilitators. Feedback is also communicated through stakeholder meetings and beneficiary meetings during Project activities. For sensitive issues, feedback is given to the concerned persons bilaterally.

GBV/SEA/SH

Referrals are a process through which the survivor gets in touch with professionals and institutions regarding her case. Services can include health, psycho-social, security and protection, legal/justice, and economic reintegration support. The grievance recipient will instantly provide the survivor with contacts of the available referral services in the respective area. If the survivor wishes for any assistance with transport or payment for services, the grievance recipient will provide allowances. Referral services are provided even in cases, where the survivor opts to not pursue the case through the GRM or through legal channels.

The grievance recipient explains to the survivor his or her right to control whether and how information about the case is shared with other entities as well as any implications of sharing information. The survivor will be informed about his or her right to place limitations on the type of information they want shared. The survivor's consent must be documented.

Step 4: Verify, Investigate and Act: The GRM Focal Point, will then undertake activity-related steps in a timely manner. The activities will include: verifying, investigating, redress action and plan.

Verification:

- Check for eligibility (objectively based on set standards and criteria) of complaint in terms of relevance to the project.
- Escalate outright grievances that require high level interventions within the implementer or PMU
- Refer outright grievances that are outside the project jurisdiction (e.g. refer to PMU or relevant external institution)

Once eligibility is determined, the IP will categorize the complaint into defined categories:

Investigation:

- GRM Focal Point to appoint an independent investigator (safeguards experts, professional outside the Implementing institution) who is a neutral investigator with no stake in the outcome of the investigation
- Collect basic information (reports, interviews with other stakeholders while ensuring triangulation of information, photos, videos)
- Collect and preserve evidence
- Analyze to establish facts and compile a report

Grievance Action Plan

- Based on the findings determine the next steps and make recommendations: (i) direct comprehensive response and details of redress action; (ii) referral to the appropriate institution to handle the grievance, where the IP has no jurisdiction
- undertake mutually agreed follow-actions
- Update of complainant
- Provide users with a grievance redress status update and outcome at each stage of redress, (iii) update the IP team on grievance redress across the GRM value chain.

GBV/SEA/SH

The PMU GBV and Gender Specialist will be the key focal point for management of such grievances and concerns and will work closely with respective GBV Specialist counterparts at the implementers in the implementation of the GBV/SEA/SH Action Plan, which contains all information on the GBV/SEA/SH referral system.

Once a case has been taken in by a GRM recipient, and informed consent of the survivor is obtained to proceed with the case, the case file will be submitted to the SCRIP GBV Specialist. The GBV Specialist will first ensure that the survivor has been provided with all necessary GBV referral services, and will ensure that the survivor is in safety.

Where the GBV/SEA/SH grievance was allegedly committed by a project worker, the grievance will be reported to the respective employing agency. The PMU GBV Specialist will follow up and determine jointly with the GRM Focal Point of the respective partner the likelihood that the allegation is related to the project. The GBV Specialist will follow up and ensure that the violation of the Code of Conduct is handled appropriately, e.g. the worker is removed from his or her position and employment is ended. The responsibility to implement any disciplinary action lies with the employer of the perpetrator, in accordance with local labor legislation, the employment contract, and the code of conduct. The GBV Specialist will report back to the survivor on any step undertaken and the results.

Where the survivor has opted to take a formal legal route with the case, the PIU GBV Specialist will ensure that the survivor has all the support required to file a case at court. The GRM process will still proceed with the survivors' consent. Ensuring due process is a matter of the formal justice system and not the grievance handlers. Unlike other types of issues, it is not part of the GRM's remit to conduct investigations, to make any announcements, or to judge the veracity of an allegation. The GRM should refer the case to the domestic regulatory framework to process the case if the consent of the survivor is received.

Since this project assumes a fully survivor-centered approach, no information can be passed on without the consent of the survivor. If the survivor does not wish for the case to be pursued, the survivor shall be offered access to referral services and the GRM operator or grievance recipient should note that the survivor did not wish for the case to be pursued, and the case is considered solved.

Case closure requires a) the case has been referred to GBV service providers (if the survivor consented) for support and appropriate actions; and appropriate actions have been taken against the perpetrator according to SEA mechanisms; b) the service provider has initiated accountability proceedings with the survivor's consent.

If the survivor does not want to launch a complaint with the employer, the case is closed. If the complaint proceeds, the case is reviewed by the PMU GBV Specialist and a course of action is agreed on with the respective IP/employer. The alleged perpetrator's employer takes agreed-on disciplinary action. Once the action is deemed appropriate by the GBV Specialist, the case is recorded as closed.

Step 5: Monitor, Evaluate and Provide Feedback: The GRM Focal Point will provide feedback to GRM users and the public at large about:

- results of investigations;
- actions taken;
- why GRM is important;
- enhance the visibility of the GRM among beneficiaries; and
- increase in users' trust in the GRM

Any implementer will report on its GRM to the PMU on a monthly basis. Monthly reporting to the PMU should provide information on the grievance and how it was handled as well as all information from the grievance register. However, it can omit the names of the aggrieved parties where necessary.

The PMU will undertake the following monitoring actions:

- develop indicators for monitoring the steps of GRM value chain;

- track grievances and assess the extent to which progress is being made to resolve them;
- conduct a stakeholder satisfaction survey for the GRM services
- conduct analysis on the raw data on the following: average time to resolve grievances, percentage of complainants satisfied with action taken, and number of grievances resolved at first point of contact
- provide a report on grievance redress actions pertaining to the steps of GRM value chain

The PIU will evaluate the GRM by

- analyzing grievance data to reveal trends and patterns,
- sharing GRM analysis in management meetings; and
- taking corrective action on project implementation approaches to address the grievance

GBV/SEA/SH

All entities reporting on GBV/SEA/SH-related cases will ensure that reports do not contain any information with the potential of identifying survivors (including names of survivors, families and perpetrators).

Furthermore, the grievance recipient needs to provide ongoing feedback to the survivor throughout the process. After conclusion of any investigation, the survivor must be informed first to determine whether the perpetrator can be informed and proposed sanctions against the perpetrator can be taken.

9.2 Information Disclosure and Consultations

ESS 10 makes it essential to identify and undertake inclusive and ongoing engagement with project stakeholders and to disclose all relevant information to stakeholders, in particular those project-affected groups or individuals that are disadvantaged or vulnerable due to their circumstances, and the public. Direct and indirect project stakeholders have been identified in the Stakeholder Engagement Plan (SEP). The SEP will be continuously updated, specifically in accordance to the identified needs. All relevant information needs to be made available to stakeholders in a timely manner, including about planned sub-components of the project, management measures and monitoring activities.

9.3 WB's Grievance Redress Service (GRS)

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org

11. Capacity Development and Training Schedule

Table 8 Capacity development and training plan

Objectives	Issues for engagement	Method of engagement	Stakeholders/target population and area	Responsible person	Time frame	Budget in USD
Institutional Strengthening	Capacity Development	Training	Project staff / IOM	PMU	Bi-annually	Incl. in staff costs
Enhance awareness and knowledge about GRM	GRM	Meeting: Plenary discussion with questions and answer	Beneficiaries at place of work	Community Mobilizer / PMU/IOM	Weekly	40,000 USD
	GRM	Meeting: Plenary discussion with questions and answer	Local Government leaders	PMU/IOM	Monthly	
Subproject Environmental and Social screening	E&S Screening	Meeting	PMU/IOM	PMU	Prior to commencement of sub-projects	Included in staff costs
Stakeholder engagement	SEP	Meeting	PMU/IOM/Contractors	PMU	Prior to commencement of sub-projects	10,000
GBV Action Plan	GBV risks	Meetings	Beneficiaries, communities, contractors, subcontractors, primary suppliers, workers	IOM		50,000 USD
LMP	Labor risks	Meetings	Contractors, subcontractors, primary suppliers, workers	IOM		20,000 USD
Emergency preparedness and response	EPP		Contractors, subcontractors, primary suppliers, workers	IOM	Prior to commencement of sub-projects	20,000 USD
Disability inclusion training	Vulnerable groups		Contractors, subcontractors, primary suppliers, workers	IOM	Prior to commencement of sub-projects	Included with other training costs

Implementation, monitoring and reporting of ESMPs	E&S risk mitigation	meetings	Contractors, subcontractors, operators primary suppliers, workers	IOM	Prior to commencement of sub-projects	Included with other training costs
Training for Project workers on occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations.	OHS risk management	FGDs, site visits and interviews	Contractors, community workers, beneficiaries, IP, communities that will be part of the operational phase	IOM	prior to construction works	30,000 USD

12. Resources and Budget

Table 9 Estimated Costs

	Required Resources	USD
Risk Management Unit / PMU – Monitoring of ESMF		
1.	Human Resources:	
	Social Specialist	Incl. in PMU staff costs
	Environmental Officer	Incl. in PMU staff costs
	Gender Specialist (IOM)	Incl. in IOM staff costs
	Community Development Specialist (IOM)	Incl. in IOM staff costs
2.	Logistics / Travel for monitoring and supervision	200,000
Grievance Redress Mechanism hotline (implemented by IOM)		
3.	Hotline and other mechanisms	300,000
Implementation of Risk Mitigation Measures IOM		
	Risk Mitigation Measures (estimates based on previous project implementation)	490,000
5.	SEP implementation	742,000
8.	Trainings and Capacity Building	180,000
10.	Implementation of GBV Action Plan	100,000
	TOTAL	2,012,000

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ANNEX 1: Environmental and Social Screening Report

SOCIAL AND ENVIRONMENTAL SCREENING FORM – ECRP-II CDD-Type Subprojects

Table 10 E&S Screening Form

SECTION A: GENERAL INFORMATION

	Social and Environmental Screening Report – ECRP-II CDD-Type Subprojects
<p>Projects are screened for their inherent social and environmental risks regardless of planned mitigation and management measures prior to initiation of any physical activities. It is necessary to identify potential inherent risks in the event that mitigation measures are not implemented or fail. This means that risks should be identified as if no mitigation or management measures were to be put in place.</p>	
SECTION A: General Information	
Date of screening	
Subproject title	
Subproject component	
Implementing Agency	
Proposed project budget	
Proposed project duration	
ES Screening Team Leader and Contact Details	
ES Screening Team Members	
Subproject/Site/Activity location	
Project Description. Briefly describe project activities, activities that interact with the ES	

Categorize Project Activities into High, Substantial, Moderate or Low, Refer to Project Description and Project Categories	
--	--

Potential Environmental/Social Risks Impacts of Activities					
Risk Category <i>(Please check each line appropriately. At this stage, questions are answered without considering magnitude of impact – only yes, no or I don't know are applicable answers)</i>	Yes	No	I don't know	If these risks ('yes') are present, refer to:	Comments
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts					
Is an Environmental and/or Social Assessment required where project is undertaken?				ESMF	
Is there a risk of diversion of project benefits?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	
Is there a risk of lack of monitoring of project activities due to remoteness of location and insecurity?				Security Management Plan (SMP)	
Is there a risk that project benefits may not reach truly vulnerable populations?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanism (GRM)	
Is there a risk that subprojects may be manipulated by different factions?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanism (GRM)	
Is there a risk that the selection of the activity location or beneficiaries will lead to conflict?				Security Management Plan (SMP) Grievance Redress Mechanisms (GRM)	
Does the activity pose a security risk for local staff?				Security Management Plan (SMP)	
Is there a risk that the activity firms up contested local authority structures?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanism (GRM)	
ESS 2: Labor and Working Conditions					
Does the activity include any of the known labor rights / ESS 2 non-compliance risks in South Sudan (child and forced labor)?				Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS)	
Does the activity include a construction component?				Labor Management Procedures (LMP) ESMF Occupational Health and Safety Plan (OHS)	
Does the activity include labor-intensive manufacturing?				Labor Management Procedures (LMP)	

			Occupational Health and Safety Plan (OHS)	
Does the activity include primary agricultural activities?			Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS)	
Will the activity require a larger contractor workforce?			Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS) ESMF	
Is there a security risk for Project Workers?			Security Management Plan (SMP)	
Is there a risk that the operation and maintenance of subproject facilities cause OHS issues?			Occupational Health and Safety Plan (OHS)	
Is there a risk of lacking OHS for workers at the construction site?			Occupational Health and Safety Plan (OHS)	
Is there a risk of delayed payment of workers?			Labor Management Procedures (LMP)	
Is there a risk that workers are underpaid?			Labor Management Procedures (LMP)	
Is there a risk that women will not be included in deployment in equal numbers?			Labor Management Procedures (LMP) GBV Action Plan	
Is there a risk that provision of employment or contracts sparks conflicts?			Security Management Plan (SMP) Grievance Redress Mechanisms (GRM)	
ESS 3: Resource Efficiency and Pollution Prevention Management				
Will the activity result in the production of solid waste? (directly by the project or by workforce)			Waste Management Plan, based on <i>WBG Environmental, Health, and Safety General Guidelines</i>	
Will the activity result in the production of toxic or hazardous waste? (e.g. used oils, inflammable products, pesticides, solvents, pharmaceuticals, industrial chemicals, ozone depleting substances)			C-ESMP	
Will the activity result in the generation of dust, noise?			C-ESMP	
Will the activity result in soil erosion?			C-ESMP	
Will the activity produce effluents (waste water)?			C-ESMP Waste Management Plan	
Will the activity result in increased levels of vibration from construction machinery?			C-ESMP	
Will the project produce air pollution? (e.g. significant greenhouse gas emissions, dust emissions and other sources)			C-ESMP	

Will the activity disturb any fauna and flora?				C-ESMP	
Will the activity result in irrigation water with high TDS with more than 1,500 ppm?				C-ESMP Waste Management Plan	
Can the project affect the surface or groundwater in quantity or quality? (e.g. discharges, leaking, leaching, boreholes, etc.)					
Will the project require use of chemicals? (e.g. fertilizers, pesticides, paints, etc.)					
Is there any risk of accidental spill or leakage of material?					
ESS 4: Community Health and Safety					
Is there a risk of increased GBV/SEA cases due to labor influx?				GBV/SEA Action Plan Labor Management Procedures (LMP)	
Is there a risk of spread of communal diseases due to labor influx?				Labor Management Procedures (LMP) ESMF	
Is there a security risk to the community triggered by project activities?				Security Management Plan (SMP)	
Does the activity have the potential to upset community dynamics?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	
Will the activity include payments or cash transfers?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	
Will the activity expose community members to physical hazards on the project site?				ESMF	
Will the activity pose traffic and road safety hazards?				ESMF	
Is there a possibility that the activity contaminates open wells?				Waste Management Plan ESMF	
Is there a possibility that the activity spreads pathogens and other pollutants (eg latrines)				Waste Management Plan ESMF	
Can the activity contribute to the spread of disease (eg health facilities)?				Waste Management Plan	
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement					
Will the project lead to the displacement of a population? (e.g. forceful relocation, relocation of the local community)				See exclusions	
Is the project located in a conflict area, or has the potential to cause social problems and exacerbate conflicts, for instance, related to land tenure and access to resources (e.g. a new road providing unequal access to a disputed land)?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	

Would the project potentially discriminate against women and girls based on gender, especially regarding participation in design and implementation or access to opportunities and benefits?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	
Is there a risk that the activity leads to loss of income, assets or means of livelihoods?				See exclusions Resettlement Policy Framework	
Will the activity lead to disputes over land ownership?				ESMF Resettlement Policy Framework	
Will the project require land acquisition from individual households?				Resettlement Policy Framework	
Will the project require land acquisition from communities				Resettlement Policy Framework	
Is it anticipated that the land will be provided through voluntary land donation agreements?					
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources					
Will the subproject be located in proximity to sensitive environmental ecosystems or habitats?				See negative project list	
Is there a risk that the project causes ecological disturbances?				ESMF	
Is there a risk that the activity causes changes in land form and habitat, habitat fragmentation, blockage or migration routes, water consumption and contamination?				ESMF	
Is there a risk that the activity causes loss of precious ecological assets?				ESMF	
ESS 8: Cultural Heritage					
Will the project be located in or close to a site of natural or cultural value?				Chance Find Procedures (ESMF)	
Is the project site known to have the potential for the presence of cultural and natural heritage remains?					
ESS 10: Stakeholder Engagement and Information Disclosure					
Is there a risk that the activity fails to incorporate measures to allow meaningful, effective and informed consultation of stakeholders, such as community engagement activities?				Stakeholder Engagement Frameworks (SEP)	
Is there a historical exclusion of disabled persons in the area?				Stakeholder Engagement Framework (SEP)	
Is there a lack of social baseline data?				ESMF	
Are women likely to participate in decision-making processes in regards to the activity?				Stakeholder Engagement Framework (SEP)	
Is there a risk that exclusion of beneficiaries leads to grievances?				Stakeholder Engagement Framework (SEP)	

			Grievance Redress Mechanisms (GRM) – see ESMF	
Is there a risk that the activity will have poor access to beneficiaries?			Stakeholder Engagement Framework (SEP) Grievance Redress Mechanisms (GRM) – see ESMF	
Will the Covid-19 outbreak hamper proper stakeholder engagement?			WB and FGS guidance and regulations on Covid-19	

SOCIAL AND ENVIRONMENTAL SCREENING FORM – ECRP-II Flood Risk Mitigation Subprojects

Table 11 E&S Screening Form

SECTION A: GENERAL INFORMATION

	Social and Environmental Screening Report – ECRP-II Flood Risk Mitigation Subprojects
<p>Projects are screened for their inherent social and environmental risks regardless of planned mitigation and management measures prior to initiation of any physical activities. It is necessary to identify potential inherent risks in the event that mitigation measures are not implemented or fail. This means that risks should be identified as if no mitigation or management measures were to be put in place.</p>	
SECTION A: General Information	
Date of screening	
Subproject title	
Subproject component	
Implementing Agency	
Proposed subproject budget	
Proposed subproject duration	
ES Screening Team Leader and Contact Details	
ES Screening Team Members	
Subproject/Site/Activity location	
Subproject Description. Briefly describe project activities, activities that interact with the ES	
Categorize Subproject Activities into High, Substantial, Moderate or Low, Refer to Project Description and Project Categories	

Potential Environmental/Social Risks Impacts of Activities					
Risk Category <i>(Please check each line appropriately. At this stage, questions are answered without considering magnitude of impact – only yes, no or I don't know are applicable answers)</i>	Yes	No	I don't know	If these risks ('yes') are present, refer to:	Comments
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts					
Is an Environmental and/or Social Assessment required where project is undertaken?				ESMF	
Is there a risk of lack of monitoring of project activities due to remoteness of location and insecurity?				Security Management Plan (SMP)	
Is there a risk that subprojects may be manipulated by different factions?				Stakeholder Engagement Plan (SEP)	
Is there a risk that the selection of the subproject location will lead to conflict?				Security Management Plan (SMP) Grievance Redress Mechanisms (GRM)	
Does the activity pose a security risk for workers?				Security Management Plan (SMP)	
Is there a risk that the activity firms up contested local authority structures?				Stakeholder Engagement Plan (SEP)	
ESS 2: Labor and Working Conditions					
Does the activity include any of the known labor rights / ESS 2 non-compliance risks in South Sudan (child and forced labor)?				Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS)	
Will the activity require a larger contractor workforce?				Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS) C-ESMP	
Is there a security risk for Project Workers?				Security Management Plan (SMP)	
Is there a risk of lacking OHS for workers at the construction site?				Occupational Health and Safety Plan (OHS)	

Is there a risk of delayed payment of workers?				Labor Management Procedures (LMP)	
Is there a risk that workers are underpaid?				Labor Management Procedures (LMP)	
Is there a risk that women will not be included in deployment in equal numbers?				Labor Management Procedures (LMP) GBV Action Plan	
Is there a risk that provision of employment or contracts sparks conflicts?				Security Management Plan (SMP) Grievance Redress Mechanisms (GRM)	
ESS 3: Resource Efficiency and Pollution Prevention Management					
Will the activity result in the production of solid waste? (directly by the project or by workforce)				Waste Management Plan, based on <i>WBG Environmental, Health, and Safety General Guidelines</i> C-ESMP	
Will the activity result in soil erosion?				C-ESMP	
Will the activity result in increased levels of vibration from construction machinery?				C-ESMP	
Will the project produce air pollution? (e.g. significant greenhouse gas emissions, dust emissions and other sources)				C-ESMP	
Will the activity disturb any fauna and flora?				C-ESMP	
Dyke Construction / Rehabilitation: Is the rehabilitation happening on both sides or only on the riparian side?				C-ESMP	
Dyke Construction / Rehabilitation : Any protective drains before the dyke being considered?				C-ESMP	
Dyke Construction / Rehabilitation : Any waste (solid/liquid) generation to be anticipated, for ex. How will the construction spoils be managed, Is there possibility of generation of any other types of waste?				C-ESMP	
ESS 4: Community Health and Safety					
Is there a risk of increased GBV/SEA cases due to labor influx?				GBV/SEA Action Plan Labor Management Procedures (LMP)	

Is there a risk of spread of communal diseases due to labor influx?				Labor Management Procedures (LMP) C-ESMP	
Is there a security risk to the community triggered by project activities?				Security Management Plan (SMP)	
Does the activity have the potential to upset community dynamics?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	
Does the flood risk mitigation subproject provide for its O&M regime to be reviewed by experienced and qualified engineers?				If not, see project exclusions	
Will the O&M regime of the subproject adopt and implement GIIP of dam safety measures?				Of not, see project exclusions	
Dyke Construction/Rehabilitation: Is there an appointed institution to takeover and maintain it continuously?				C-EMSP	
Dyke Construction/Rehabilitation: Does construction of the dyke entail downstream risks on the local community or their properties, for ex. in case of dyke failure?				C-ESMP	
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement					
Will the project lead to the displacement of a population? (e.g. forceful relocation, relocation of the local community). Are these displacements significant?				See exclusions	
Is the project located in a conflict area, or has the potential to cause social problems and exacerbate conflicts, for instance, related to land tenure and access to resources (e.g. a new road providing unequal access to a disputed land)?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	
Is there a risk that the activity leads to loss of income, assets or means of livelihoods?				See exclusions	
Will the activity lead to disputes over land ownership?				ESMF	
Dyke Construction/Rehabilitation : Will there be safe crossing points for the residents?					
Dyke Construction/Rehabilitation : Is there a service road being considered to facilitate continued maintenance of the dyke?					
Dyke Construction/Rehabilitation What is the potential impact of the subproject on individuals land and/or asset?				RPF	

Dyke Construction/Rehabilitation : Has the location of quarry sites, borrow pits, camp sites etc been identified? Will there be any significant impact on the surrounding landscape area because of the quarry sites, borrow pits, camp sites, etc., for ex. How will the relevant material sites be reinstated following completion of the extraction activities?					
Dyke Construction / Rehabilitation : What about extra meters required as working area (if additional RoW is required) for the equipment on both sides?				C-ESMP	
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources					
Will the activity impact sensitive environmental habitats				See negative project list	
Is there a risk that the project causes ecological disturbances?				ESMF	
Is there a risk that the activity causes changes in land form and habitat, habitat fragmentation, blockage or migration routes, water consumption and contamination?				ESMF	
Is there a risk that the activity causes loss of precious ecological assets?				ESMF	
Dyke Construction / Rehabilitation : How much volume of water is expected to be reserved by the dyke?					
Dyke Construction / Rehabilitation: What is the environmental setting of the areas to be traversed by the dyke, for ex., swamps, agricultural					
Dyke Construction / Rehabilitation : farms, forests, protected areas, settlements, or any other sensitive environmental elements?					
Dyke Construction / Rehabilitation: How many more feet or meters high from the original dyke level is the new dyke?					
Dyke Construction / Rehabilitation: How many more meters wide?					
ESS 8: Cultural Heritage					
Will the project be located in or close to a site of natural or cultural value?				Chance Find Procedures (ESMF)	
Is the project site known to have the potential for the presence of cultural and natural heritage remains?					
ESS 10: Stakeholder Engagement and Information Disclosure					

Is there a risk that the activity fails to incorporate measures to allow meaningful, effective and informed consultation of stakeholders, such as community engagement activities?			Stakeholder Engagement Frameworks (SEP)	
Is there a lack of social baseline data?			ESMF	
Are women likely to participate in decision-making processes in regards to the activity?			Stakeholder Engagement Framework (SEP)	
Will the Covid-19 outbreak hamper proper stakeholder engagement?			WB and FGS guidance and regulations on Covid-19	

SECTION B: SUMMARY OF THE SCREENING PROCESS

E&S Screening	Results and Recommendation		
Screening Results: Summary of Critical Risks and Impacts Identified	Risk/Impact	Individual Risk/ Impact Rating	Mitigation At the end of the screen process, tabulate the mitigation measures in an ESMP Format
	Eg Land Degradation	Low	Rehabilitation of worked out areas.
Is Additional Assessment Necessary?	Screening Result (see Table 7: Sub-Project Risk Level for further details)		Summary of Screening Result Justification
	No further ES Assessment required.		
	No further ES Assessment required but requires simple ESMP.		
	Detailed ESMP and/or RAP or VLD. Done internally.		
	Detailed ESMP and/or RAP. Contracted to Consultancy.		
	ESIA and/ or RAP required. Contracted to consultancy.		
	Yes	No	

ES Screening Conducted by (Names and Signatures)
Recommended by Project Manager
Approved by PMU

SECTION C: GUIDANCE FOR SIMPLE ENVIRONMENTAL AND SOCIAL MANAGEMENT AND MONITORING PLAN

Mitigation measures: In the Simplified ESMP, specify feasible and cost-effective measures to minimize adverse risks and impacts to acceptable levels. Mitigation measures and indicators should be drawn from the generic ESMP where applicable. Further, provide details on the conditions under which the mitigation measure should be implemented and specify the phase in which it is applicable (design, construction and/or operation).

Monitoring: In order to ensure that the proposed mitigation measures are effective and comply with national laws, monitoring indicators shall be developed or drawn from the generic ESMP. These should be easily measurable.

Responsibility: Institutions responsible for implementing mitigation measures and for monitoring their performance should be clearly identified.

Costs: Implementation of mitigation measures mentioned in the Simplified ESMP will involve an initial investment cost as well as recurrent costs. The Simplified ESMP should include cost estimates into the activity design, bidding and contract documents to ensure that the contractors comply with the mitigation measures. The costs for implementing the E&S mitigation measures will be included in the sub-project design, as well as in the bidding and contract documents.

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring
		Planning	Construction	Operation	
Environmental, health and safety					
	▪				
	▪				
	▪				
Social					
	▪				
	▪				
	▪				

Annex 2: Cultural and Chance Find Procedures

This procedure was developed in accordance with the mandate of the Ministry of Youth, Culture and Sports (Directorate of Archives and Antiquities) of protecting and preserving both tangible and intangible cultural heritage records of South Sudan and the requirements of the World Bank's ESS 8 (To protect cultural heritage from the impacts of project activities and support its preservation, to address cultural heritage as an integral aspect of sustainable development, to promote meaningful consultation with stakeholders regarding cultural heritage and to promote the equitable sharing of benefits from the cultural heritage).

This procedure is included as a standard provision in the implementation of ECRP Public Works contracts to ensure the protection of cultural heritage (Archaeological and Historical Sites). IOM, as well as contractors will be required to observe this procedure as documented hereafter.

Subprojects that require excavation or construction in sites of known archaeological will not be allowed (see negative project list), including sites where project would require FPIC due to impacts on cultural heritage. Where historical remains, antiquity or any other object of cultural or archaeological importance are unexpectedly discovered during construction in an area not previously known for its archaeological interest, the following procedures should be applied:

- Stop construction activities;
- Delineate the discovered site area;
- Secure the site to prevent any damage or loss of removable objects. In case of removable antiquities or sensitive remains, a full-time guard should be present until the responsible authority takes over;
- Notify the responsible foreman/archaeologist, who in turn should notify the responsible authorities, the concerned officers from the Directorate of Archives and Antiquities and local authorities (within less than 24 hours);
- Responsible authorities are in charge of protecting and preserving the site before deciding on the proper procedures to be carried out;
- An evaluation of the finding will be performed by the concerned officers from the Ministry of Youth, Culture & Sports in the Directorate of Archives and Antiquities. The significance and importance of the findings will be assessed according to various criteria relevant to cultural heritage including aesthetic, historic, scientific or research, social and economic values;
- Decision on how to handle the finding will be reached based on the above assessment and could include changes in the project layout (in case of finding an irrevocable remain of cultural or archaeological importance), conservation, preservation, restoration or salvage;
- Implementation of the authority decision concerning the management of the finding;
- Construction work can resume only when permission is given from the concerned officers from the Ministry of Youth, Culture & Sports after the decision concerning the safeguard of the heritage is fully executed;
- In case of delay incurred in direct relation to archaeological findings not stipulated in the contract (and affecting the overall schedule of works), the contractor may apply for an extension of time. However, the contractor will not be entitled for any kind of compensation or claim other than what is directly related to the execution of the archaeological findings works and protections.

Annex 3: GBV/SEA and Child Protection Action Plan

This GBV/SEA and Child Protection Action Plan has been developed to accompany the implementation of the ECRP-II and ensure that the project does not have any negative impacts or further promotes GBV, SEA or the abuse of children. It presents operational activities as well as recommendations for GBV, SEA and child protection risk mitigation measures that build on existing mechanisms in South Sudan. The Action Plan provides general procedures for grievances related to such abuse in project areas. It is based on existing protection, prevention and mitigation strategies and measures practiced by IOM and other key actors in South Sudan, as coordinated through the GBV sub-cluster group. IOM will implement a survey of available service providers in the project locations by 180 days after effectiveness and will maintain an updated list of service providers available for project implementation. Service agreements will be entered with relevant NGOs following the survey.

Classification of GBV/SEA

GBV: According to the World Bank Guidance Note on GBV in civil works, 'GBV is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed gender differences.'¹⁴⁵ It can therefore occur in a variety of different ways, including through the infliction of physical, mental and sexual harm, or suffering threats of such acts, as well as coercion and other deprivations of liberty, such as early or forced marriage, economic abuse or denial of resources, services and opportunities, trafficking and abduction for exploitation, Intimate Partner Violence (IPV) perpetrated by a former or current partner. Most importantly, the World Bank applies 'GBV' as an umbrella term that includes SEA.

The Guidance Note defines four key areas of GBV risks:

1. SEA - exploitation of a vulnerable position, use of differential power for sexual purpose; actual or threatened sexual physical intrusion;
2. Workplace sexual harassment - unwanted sexual advances; requests for sexual favors, sexual physical contact;
3. Human trafficking - sexual slavery coerced transactional sex, illegal transnational movement of people;
4. Non-SEA: Physical assault, psychological or physical abuse, denial of resources, opportunities or services, IPV.¹⁴⁶

For the ECRP-II, this broader definition of GBV will be applied to ensure that a broader set of acts are covered.

Violence against Children: The Convention on the Rights of the Child defines violence against children as: 'All forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment

¹⁴⁵ World Bank, Good Practice Note. Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works, September 2018, p.5.

¹⁴⁶ World Bank 2018, p. 3

or exploitation, including sexual abuse...'. Child labor, however, is treated by UNICEF as a context of heightened risk of violence rather than violence itself.¹⁴⁷

The ECRP-II sub-components and activities do not rely on major civil works, and the anticipated social impacts are mainly positive and are not expected to have irreversible social impacts related to land acquisition, community health and safety and cultural heritage. The potential adverse risks and impacts include gender-based violence (GBV) and sexual exploitation and abuse (SEA).

Existing Risk Management System

Government of South Sudan

The Government has made efforts in bringing justice to victims of sexual violence through key measures that were undertaken within the criminal justice system. A training manual on the investigation and prosecution of SGBV was developed in 2017 by the Ministry of Justice with technical support from the Ministry of Gender. Also, a Department of Women and Juvenile Justice was established under the Directorate of Public Prosecution.

In 2014, the Government developed Standard Operating Procedures for Prevention and Response to Sexual and Gender-based Violence (SGBV). The SOPs were developed through a consultative process with inputs from various government institutions, UN Agencies, International and National nongovernmental Organizations and Traditional Chiefs at National and State level. The document is in line with the Republic of South Sudan's legal and policy framework and other international frameworks such as the Inter-Agency Standing Committee (IASC) Guidelines for GBV Interventions in Humanitarian Settings, UNHCR's Sexual and Gender-based Violence against Refugees, Returnees, and Internally Displaced Persons, and Guidelines for Prevention and Response.

The SOP describes the following pathways and timelines for cases of sexual abuse and violence¹⁴⁸.

Reporting GBV Case

The GBV survivor has the freedom and right to report an incident to anyone. She/he may seek help from: leaders in the community; i.e. Boma leaders, chiefs, headmen, religious leaders, women's group leaders, etc...; GBV actors in the community / working groups; health and community workers, NGO staff or anyone whom the survivor believes can be of great assistance to her/him (friend, relative, neighbor, for example).

The person receiving the initial report will attend to the survivor and make a timely and appropriate referral according to the nature of the case either to the local authorities, the Police, the Attorney General, and a health practitioner. The service provider should adhere to the guiding principles of the SOP.

Referral

¹⁴⁷ UNICEF, Preventing and Responding to Violence against Children and Adolescents. Theory of Change 2017

¹⁴⁸ Ministry of Gender, Child and Social Welfare, Standard Operating Procedures for Prevention, protection and response to GBV in South Sudan, Republic of South Sudan, 2014. <http://southsudanhumanitarianproject.com/wp-content/uploads/sites/21/formidable/GBV-SOPs-South-Sudan.pdf>

A survivor has the right to make an informed choice on services required. When the survivor is referred, the services available and the conditions that apply should be explained to them. For instance, there is a 72 hours' time limit for Post –Exposure Prophylaxis (PEP) in the case of a sexual abuse survivor.

Prioritized response actions for GBV survivors

1. Medical examination and treatment of the survivor
2. Early psychosocial counselling to avoid or reduce traumatic feeling for the GBV survivor
3. Police investigation and protection intervention for physical safety social re-integration where deemed necessary
4. Access to Justice
5. Place of safety/shelter
6. Basic needs
7. Livelihood/economic support

If the survivor is a child, the consent of parents or guardians should be sought where it is in the best interest of the child, assuming they are not the perpetrators. However, where parents/guardians refuse to pursue the case in the court of law on the child's behalf, with clear evidence, the Directorate of Gender and Child Welfare should take up the role and pursue the case on the child's behalf to ensure that she/he is protected. Parents/guardians should be counselled first and thereafter, and taken to task by filing a case against them for denying the child her/his rights. All service provider interventions to child survivors must be undertaken with staff trained in child-friendly procedures in regards to the handling of cases. A child survivor should continue to go to school while procedures are ongoing and all efforts should be made to ensure her/his protection. In addition to this, all the above reporting and referral procedures should be applied.

In this context, a child perpetrator is a boy or girl under 18 years of age who has allegedly committed an act of GBV against another person. With regard to child perpetrators, juvenile justice procedures apply and child perpetrators should undergo rehabilitation and psycho-social counselling.

Coordination Mechanism

The Ministry of Gender, Child and Social Welfare (MGCSW) takes the lead in GBV prevention, protection and response at the national level while at the state level, the mandate is with the State Ministries of Social Development. The ministries collaborate with line ministries – Ministry of Health, Ministry of Justice and Ministry of Interior (MOH, MOJ, MOI,) UN Agencies, Development Partners, and CSOs on addressing GBV.

GBV coordination is implemented through the GBV sub-cluster and is represented in the Gender Coordination Forum. The GBV sub-cluster aims at coherent and effective GBV prevention, protection and response through the mobilization of key government Institutions, UN Agencies, Development Partners and International and National NGOs at national and state level. The key members include MGCSW, MOH, MOI, MOJ, UNFPA, UNICEF, UNHCR, Norwegian Refugee Council (NRC), American Refugee Committee (ARC), International Refugee Committee (IRC), media and National NGOs. Alongside the GBV sub-cluster, there are several coordination forums which play a role in GBV responses. These include the child protection sub-cluster, prevention of sexual exploitation and abuse task force, psycho-social support technical working group.

All actors have a responsibility to contribute to efforts towards GBV prevention, protection and response. Therefore, all actors will be trained and made aware of existing GBV prevention, protection and response protocols. Each actor will constantly monitor the implementation of GBV protocols in field offices.

The GBV Sub-Cluster in South Sudan

Within the Global Protection Cluster, GBV is an Area of Responsibility (AOR), facilitated by the United Nations Population Fund (UNFPA), as the designated focal point agency at the global level. In South Sudan, current membership includes more than 150 individual members, with approximately 35 organizations participating in biweekly sub-cluster meetings. Fewer than 15 percent of members offer specialized GBV services and there is a lack of uniformity in standards for service delivery and training.

By the end of September 2018, the Protection Cluster had reached 34 percent of the 3.7 million South Sudanese targeted. In 2019, the group aimed to target 3.3 million South Sudanese and some 300,000 refugees. The clear majority of the target population are women and children. The cluster's focus is currently on Unity, Upper Nile, Jonglei, Western and Northern Bahr el Ghazal, and the Equatoria states. Within these areas, protection partners will prioritize locations with most severe needs, including through mobile teams.¹⁴⁹

The key objectives of the GBV sub-cluster are: 1) Expand availability of the basic package of multi-sectoral GBV services; 2) Build capacity of service providers and communities to deliver quality GBV services in line with best practices and minimum standards for humanitarian settings; 3) Strengthen GBV prevention and risk mitigation across other humanitarian sectors and with UNMISS, including through mainstreaming; 4) Strengthen co-ordination, advocacy and collaboration at national and sub-national levels.

Current ongoing activities by sub-cluster partners are:

Data on gender-based violence: UNFPA has led efforts for the inter-agency GBV Information Management System (GBVIMS) to collect data from service providers, it has analyzed the trends and rallied partners to respond. Also, training for social workers and health staff to sensitively and professionally meet the needs of GBV survivors, including the provision of psychosocial support, post-rape treatment with emergency contraception and HIV post-exposure prophylaxis are provided.

Risk Mitigation

- IOM provided GBV and PSEA capacity building to 288 men and 112 in 2019¹⁵⁰
- UNICEF-led clusters were supported to include GBV risk mitigation in their South Sudan Humanitarian Fund (SSHF) and Humanitarian Response Plan (HRP) processes.

Awareness and prevention

- GBV awareness messages through dialogues and dramas targeted at communities. Around 3,560 persons were reached by this IOM led programme
- Communities Care: Transforming Lives and Preventing Violence Programme: The UNICEF Communities Care (CC) programme promotes gender equitable social norms to support survivors of GBV and to transform inequitable gender relations that drive GBV.

¹⁴⁹ Reliefweb, 2017. GBV Strategy South Sudan https://reliefweb.int/sites/reliefweb.int/files/resources/gbv_sub-cluster_strategy_final_1.pdf

¹⁵⁰ IOM (2019), GBV Report, Quarter 2

Protection and response¹⁵¹

Table 12 GBV Activities per region

Region	Activity	Actor
Bahr el Ghazal		
Northern Bahr el Ghazal	Family protection centers (Malualkon) Once stop center (expanding to Aweil ¹⁵²) Aweil Civil Hospital/American Refugee Committee	UNFPA
Western Bahr el Ghazal	Humanitarian hubs with prepositioned supplies (Wau)	UNFPA
	One stop center (Wau)	UNFPA
	Psychosocial support for survivors of sexual violence	DRC
Lakes	Family protection centers (Rumbek)	UNFPA
	One stop center	UNFPA
	Psychosocial support for survivors of sexual violence	ICRC
Warrap	Transforming lives and preventing violence programme	UNICEF
	Integrated Mobile Teams ¹⁵³ (Twic)	DRC
	Capacity building on GBV basis and response to GBV, update of referral pathways. A GBV assessment (Twic)	GBV WG
Equatoria		
Western Equatoria		
Central Equatoria	Campaign to address harmful social norms at the root of GBV through individual behavior change and community awareness approaches ¹⁵⁴ . (Juba)	Active Youth Agency and IOM
	Family protection centers (Juba), Humanitarian hubs with prepositioned supplies	UNFPA
	Transforming lives and preventing violence programme (Juba)	UNICEF
	Legal aid clinics for IDPs on Land and housing.	UNHCR
	Dignity kits (200) and counseling and referrals for women (Lobonok)	AYA, IOM

¹⁵¹ Table developed based GBV sub cluster member annual reports as well as information shared at the meeting held on February 11 with GBV sub cluster members for the WB Safety Net Project.

¹⁵² Information from the SSSP meeting with GBV sub cluster members held on 11th February.

¹⁵³ Protection Cluster, July 2019.

¹⁵⁴ IOM (2019), GBV Report, Quarter 2.

	Juba Teaching Hospital	
Eastern Equatoria	Training on Interagency GBV Case Management Guidelines for GBV and Child Protection agencies in Kapoeta	IOM
Greater Upper		
Jongley	Transforming lives and preventing violence programme. Integrated protection Mobile Teams	UNICEF DRC
Unity		
Upper Nile	Humanitarian hubs with prepositioned supplies One stop Center (Malakal) Psychosocial support for survivors of sexual violence (Malakal)	UNFPA UNFPA ICRC International Medical Corps

- Two mobile Protection Teams: The interventions ranged from Individual Protection Assistance, Referrals of Protection Cases identified, Early Warning Early Response and community-based protection reaching a total of 81,748 individuals. These mobile interventions allowed for integrated responses with lifesaving sectors such as Shelter/NFI, Food Security, WASH and CCCM Clusters
- Training on Interagency GBV Case Management Guidelines for GBV and Child Protection agencies in Kapoeta, Eastern Equatoria (IOM). In Juba, IOM and the national partner organization Active Youth Agency continued to strengthen work to address harmful social norms at the root of GBV through individual behavior change and community awareness approaches¹⁵⁵
- Family Protection Centers to support GBV survivors in Juba, Rumbek and Malualkon. Integrated services are provided under one roof, including clinical treatment for rape, psychological first aid, counselling, legal support and other services. UNFPA has established 10 women-friendly spaces in displacement camps. In addition, UNFPA supports youth corners in five facilities in three states¹⁵⁶
- Women and Girls Friendly Spaces (WGFS) Guidelines: UNICEF led the development of WGFS guideline. WGFS are venues where women and girls feel physically and emotionally safe. A total of 20,712 people (6,952 girls; 13,516 women; 95 boys; 149 men) were reached through activities in the women and girls' friendly spaces and information sessions in 2018 which included information on referral pathways¹⁵⁷. UNICEF trained 1,377 service providers and community leaders on survivor-centered GBV response and established 20 WGFS and 24 health facilities with clinical management of rape capacity.

¹⁵⁵ IOM (2019), GBV Report, Quarter 2

¹⁵⁶ UNFPA (2018) Delivering supplies when Crisis strikes South Sudan

¹⁵⁷ UNICEF (2019), South Sudan GBV briefing note, January 2019.

- Training on GBV and Survivor Centered Response: UNICEF and partners trained 155,668 community leaders and service providers on GBV and survivor-centered response in 2018. The training of key community structures also included GBV guiding principles and referral pathways¹⁵⁸.
- Humanitarian hubs with prepositioned supplies: UNFPA prepositions supplies in five humanitarian hubs — Bentiu, Juba, Malakal, Rumbek and Wau –to support delivery of services for sexual and reproductive health and GBV response¹⁵⁹
- Clinical management of rape (CMR): In 2018, UNICEF and partners trained 135 healthcare providers on the clinical management of rape (CMR) and supported 24 health facilities to provide CMR services. In addition, UNICEF provided training of training (ToT) and on the job supervision for healthcare providers to strengthen capacity on CMR in South Sudan¹⁶⁰.

According to the South Sudan Humanitarian Country Team ‘Centrality of Protection’ Strategy for 2020¹⁶¹, focuses on four priority areas: 1. Prevention of SEA; 2. Safe & dignified access to life-saving assistance; 3. Prevention, mitigation, or end of grave violence; 4. Prevention of protracted displacement.

To date, the type and quality of key services, including case management, Clinical Management of Rape (CMR), psycho-social support, livelihoods, safety and legal and justice can vary significantly from one location to the other. There is insufficient territorial coverage of most GBV services outside of capital departments. Since 2014, the GBV sub-cluster has recommended a Minimum Service Package for implementation in areas of humanitarian need, but these standards have not been fulfilled in many settings due to insufficient funding, access, security and human resources.

The Office of the Victim’s Rights Advocate 2020 report concludes that there is lack of services for victims in South Sudan generally, that and some victims may not wish or require access to such services, however it is essential that they are available¹⁶².

Taking into account some key GBV risk factors, such as the fact that households can travel for more than 30 minutes to fetch water, along with the status of food insecurity, incidents of armed conflict and proximity of cantonment to civilian sites and access to GBV services, the Humanitarian Needs Overview (2021)¹⁶³ considers that 72 counties fall under the category ‘in extreme need’. In these counties, besides multisectoral response, the provision of dignity kits and livelihood support is a high priority.

IOM PSEA Mechanisms

PSEA Commitments: IOM abides by the Secretary-General’s Bulletin ST/SGB/2003/13 on “Special Measures for Protection from Sexual Exploitation and Sexual Abuse”. IOM has a mandatory Instruction, entitled: Policy and Procedures for Preventing and Responding to Sexual Exploitation and Abuse, IN/234, which binds staff members to standards of behavior at all times and especially when working with

¹⁵⁸ UNICEF (2019), South Sudan GBV briefing note, January 2019.

¹⁵⁹ UNFPA (2018)

¹⁶⁰ UNICEF (2019)

¹⁶¹ South Sudan Humanitarian Country Team, Centrality of Protection, Strategy for 2020, accessed at: https://reliefweb.int/sites/reliefweb.int/files/resources/centrality_of_protection_strategy_15_january_2020_0.pdf

¹⁶² Office of the Victim’s Rights Advocate (OVRA), South Sudan Country Profile, 2020.

¹⁶³ Humanitarian Programme Cycle 2021, Humanitarian Needs Overview South Sudan, January 2021, accessed at: https://reliefweb.int/sites/reliefweb.int/files/resources/south_sudan_2021_humanitarian_needs_overview.pdf

beneficiaries of assistance, including during emergency response. Sexual exploitation and abuse of affected populations constitutes gross misconduct and is grounds for disciplinary action, including summary dismissal and referral for criminal prosecution, where appropriate. In addition to IOM's PSEA Instruction and the Standards of Conduct, IOM has also made PSEA commitments that include inter-agency coordination to prevent and address SEA incidents, including active participation in in-country PSEA Networks.¹⁶⁴

Inter-Agency Community-Based Complaint Mechanisms (CBCMs): IOM establishes and participates in CBCMs. A CBCM is a mechanism for receiving complaints from beneficiaries that is designed based on the input of the affected community and allows reports (including SEA) to be made safely and confidentially. An inter-agency CBCM links the various complaint mechanisms of agencies working in a response to ensure that complaints are safely and efficiently referred to the appropriate agency for follow up and potential investigation, regardless of who receives the complaint.

IOM has worked in close collaboration with humanitarian agencies to develop tools on inter-agency complaint mechanisms (see Guidance Documents and Tools for PSEA) and plays an active role in the Task Team on Accountability to Affected Populations and PSEA, and its technical assistance helpdesk for in-country PSEA networks. Since 2016, the inter-agency PSEA capacity-building team has provided technical assistance to Humanitarian Country Teams and PSEA Networks on setting up or strengthening joint PSEA initiatives, including joint CBCMs.

The IOM South Sudan Gender Based Violence in Crisis (GBViC) Action Plan 2019-2021 has an overall priority of strengthen internal collective practices to support GBV programming, enhance IOM staff capacity and reinforce accountability mechanisms on GBV.

Action Plan

This GBV/SEA and Child Protection Action Plan provides a general workplan to mitigate and respond to GBV, SEA and safeguard child protection under the ECRP-II, complying with the World Bank ESF. It is designed to provide general guidance for the prevention of and response to GBV, taking into consideration the mechanisms in place and existing good practices and recommendations according to the findings of the literature review. The Action Plan facilitates a consistent approach across all potential SEA and child protection complaints received from every possible channel, implementing Secretary-General's Bulletin ST/SGB/2003/13, dated 9 October 2003, on "Special measures for protection from sexual exploitation and sexual abuse", as well as the Secretary-General's Report A/71/818 dated 28 February 2017 on "Special measures for protection from sexual exploitation and abuse: A new approach".¹⁶⁵

IOM has PSEA mechanisms and a SEA misconduct response system in place within its organization, which will apply to the ECRP-II, and which will ensure organizational responses for misconduct of UN staff or any worker of contractors or sub-contractors of the ECRP-II. These responses will follow the different

¹⁶⁴ IOM, Emergency Manual, Protection from Sexual Exploitation and Abuse (PSEA). Accessed January 2019 <https://emergencymanual.iom.int/entry/21309/protection-from-sexual-exploitation-and-abuse-psea>

¹⁶⁵ The report is emphasizing a new approach, which is based on a) prioritizing the rights and dignity of victims; b) ending impunity through strengthened reporting and investigations; c) engaging civil society and external partners; and d) improving strategic communication for education and transparency.

organizational set-ups but will all comply with the relevant UN protocols on PSEA. Responses will include the implementation of sanctions for violations of worker CoC.

The Action Plan will build upon the protection systems and referral systems established by the GBV sub-cluster in the country. However, since specific referral systems and protection mechanism per county are unknown, the Action Plan provides general guidance and recommendations for improving existing mechanism that are known to be scarce in many areas of South Sudan, specifically in rural areas where the project will be implemented.

Outreach activities to manage risk of GBV

The following activities are conducive to the recognition by all ECRP-II implementers of the risks of sexual violence and GBV and the specific vulnerabilities of women and girls.

- Prevention measures against SEA. All partners, sub-contractors and suppliers of the ECRP-II are obliged to create and maintain an environment that prevents sexual exploitation and sexual abuse develop systems that maintain this environment, including but not limited to:
 - Adoption of the Core Principles of the IASC Task Force on Protection from Sexual Exploitation and Abuse¹⁶⁶;
 - Worker Code of Conduct: All categories of workers will be induced and will sign a Code of Conduct (CoC)¹⁶⁷, which includes expected standards of behavior regarding GBV/SEA according to the IASC six core principles. All partners will further ensure that all contractors, suppliers, NGOs and other implementing partners' workers have been induced and have signed a CoC. IOM has its own institutional CoC in place, which may be used. The PMU will assess it for its appropriateness for the ECRP-II, following World Bank ESS and the IASC Core Principles. If necessary, the PMU will provide a template CoC and these should be signed by all project workers (see LMP for definition) that will be present at an activity site. Where necessary, a CoC should be translated into the local language to ensure that workers fully understand their obligations:
 - Taking action to prevent SEA cases, including through awareness raising, training and other measures
 - Nomination of a senior level PSEA focal point
 - Setting up of internal protocols for investigation of cases
 - Taking disciplinary actions in case the offense is proven.
- All partners shall have organizational whistleblowing policies that encourage staff to report concerns or suspicions of misconduct by colleagues by offering protection from retaliation for reporting. The definition, scope and protection measures may differ between organizations. General principles¹⁶⁸

¹⁶⁶ IASC (2002), Six Core Principles for Relating to Sexual Exploitation and Abuse, accessed at:

<https://interagencystandingcommittee.org/principals/documents-public/iasc-six-core-principles-relating-sexual-exploitation-and-abuse-2002>.

¹⁶⁷ See at the end of ANNEX 3 for a sample UN Code of Conduct.

¹⁶⁸ IOM GBV programming guiding principles. Confidentiality: At all stages of an intervention, the privacy and confidentiality of survivors will be ensured, prioritizing the well-being of survivors and that the delivery of services and support will not compromise the privacy or identity of individuals involved. Respect: Respecting the wishes, dignity and choice of the survivors will be observed at all times and during all stages of any intervention. Survivors will be supported to give their free and informed consent, based on a clear understanding of the facts, implications, risks and consequences of an action, before information is shared or action is taken.

apply to whistle-blowers, as they would to any complainant, and internal agency policies shall protect whistle-blowers on SEA from retaliation, so long as the report is made in good faith and in compliance with internal agency policies.

- All partners of the ECRP-II commit to timely and expeditious action to provide assistance to survivors, to prevent, investigate and punish SEA, and to comply with all timelines for action laid out in the Action Plan. The PMU will monitor ECRP-II partners on a bimonthly basis in view of their implementation of the GBV action plan via reports and field visits.
- Community awareness and disclosure of CoC. The CoC will be made available to the public in the project areas, especially to identified project stakeholders. Education and the raising of awareness of women, adolescents and children of SEA and their legal rights will be provided. Project beneficiaries should be made aware of the laws and services that can protect them and provide redress in case of an incident.
- Disclosure will take place through different communication channels taking into consideration women's safety when designing and distributing information set out in the SEP, by the PMU and/or IOM. For instance, health programmes have found that it can be helpful to place information (e.g. cards / pamphlets / posters) in bathrooms, where women can look at them without being observed by a male partner¹⁶⁹. It is expected that all IPs, contractors and sub-contractors disclose their CoC, and that IOM reports all SEP-related activities to the PMU for monitoring purposes.
- Training of Workers and Partners: IOM will ensure that its direct workers, partners, sub-contractors, suppliers and others are trained on the CoC and GBV/SEA and child protection risk issues as part of their induction. It will roll out direct training activities for all contracted as well as community workers deployed for their activities prior to the start of such. It will ensure that records of all inductions are kept and shared with the PMU. The PMU will further review training materials and make suggestions if there are gaps.

GBV response measures

GBV response activities are outlined here and will be detailed and operationalized once decisions on project locations are taken. GBV response measures are designed based on World Bank recommendations for improving gender outcomes and a review of lessons learned from different actors working in South Sudan as well as the IOM Return, Recovery, and Resilience and GBV Strategy regarding the empowerment of women and youth populations. GBV response activities are outlined here and will follow different levels of implementation adapted to different contexts on project locations.

Referral:

Existing knowledge on referral pathways for GBV survivors is limited in project counties. The following is

Safety and security: Awareness and consideration of any risks or safety concerns that might compromise the physical safety of individuals affected by GBV will be sufficiently addressed and factored into any GBV intervention or initiative.

Non-discrimination: All GBV interventions will be designed to ensure access and the same level of quality of care and assistance for all persons seeking support, or persons affected by GBV, without regard to sex, sexual orientation, gender identity, age, ethnicity, religion or other status.

¹⁶⁹ World Bank 2019

the information available on GBV referral services according to the GBV sub cluster group. The list will be updated when new counties are entered and before the commencement of project activities.

Table 13 GBV Referral Services

Region	Activity	Actor
Bahr el Ghazal		
Northern Bahr el Ghazal	Family protection centers (Maluakon) One stop center (expanding to Aweil ¹⁷⁰) Aweil Civil Hospital/American Refugee Committee	UNFPA
Western Bahr el Ghazal	Humanitarian hubs with prepositioned supplies (Wau)	UNFPA
	One stop center (Wau)	UNFPA
	Psychosocial support for survivors of sexual violence	DRC
Lakes	Family protection centers (Rumbek)	UNFPA
	One stop center	UNFPA
	Psychosocial support for survivors of sexual violence	ICRC
Warrap	Transforming lives and preventing violence programme	UNICEF
	Integrated Mobile Teams ¹⁷¹ (Twic)	DRC
	Capacity building on GBV basis and response to GBV, update of referral pathways. A GBV assessment (Twic)	GBV WG
Equatoria		
Western Equatoria		
Central Equatoria	Campaign to address harmful social norms at the root of GBV through individual behavior change and community awareness approaches. ¹⁷² (Juba)	Active Youth Agency and IOM
	Family protection centers (Juba), humanitarian hubs with prepositioned supplies	UNFPA
	Transforming lives and preventing violence programme (Juba)	UNICEF
	Legal aid clinics for IDPs on land and housing.	UNHCR
	Dignity kits (200) and counseling and referrals for women (Lobonok)	AYA, IOM
	Juba Teaching Hospital	

¹⁷⁰ Information from the SSSP meeting with GBV sub cluster members held on 11th February.

¹⁷¹ Protection Cluster, July 2019

¹⁷² IOM (2019), GBV Report, Quarter 2

Eastern Equatoria	Training on Interagency GBV Case Management Guidelines for GBV and Child Protection agencies in Kapoeta	IOM
Greater Upper Jongley	Transforming lives and preventing violence programme. Integrated protection Mobile Teams	UNICEF DRC
Unity Upper Nile	Humanitarian hubs with prepositioned supplies One stop Center (Malakal) Psychosocial support for survivors of sexual violence (Malakal)	UNFPA UNFPA ICRC, International Medical Corps

Community consultation on GBV referral pathways. In order to complete existing information on referral pathways in project counties, a community and stakeholder consultation on GBV referral pathways assessment on further identification of the project counties will shed light on the functioning and effectiveness of referral pathways in place. Consultation will take place during the Project Inception Phase and will serve to update this GBV Action Plan.

In case referral pathways are non-existent or inadequate, the ECRP-II will enable a minimum set of services for GBV survivors that will include health, psychosocial and legal support. The ECRP-II will ensure that all project areas receive dignity and PEP-kits following by referrals to GBV services.

Following community consultations and in-depth analysis to understand existing referral services in each county, the PMU will sign service agreements with NGOs working in the area to provide a minimum of health, psychosocial, case management and legal services to survivors of GBV. In those counties where GBV services are very weak or non-existent, the project will establish mobile task forces (e.g. DRC integrated protection mobile teams) to provide services to GBV survivors at short notice. It is already documented in the Humanitarian Needs report 2020 that some ECRP-II areas lack basic GBV services such as Twic, Gogrial east, Longochuk, Balliet, Ayod, which will require the establishment of mobile teams.

Training on referral systems: All relevant staff of the PMU and IOM will receive training on the referral systems and case management guidelines during the project initiation phase. IOM will pass on all relevant details to their respective field staff and will take up the information in their various trainings and community awareness activities mentioned above.

Establish a Grievance Redress Mechanism (GRM) for project beneficiaries to facilitate reporting of GBV incidents¹⁷³. In particular, the GRM should consider including key features on the prevention of GBV: 1) The establishment of women quotas in community level grievance management to facilitate women-to-

¹⁷³ Based on World Bank good practice note on GBV (2018).

women reporting, 2) The provision of multiple channels for receiving complaints (channels to be determined after community consultation) 3) The resolution of complaints at the point of service delivery to reduce information and transaction costs and gender sensitive independent channels for redress. 4) The communication of GRM services at the community level to create GBV awareness and enable project-affected people to file complaints.

As a functioning mechanism:

- The GRM will only record information on (i) the nature of complaint (what the complainant says in their own words); and (ii) if, to the best of their knowledge, the survivor believes the perpetrator was associated with the project.
- The GRM Operator needs to report the case within 24 hours to the PMU, as the PMU is obliged to report any cases of GBV/SEA to the World Bank within 48 hours following informed agreement by the survivor. The PMU would then refer the survivor to ensure the adequate provision of case management and referral pathways, ensuring survivor confidentiality.
- OM will sensitize the public on SEA, raise public awareness about the different entry points to place complaints with the GRM, train stakeholders (contractors, communities, PMU), assist and refer survivors to appropriate service providers, and monitor implementation of the GBV risk mitigation and response measures. This includes the sensitization of affected populations to the risk and impact of GBV through awareness-raising sessions and the dissemination of information as well as through education and communication materials on GBV prevention. All information should be made accessible to children so they are aware of how to report incidents from the project affecting them.
- IOM will monitor that the courses for contractors regarding the CoC obligations and awareness-raising activities for the community are in place or will conduct them itself. The information gathered will be monitored and reported to the PMU and the World Bank.
- Community awareness on child protection concerns: Communities should be informed that in the events that project or partner staff abuses a child they should refer such complains to child protection partners without recording.
- Target livelihoods activities for women, survivors of GBV and at-risk youth, including capacity building for income generating activities. In particular, women will participate in WASH operations and maintenance. Activities will include:
 - Training women as pump mechanics
 - Ensuring and facilitating the role of women in managing user fees and determining maintenance schedules for investments;

Social norms change programming with men and male youth on positive masculinities, reducing the use of violence, particularly against intimate partners, and prevention of GBV. In particular, the ECRP-II will work with the “Engaging Men through Accountable Practice (EMAP) approach. This programme created by IRC and implemented by IOM and AYA in South Sudan has three components: Training of trainers, sessions with women’s groups and men’s dialogue groups. The goal of the EMAP intervention is to reduce harmful behavior and increase gender equality in the home, prevent gender based violence through individual behavioral change and build on existing community efforts to address gender based violence.

The EMAP approach will be used to complement ECRP-II gender components on women’s empowerment though the creation of labor opportunities for women. Such components can exacerbate the risk of GBV and domestic violence due to changes in intra household dynamics. The project will consider including features of the Men’s Resource Center (In Rwanda) to provide men and couples with the opportunity to discuss important topics such as paternity expectations and fears, conflict resolution and the sharing of

caregiving responsibilities¹⁷⁴

Community engagement, in the form of participation in community meetings, leadership in community structures and groups and community construction works are performed predominantly by men. Men are highly engaged in community development activities, such as village meetings, community events, participation in elections and leadership positions. Therefore, engaging and mentoring community leaders and powerholders on the inclusion and rights of women, people with disabilities and youth in decision-making is key and will facilitate women's meaningful participation in community structures. Most social and government institutions that handle sexual and domestic violence cases are male dominated. Therefore, it is key to involve community leaders in awareness raising and education campaigns regarding the rights of women. Issues such as land rights, GBV conflict related vulnerabilities, dowry and domestic violence should be tackled with the aim of changing community leader's and chief's perception of this topic towards gender equality.¹⁷⁵

Monitoring of GBV/SEA and Child Protection Cases

IOM will monitor all GBV/SEA and child protection cases reported through the various reporting mechanisms and report back to the PMU. IOM and the PMU will adopt a mixed-method approach to monitoring, including the utilization of perception surveys and community-based monitoring, to enable an in-depth understanding of the impact of activities on community members. This is a particularly pertinent approach given the sensitivities of interventions aimed at peacebuilding, social cohesion and governance.

This approach will also serve to empower local communities by strengthening their involvement and engagement in project implementation. In order to respond to shifting dynamics and local needs, real-time monitoring will be used to ensure that the information and data gathered is used to inform ongoing programming and subsequent activities¹⁷⁶.

Monitors will ensure that:

- Communities, including children, are aware of the risks of GBV, their rights and the mechanisms available to them to report GBV cases
- Appropriate referral pathways are provided to survivors
- Changes in the perception of gender inequality and women's rights among male community leaders and chiefs leading to more gender equal customary law resolutions
- Essential services are provided to the survivor
- All staff are trained on PSEA, CoC and their protocols. At the PMU level a complaint is received and processed and the protocols are followed in a timely manner and complaints are referred to the GBV resolution mechanism to be addressed
- Where applicable, a response from the criminal justice system to investigate sexual violence/exploitation is provided
- Where applicable, perpetrators are brought to justice and survivors are encouraged to report and engage with the criminal justice system
- Services from the health system are provided, including for acute and long-term health implications

¹⁷⁴ World Bank assessment of projects.

¹⁷⁵ World Bank (2017), GBV recommendations for World Bank Investment Projects.

¹⁷⁶ IOM, South Sudan Return, Recovery & resilience Strategy 2019-2022.

of sexual violence

- A comprehensive response from social welfare services and community-based support services is provided
- The needs of survivors are met and outcomes improved.

Indicators for referral pathways¹⁷⁷:

- Referral pathways in place and functional
- GBV SOPs are in place at national and sub-national levels
- Percentage of GBV survivors who were referred for comprehensive care, within a given time period
- Percentage of first responders who are trained/oriented on the referral pathway
- Standard intake and referral forms are developed and utilized by service providers
- Capacities of GBV actors are mapped and assessed to strengthen referral system.

Monitoring and Supervision of Action Plan

Continuous monitoring: New complaints and ongoing cases and complaints will be followed closely by the IOM monitoring team to ensure instant appropriate responses.

Monthly review of services: The PMU and IOM will conduct monthly review of services to ensure the continuous availability of services, continued access to services by survivors, dissemination of correct information to survivors during case management and to women, girls and the community during awareness on services available.

Quarterly monitoring of Action Plan. The PMU will monitor the implementation of this Action Plan on a quarterly basis. Quarterly reviews will focus on:

- Ensuring that all activities (as listed above) have been undertaken and/or are on track
- Reviewing all referrals made in specific cases, and assess whether complaints have been handled and resolved appropriately
- Monitoring and reporting on the effectiveness of the implementation of the Action Plan
- Reporting on progress on all activities and re-assessment of risks, monitoring of the situation as appropriate.

Non-compliance: Where quarterly reviews identify non-compliance with the Action Plan, the matter will be reported to the PMU Project Manager. The PMU will then seek clarification from IOM and jointly develop plans for how to assist the IP to bring activities back on track. Serious cases of non-compliance will be reported to the World Bank by the PMU and may result in closure of activities.

Documenting of lessons learnt. Bi-annual reviews will allow for the development of lessons learnt, which are aimed at allowing for adjustments of the Action Plan, but should also contribute to general understanding and improvement of GBV/SEA and child protection risk mitigation.

Reporting to the World Bank: in addition to emergency reporting, quarterly reviews, lessons learnt and any other insights will be integrated into the general bi-annual ECRP-II report to the World Bank.

Monitoring GBV prevention and response

The following questions should be integral to the monitoring of GBV prevention and response:

¹⁷⁷ UNFPA GBVIE Minimum Standard.

- Benefits/positive impacts: What do women, girls, boys and men think and feel about the project? What benefits is the project bringing to the lives of the target population?
- Participation/access/leadership: How are women, girls, boys and men participating in the project? What is the extent of their participation? What barriers to participation are being experienced?
- How can they be overcome? Does action need to be taken to enhance the participation of girls and/or women in decision-making or leadership? Are there other at-risk subgroups that need to be addressed through this project?
- Negative consequences/adverse impacts: Is the project worsening the situation for women, girls, boys and men? In what ways? To what extent? What will be done to change this negative impact?
- Equity: Are some groups of women, girls or other at-risk groups in that context being excluded? Who is not being reached?
- Empowerment: Are women and girls being empowered? How? To what extent? What else needs to, or can, be done to enhance their empowerment?



IASC Six Core Principles Relating to Sexual Exploitation and Abuse¹

1. "Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.
3. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of assistance that is due to beneficiaries.
4. Sexual relationships between humanitarian workers and beneficiaries are strongly discouraged since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of humanitarian aid work.
5. Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.
6. Humanitarian workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment."

UN SUPPLIER CODE OF CONDUCT (2017)

United Nations Charter: The values enshrined in the United Nations (UN) Charter, *respect for fundamental human rights, social justice and human dignity, and respect for the equal rights of men and women*, serve as overarching values to which suppliers of goods and services to the UN1 are expected to adhere.

Global Compact: The Global Compact is a voluntary international corporate citizenship network initiated to support the participation of both the private sector and other social actors to advance responsible corporate citizenship and universal social and environmental principles to meet the challenges of globalization. The UN strongly encourages all suppliers to actively participate in the Global Compact. And to that end, this Code of Conduct has been developed with recognition of the importance of the ten principles of the UN Global Compact and is viewed as an important means of integrating the Compact into the operations of the UN. The Code of Conduct addresses the issues included in the Compact in the areas of human rights, labor, environment and anti-corruption and interpretation of the Code should be undertaken in a manner consistent with the Global Compact. Suppliers interested in supporting the Global Compact and obtaining more information on the ten principles, can visit the Global Compact website at www.unglobalcompact.org.

International Labor Conventions and Recommendations: The International Labor Standards (i.e., Conventions and Recommendations) as established by the tripartite UN specialized agency, the International Labor Organization (ILO), have served as the foundation on which much of this Code of Conduct is based. It is the UN's expectation that any supplier providing products or services to the UN will, in addition to the values of the UN Charter, adhere to the principles concerning International Labor Standards summarized below in paragraphs 4 – 9.2

1. Scope of Application:

The UN expects that these principles apply to suppliers and their employees, parent, subsidiary or affiliate entities and subcontractors. The UN expects suppliers to ensure that this Code of Conduct is communicated to their employees, parent, subsidiary and affiliated entities as well as any subcontractors, and that it is done in the local language and in a manner that is understood by all. In order for a supplier to be registered as a UN supplier or to do business with the UN, the supplier is required to read and acknowledge that this Code of Conduct provides the minimum standards expected of UN Suppliers. In addition, suppliers should note that certain provisions of this Code of Conduct will be binding on the supplier in the event the supplier is awarded a contract by the UN pursuant to the terms and conditions of any such contract. Failure to comply with certain provisions may also preclude suppliers from being eligible for a contract award, as reflected in the solicitation documents of one or more organizations in the UN. Prospective suppliers are invited to review the specific terms and conditions of contract and procurement policies of the organization(s) within the UN with which they would like to do business in order to ascertain their current and future eligibility.

2. Continuous Improvement:

The provisions as set forth in this Code of Conduct provide the minimum standards expected of suppliers to the UN. The UN expects suppliers to strive to exceed both international and industry best practices. The UN also expects that its suppliers encourage and work with their own suppliers and subcontractors to ensure that they also strive to meet the principles of this Code of Conduct. The UN recognizes that reaching some of the standards established in this Code of Conduct is a dynamic rather than static process and encourages suppliers to continually improve their workplace conditions accordingly.

3. Management, Monitoring and Evaluation:

It is the expectation of the UN that its suppliers, at a minimum, have established clear goals toward meeting the standards set forth in this Code of Conduct. The UN expects that its suppliers will establish and maintain appropriate management systems related to the content of this Code of Conduct, and that they actively review, monitor and modify their management processes and business operations to ensure they align with the principles set forth in this Code of Conduct. Supplier participants in the Global Compact are strongly encouraged to operationalize its principles and to communicate their progress annually to stakeholders.

Labour:

4. Freedom of Association and Collective Bargaining: The UN expects its suppliers to recognize the freely-exercised right of workers, without distinction, to organize, further and defend their interests and to bargain collectively, as well as to protect those workers from any action or other form of discrimination related to the exercise of their right to organize, to carry out trade union activities and to bargain collectively.

5. Forced or Compulsory Labor: The UN expects its suppliers to prohibit forced or compulsory labor in all its forms.

6. Child Labor: The UN expects its suppliers not to employ: (a) children below 14 years of age or, if higher than that age, the minimum age of employment permitted by the law of the country or countries where the performance, in whole or in part, of a contract takes place, or the age of the end of compulsory schooling in that country or countries, whichever is higher; and (b) persons under the age of 18 for work that, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of such persons.

7. Discrimination: The UN expects its suppliers to ensure equality of opportunity and treatment in respect to employment and occupation without discrimination on grounds of race, colour, sex, religion, political opinion, national extraction or social origin and such other ground as may be recognized under the national law of the country or countries where the performance, in whole or in part, of a contract takes place. The UN expects its suppliers to take all appropriate measures to ensure that neither themselves nor their parent, subsidiary, affiliate entities or their subcontractors are engaged in any gender-based or other discriminatory employment practices, including those relating to recruitment, promotion, training, remuneration and benefits.

8. Wages, Working Hours and Other Conditions of Work: The UN expects its suppliers to ensure the payment of wages in legal tender, at regular intervals no longer than one month, in full and directly to the workers concerned. Suppliers should keep an appropriate record of such payments. Deductions from wages are permitted only under conditions and to the extent prescribed by the applicable law, regulations or collective agreement and suppliers should inform the workers concerned of such deductions at the time of each payment. The wages, hours of work and other conditions of work provided by suppliers

should be not less favourable than the best conditions prevailing locally (e.g. collective agreements covering a substantial proportion of employers and workers / arbitration awards / applicable laws or regulations) for work of the same character performed in the trade or industry concerned in the area where work is carried out.

9. Health and Safety: The UN expects its suppliers to ensure, so far as is reasonably practicable, that: (a) the workplaces, machinery, equipment and processes under their control are safe and without risk to health; (b) the chemical, physical and biological substances and agents under their control are without risk to health when the appropriate measures of protection are taken; and (c) where necessary, adequate protective clothing and protective equipment are provided to prevent, so far as is reasonably practicable, risk of accidents or of adverse effects to health.

Human Rights:

10. Human Rights: The UN expects its suppliers to support and respect the protection of internationally proclaimed human rights and to ensure that they are not complicit in human rights abuses.

11. Harassment, Harsh or Inhumane Treatment: The UN expects its suppliers to create and maintain an environment that treats all employees with dignity and respect. The UN further expects that its suppliers, as well as their parent, subsidiary and affiliated entities along with any subcontractors, will neither use or engage in, nor allow their employees or other persons engaged by them to use or engage in, any: threats of violence, verbal or psychological harassment or abuse, and/or sexual exploitation and abuse. Sexual exploitation and abuse violate universally recognized international legal norms and standards and have always been unacceptable behavior and prohibited conduct for the UN. Prior to entering into agreements with the UN, suppliers are informed of the standards of conduct with respect to the prohibition of sexual exploitation and abuse, expected by the UN. Such standards include, but are not limited to, the prohibition of: (i) engaging in any sexual activity with any person under the age of 18, regardless of any laws of majority or consent, (ii) exchanging any money, employment, goods, services, or other things of value, for sex, and/or (iii) engaging in any sexual activity that is exploitive or degrading to any person. The UN expects its suppliers to take all appropriate measures to prohibit their employees or other persons engaged by the suppliers, from engaging in sexual exploitation and abuse. The UN also expects its suppliers to create and maintain an environment that prevents sexual exploitation and abuse. United Nations contracts will contain provisions concerning a supplier's obligation to take appropriate measures to prevent sexual exploitation and abuse. The failure by a supplier to take preventive measures against sexual exploitation or abuse, to investigate allegations thereof, or to take corrective action when sexual exploitation or abuse has occurred, constitute grounds for termination of any agreement with the United Nations. Moreover, no harsh or inhumane treatment coercion or corporal punishment of any kind is tolerated, nor is there to be the threat of any such treatment.

12. Mines: The UN expects its suppliers not to engage in the sale or manufacture of anti-personnel mines or components utilized in the manufacture of anti-personnel mines.

Environment:

13. Environmental: The UN expects its suppliers to have an effective environmental policy and to comply with existing legislation and regulations regarding the protection of the environment. Suppliers should wherever possible support a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility and encourage the diffusion of environmentally friendly technologies implementing sound life-cycle practices.

14. Chemical and Hazardous Materials: Chemical and other materials posing a hazard if released into the environment are to be identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.

15. Wastewater and Solid Waste: Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be monitored, controlled and treated as required prior to discharge or disposal.

16. Air Emissions: Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge or disposal.

17. Minimize Waste, Maximize Recycling: Waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

Ethical conduct:

18. Corruption: The UN expects its suppliers to adhere to the highest standards of moral and ethical conduct, to respect local laws and not engage in any form of corrupt practices, including but not limited to extortion, fraud or bribery.

19. Conflict of Interest: UN suppliers are expected to disclose to the UN any situation that may appear as a conflict of interest, and disclose to the UN if any UN official or professional under contract with the UN may have an interest of any kind in the supplier's business or any kind of economic ties with the supplier.

20. Gifts and Hospitality: The UN will not accept any invitations to sporting or cultural events, offers of holidays or other recreational trips, transportation, or invitations to lunches or dinners. The UN expects its suppliers not to offer any benefit such as free goods or services, employment or sales opportunity to a UN staff member in order to facilitate the suppliers' business with the UN.

21. Post-employment restrictions: Post-employment restrictions may apply to UN staff in service and former UN staff members who participated in the procurement process, if such persons had prior professional dealings with suppliers. UN suppliers are expected to refrain from offering employment to any such person for a period of one year following separation from service.

Annex 4: Procedures for Managing Contractors

This procedure was developed consistent with the World Bank Group ESHS Guideline which incorporates the IFC ESHS Guidelines, under the “Good Practice Note: Managing Contractors’ Environmental and Social Performance”. This is to remind the borrower’s responsibility to comply with the ESHS Guidelines, loan agreement commitments, ESIA, local laws and regulations, and permits and standards, ensuring that any contractor providing services of any kind to the implementing entity duly follows these requirements throughout the duration of the contract, including any activity or services performed by subcontractors or third parties undertaking a contract from the contractor.

IOM must use its direct control over contractors to ensure that E&S requirements are met by contractors. To achieve this commitment, IOM needs to include in subcontracts the requirement to comply with all the ESS and all E&S requirements that are appropriate for the works being subcontracted and consistent with the implementing entity’s and the contractor’s E&S management programs.

Understanding Implementation Responsibilities: The roles of IOM and contractors in meeting E&S requirements are intertwined and must be worked out at the subproject level. In some cases, such as stakeholder engagement, both IOM and contractors will have certain obligations and limits and will need to coordinate their efforts. In others, such as monitoring, each party will monitor E&S performance, but at different frequencies and levels of detail. In all cases, the PMU remains ultimately responsible to the World Bank for ensuring E&S requirements are met, with the responsibilities of the contractor defined in the contract. The design standards and requirements of subprojects (and operation standards) will also be set out in the terms of reference of the contract.

Contractor Oversight: IOM will monitor contractors and their E&S performance and ensure the contractor monitors its own and all subcontractors’ E&S performance throughout construction, including mobilization, the main construction phase, and demobilization. Clear responsibilities and reporting lines are essential to avoid duplication of effort or, conversely, gaps in monitoring. If operations are carried out under contract, or some work is performed by contractors, IOM and the contractor will monitor E&S performance during operations as well. All contractors engaged on the project operate in a manner consistent with the requirements of the ESSs, including the specific requirements set out in the Environmental and Social Commitment Plan (ESCP).

IOM should require contractors to report on an agreed frequency their E&S performance and metrics (which shall include relevant information and data from subcontractors, as applicable). Timely reporting of E&S performance and results enables the client to identify opportunities for improvement, prevent poor performance issues, and assist contractors if remedial action is to be taken.

E&S Performance Meetings: Regular meetings are essential to ensure contractor performance is satisfactory and that project specifications are being met. Experience has shown that IOM may share performance-monitoring results at weekly meetings with all contractors to effectively drive improved performance by introducing a competitive element, sometimes with small incentives. The authority of monitoring staff who control contractor performance also needs to be clarified and understood by contractors (for example, who gives instructions to stop work or proceed but with modifying the approach, scope, equipment, and so forth).

IOM should ensure that contractors employ qualified E&S personnel to oversee E&S performance, and that contractor staffing and resources are commensurate with the magnitude and timing of work and potential E&S risks. IOM should also approve documentation, including for training programs, to ensure all staff are aware of E&S commitments and their part in meeting them.

Review and Approval of Contractor Site-Specific E&S plans: IOM is responsible for its contractors, meeting all of the project's E&S requirements, it is essential for them to review and approve project E&S management plans and procedures, including a C-ESMP prepared by the contractor. These might include such plans as working within boundaries (footprint management), protection of biodiversity, land clearing and erosion control, traffic management, labor sources and methods of recruitment of workers, worker accommodation, noise and dust control, and possibly others. Where an ESMP has not been approved, no works will commence in the area.

Kickoff Meeting: Prior to early work activities, the PIU should hold a kickoff meeting with each of the contractors prior to arriving at the site. Timing of mobilization based on logistical issues, resources, customs delays, and so forth should be considered in the planning. IOM and contractor project managers and subcontractors should participate in these meetings. The purpose is to review planned activities and schedules, review E&S requirements (among others), review the roles of the various parties in implementing and monitoring mitigation measures, and agree on project-specific induction and training content. These meetings should include a discussion about control of access to the site, use of security forces if applicable, the implementation of relevant provisions in the GBV/SEA/SH Action Plan and the LMP, as well as the requirements for the implementation of a Project GRM and a worker GRM, and how to best coordinate the security management system and E&S activities at both the base camp (accommodation site) and any remote construction sites. Both client and contractor E&S representatives should be present to reiterate all E&S commitments and establish initial compliance points and coordination requirements during site establishment.

E&S Induction and Training: A general E&S site induction should be mandatory for all workers, with specialized technical E&S training delivered to staff. The degree of training should be based on the project's E&S risks, on the tasks that will be performed, the CoC, including the SEP, and SMP, and on the general E&S provisions that are applicable for all personnel, including contractors and subcontractors. All workers should be made aware of the worker GRM and Project GRM and how to access them. Contractors should develop and implement SEA and GBV awareness training for staff at all levels, from contract management to day laborers. Additional training may be needed for staff that will be responsible for implementing, monitoring, and reporting E&S performance. Once the general E&S induction is defined, a series of specific trainings may be required in order to ensure that the requirements, controls, and mitigation measures are well communicated and understood.

PIU Monitoring of Activities: The monitoring of contractor E&S performance by IOM must be practiced throughout construction, from mobilization through demobilization. This should involve both visits to work locations and reviews of records kept by the contractor and of reports submitted by the contractor. The frequency of site visits should be commensurate with the magnitude of the E&S risks of the activities being carried out and permanence of potential impacts that could result from ongoing activities. Monitoring may be conducted by IOM E&S staff.

IOM environmental and social officers should review one or more recent inspection reports and the contractor's previous month's E&S progress report prior to visiting the site to monitor the contractor's E&S performance. They should do the same before participating in meetings where the contractor's E&S

performance is to be discussed. IOM will review contractor reports and follow up as needed to ensure timely resolution of issues of noncompliance with E&S requirements. This may include additional visits to the contractor’s site or offices, further communications with contractor E&S personnel, issuance of notices of deficiency or warnings to the contractor, and other actions as needed.

At any stage of construction or other work, if the contractor has not taken appropriate action to achieve compliance with E&S requirements after repeated notices of violation and warnings of noncompliance, and significant E&S impacts are occurring or imminent, the PIU should order the contractor to stop work until E&S performance is brought under control and up to acceptable standards.

Contractor Monitoring and Reporting: IOM should require contractors to monitor and keep records on E&S performance in accordance with the E&S management plans. This may include monitoring of E&S matters, scheduled and unscheduled inspections to work locations, observations made during routine activities, desk reviews, drills, and any other monitoring protocols implemented by the contractor to ensure E&S compliance. IOM must be familiar with the contractor’s monitoring and record keeping system so this aspect of the contractor’s performance can itself be monitored.

Responsibilities for monitoring need to be clear between the client and contractor, and results (if client and contractor are both collecting data) must be comparable, for example, collected using the same methodologies, analyzed at the same labs, and using similar equipment, and so forth.

IOM should require contractors to report on E&S performance on at least a monthly basis throughout the construction phase, including mobilization, construction, and demobilization. This could be more frequent for more sensitive E&S projects. It can be part of the overall engineering progress report or a stand-alone E&S report. The table below shows the E&S parameters considered in the reporting of E&S performance. Parameters to consider for E&S reporting by the contractor at least on a monthly basis.

IOM will require all contractors to ensure that all workers have signed a Code of Conduct (see Annex 3).

Item	Parameter	Description
1	<i>Safety:</i>	hours worked, recordable incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, and so forth).
2	<i>Environmental incidents and near misses:</i>	environmental incidents and high potential near misses and how they have been addressed, what is outstanding, and lessons learned.
3	<i>Major works:</i>	those undertaken and completed, progress against project schedule, and key work fronts (work areas).
4	<i>E&S staffing:</i>	new hires and departures, and listing of current staff and titles.
5	<i>E&S requirements:</i>	noncompliance incidents with permits and national law (legal noncompliance), project commitments, or other E&S requirements.
6	<i>E&S inspections and audits:</i>	by contractor, engineer, or others, including authorities—to include date, inspector or auditor name, sites visited and records reviewed, major findings, and actions taken.
7	<i>Workers:</i>	number of workers, indication of origin (expatriate, local, nonlocal nationals), gender, and skill level

		(unskilled, skilled, supervisory, professional, management).
8	<i>Training on E&S issues:</i>	including dates, number of trainees, and topics
9	<i>Footprint management:</i>	details of any work outside boundaries or major off-site impacts caused by ongoing construction—to include date, location, impacts, and actions taken.
10	<i>External stakeholder engagement:</i>	highlights, including formal and informal meetings, and information disclosure and dissemination—to include a breakdown of women and men consulted and themes coming from various stakeholder groups, including vulnerable groups (e.g., disabled, elderly, children, etc.).
11	<i>Details of any security risks:</i>	details of risks the contractor may be exposed to while performing its work—the threats may come from third parties external to the project or from inappropriate conduct from security forces employed either by the client or public security forces.
12	<i>Worker grievances:</i>	details including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken—grievances listed should include those received since the preceding report and those that were unresolved at the time of that report.
13	<i>External stakeholder grievances:</i>	grievance and date submitted, action(s) taken and date(s), resolution (if any) and date, and follow-up yet to be taken—grievances listed should include those received since the preceding report and those that were unresolved at the time of that report. Grievance data should be gender-disaggregated. Particular sensitivity may be needed around SEA or GBV issues raised.
14	<i>Major E&S changes:</i>	to E&S management, or E&S practices (most often done by the Project Implementing Entity)
15	<i>Deficiency and performance management:</i>	actions taken in response to previous notices of deficiency or observations regarding E&S performance and/or plans for actions to be taken—these should continue to be reported until the client determines the issue is resolved satisfactorily.

Annex 5: Labor Management Procedures

The World Bank's Environmental and Social Standard 2 (ESS2) - Labor and Working Conditions and ESS4 - Community Safety and Health were identified as applicable for the project. In accordance with the requirements of ESS2, these Labor Management Procedures (LMP) were prepared. The purpose of the LMP is to set out the ways in which the PMU and IOM will manage all project workers in relation to the associated risks and impacts. The objectives of the LMP are to:

- (a) Identify the different types of project workers that are likely to be involved in the project
- (b) Identify, analyze and evaluate the labor related risks and impacts for project activities
- (c) Set out procedures to meet the requirements of ESS2, ESS4 and applicable national legislation.

The LMP will be applied with due consideration to the requirements of national laws, the interrelatedness of ESS2 with other Environmental and Social Standards in general and ESS4 in particular.

The LMP will be administered to different types of project workers as follows:

- (a) **Direct Workers.** People employed directly by the MoP to work specifically in relation to the project in the PMU at the Head Office in Juba.
- (b) **Contracted Workers.** People engaged through third parties to perform work related to core functions of the project, regardless of location. Under this category are included employees of IOM as well as all other partners (including NGOs) that IOM may contract to implement project activities.
- (c) **Primary Supply Workers.** People engaged by IOM's primary suppliers. These include, for example, suppliers of road rehabilitation materials like gravel or other goods required.
- (d) **Community Workers.** People employed or engaged in providing community-based project interventions. These will include community members who will be working in minor road or other infrastructure works.

The LMP will apply to project workers including fulltime, part-time, temporary and seasonal. The project scope does not have chances of employing migrant workers.

Labor Forecast / Types of Activities

The ECRP-II has four Components:

Component 1: Community Infrastructure and Services. This component will support eligible investments in community-level infrastructure and services in selected vulnerable areas through a participatory planning process. Eligible investments are limited to construction or rehabilitation of public goods such as water supply and sanitation facilities, footpaths and community roads, dykes for flood protection, health and education facilities, among others, to ensure maximum community benefit.⁵⁷ Selection will be made from an open menu (subject to a short exclusion list)⁵⁸ from which communities will choose in a participatory manner, based on their needs and priorities. The community-infrastructure will adopt disaster and climate resilient approaches including risk assessments to identify safe location and elevated building structure to reduce inundation risk.

Component 2: Institution Strengthening: This component supports the participatory planning process for the identification of subprojects to be financed under Component 1, monitoring of the construction and O&M of subprojects, and capacity building of the national and local institutions. This Component will include Sub-Components on Community Institution Strengthening; County Government Strengthening; National Government Strengthening; and Operations & Maintenance.

Component 3: Project Management and Learning. This component will support (a) project management including technical planning, financial management (FM), procurement, social and environment risk management, and communications; (b) project monitoring which includes a geo-enabled monitoring system and beneficiary feedback/grievance redress mechanism (GRM); (c) impact evaluation; (d) continuous conflict analyses; (e) just-in-time studies as and when needs arise. Such studies may include O&M study, engagement with refugees and IDPs in camp settings, etc.; (f) financing for a third-party monitor (TPM); and (g) PMU operating costs.

Component 4: Contingency Emergency Response. A contingency emergency response component (CERC), initially without a budget allocation, will allow for the rapid reallocation of project funds in the event of natural or man-made crisis and major disease outbreaks of public health importance during the implementation of the project, in accordance with the World Bank Investment Project Financing (IPF) Policy, paragraphs 12 (Projects in Situations of Urgent Need of Assistance or Capacity Constraints).

The labor requirements of the ECRP-II show that the LMP will have to cater for all four categories of project workers as described in ESS2, namely direct workers, contracted workers, primary supply workers and community workers.

Labor Risk Assessment

As part of the labor risks and impacts identification, the following activities will assist in understanding the exposure pathways. However, it has to be pointed out that since an open menu approach will be deployed in communities for the selection of subprojects, presented here are only key risks related to workers of predictable activities:

- (a) The main activities for community workers will be light works construction and rehabilitation of water supply, sanitation facilities, community roads, health facilities, and educational facilities.
- (b) The main types of activities for contracted workers will be activities in the construction and rehabilitation of water supply, sanitation facilities, community roads, health facilities, and educational facilities - including more complicated civil works (heavy equipment).

The table highlights and analyses the potential labor related risks and impacts in view of the anticipated labor utilization and general baseline settings of the project areas.

Table Labor Risk Identification and Analysis

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Risk Mitigation Measures
ESS2: Labor and working conditions		
Labor standards are not in accordance to national laws and international standards	There are some gaps between South Sudanese labor laws and international standards / ESS 2 (for example in regards to child labor, see below. See annex 6 for legal and policy review and legal gap analysis).	Through the implementation of this LMP the gaps are addressed
Underpayment of contracted workers or supply workers	Since South Sudan has no statutory minimum wage, there is a risk that local contractors and sub-contractors underpay the contracted or supply workers.	The project will decide on a minimum wage (categorized by type of task, and based on comparable projects implemented by international organizations) and implement it throughout the project / cascade it down to contractors
Labor disputes over contracts	Given the generally high conflict potential, it is possible that disputes over contracts emerge	The project will provide workers' GRM
Deployment of immigrant/migrant workers without required permits	Significant amounts of unskilled jobs are filled by immigrant workers. These require work permits, which can be subject to lengthy processes. The risk therefore exists that local contractors contract migrant workers without appropriate permits in country.	The project will prioritize workers hired locally to strengthen local ownership and benefits, and, where that is not possible, ensure that workers from abroad have the appropriate permits.
Poor working conditions: Unsafe work environment	Due to the protracted conflict in South Sudan and the weakness of formal justice institutions, employees' working conditions are poor and the project needs to ensure that such working conditions are not accepted. The impact is significant in that it may manifest in exploitation of the very community that the project intends to benefit, community workers, but also contracted workers may be affected.	Supervision of Contractor Labor Management Practices is essential to mitigate against this risk. A contractor checklist will be used.
Poor working conditions: lack of workers' rights	Labor laws in South Sudan have been criticized for their lack of enforcement. This is not surprising given that the formal justice sector is generally extremely weak.	The project therefore needs to ensure, through rigorous workers' grievance mechanisms, that workers can articulate violations of their rights and receive redress.
Discrimination against women in employment	In most rural communities in South Sudan, women typically carry out household work owing to the general perception that men go to formal work while women and girls assume household duties. If there is no deliberate effort by the project to encourage the local women to thrive in contracted work or community work the risk of missing them as beneficiaries of potential employment is substantial. There is also a high incidence of sexual harassment of female workers by other workers, and discrimination in recruitment and employment of women generally.	Contractors are compelled to safeguard the interests of women, including gender parity at the workspace, prohibiting sexual harassment and other forms of GBV toward female workers by other project workers, appropriate sanitation facilities at workplace, and appropriate PPE for women.
Use of child labor	The general minimum age for work is 14 (which is in accordance with ILO standards on minimum age where a country's economy and educational facilities are insufficiently developed). <u>Children between the ages 14 and 18 to</u>	The minimum age of eighteen will be enforced in recruitment and in daily staff team talks by contractors. IOM will also supervise this through the Contractor Management Checklist.

	<u>engage in the worst forms of child labor, violating international standards.</u> Compulsory education age (13) is inconsistent with minimum age for work (14).	
Worst forms of child labor	<p>The Labor Act lacks clarity on prohibitions on the worst forms of child labor. Article 12(2) allows children between the ages 14 and 18 to engage in the worst forms of child labor, violating international standards.</p> <p>In practice, children in South Sudan engage in armed conflict and in cattle herding. The national army continues to recruit, sometimes forcibly, children to fight opposition groups. Children are further engaged in other worst forms of child labor, including in commercial sexual exploitation. Perpetrators have not been brought to justice.</p> <p>Furthermore, hazardous work falls under the worst form of child labor.</p>	The project will not recruit any workers for hazardous work and will enforce the minimum age of 18 for all workers.
Forced Labor	Forced labor takes place in South Sudan, for example in regards to recruitment into the national army. There is hence a risk that forced labor will be deployed under the project, for example in the form of community workers by local governments.	Contractors' obligations will be spelled out in their respective contracts and the PMU will monitor full compliance
Injuries at the workplace	Given that PPE may be scarce for contracted workers or community workers, and health and safety regulations may not exist or not be enforced.	Contractor occupational risk assessments and mitigation plans will be devised and implemented.
ESS4: Community Safety and Health		
Labor influx and GBV	There is likely to be internal movement of people from areas outside the project areas to seek employment and associated benefits from within targeted communities. Furthermore, contracted workers may be brought into communities to conduct construction works. Population movement due to labor influx may result in GBV/SEA cases.	IOM and all contractors will implement the Labor Influx Management Procedure (see below); a GBV/SEA Action Plan will be implemented (see annex 3)
Spread of diseases in communities, including HIV through labor influx	Population movement due to labor influx may result in the spread of HIV and other diseases.	IOM and all contractors will implement the Labor Influx Management Procedure (see below), including sensitization on preventing common diseases. Communication of risks will be conducted through locally appropriate means – targeting specific social groups and genders.
Contamination of drinking water supplies, ambient air quality and general nuisance from septic tanks and pit latrines.	The siting and operation of the latrines may create the potential for contamination of the water supply, ambient air and create diseases vectors.	Location of such facilities should be downstream or a minimum of 30 meters from water sources. The direction of wind will be considered and the facilities will be kept clean and hand washing will be observed.
Spread of COVID-19	Given the ongoing Covid-19 pandemic, there is a risk that COVID-19 spread at construction sites.	COVID-19 protocols will be followed at construction sites (see COVID-19 protocols in Annex 15)

Safety of flood risk reduction activities	The safety of the flood risk reduction activities may be compromised by the design of the subproject or by the selected location, which can have adverse impacts of the safety of the community.	Ensure that all proposed flood risk mitigation design, operation and maintenance regimes are designed and reviewed by qualified engineers. Adopt and implement GIIP Safety measures to ensure that flood risk mitigation activities are safe.
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Institutional Arrangement for Implementation of LMP

Given the categories of project workers (direct workers, contracted workers, primary supply workers and community workers), this section lays out the operational arrangements amongst the various institutions that are collaborating with the ECRP-II and ensure the smooth implementation of the LMP. The requirements of the LMP apply to all categories of project workers and where there is a special emphasis for a particular category of workers, this will be highlighted within the applicable section of the LMP.

Direct Workers are those workers employed by the PMU, specifically for the ECRP-II. The requirements of the LMP as applicable to the direct workers will be the responsibilities of the PMU. The PMU will however have an oversight role vis-a-vis IOM through direct reporting arrangement on the requirements of the LMP in particular and other ESMF requirements in general.

Contracted workers are those who will be employed by IOM to execute the project activities. Where the LMP refers to contractor responsibilities, it also refers to IOM. This is in addition to contractors that IOM may engage. IOM therefore has the responsibility to ensure LMP implementation at the interface with its respective contractors and sub-contractors, while the PMU oversees the LMP implementation at all levels.

IOM may engage community workers directly in rehabilitation or construction activities. It is therefore responsible for the full implementation of the requirements of the LMP as it applies to community workers in relation to ESS2, while the PMU will exercise oversight over labor management processes. It has been established that IOM already has some community labor and relations management systems in place and will integrate these existing structures and systems with the LMP to fully comply with the requirements of ESS2 and ESS4 in general and the community workers procedure in particular. IOM will ensure observance of the LMP.

The Primary Suppliers are identified at the sub-project level by IOM or directly during sub-project screening and the applicability of the LMP will be affirmed at that time. IOM has the mandate to ensure that all the procedures for primary supply workers are observed, though the PMU will have the overall responsibility. ESS2 applies a proportionality approach to oversight responsibility towards suppliers. That being said it is important that the project ensures minimum conditions in cases like quarries, or camp service suppliers, or any activities ongoing within construction sites.

The approach to the implementation of this LMP is that all the provisions of the LMP are applied to all project workers. In some cases special mention for a particular category of project worker is required.

Key Procedures

The ECRP-II is guided by the recognition of the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. The ECRP-II will promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions.

Key Procedures Rationale

PMU, IOM and contractors and all project workers will follow up in ensuring the full accomplishment of the objectives of ESS2 and ESS4 in specific. During the gap assessment, there are some aspects that are completely covered through legislation, while aspects not completely covered by legislation will be satisfied through reference to the World Bank's sector specific guidelines on good practices on occupational health and safety (OHS).

Recruitment and Replacement Procedure

Procedure Objective

The objective of this procedure is to ensure that the recruitment process and placement of project workers is conducted in a manner which is non-discriminatory and employees are inducted to all essential work-related matters.

Procedure

1. Contractors submit a recruitment plan to PMU/IOM for review and approval. The following details will be shown:
 - i. Number of staff required
 - ii. Intended working condition as in appendix B
 - iii. Intended locations of staff
 - iv. Job specifications in terms of qualification and experience
2. Contractor publishes the job invitation in the appropriate media (local press or direct invitation for contracted worker, or word of mouth through local leaders for community workers) to ensure all potential candidates have access to the information, including women and persons with disabilities, actively addressing risks of nepotism, or other forms of recruitment or employment discrimination.
3. Shortlist and recruit candidates ensuring the following;
 - i. As far as possible, 50% shortlisted candidates are women.
 - ii. As far as possible, 50% engaged employees are women.
 - iii. Screen off candidates under the age of eighteen years.
4. On recruitment, ensure a contract of employment is signed voluntarily, for both contracted workers and community workers.
5. For community workers, contractors will have the terms and conditions discussed, explained, negotiated and documented through joint community meetings, with each community employee showing consent by appending their signature against the resolutions or signing the attendance register of the meeting which made the employment resolutions.
6. Before commencement of work, the contractor will ensure the employee is inducted on the essential work related issues, which include the following;
 - i. Key Job Specifications
 - ii. Terms and Conditions of Employment
 - iii. Special Codes of Conduct
 - iv. Disciplinary Procedures
 - v. Workers' Grievance Mechanism
 - vi. Freedom to join and participate fully in Workers Association activities, Employment Council or Trade Union
 - vii. Key E&S aspects of the ECRP-II and the ESMF and other E&S instruments
 - viii. Emergency Preparedness

7. Maintain all such employment records available for review by the PMU, the World Bank, or Regulatory Authority.

Workers' Grievance Redress Procedure

a. Objectives of the procedure

The objective of this procedure is to settle the grievance between an employer and employee or between employees bilaterally before recourse to formal dispute resolution. Under the provisions of ESS2, the project will provide a grievance mechanism for all direct and contracted workers to raise workplace concerns. Workers will be informed of this grievance mechanism at the time of recruitment and the measures put in place to protect them from any reprisal for its use. The project will put in place measures to make the worker grievance mechanism easily accessible to all project workers.

b. Procedure

1. IOM will only engage contractors with registered code of conduct or who sign an undertaking to comply with the provisions of the South Sudan Labor Act from 2017 for contracted workers and contractors who will comply with community meetings resolutions on applicable rules in the case of community workers.
2. Contractors induct the employee on the applicable workers' grievance redress mechanism. Induct all project workers to be aware of their rights. All records of induction shall be kept and made available to the World Bank.
3. In case of violation, the aggrieved employee must capture and present the details of the grievance to the person they report to or the supervisor's superior in case of conflict of interest.
4. The supervisor will verify the details and seek to address the matter within the shortest time (up to 48 hours).
5. The supervisor will escalate the matter if not resolved within 48 hours if a resolution is not found.
6. Where no resolution is found, the employee can escalate the matter to the sector specific institutions or courts who will resolve the matter between employer and employee, except in cases where the employer is a UN entity, in which case see paragraph 7 below. The Supreme Court's decision is final, where it has exercised lawful jurisdiction.
7. Where the formal courts are not accessible, do not exist in an area, or cannot render a judgment, the matter shall be reported to and handled under the PMU, for example through the Project Grievance Redress Mechanism (GRM). The PMU, in this case, will accommodate a fair agreement between the worker and the contractor.
8. The contractor shall keep records of all proceedings of grievance redress that are within their jurisdiction and furnish IOM as part of the periodic progress reporting to the PMU/IOM.
9. All grievances of sexual nature (GBV/SEA/SH) should follow the ECRP GBV/SEA and Child Protection Action Plan referral pathways and complaints resolution mechanism.
10. In case of risk of retaliation, the employee may immediately escalate to the court system [6], except in cases where the employer is a UN System entity, or to the PMU as noted under [7]. If confidentiality is requested, the PMU will ensure it to avoid any risk of retaliation, including in its follow-up actions.
11. Community workers apply the project GRM.

Occupational Health and Safety (OHS) Procedures

a. Objective of procedure

The objective of the procedure is to achieve and maintain a healthy and safe work environment for all project workers (contracted workers and community workers) and the host community.

b. Procedure

1. On procurement for contractors, IOM will avail the ESMF, ESMP or other relevant E&S instruments to prospective bidders so that contractors include the budgetary requirements for OHS and community health and safety measures in their respective bids.
2. The contractors will develop and maintain an OHS management system that is consistent with the scope of work, duration of contract and IFC General Environmental Health and Safety Guidelines (EHSGs) on Occupational Health and Safety.
3. Contractors will adopt the sub-project ESMPs and where necessary develop Construction Environmental and Social Management Plans (C-ESMPs) to help manage construction risks.
4. Contractors appoint an appropriately qualified and experienced OHS/Environmental Officer whose responsibilities is to advise the employer on an OHS related issues.
5. Contractors prepare task specific risk assessment (TRA) and safe working procedures (SWP) for executing works;
6. Contractor provides preventive and protective measures, including modification, substitution or elimination of hazardous conditions or substances informed by TRA and SWP.
7. Contractor provides for appropriate training/induction of project workers and maintenance of training records on occupational health and safety subjects including TRA and SWP.
8. Contractor documents and reports on occupational accidents, diseases and incidents.
9. Contractor provides emergency prevention and preparedness and response arrangements to emergency situations including and not limited to:
 - Workplace accidents
 - Workplace illnesses
 - Flooding
 - Fire outbreak
 - Disease outbreak
 - Labor unrest and
 - Security
10. Contractors to comply with all requirements of applicable occupational Health and Safety legislation and Environmental legislation including WB EHS guidelines.
11. Contractors shall maintain all such records for activities related to the safety health and environmental management for inspection by the PMU or The World Bank.

Contractor Management Procedures

a. Objective of procedure

The objective of this procedure is to ensure that PMU/ IOM have contractual power to administer oversight and action against contractor non-compliance with the LMP.

b. Procedure

- i. IOM shall avail all related documentation to inform the contractor about their requirements for effective implementation of the LMP.
- ii. Before submitting a bidding for any contracted work, the contractor shall incorporate the requirements of ESMF and all other relevant E&S instruments
- iii. Contractor to formulate, implement and review contractor specific Management Plans (C-ESMPs) as required by the ESMF and specifically the LMP including:
 - OHS plans
 - Labor Recruitment Plan
 - CoCs for employees
 - Waste management plan
 - Emergency plan
- iv. Contractor to submit the progress reports on the implementation of the LMP and allow IOM access to verify the soundness of the contractor's implementation of the requirements of the LMP.
- v. Where appropriate, IOM may withhold contractor's payment until corrective action(s) is/are implemented on major noncompliance to the LMP. The following are some of the major noncompliance that contractors need to take note of:
 - Failure to submit mandatory quarterly progress report
 - Failure to avail for inspection specified documentation pertaining to the implementation of the ESMP, C-ESMP and LMP
 - Failure to timely notify and submit incident and accident investigation report
 - Failure to appoint or replace a competent and experienced EHS officer
 - Failing to enforce C-ESMPs including provision of adequate appropriate PPE
 - Recruitment of nontechnical staff from outside the local community.

Labor Influx Procedure

a. Objective of the procedure

The objective of this procedure is to capacitate IOM and all contractors to mitigate the labor influx risk and impacts. The influx of workers and followers can lead to adverse social and environmental impacts on local communities, especially if the communities are rural, remote or small. Such adverse impacts may include increased demand and competition for local social and health services, as well as for goods and services, which can lead to price hikes and crowding out of local consumers, increased volume of traffic and higher risk of accidents, social conflicts within and between communities, increased risk of spread of communicable diseases, and increased rates of illicit behavior and crime, including GBV cases.

b. Procedure

- i. Contractor shall ensure that all non-technical work is reserved for locals (identifiable with the host community and witnessed by host community leadership).
- ii. Beneficiary selection and employment recruitment should verify the authenticity of the localness of potential employees.
- iii. Contractor liaises with local leadership on enrolment for community workers while at the same time ensuring that no grievances derive from nepotism via utmost transparency in the selection process, announcing hiring campaigns early enough in community consultations and/or other outreach activities.

- iv. Where there are camp establishments, contractor shall ensure camp management and community relations are good. If labor camps are required, special management plans need to be developed, or if smaller establishment, camp management reflected in the ESMP.
 - Security within camp
 - Social relations with community members should be cordial and consistent with GBV and SEA
 - Waste management
 - Water and sanitation
 - Proper camp demobilization
- v. Establish code of conduct for contract workers interaction with the host community. This may include:
 - Access to camp by children, non-employed girls and women
 - Appropriate language
 - Time restrictions where required
 - GBV/SEA
 - Good conduct if small numbers of workers are accommodated in communities rather than camps (requirements on when to establish a camp shall be included in the POM)
- vi. Contractors should have own supply of, pay for accommodation offered by community to contracted employees.
- vii. Contractor shall ensure that local supply shall not negatively impact the availability of resources for the local communities and sourcing of local wildlife shall be prohibited.
- viii. Contractor shall provide a fully equipped first aid kit.
- ix. Contractors to mainstream HIV issues in the workplace by providing HIV prevention training during induction and continuously during employment through health and safety talks.
- x. Contractor to be fully aware of and be ready to implement the Workers' Grievance Redress Mechanism.

Procedure for Primary Suppliers

Primary supply workers are employees of suppliers who, on an ongoing basis, provide goods and services to the project. IOM has oversight of the implementation of the LMP requirements in this category.

Objective of the procedure

The objective of the procedure is to ensure that labor-related risks to the project from primary supply workers are managed in line with the requirements of ESS2.

Procedure

PMU and IOM will undertake the following measures:

- i. Procure supplies from legally constituted suppliers. The legal registration ensures that the company is legally obliged to comply with all applicable labor laws in South Sudan including the Labor Act, which makes it possible to assume mainstreaming of the labor laws within the supplier's firm. This will include ensure evidence of
 - Certificate of incorporation
 - Tax Clearance
 - Value Added Tax certificate
 - Registration of supplier with regulatory body for the goods or services where required

- ii. Make a physical check on the supplier's labor management system, including parameters in appendix C where applicable, including
 - employee contracts
 - occupational safety and health
 - any past work-related environmental or occupational incidents
 - workers committee in place
- iii. Check products quality certification and environmental rating where required
- iv. Undertaking to take back waste for reuse, for example containers and packaging where applicable
 - vi. Possibility of training in safe use of product by community users where applicable
 - vii. where potential child labor or forced labor or serious safety risks are identified in a specific sector or industry, in connection with the supply of goods, a mapping exercise should be conducted to identify suppliers relying on such goods.
 - viii. Where it is not possible to identify specific primary suppliers, the mapping should identify general industry labor issues relating to the supply of the respective goods.

Procedure for Community Workers

The activities in components 1 will include the use of community workers in a number of circumstances, such as labor provided by the community in construction or rehabilitation activities. In these scenarios of community workers, the related occupational risks are perceived as low since they will be using simple tools and perform light work. Given the nature and objectives of such a project, the application of all requirements of ESS2 may not always be applicable. In all such circumstances, this procedure provides measures to be implemented to ascertain whether such labor is or will be provided on a voluntary basis as an outcome of individual or community agreement and if the employment terms and conditions have been fully discussed and agreed.

Objective of procedure

The objective of this procedure is to ensure the community workers offer their labor voluntarily and are agreeable to the terms and conditions of employment.

Procedure

IOM will apply the following guidelines when dealing with community workers. IOM will develop standard TOR, working times, remuneration systems (depending on the type of work), methods of payment, timing of payment, and community CoC which will apply to all project activities. These will be developed during the project inception phase.

- i. Produce a recruitment plan and have it reviewed and approved by PMU
- ii. Meet and document resolution of meeting with the community on the intended community workers recruitment. The resolution shall include details on
 - Nature of work
 - Working times
 - Age restrictions (18 and above, and below IOM retirement age, verification will be based on ID documentation, and where not available through affidavits from the boma or payam chief)
 - Remuneration amount
 - Method of payment
 - Timing of payment
 - Individual signatory or representative signatory of meeting resolution

- Employment is voluntary
 - Community CoC
- iii. Induct community workers on key LMP issues, including
- GBV and SEA
 - Workers' and Project GRM
 - OHS
 - HIV awareness
 - Safe use of equipment and lifting techniques
 - Applicable PPE

Vi. Ensure that all proposed subproject designs, operation and maintenance regimes, specifically in view of flood risk mitigation activities, are designed and reviewed by qualified engineers.

Terms and Conditions of Project Workers

The specific terms and conditions for the different categories of project workers and different types of activities will be defined in the inception phase of the project, they will draw on currently applied terms and conditions by IOM.

Workers' Grievance Redress Mechanism

The objective of the Workers' Grievance Redress Mechanism (Workers' GRM) is to settle the grievance between an employer and employee or between employees bilaterally before resorting to formal dispute resolution, except in cases where the grievance constitutes a criminal offense that requires notifying law enforcement. The Workers' GRM are in accordance with the provisions of ESS2, and apply to all direct and contracted workers.

Community workers apply the Project GRM.

Assess and Clarify. Workers will be informed of this grievance mechanism at the time of recruitment and the measures put in place to protect them from any reprisal for its use. Contractors induct the employee on the applicable workers' grievance redress mechanism. Induct all project workers to be aware of their rights. All records of induction shall be kept and made available for inspection by PMU/IOM. Workers will further receive easily accessible information on the contractual details, as well as CoCs included. They can further request clarifications on any contractual issues from the employer at any time during the deployment. The provided information will allow the worker to assess whether her or his concern is valid and should be taken up with the employer.

IOM contracts only contractors with registered code of conduct or who sign an undertaking to comply with the provisions of the Labor Act for contracted workers and contractors who will comply with community meetings resolutions on applicable rules in the case of community workers.

Intake, Acknowledge and Follow-Up. In case of a perceived violation, the aggrieved employee must capture and present the details of the grievance to the person they report to or the supervisor's superior in case of conflict of interest. The supervisor or the supervisor's superior will acknowledge the reception of the reported grievance to the employee.

In case of risk of retaliation, the employee may immediately escalate to the court system, except in cases where the employer is a UN System entity, or to the PMU. If confidentiality is requested, the PMU will ensure it to avoid any risk of retaliation, including in its follow-up actions.

Verify, Investigate and Act. The supervisor or the supervisor's superior will verify the details and seek to address the matter within the shortest time (up to 48 hours). They will escalate the matter if not resolved within 48 hours if a resolution is not found.

Where no resolution is found, the employee can escalate the matter to the sector specific institutions or courts who will resolve the matter between employer and employee, except in cases where the employer is a UN System entity, in which case see the next paragraph. The Supreme Court's decision is final, where it has exercised lawful jurisdiction.

Where the formal courts are not accessible, do not exist in an area, or cannot render a judgment, the matter shall be reported to and handled under the PMU, for example through the Project Grievance Redress Mechanism (GRM). The PMU, in this case, will accommodate a fair agreement between the worker and the contractor.

Monitor, Evaluate and Feedback. The contractor shall keep records of all proceedings of grievance redress that are within their jurisdiction and furnish IOM as part of the periodic progress reporting. IOM will provide analytical synthesis reports on a quarterly basis to the PMU, which include the number, status and nature of grievances to the PMU. These reports will form the basis of all regular reports to the World Bank.

IOM will further provide an excel sheet summary of the feedback and grievances reported, which will be linked to the Project's Management Information System (MIS) and to the M&E Results Framework. They will further maintain a documented record of stakeholder engagements, including a description of the stakeholders consulted and a summary of the feedback/grievances received during community consultations.

Grievances of Sexual Nature.

All grievances of sexual nature (GBV/sexual harassment/Sexual Exploitation and Abuse) should follow the ECRP-II GBV/SEA Action Plan referral pathways and complaints resolution mechanism.

Cases of GBV/SEA can be reported through the Workers' GRM, or the general Project GRM. The GBV survivor has the freedom and right to report an incident to anyone: community member, project staff, GBV case manager, employer, etc...¹⁷⁸. All relevant staff of the PMU, IOM and contractors will receive

¹⁷⁸ In case the survivor is a child, the consent of parents or guardians should be sought where it is in the best interest of the child and if they are not the perpetrators. However, where parents/guardians refuse to pursue the case in the court of law on the child's behalf, with clear evidence, the Directorate of Gender and Child Welfare should take up the role and pursue the case on the child's behalf to ensure that she/he is protected. Parents/guardians should be counselled first and thereafter, and taken to task by filing a case against them for denying the child her/his rights. All service provider interventions to child survivors must be undertaken with staff trained in child-friendly procedures in regards to the handling of cases. A child survivor should continue to go to school while procedures are ongoing and all efforts should be done to ensure her/his protection. In addition to this, all the above reporting and referral procedures should be applied

training on receiving GBV complaints and referral systems, ideally during the project initiation phase and as part of the staff welcome package. The GRM operators will be trained to receive those cases in an appropriate manner and immediately forward them to the GBV/SEA referral system. The GRM operator will ensure appropriate response by i) providing a safe and caring environment and respecting the confidentiality and wishes of the survivor ii) If survivor agrees, obtaining informed consent and making referrals and iii) providing reliable and comprehensive information on the available services and support for survivors of GBV.

Workers should generally be encouraged to report all GBV/SEA cases through the dedicated GBV/SEA referral system and complaints resolution mechanism. This will be made explicit in all community awareness sessions and be a part of the publicly disclosed information. The GBV/SEA referral system will guarantee that survivors receive all necessary services, including medical, legal and counselling, and cases will be reported to the police where applicable.

If such cases are reported through the project GRM or the Workers' GRM, the GRM Operator or the employer needs to report the case within 24 hours to the PMU, as the PMU is obliged to report any cases of GBV/SEA to the World Bank within 48 hours (provided there is informed agreement from the survivor).

IOM has its organizational PSEA systems in place through which violations by staff will be handled. This may be in addition to criminal prosecution to ensure that sanctions for the violation of CoCs are implemented. IOM is in charge of checking that the courses for contractors regarding the CoC obligations and awareness raising activities to the community are in place. The information gathered should be monitored and reported to the PMU and the World Bank. All reporting will limit information to the survivor's wishes regarding confidentiality and in case the survivor agrees on further reporting, information will be shared only on a need-to-know-basis, avoiding all information which may lead to the identification of the survivor and any potential risk of retribution.

WB's Grievance Redress Service (GRS). Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org

Monitoring and Supervision

The performance monitoring of this LMP will follow the same institutional arrangement as the monitoring and supervision of the ESMF. Detailed mechanisms are laid out above in the monitoring section of the ESMF. In general, the PMU will be responsible for the monitoring of the implementation of the LMP. In particular, the Social Specialist in the PMU will work directly with the IOM Social Specialist to ensure that the LMP is fully implemented.

The Social Specialist will undertake supervision missions and spot checks as per schedule laid out above. Through the initial activity- or site-specific screening process, the Social Specialist will be aware of potential labor-related risks and impacts of activities and will develop a monitoring schedule around these.

Non-compliance of the LMP will be reported to the PMU Project Manager, and will be taken up in the regular E&S reporting.

Furthermore, the Project will deploy IVA, who will also be tasked to monitor the implementation of the ESMF and associated instruments, such as the LMP.

Annex 6: Gap Analysis World Bank ESS and National Legal Framework

Table 14 Gap Analysis WB ESS and national legal framework

GAP Analysis World Bank ESS and National Legal Framework			
ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts			
<p>Objectives of ESS 1 are:</p> <p>To identify, evaluate and manage the environmental and social risks and impacts of the project in a manner consistent with the ESSs.</p> <p>To adopt a mitigation hierarchy approach to:</p> <p>(a) Anticipate and avoid risks and impacts (b) Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels (c) Once risks and impacts have been minimized or reduced, mitigated; and (d) Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible</p> <p>To adopt differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable and they are not disadvantaged in sharing development benefits and opportunities resulting from the project.</p> <p>To utilize national environmental and social institutions, systems, laws, regulations and procedures in the</p>	<p>South Sudan Draft Environmental and Protection Bill (2013). Section 18 of the South Sudan Draft Environmental and Protection Bill introduces the requirement for Environmental Impact Assessments. Section 32, Cap 5, introduces the requirement for Environmental Audits. Section 20, Cap 5, introduces the requirement for Environmental Monitoring.</p>	N/A	<p>The ESMF lays out a screening process of all subprojects and activities in order to assess whether activities require environmental impact assessments.</p>

<p>assessment, development and implementation of projects, whenever appropriate.</p> <p>To promote improved environmental and social performance, in ways which recognize and enhance borrower capacity.</p>			
<p>ESS 2: Labor and Working Conditions</p>			
<p>The Objectives of ESS 2 are:</p> <p>To promote safety and health at work.</p> <p>To promote the fair treatment, non-discrimination and equal opportunity of project workers.</p> <p>To protect project workers, including vulnerable workers such as women, people with disabilities, children (of working age, in accordance with this ESS) migrant workers, contracted workers, community workers and primary supply workers, as appropriate.</p> <p>To prevent the use of all forms of forced labor and child labor.</p> <p>To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.</p> <p>To provide project workers with accessible means to raise workplace concerns.</p>	<p>Labor Act, 2017 (Act No. 64 of 2017). The Act establishes a legal framework for the minimum conditions of employment, labor relations, and labor institutions</p> <p>Labor Act, 2017 (Act No. 64 of 2017) establishes requirement for a dispute resolution mechanism</p> <p>Labor Act, 2017 (Act No. 64 of 2017) chapter XI makes provisions for health and safety at the workplace</p> <p>Labor Act, 2017 (Act No. 64 of 2017) chapter VI says that no person shall discriminate, directly or indirectly against an employee or job applicant in any work policy or practice (discrimination is defined on</p>	<p>South Sudan has no statutory minimum wage.</p> <p>Enforcement of labor laws is minimal.</p> <p>Significant amounts of unskilled jobs are filled by immigrant workers. These require work permits.</p> <p>n/a</p> <p>n/a</p> <p>n/a</p>	<p>The project will comply with the Labor Act, but it will monitor wages paid. The LMP define a minimum wage.</p> <p>The implementation of the LMP will be monitored by the PMU.</p> <p>The project will not deploy foreign workers under contractors and sub-contractors.</p> <p>The LMP spells out a Workers' GRM.</p> <p>Project will apply OHS management system that is consistent with the IFC General Environmental Health and Safety Guidelines (EHSGs) on Occupational Health and Safety.</p> <p>n/a</p>

	grounds of race, sex, age, religion, etc...)		
	<p>Labor Act, 2017 (Act No. 64 of 2017) section 12 provides protection for children. Minimum age for work is 14, and minimum age for hazardous work is 18</p> <p>The Child Act, 2008 (Act No. 10 of 2008). The child Act regulates the elimination of child labor, protection of children, and young persons, hazardous child labor.</p>	<p>Minimum age for general work is 14, which accords with ILO Convention 138, recognizing the age of 14 as the minimum age for general work for a country whose economy and educational facilities are insufficiently developed.</p> <p>However, in practice children between the age of 10-14 are further employed in agriculture and industry and services, including in rock breaking, construction (building and transporting materials), making bricks.</p>	<p>The project will only allow the deployment of children – in all project worker categories – from the age of 18 (see LMP). Rigorous monitoring will ensure the application of the LMP.</p>
	<p>The Labor Act (Act No. 64 of 2017) section 10 spells out that forced labor is prohibited.</p>	<p>Forced labor takes place, for example in recruitment into the national army</p>	<p>The project will not allow any forced labor. It will hold all contractors liable to the implementation of the LMP. The PMU will have overall responsibility to monitor the implementation of the LMP.</p>
	<p>The Labor Act (Act No. 64 of 2017) Article 12 (2) allows children between the ages 14-18 to engage in labor.</p>	<p>Article 12(2) allows children between the ages 14-18 to engage in general labor</p> <p>The Labor Act lacks clarity on prohibitions on the worst forms of child labor.</p>	<p>The project will only allow deployment of children – in all project worker categories – from the age of 18 (see LMP).</p> <p>Rigorous monitoring by the PMU will ensure the application of the LMP.</p>

		<p>Compulsory education age (13) is inconsistent with minimum age for work (14).</p> <p>Furthermore, children in South Sudan engage in armed conflict and in cattle herding. The national army continues to recruit, sometimes forcibly, children to fight opposition groups.</p> <p>Children are further engaged in other worst forms of child labor, including in commercial sexual exploitation. Perpetrators have not been brought to justice.</p>	
ESS 3: Resource Efficiency and Pollution Prevention and Management			
<p>The Objectives of ESS 3 are:</p> <p>To promote the sustainable use of resources, including energy, water and raw materials.</p> <p>To avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities.</p> <p>To avoid or minimize project-related emissions of short and long-lived climate pollutants.</p>	<p>The Constitution of South Sudan: Article 41 ⁽¹⁾ provides that the people of South Sudan shall have a right to a clean and healthy environment. (2) that every person shall have the obligation to protect the environment. (3) that future generations shall have the right to inherit an environment protected for the benefit of present and future generations.</p> <p>Specific measures to ensure the objectives above include: Prevention of pollution and ecological degradation; promotion of conservation; and securing of ecologically sustainable development and use of natural resources while promoting rational economic and social development so as to protect the bio-diversity of South Sudan</p>	n/a	<p>The project will promote the sustainable use of resources and avoid or minimize adverse impacts on human health.</p>

To avoid or minimize generation of hazardous and non-hazardous waste.			
ESS 4: Community Health and Safety			
<p>The Objectives of ESS 4 are:</p> <p>To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life-cycle from both routine and non-routine circumstances.</p> <p>To avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials.</p> <p>To have in place effective measures to address emergency events.</p> <p>To ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities.</p>	<p>n/a</p> <p>The Public Health (Water and Sanitation) Act (2008) emphasizes the prevention of pollution of air and water and also encourages improvement in sanitation. Key provisions include the protection of the sanitation of the environment and encompasses the measure to address the pollution of water and air.</p> <p>The following are measures geared towards control of pollution of water: Measures to prevent pollution of water for consumption; Measures destined to prevent pollution of potable water; Anyone who offers the public water to drink or human food, and which includes frozen food should ensure that the water conforms to the portability regulations; Management and disposal of hazardous wastes; and storage of wastes on the premises of waste generators.</p> <p>The Public Health Act (2008) also provides the need for the protection of pollution of water through the</p>	<p>n/a</p> <p>ESS 4 also considers worker conduct.</p>	<p>Although the project aims to improve the lives of previously affected communities, it needs to be ensured that project activities do not pose any unintended negative consequences on communities, for example through increased GBV incidents. A GBV/SEA and Child Protection Action Plan will be implemented.</p> <p>The project will utilize WBG guidelines on waste management in order to be fully compliant with this Act.</p> <p>Several measures will be undertaken, including contractors will develop road safety management plan and a health and safety Plan as part of the C-ESMPs to address the impacts on local communities of moving construction equipment; measures and actions developed to assess and manage specific risks and impacts outlined in the ESMF and subsequent ESMPs.</p>

	enforcement of regulations and measures necessary to combat all elements of pollution and protect the natural level of the environment and public health.		
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ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

<p>The Objectives of ESS 5 are:</p> <p>To avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring project design alternatives.</p> <p>To avoid forced eviction.</p> <p>For groups identified under ESS7, free, prior informed consent must be sought</p>	<p>The Land Act of 2009 also provides for fair and prompt compensation to any person whose right of occupancy, ownership or recognized long standing occupancy of customary use of land is revoked or otherwise interfered with by the Government.</p>		<p>Where land is donated by private owners, a land donation agreement process is implemented.</p> <p>A Resettlement Policy Framework (RPF) will be followed, and where necessary, specific instruments, such as Resettlement Action Plans (RAPs) will be prepared and implemented.</p>
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ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources			
<p>The Objectives of ESS 6 are:</p> <p>To protect and conserve biodiversity and habitats.</p> <p>To apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity.</p> <p>To promote the sustainable management of living natural resources.</p> <p>To support livelihoods of local communities, including Indigenous Peoples, and inclusive economic development, through the adoption of practices that integrate conservation needs and development priorities.</p>			<p>The project will avoid any encroachment into any sensitive habitat and/or protected areas.</p>
ESS 7: Indigenous People/Sub-Saharan African Historically Underserved Traditional Local Communities			
<p>The Objectives of ESS 7 are:</p> <p>To ensure that the development process fosters full respect for the human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities.</p> <p>To avoid adverse impacts of projects on Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, or when avoidance is not possible, to minimize, mitigate and/or compensate for such impacts.</p> <p>To promote sustainable development benefits and opportunities for Indigenous Peoples/Sub-Saharan African</p>			<p>The project aims at Sub-Saharan populations as a key beneficiary group. Through the SEP it will ensure that consultations with all stakeholders are undertaken.</p>

<p>Historically Underserved Traditional Local Communities in a manner that is accessible, culturally appropriate and inclusive.</p> <p>To improve project design and promote local support by establishing and maintaining an ongoing relationship based on meaningful consultation with the Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities affected by a project throughout the project's life-cycle.</p> <p>To obtain the Free, Prior, and Informed Consent (FPIC) of affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in the three circumstances described in this ESS.</p> <p>To recognize, respect and preserve the culture, knowledge and practices of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, and to provide them with an opportunity to adapt to changing conditions in a manner and in a timeframe acceptable to them.</p>			
ESS 8: Cultural Heritage			
<p>The Objectives of ESS 8 are:</p> <p>To protect tangible and intangible cultural heritage from the adverse impacts of project activities and support its preservation.</p>	<p>The Constitution of South Sudan, Art. 38 (1e) spells out to protect cultural heritage, monuments, and places of national historic or religious importance from destruction, desecration, unlawful removal or illegal export.</p>	<p>n/a</p>	<p>The project will implement chance find procedures to protect cultural or archeological findings during project activities, as per the Chance Find Procedure in annex³</p>

<p>To address cultural heritage as an integral aspect of sustainable development.</p> <p>To promote meaningful consultation with stakeholders regarding cultural heritage.</p> <p>To promote the equitable sharing of benefits from the use of cultural heritage.</p>			<p>The project will further conduct community consultations (as per SEP) prior to project activities in order to ensure protection of other tangible cultural heritage.</p>
<p>ESS 10: Stakeholder Engagement and Information Disclosure</p>			
<p>The Objectives of ESS 10 are:</p> <p>To establish a systematic approach to stakeholder engagement that will help borrowers to identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.</p> <p>To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be considered in project design and environmental and social performance.</p> <p>To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle on issues that could potentially affect them.</p> <p>To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.</p> <p>To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow borrowers to respond to and manage such grievances.</p>	<p>The Constitution of South Sudan, Article 166 (6) expects local governments to involve communities in decision-making in the promotion of a safe and healthy environment.</p>	<p>n/a</p>	<p>The project will implement stakeholder consultations throughout the lifetime of the project, as per the SEP</p>

Annex 7: Reporting Format

The MoFP/PMU will prepare and submit to the WB regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).

The PMU will provide a quarterly progress report throughout project implementation every 45 days after the end of each quarter. IOM will provide its quarterly progress report to the PMU 30 days after the end of each quarter. IOM's report will be incorporated into the general quarterly progress report.

Summary of Key E&S Aspects during the Reporting Period

Project Status, E&S Incidents, E&S Changes, E&S Initiatives

Project Status

- Provide a brief description of any new developments in relation to operations and facilities over the reporting period.

E&S Incidents

- Please provide a summary of all the notifiable E&S incidents.

Please expand or collapse the table where needed.

Date	Incident description	Class	Reports sent to lenders	Corrective action / remedial plan	Status of Corrective Action

E&S Changes

- Please provide a summary of all the notifiable E&S changes.
- Please expand or collapse the table where needed.

Date	Change description	Reports sent to lenders	Implementation status

Improvements/initiatives regarding E&S performance

- Briefly describe improvements/initiatives implemented during the reporting period on the management of E&S aspects (e.g. energy/water savings, sustainability reports, waste minimization, etc.)

ESS1: Assessment and Management of Environmental and Social Risks and Impacts

E&S Impact / Risk Assessment

- Have any supplemental environmental, social, health and safety impact/risk studies been conducted during the reporting period? (Please provide copies)

E&S Regulatory Reporting, Permits and Supervision

- Please list any environmental reports submitted to the South Sudan authorities.

Copies attached with this report Copies available upon request

- Please summarize South Sudan authority monitoring and inspections.

Management of IOM

- Please illustrate with a chart or table on IOM’s organizational structure to manage environment, health and safety, labor and social aspects during the reporting period. Please name the individuals in IOM who hold responsibility for environmental, social, health and safety, human resources, security performance and give their contact information

Compliance with Environmental and Social Management Plans

- The status of the ESMP implementation should be described and any issues that remain outstanding should be detailed.

ESS2. Labor and Working Conditions

Human Resources Management

- Have IOM and contractors changed/updated their Human Resource (HR) policy and procedures, HR manual, and Health & Safety (H&S) procedures, during the reporting period?

Yes No

If yes, please provide details.

- Provide the following information regarding the workforce:

	# community workers	# direct workers	# Female direct workers	Turnover	# Contracted workers ¹⁷⁹
Previous year					
Reporting year					

- List the worker-related court cases and describe their status.

Occupational Health and Safety

¹⁷⁹ See ESS2 definitions.

- Describe the main changes implemented in terms of Occupational Health and Safety (OHS) during the reporting period, e.g. revision of the OHS management procedures, action plans for technical improvements, leading/lagging indicators used/introduced, identification of hazards, new controls, etc.
- Please attach Health & Safety audit reports available for the reporting period.

Copies attached with this report Copies available upon request Not Available

Accident Statistics Monitoring

Report TOTAL numbers for each parameter	This reporting period			Last reporting period (not cumulative) ¹⁸⁰		
	Community workers	Direct workers	Contracted workers	Community workers	Direct workers	Contracted workers
Total number of workers						
Total man- hours worked – annual						
Total number of lost time occupational injuries ¹⁸¹						
Total number of lost workdays ¹⁸² due to injuries						
Lost time injury frequency ¹⁸³						
Fatalities						
Vehicle collisions ¹⁸⁴						

¹⁸⁰ To be provided after the project has been operational for at least two consecutive years.

¹⁸¹ A *lost-time injury* (LTIs) is the incapacity to work for at least one full workday beyond the day on which the accident or illness occurred.

¹⁸² *Lost workdays* are the number of workdays (consecutive or not) beyond the date of injury or onset of illness that the employee was away from work or limited to restricted work activity because of an occupational injury or illness.

¹⁸³ The number of *lost time injuries* (LTIs) recorded for Project workers per million man-hours worked by them. LTI Frequency Rate = injuries per million hours worked = # of lost time accidents x 1,000,000 hours / total man-hours worked).

¹⁸⁴ Vehicle Collision: When a vehicle (device used to transport people or things) collides (comes together with violent force) with another vehicle or inanimate or animate object(s) and results in injury (other than the need for First Aid) or death.

- Provide details for the non-fatal lost time injuries during this reporting period.

IOM / contractor/ Subcontractor employees?	Total workdays lost	Description of injury	Cause of accident	Corrective measures to prevent reoccurrence

- Provide details for fatal accidents during this reporting period, if any, (and provide copies of accident investigation and respective corrective plan).

Date of Accident	Type of Accident	Description of Accident	# of Fatalities	Preventive measures taken after the incident

OHS Training

- Describe Health and Safety training programs carried out in the reporting period.

Date	Type of audience	Description of training (and duration)	Number of attendees

Workplace Monitoring

- Please provide copy of any Workplace Monitoring reports developed for the reporting period.

ESS3. Resource Efficiency and Pollution Prevention

Environmental Monitoring

- Provide copy of environmental monitoring data reports for this reporting period, collected consistent with the ESMPs for the subprojects.
- Briefly describe environmental mitigation measures implemented during the reporting period to comply with E&S requirements.

Resources Efficiency: Energy and Water

- Provide data on energy and water consumption during the reporting period. If the data requested are available in another format, they can be submitted instead.
- Describe the concessionaires' resources efficiency measures/efforts being implemented to minimize fuel, energy and water consumption.

Hazardous and non-Hazardous Waste¹⁸⁵

- Erosion Control, Slope Stability and Reinstatement

¹⁸⁵ Waste types include but are not limited to: chemical containers, chemical sludge, containers/pallets, dewatered sludge, domestic waste, ferrous and non-ferrous scrap, hospital waste, laboratory waste, liquids, off-specification raw materials, paint waste, sludge, solids, truck and auto tires, waste fuel hydrocarbons, waste hydraulic fluids, waste lubricating hydrocarbons, waste solvents, waste treatment sludge, contaminated soil, creosote sleepers, etc.

- Please describe status and actions implemented in terms of erosion control, slope stability, and reinstatement within the project's footprint and area of influence.

ESS4 Community Health, Safety and Security

Community Health and Safety

- Please list and describe any initiatives implemented in relation to community health and safety during the reporting period.
- Please provide the list and description of the actions, the expected or actual dates of implementation, progress/status, results obtained. You can use a tabular format (as below) or provide the information as an attachment of the report.

Issues	Mitigation Measures	Expected or Actual Date of Implementation	Results/Current Status

- During the reporting period, have any emergency drills been conducted with participation of the local authorities, public emergency organizations or local communities? Are the communities aware of the emergency response plans?

Accident Reporting

- Provide details for the non-fatal casualties, involving third parties, during this reporting period.

Date of Accident	Type of Accident	Description of Accident	# of People Injured	Preventive measures taken after the incident

- Provide details for fatal accidents during this reporting period (and provide copies of accident investigation and respective corrective plan).

Date of Accident	Type of Accident	Description of Accident	# of Fatalities	Preventive measures taken after the incident

GBV/SEA and Child Protection Action Plan

- Please provide an update on the status and progress of the actions as defined in the GBV/SEA Action Plan. You may attach relevant monitoring reports.

ESS5 Land Acquisition and Involuntary Resettlement

- Report any activities guided by the Resettlement Policy Framework (RPF)
- Have any specific instruments in regards to land and resettlement been prepared in the reporting period

- Report on the implementation of specific land-related instruments (e.g. RAPs)
- Report any activities that are using voluntary land donations and assess compliance with the protocol
- **Provide summary of voluntary land donations**

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

Biodiversity Management

- Please report on the mitigation measures included in the ESMF and ESMPs
- As needed, using the table below describe any **new activities or expansions** that have increased the project footprint into new **areas of habitat** during the reporting period.

New activity/expansion	Total area covered	Habitat type

ESS7 IP/SAHUTLUC

- List any information dissemination and consultation events vis-à-vis land donors that have been undertaken to fulfil free, prior and informed consent (FPIC) in land donations.
- List any cultural issues identified in subprojects, corrective actions, and lessons learned for future projects.

ESS8 Cultural Heritage

- Report if chance find procedures have been applied if not, please indicate Not Relevant.

ESS 10 Stakeholder Engagement and Information Disclosure

Stakeholder Engagement, Public Consultation and Disclosure

- List any stakeholder engagement events, including public hearing, consultation and disclosure, liaison with non-governmental organizations, civil society, local communities on E&S.

Date	Participant(s)	Formats of Interaction	Issues Discussed	IOM response/ Agreement reached (attach minutes if any)	Actions Taken (if any)/ Remarks

Grievance Mechanism and Court Cases

- Report the number and type of requests and/or grievances received from project affected people / local communities / local organizations.
- How many have been resolved and how many are pending? (Please attach a log of the grievance redress registry).

Report the number and type of court cases on E&S grounds, if any (Please attach a log of all court cases and their status)

ANNEX: Context analysis and local security plans developed during this period

Annex 8: Local Context Analysis Key Questions

Table 15 Key questions for local context analysis

Local Context Analysis – proposed key questions
Entry point questions for local context analysis: ¹⁸⁶
a) What questions need to be considered when evaluating existing information on a particular location for the purpose of planning CDD?
b) What location-specific empirical material is available?
c) How can community voices be identified?
d) Whose interests are served and what trends are reinforced by up-to date information provided by local sources?
e) How flexible is group membership?
f) How can buy-in from everyone be achieved?
g) What are the specific authority structures in a local context?
h) To what extent are past leadership structures used to understand the present?
i) How can ever-evolving authority be engaged in program planning?
j) How can existing information on communities and authority structures be used in designing further research?
k) What are the current local politics behind language?
l) Is ecology used to include or exclude people in contested spaces?
m) How does wealth influence representation?
n) Can women be representatives of their community?
o) How can youth be engaged?
p) Are there any significant youth groups in the area?
q) How can the project accommodate expectations of returnees?
r) What role do ex-combatants play in the local context?
s) What happens to ex-combatants after DDR?
t) How is CDD different in an urban context?
u) What are the current dynamics of land tenure?
v) How might CDD deal with issues regarding local administrative boundaries?
w) Can histories of displacement be used to rethink conflict flashpoints?
x) Can coping strategies of moving populations be used to draft realistic long-term development strategies?
y) What are the potential local mechanisms for elite capture?
z) How can elite capture be avoided?
aa) What are potential disagreements on administrative boundaries?
bb) How can these disagreements be avoided?

¹⁸⁶ Pendle et al, 2012, p. 103-105

Annex 9: Contingency Emergence Response Activation

This annex is prepared to provide additional information on the process for the preparation of a CERC-ESMF in the event that a Contingency Emergency Response Component (CERC) is requested. The guidance and procedures included in a CERC-ESMF should be considered in an Emergency Operations Manual that will be prepared in the event that a CERC is triggered.

It should be noted that the CERC-ESMF shall be prepared prior to activation of the CERC itself. The ECRP-II PMU is the lead agency responsible for the implementation of emergency activities, including all aspects related to procurement, financial management, monitoring & evaluation and safeguard compliance. It will further ensure the delivery of the emergency activity outputs and the attainments of outcomes by facilitating coordination among IOM and other potential contractors participating in the implementation and by addressing coordination issues as they arise. The PMU will consist, as described in the ESMF, of an environmental and a social specialist, who will be overseeing and monitoring the CERC-related safeguards compliance in addition to the compliance of other project activities. The PMU will further ensure adequate staffing within IOM and other partners as applicable, in regards to the thematic issues covered by the CERC.

The PMU may seek support from the World Bank to select a list of activities for financing under the CERC based on a positive list and priorities identified at the preliminary assessment of the emergency's impact. These activities will constitute the Contingent Emergency Response Plan (CERIP), which will be key for responding to the crisis or emergency, as it will (i) list the approved emergency activities; (ii) inform any additional implementation arrangement; and (iii) provide a preliminary procurement plan and implementation calendar.

It is important to mention that the activities financed by the CERC should avoid complex environmental and social aspects, because the CERC objective is to support immediate priority activities (less than 18 months). Activities financed will therefore be limited to the provision of critical goods and services, as well as repair or reconstruction of damaged infrastructure outlined in the positive list to be developed.

Land acquisition leading to involuntary resettlement and/or restrictions of access to resources and livelihoods will comply with the ECRP-II RPF. If required, the RPF will be amended prior to commencement of activities. Similarly, all other E&S instruments will be updated if the emergency activities do not fall within the scope of the existing instruments. If required, new instruments will be prepared, consulted upon and disclosed.

