



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

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BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Iraq	MIDDLE EAST AND NORTH AFRICA	P171446	
Project Name	Iraq Road Maintenance Microenterprises Grant Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Transport	Investment Project Financing		5/20/2020
Borrower(s)	Implementing Agency(ies)		
Republic of Iraq	Ministry of Construction, Housing, Municipalities and Public Works		

Proposed Development Objective(s)

The proposed Project Development Objective (PDO) is to provide entrepreneurship and employment opportunities to rural inhabitants in lagging areas of Iraq and improve their level of road access to markets and critical social services.

Financing (in USD Million)	Amount
Total Project Cost	5.00

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

No

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

The project as a pilot will finance (i) labor-intensive rural roads maintenance works to be implemented as sub-projects within the Project Area by local specialized micro-enterprises employing rural disadvantaged population and (ii) related technical assistance activities to strengthen the sector and the relevant counterparts and ensure adequate implementation of the financed activities.



D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]

The road maintenance works involve about 50 subprojects to be implemented within project areas by microenterprises. The geographical scope of this project will cover eight governorates of Iraq, namely Al-Qadisiyah, Al-Najaf, Karbala, Diyala, Salah al-Din, Nineveh, Al-Muthanna and Dohuk. The stability and development of Iraq have been obstructed by decades of conflict resulting from disputes between political, ethnic and religious factions. The poor condition of the transport infrastructure and lack of transport services in the targeted project areas has significantly affected the mobility of Iraqis, particularly the poor, and especially in rural areas. There are many IDPs in some project implementing cities such as Duhok and the unemployment rate for female is much higher than the unemployment rate for male in the project area. These factors will be carefully considered in selection of the subprojects to ensure vulnerable communities to be included in the project. While the Project Area would encompass predominantly rural communities within these governorates with the highest level of poverty, it is expected to significantly impact the mobility of Iraqis, particularly the poor, the most disadvantaged and excluded as youth, women and internally displaced peoples. Improving road infrastructure condition would considerably increase access to market, health services, and education. Additionally, the project intends to provide work opportunities to about 4000 disadvantaged individuals in the projects through the maintenance activities and to improve the livelihood of local population, strengthen their entrepreneurial capacity. Therefore, will have important implications for poverty reduction and local economic and social development.

D. 2. Borrower’s Institutional Capacity

The Ministry of Construction, Housing, Municipalities and Public Works (MOCHMPW) in Baghdad will be the main recipient of the grant given its experience managing nationwide World Bank-funded roads programs and will closely cooperate during the project implementation with the equivalent Ministry of Construction and Housing (MOCH) in Erbil since one of the pilot regions is within the Kurdistan region. Although these two institutions have experience of implementing some Bank financed projects but they do not have in-house environmental and social safeguards staff. The road maintenance activities will be implemented by local microenterprises to be selected in a competitive process. Iraq’s microenterprises are not experienced in road works but are principally capable of implementing projects with the equivalent level of complexity. These microenterprises do not have any experience of implementing Bank financed projects and don’t know about the Bank’s environmental and social policies. Thus, the current institutional capacity to implement the project under the ESF is considered weak. To manage the potential environmental and social impacts and risks, an independent consulting services will be used to provide hand on training for staff of implementing agencies and selected microenterprises to ensure that the maintenance works are executed in accordance with internationally recognized best practices, including in terms of management of social and environmental impacts and risks associated with civil works of the project. The capacity assessment and strengthening measures, such as staff training, etc., will need to be integrated in the project implementation plan and reflected in the Environmental and Social Commitment Plan (ESCP).

Public Disclosure

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

A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Moderate



The project's interventions under component (1) will be limited to preventive road maintenance activities that will be carried out by microenterprises. Also, it will be limited to the existing rural roads footprint and will not include any road extensions or new road construction. This sub-component has the propensity to generate minimal and site specific environmental impacts during works related essentially to the management of waste, noise, wastewater and disposal of some hazardous materials.

All these impacts are easily remediable and can be effortlessly mitigated. However, given the FCV context, the relatively weak capacity of the implementing agencies and the microenterprises, the legacy of low occupational safety awareness and capacity the environmental risk is rated as Moderate. Also the risk of ERW (explosive remnants of war) presence in different project areas, including UXO (unexploded ordnance), and AXO (abandoned explosive ordnance) must be considered during selection of the 50 subprojects.

Social Risk Rating

Moderate

The maintenance activities of rural roads will have social benefits for the rural communities and will ease the transportation of goods and passengers. The road maintenance activities will be on existing footprints and no road expansion or new construction will involve. Thus, the project will not involve permanent land acquisition. Additionally, the maintenance activities will be carried out by local people to create job opportunities, accordingly, there will be no need to set up a camp for workers.

As a result, the social risks related to labor influx and GBV is low. If the microenterprise selected is not from the local area, the local practice is to rent a house in a nearby community to be used as offices and storage for material. However, project implementation may have social risks related to community health and safety, potential social conflicts if the project is unable to have transparent process to provide equal opportunities to local people, and possible exclusion of the vulnerable/disadvantaged groups and/or by unconscious discrimination/ practices under the current systems. Additionally, there might be social risks related to exclusion of certain groups due to preferential treatment of some actors on religious, political or ethnic groups. These risks can be managed through transparent and participatory process, accordingly, the social risk is rated as moderate.

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

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The environmental and social impacts and risks are screened based on review of the following documents: i) draft project paper; ii) Country partnership framework for Iraq (FY20-25); iii) Systematic Country Diagnostic; and iv) Iraq Reconstruction and Development Framework.

The project will finance about 50 labor intensive rural roads maintenance to be implemented by microenterprises. The subprojects activities will consist of preventive maintenance works of roads and road-related infrastructure, specifically debris removal, cleaning of shoulders, drainage system and bridges, vegetation control, slopes and retaining walls, installation of simple protection measures, and/or minor surface repairs.

Given that the zone of influence and impact of this project is very specific to rural road maintenance activities on existing footprints with no widening or new construction, there is still potential environmental, health and safety and social impacts that are identified at this stage given the information at hand.

Public Disclosure



From an environmental perspective, the subproject activities are expected to generate site specific environmental impacts during works related essentially to the management of waste, noise, wastewater, borrow pits and disposal of some hazardous materials. All these impacts are easily remediable and can be easily mitigated. However, given the FCV context, the relatively weak capacity of the implementing agencies and the microenterprises, it is anticipated that the project will have probability of serious adverse impacts on human health due to traffic or occupational safety aspects. Additionally the risk of ERW (explosive remnants of war) presence in different project areas, including UXO (unexploded ordnance), and AXO (abandoned explosive ordnance) must be considered during selection of the 50 subprojects.

From social perspective, the main social impacts will be positive. However, the project implementation may have social risks such as the risks of exclusion of certain vulnerable groups from targeted areas due to inefficiencies in outreaching to these groups to ensure their participation in the maintenance activities. There might also be social risks of exclusion of workers among certain categories of people due to their vulnerabilities (i.e. women, children, and minorities) . Iraq is considered a very diverse country , groups might be excluded due to preferential treatment of some actors, on religious, political or ethnic grounds. Possible social risks also include labor and working conditions, stakeholder engagements , and weak institutional capacity.

Since the selection of subprojects locations have not been identified at this stage, ESMF will be prepared by project appraisal to provide general guidance on how the potential adverse environmental and social impacts and risks will be addressed during the project implementation. The ESMF will include but not limited to the following: i) the principle of developing mitigation measures proportionate to the impacts and risks; consistency with the World Bank Group Environment, Health and Safety (EHS) Guidelines; iii) the eligibility criteria for subproject selection; iv) requirements on non-discrimination; v) participation of and consultation with different stakeholders; vi) mechanisms to address grievances; (vii) Contractors Environmental and social prescriptions, (viii) Labor management Procedures including prevention of child labor and forced labor and inclusion.

Areas where “Use of Borrower Framework” is being considered:

The use of Borrower Frameworks is not considered for this project.

ESS10 Stakeholder Engagement and Information Disclosure

ESS10 on stakeholder engagement applies to the project. Stakeholder engagement will be the responsibility of the MOCHMPW who is the main recipient of the grant. The main affected stakeholders will include: i) the selected microenterprises which will implement the road maintenance activities; ii) the intended 4000 individual workers from local communities who will be hired by microenterprises for the road maintenance work; and iii) the local communities and local people adjacent to the proposed 50 road maintenance subprojects who are going to benefit from the improvement of the road. The other interested stakeholders will include: non-direct communities, NGOs, civil society, labor unions, ministry of environment, ministry of labor, etc.

A Stakeholder Engagement Plan (SEP) will be prepared by PMT and will be disclosed before appraisal. updated as and when necessary before start of implementation This SEP will i) identify stakeholders to be consulted during project life-cycle; ii) conduct consultations related to the environmental and social impacts of rural roads maintenance



activities; iii) establish an approach for stakeholder engagement; and iv) ensure appropriate project information disclosure. The project will also establish a grievance redress mechanism. Disclosure of information is required at the central level and at the local level.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

The project will have direct workers, contracted workers and community workers. The Central PMT in Baghdad and the PMT in KRG will include direct workers (i.e. PMT directors and their staff, field technical inspectors involved in the road maintenance, consultants hired by the borrower). As the PMT will have contract with microenterprises for road maintenance subprojects. The staff of microenterprises are contracted workers. The people hired by microenterprises can be considered as community workers.

The project activities during implementation will entail different types of health and safety risks. Coupled with weak safety culture and capacity of the implementing agency, these activities will have high potential for health and safety risks. To ensure health and safety of workers, OHS policies, procedures, training and monitoring shall be prepared and implemented during the project life time. Therefore, a labor management procedures (LMP) will be prepared as part of the ESMF consistent with the requirements of the ESS2 and the Iraq labor law by project appraisal. The LMP will include also assessment of potential labor related risks, GBV/sexual exploitation and abuse, Code of Conduct, overview of labor regulation, staff responsibility, policies and procedures, working age, contract terms and conditions, GRM. Also, the LMP will detail specific requirements for community workers including terms and conditions, GRM, rules and responsibilities.

ESS3 Resource Efficiency and Pollution Prevention and Management

In accordance with ESS1, resource efficiency measures will be assessed in the ESMF. In addition, the ESMF will address the risks associated with waste generation during subprojects execution, propose measures to manage wastes in an environmentally and safe management practice. Also, the construction contracts will include relevant provisions on waste management.

ESS4 Community Health and Safety

It is anticipated that subcomponent 1 will be undertaken close to rural communities, hence maintaining health and safety of nearby communities is essential. The ESMF will assess the community health and safety risks associated with the subprojects and propose mitigation measures to avoid, minimize and mitigate the impact in accordance with the World Bank Group Environment, Health and Safety (EHS) Guidelines. Community Impacts associated with the subprojects might include accidents due to movement of vehicles or traffic disturbance, dust and noise emissions and generation of wastes. The project will adopt site specific mitigation measures on a case by case basis for each subproject depending on its scale, location and surrounding receptors.



ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The project will not finance activities that will involve permanent land acquisition such as construction of new roads or expansion of existing roads.. Additionally, the project will not require temporary involuntary land take to set up a camp for workers’ accommodation or offices due to the fact that the maintenance activities are of small scale. Accordingly, the contractors might rent a house in a nearby community where they would have their offices and material during the project life cycle. The project also is not expected to cause restriction of access which may cause physical or economic displacement. Based on the above reasons, this ESS is not relevant to the project.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The project's physical interventions will be limited to the existing rural roads footprint and will not include any road extensions or new road construction. Therefore, it is not expected to impact biodiversity and habitats, however the ESMF will further examine the relevance and the applicability of ESS 6 to the subprojects

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

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

ESS8 Cultural Heritage

It is investigated that maintenance activities might include some limited excavation works. Therefore the ESMF shall further investigate including provisions for chance finds which will be included in the relevant construction contracts.

ESS9 Financial Intermediaries

Currently the project modality does not include financial intermediaries.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways	No
The project will not affect international waterways.	
OP 7.60 Projects in Disputed Areas	No
The project is not located in a disputed area.	

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered?	No
Financing Partners	

Public Disclosure



Despite that subprojects under subcomponent 1.1 will be co-financed by the grant and the recipients in agreed upon proportion, however, common approach is not considered because it is bilateral financing.

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

Actions to be completed prior to Bank Board Approval:

The following documents will need to be prepared and approved by the Bank and disclosed:

- Environmental and Social Management Framework (ESMF) including Labor Management Procedures (LMP)
- Stakeholder Engagement Plan (SEP)
- Environmental and Social Commitment Plan (ESCP)

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

Implementation of the ESMF including Labor Management Procedures (LMP)

- Inclusion of ESMF and LMP requirements shall be part in bidding and contract documents with micro-enterprises
- Hiring and of independent consulting services in charge to provide hands on training for key stakeholders
- Implementation of the SEP
- Hiring of at least one environmental specialist and one social development specialist
- Setting up and make operationalization of the GRM
- Preparation of e the Project Operational Manual to ensure transparent and participatory approach of the project implementation.

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

10-Mar-2020

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Republic of Iraq

Implementing Agency(ies)

Public Disclosure



Implementing Agency: Ministry of Construction, Housing, Municipalities and Public Works

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

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