



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)
Eastern Africa	AFRICA EAST	P176181	
Project Name	Eastern Africa Regional Digital Integration Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Digital Development	Investment Project Financing	8/1/2022	11/15/2022
Borrower(s)	Implementing Agency(ies)		
Republic of the Sudan, Federal Republic of Somalia, Federal Democratic Republic of Ethiopia	East African Community (EAC)		

Proposed Development Objective

The development objective is to increase access to broadband and digital services through the development and integration of digital markets in the Eastern Africa region.

Financing (in USD Million)	Amount
Total Project Cost	230.00

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 development objective of the proposed project is to increase access to broadband and digital services through the development and integration of digital markets in the Eastern Africa region. The proposed project would aim to advance regional integration of digital markets through the simultaneous integration of the connectivity, data, and online market across the region. Advancement in each distinct market layer is expected to create a virtuous cycle as each segment builds on another, reinforcing the development, expansion and integration of the region’s digital



market. The following components are proposed for the project, which would consist of a menu of activities from which participating countries and entities could choose. Interventions under each component would target both relevant regional bodies and individual countries and would be tailored to the needs of each individual recipient, considering the different stages of development within the region. The trajectory of the participants however would remain the same, e.g. moving towards the creation of a digitally enabled environment for regional integration and development.

Component 1 would support reforms to reduce barriers to the provision of cross-border telecoms services through open markets as well as broadband connectivity infrastructure deployment. Broadband infrastructure, such as fiber optic and mobile networks, as well as broadband services, benefit greatly from scale, as the cost of capital investment and operating costs can be spread across more users through infrastructure sharing based on open access. Economies of scale from a regionally integrated market could also attract more private investment. Increased competition would enable wholesale, and subsequently, retail connectivity services prices to fall in the region. More affordable prices would in turn help expand access and boost demand for related services, generating increased data traffic and online activity critical to the business case for further network investment in capacity upgrades and expansion to new areas. Doing so can help address deficits for landlocked countries or close to urban-rural divide, which is a key lever for job creation and advancing inclusive economic growth. Lower cost and more accessible connectivity would also pave the way for more innovative services and digital businesses that rely on higher bandwidth capacity, further reinforcing this positive cycle. In line with regional goals, this component could potentially include support to national objectives which would be critical to set the path for integration.

Component 2 aims to enable the secure exchange, storage and processing of data across borders to support regional deployment and access to data-driven services, innovation and infrastructure, including reducing regional restrictions on the free flow of data and increasing investments into data infrastructure. It would also enable and encourage the development of a data pool to support regional deployment and access to data-driven services and innovation. A more integrated data market in Eastern Africa could boost innovation and enhance 'big data' analytics, resulting in significant economic and social benefits and efficacy gains across virtually all sectors (e.g. public sector governance, social protection services, e-commerce, telecommunications, etc.). The creation of a larger data market would also generate substantial cost savings by creating economies of scale that make investment in regional data centers that support online services, including cloud hosting, more financially viable. In line with regional goals, this component could potentially include support to national objectives which would be critical to set the path for integration.

Component 3 aims to support the development and integration of the online market, which would enhance the enabling environment for the cross-border delivery and access of digital goods or services. This component would support governments, firms and citizens in participating countries to access and deliver both public and private services online, as well as make online purchases seamlessly from anywhere in the region. For example, the development of foundational ID systems in the region is critical for service delivery and a significant enabler for online markets. The project could support to increase coverage- especially for women- and aligning national ID systems with best practices on inclusion, data protection and privacy, vendor- and technology- neutrality, while simultaneously advancing mutual recognition of ID credentials and interoperability between ID systems. This would also help to enable cross-border payments and commerce, which this component will further enhance by reducing additional barriers around cross-border transactions and increasing regional coordination in particular on digital payments and other digital financial services. Digital payments need to be supported by sound and proportionate legal framework to ensure their effective operations. In this context regulatory frameworks based on good practices and international



standards need to be in place and harmonized at regional level to be applicable across countries. As a result, citizens and businesses would gain larger access to a wider range of digitally enabled services. In line with regional goals, this component could potentially include support to national objectives which would be critical to set the path for integration.

Component 4 would provide TA and capacity support for project preparation and implementation. It will finance the operating costs of the Project Implementation Units (PIUs) for each participating country as well as a PIU embedded in the participating regional body. Support will be provided to ensure the establishment of adequate social and environmental safeguards capacity, as well as fiduciary and monitoring and evaluation (M&E), for the implementation of activities. Due to potential high safeguards risks associated with the project, particular attention will be provided to ensure adequate development of technical studies and capacity building of relevant institutions and coordination measures. Other technical expertise/support could be also provided as needed. Project preparation would also include a set of technical studies to ensure PCM approach is taken as well as the necessary environment and social safeguards studies and assessment around climate co-benefits.

The proposed project would adopt a two-track approach so to provide appropriate support for the varying needs of the individual countries and sub-regions on different rungs of the digital adoption ladder. It is proposed that the project incorporates both regional IDA credit and grant financing to meet the needs of the different recipients in the region (primarily country beneficiaries), as well as, IDA grant financing to relevant regional organizations, to support legal and regulatory harmonization efforts among member countries. It is also proposed to support this project through a series of projects (SOP) to allow countries and regional bodies to join as and when they are ready (subject to the availability of IDA funds).

D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

To date Ethiopia, Somalia and Sudan and the EAC have indicated interest in participating in phase 1, but additional countries may be involved in future phases. The Eastern Africa region (which for the proposed project, includes Burundi, Djibouti, Ethiopia, Eritrea, Kenya, Rwanda, Somalia, South Sudan, Sudan, Tanzania and Uganda) is home to about 375 million people. Population growth in some countries is expected to increase up to two-fold by 2050. However, economic growth has been uneven; Djibouti, Ethiopia and Kenya recorded the highest per capita growth rates, while in Somalia economic growth hardly outpaced population growth.

Countries in Eastern Africa have diverse ecosystems and habits. For example, Ethiopia has geographic diversity, and macro- and micro-climatic variability meaning the country is endowed with diverse plant, animal, and microbial genetic resources. Ethiopia is one of biodiversity rich countries in the world (Ethiopia Institute of Biodiversity, 2014). Sudan is home to a variety of ecosystems and habitats (UNEP, 2020). The Sudanese Red Sea is famous for its attractive and mostly pristine habitats, particularly its coral reefs (Mubarak et al, 2018).

The region includes countries with a history of fragility, droughts, and conflict. A complex set of historical, ideological, political, economic, territorial, and environmental factors have created tensions within and between states. These conflicts have weakened states' capacity to provide public services, social cohesion, and increased vulnerability (particularly in historically marginalized border areas), thereby increasing the risk of conflict. Climate change is



exacerbating the situation, leading to tension over natural resources. Successive shocks of different kinds have led to record numbers of displaced people and increased migration, including recently from Tigray Region into Sudan. Environmental pollution is a growing problem in Africa, waste generation has been increasing with a need for improved management. Digital pollution is also on the rise from production of IT hardware, e-waste and daily exposure to digital use. Africa generates about 2.2 million tonnes annually of e-waste (UNU 2016) from imports of equipment and a few local assembly plants. Locally derived e-waste generation constitutes about 50-85% while the rest is from trans-boundary illegal imports. Infrastructure for solid waste management is weak and there is a lack of regulatory enforcement. Additional e-waste from the digital technology program will exacerbate e-waste management issues if not addressed from a regulatory, institutional and infra point of view. Many Eastern African countries have not enacted legislation to manage e-waste. Potential future investments in digital infrastructure can also cause alteration of terrestrial and aquatic habitats during the construction of communications infrastructure. Within sub-Saharan Africa according to the International Telecommunication Union 82% of people have access to mobile phones. However, less than 1% have access to fixed broadband and only 25% of the population have access to the internet. Figures vary between and within countries with access generally being lower in rural areas and lower income groups due to the relatively high costs associated with accessing digital technology. This affects access to the digital economy. Within the context of this digital divide, vulnerable groups including women, people living with disabilities as well as remote communities, people who do not speak the main language of the country and those who lack access to education are even less likely to access digital technology. Some of these vulnerabilities are features of indigenous groups who are at risk of being left behind in the digital transformation. Furthermore, vulnerable groups and people in FCV countries may have concerns about the digitization of services and data including the use of the data as well as issues of data protection and security.

D. 2. Borrower's Institutional Capacity

At a national level, the line ministry responsible for ICT and the digital economy will play a key role in technical oversight of the project including environmental and social risk management activities. The countries in the Eastern Africa have considerable experience in the implementation of World Bank financed projects, with the exception of Sudan. However, there are variations in the E&S risk management capacity and knowledge of the ESF between the countries with many FCV countries lacking capacity. As such, each borrower's capacity to manage E&S risks will need to be assessed in detail during preparation once the ministries and implementing agencies are identified. It is expected that some of the countries may have limited experience and expertise in managing environmental and social risks in line with the requirements of the ESF. Moreover, the Clients' capacity to understand and address E&S risks related to digital integration including issues such as data privacy, data protection and security, cyber security and e-waste are likely to be limited. Hence, there should be technical assistance embedded in the project design to ensure that individual borrower countries will develop appropriate policy and regulatory frameworks related to e-waste management, data privacy, protection and security (where such legal frameworks have not been enacted) and implementation. Opportunities to utilize grants such as the South-South Facility to promote knowledge exchange and capacity building will be considered during preparation and implementation. Furthermore, each implementing country will establish E&S risk management implementation arrangements including hiring of qualified E&S staff proportionate to the anticipated workload and level of risk. Capacity assessments and capacity building action plans will be prepared as part of the Environmental and Social Management Framework which will be prepared by each participating country/ entity prior to project appraisal.

At a regional level, responsibilities for coordination of cross-cutting legal, policy and regulatory areas such as regional digital markets regulation, cybersecurity, data use, and privacy, would potentially be assigned to the EAC (for Eastern Africa) will then collaborate with additional development partners active within the region and on given topic areas



covered. In the East Africa region, these additional partners may include the East African Business Council (EABC), the East African Competition Authority (EACA), the UbuntuNet Alliance (US, the regional Research and Education Network), and Smart Africa. In the HoA region, additional partners could include the International Telecommunication Union (ITU), a United Nations specialized agency which has regional offices in Addis Ababa and Cairo, and the Inter-Governmental Authority on Development (IGAD).

The Regional Organization(s) which will be engaged in the implementation of the project activities such as East African Community will need to ensure that the requirements of the Environmental and Social Framework (ESF) and specifically the requirements of the Bank’s Advisory Note on Technical Assistance are taken into account in the activities to be supported by the project. The environmental and social risk management capacity of the Regional Organization(s) will be assessed during preparation; and capacity building measures will be proposed based on the assessment’s findings. To address potential downstream environmental and social risks of regional regulatory and policy regimes to be financed by the Project, the Regional Organizations will conduct a Strategic Environmental and Social Assessment (SESA) during implementation phase of the Project.

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

A. Environmental and Social Risk Classification (ESRC)

Substantial

Environmental Risk Rating

Substantial

The environment, health and safety risks of the project could mainly result from Component 1 as it will finance broadband connectivity infrastructure deployment such as fiber optic and mobile networks, as well as broadband services. Furthermore, downstream EHS risks can also result from regional regulatory and policy frameworks that may promote investments in new infrastructure for digital integration. Similarly, activities to be financed under Component 2 and 3 could stimulate investments in new digital infrastructure in the participating countries that can have various EHS risks during construction, and operation phases (e.g. those listed in the WBG EHS guidelines for telecommunications). Terrestrial and aquatic habitats may be altered primarily during the construction of communications infrastructure. Potential impacts to habitat may be more significant during construction and installation of linear infrastructure such as long-distance fixed line cables, as well as access roads to other types of infrastructure along previously undeveloped land. Depending on their location, the installation of fixed line components, including shore approaches for long distance fiber optic cables, and access roads to transmission towers and other fixed infrastructure, may require construction of corridors crossing aquatic habitats with the potential to disrupt watercourses, wetlands, coral reefs, and riparian vegetation. Telecommunications processes do not usually require the use of significant amounts of hazardous materials. However, the operation of certain types of switching and transmitting equipment may require the use of solar power and backup power systems consisting of a combination of batteries (typically lead-acid batteries). Operations and maintenance activities may also result in the generation of electronic wastes (e.g. nickel cadmium batteries and printed circuit boards from computer and other electronic equipment as well as backup power batteries). Poor E-waste handling and disposal could expose people to non-dioxin-like polychlorinated biphenyls, polycyclic aromatic hydrocarbons, polychlorinated dibenzo-p-dioxins, polychlorinated dibenzofurans and dioxin-like polychlorinated biphenyls. Most of these compounds are endocrine

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disrupters and most are neuro-toxic. E-waste-related toxic elements can enter living organisms through air (e.g. open burning), soil (e.g. disposal) and water via ingestion (e.g. food chains contamination due to disposal and poor recycling processes). E-waste is resistant to biodegradation with strong tendency to bio-accumulate in agricultural lands and be available for uptake by grazing livestock. However, the regional strategy for e-Waste management to be financed by this project (under Component 1) could help to minimize the risks. Emissions from telecommunications projects may be primarily associated with the use of backup power generators, and the use of cooling and fire suppression systems. Construction of the digital infrastructure may contribute to environmental pollution such as air, construction waste, noise and water pollution. Occupational health and safety issues in the telecommunications projects include elevated and overhead work, confined space entry, electrical and motor vehicle safety issues. There are community health and safety concerns if e-wastes are not properly managed. For example, people can be exposed to e-waste-related toxicants through air, soil, water via ingestion, inhalation, and dermal absorption. Increased incidence of communicable and vector-borne diseases may occur because of construction activities. Construction activities may also result in an increase in traffic-related accidents and injuries to workers and local communities. The Client's capacity to manage the above risks is expected to be weak. Hence, the environmental risk of the project is rated as substantial based on the information available at this stage.

Social Risk Rating

Substantial

The Social Risk is Substantial at concept. However, given the level of uncertainty the social risk rating will be reviewed and confirmed during project preparation as depending on the final activities and locations a High risk rating may be more appropriate. Component 1, will finance broadband connectivity infrastructure deployment potentially including submarine landing stations and terrestrial fiber optic backbones as well as mobile networks. Any such activities are likely to require acquisition of land and potentially physical and /or economic resettlement. The severity of any such impacts will depend on the both the existing land uses, importance of sites for livelihoods (both terrestrial and marine) and the ability of landowners to utilize the land where cables are located following construction. Such impacts will differentially affect vulnerable groups notably traditional local communities (as per ESS7) as well as women, people living with disabilities and those with smaller land plots or with informal rights to the land they use. Similarly, construction of secure exchange and data storage, proposed under Component 2, though likely to be smaller in terms of geographical footprint may also result in resettlement impacts. As noted above, Components 2 and 3 could stimulate investments in new digital infrastructure in the participating countries which also may impact on access to land and rights of communities. Expansion of digital infrastructure will require a construction workforce and may result in labor influx. This has the potential for impacts on community health and safety including transmission of diseases, including sexually transmitted infections and potentially Covid-19 (depending on the evolving nature of the pandemic). These issues will need to be assessed in the Environmental and Social Management Framework and appropriate mitigation proposed. Risks associated with the use of any security personnel during construction will also need to be determined. This will need to include consideration of private and government personnel to secure work sites. A Security Risk Assessment will therefore be required prior to appraisal and Security Management Plans will need to be developed. Risks to project workers will need to be assessed and mitigated through Labor Management Procedures. However, risks include the use of child and forced labor especially in relation to construction activities and the supply chain, living conditions, hours of work and remuneration. Given the potentially remote and geographically distributed nature of activities as well as any security considerations supervision of these requirements may be a challenge. The Project proposes activities to harmonize policies for and legal framework for data privacy, protection and security. These TA activities would need to be undertaken in line with the World Bank guidance. Establishing foundational ID systems, provision of public and private services online and data exchange all bring about risks associated with data security. The rights of vulnerable

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groups and indigenous peoples must be considered in the project to ensure their inclusion, that collected data cannot be used as a basis for discrimination (e.g. on the basis of religion, ethnicity, sexual orientation and gender identity etc.) and that data protection covers such groups as needed. The SESA will need to assess the social risks of any harmonization policies and the legal frameworks proposed.

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:

Key EHS risks could result from activities under: (i) Component 1 including bulk purchase of internet capacity (10-15 years) such as for government, university use among other beneficiary groups; and gap financing in association with private sector investment to support regional connectivity infrastructure development, such as submarine landing stations or festoon cables for those countries with a coast, terrestrial fiber optic backbone infrastructure in particular for those landlocked countries; (ii) Component 2 including investment financing of cost associated with establishing PPP for data centers and cost associated for cloud subscription services; and (iii) Component 3 which includes investment financing such as acquisition of retail payment systems infrastructure in support of interoperable cross border payment systems across EAC member states. Technical Assistance and Capacity Building Activities undertaken as part of the 3 components will be implemented in compliance with the Bank's Advisory Note on Technical Assistance.

The project activities could have four potential EHS risks and impacts: i) alteration of terrestrial and aquatic habitats which could have adverse impacts especially if linear digital infrastructure may pass through critical habitats or biodiversity hotspots during construction periods and possibly during maintenance. The installation of fixed line components, including shore approaches for long distance fiber optic cables, and access roads to transmission towers and other fixed infrastructure, may require construction of corridors crossing aquatic habitats with the potential to disrupt watercourses, wetlands, coral reefs, and riparian vegetation; ii) construction and electronic wastes; iii) localized greenhouse gas emissions; iv) Construction activities may also account for an increased demand for resources including water, energy and raw materials; and v) occupational health and safety issues. There are also similar downstream EHS risks due to technical assistance activities to be financed by the project such as legal, policy and regulatory frameworks.

A range of social risks may occur including i) physical and/ or economic displacement as a result of land take for fixed line components, access road and other fixed infrastructure under Component 1 and data centers under Component 2. Works at the nearshore associated with long distance fiber optic cables landing stations may impact on livelihoods such as fishing (grounds and landing sites) and physical displacement; (ii) civic works under components 1 and 2 may result in community health and safety impacts including transmission of diseases, social conflict etc. while construction is ongoing and during any maintenance activities during operation; (iii) presence of security personnel (if required) notably during construction of infrastructure but also to protect assets during operation; and (iv) adverse impacts to land used by traditional local communities depending on siting of infrastructure. Differential impacts may be experienced by vulnerable groups.



Potential environmental and social (E&S) risks and impacts will need to be considered as part of the decision-making process to determine sub-projects to be invested in. Screening of the sub-projects should be undertaken as early as possible (and as part of preparation) to determine if proposed activities are likely to be environmentally and socially sound and sustainable against pre-defined criteria which will include but not be limited to consideration of access to land, livelihoods, presence of ESS7 communities, existing land uses etc. Framework plans will be prepared by the participating countries prior to appraisal to guide the development of projects.

Each participating country will prepare an Environmental and Social Management Framework (ESMF) which will serve as a basis for identification and management of the E&S risks associated with the project activities such as broadband connectivity infrastructure deployment including fiber optic and mobile networks, as well as broadband services in addition to developing frameworks related to e-waste (where such legal frameworks have not been enacted). ESIA's or other site-specific instruments for civil works, if any, will be prepared during implementation stage, when specific sub-projects have been defined, following the requirements of the ESMF and other frameworks (eg Resettlement Policy Framework) prior to commencement of construction activities. At appraisal stage key project activities will be identified and described at PAD and ESRS; TORs for major civil works will be prepared if possible. Site-specific E&S Assessments and Management Plans (including e-waste management) will be prepared by each borrower country based on the ESMF and if relevant RPF. At this stage no facilities, which fulfill the ESF definition of associated facilities, have been identified. If any associated facilities are identified during preparation, E&S risks will be identified and managed in compliance with the requirements of the ESF.

Direct social impacts associated with the project, notably the activities under Component 3 but potentially from TA activities under Components 1 and 2, may relate to data privacy protection and use associated with the establishment of open access, data exchange, big data analytics as well as use in public and private services online. Protocols/ agreements should be established for the sharing of the data within and between countries recognizing its potential usefulness. Vulnerable groups such as pregnant girls, the disabled, LGBTQ individuals etc. and indigenous peoples may be placed at risk if data is collected or shared inappropriately. The development of any legal, regulatory or operational frameworks as part of the project at the regional or national level will need to be undertaken in line with the requirements for the ESSs to protect people from potential harm. The proposed activities around foundational ID systems under Component 3 will need to be developed in a manner that is non-exclusionary, protects personal information, provides people with greater control over their data, and respond to the needs of the population. This needs to consider limitations of vulnerable groups and avoid exacerbating any digital divide that may exist in participating countries e.g. through lack of access to technologies. These issues should be addressed through Component 3 of the Project and the SESA to be developed.

To address potential downstream impacts of technical activities to be implemented by the Regional Organizations (e.g. EAC), a Strategic Environmental and Social Assessment (SESA) will be conducted during implementation phase of the Project once activities have been defined. The SESA should cover issues such as ICT, data security, data protection, data privacy, cybersecurity, cumulative impacts, e-waste management and perceptions and concerns around digitization. The findings of the SESA will be used to update the ESMF as needed and to inform the development of E&S Assessments. Implementing agencies will ensure that other capacity building or technical assistance activities will be implemented in compliance with the Bank's Advisory Note on Technical Assistance.



The Project implementing entities will follow the WBG EHS Guidelines for Telecommunications to address EHS risks. The EAC and individual borrower countries will also prepare ESCPs which outline the measures and actions that are required to avoid, minimize, reduce or otherwise mitigate the potential environmental and social risks and impacts. Furthermore, the project will finance a regional strategy for e-Waste management under Component 1 and the development and harmonization of data privacy policies in Component 2. If the E&S assessment reveals that third-party monitoring (TPM) will be needed, this will be clearly reflected in the Appraisal ESRS and the requirement for TPM included in the ESCP.

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

The use of Borrower Frameworks are not being considered.

ESS10 Stakeholder Engagement and Information Disclosure

Stakeholder engagement is a critical tool for social and environmental risk management, project sustainability and success. In consultation with the Bank the participating borrower countries and regional institutions will prepare and implement inclusive Stakeholder Engagement Plans (SEPs) proportional to the nature and scale of the project and associated risks and impacts. This will need to consider regional, national and local stakeholders who may be affected by the Project. Stakeholders are likely to include supporting ministries, academic institutions, civil society, technical organizations and the telecommunications private sector. In addition, Project Affected People especially in relation to proposed civil works will need to be engaged.

A SEP will be prepared by each participating Country/ Regional Entity. The Country/ Regional Entity SEPs will ensure there is engagement on the Program overall with the regional entity expected to take a lead on regional engagement on the program. The Country Specific SEPs will ensure engagement at the national level and the approach to engagement for the sub-projects to be implemented in their countries including collaboration with other implementing partners for cross border activities.

The SEPs will need to consider sharing information on the project activities, incorporating stakeholder feedback into the Project and reporting and disclosure of project documents. In addition, the needs of different groups including vulnerable and Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities (IP/SSAHUTLC) will need to be considered in planning such activities where relevant.

A draft of the SEPs will be prepared and disclosed prior to appraisal which will outline the engagement during project preparation and implementation including stakeholder identification and mapping, proposed approaches to engagement for different stakeholder groups as well as timings. The results of the engagement planned/undertaken for the preparation phase will be reported on during appraisal, including how the inputs were considered in project design and E&S instrument preparation. The Borrowers will undertake meaningful engagement with stakeholders ensuring the provision of timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.

The SEPs will also consider how engagement can be undertaken in line with any restrictions that may be in place as a result of social distancing or restrictions on gatherings as a result of COVID-19 within the selected countries. This may



involve the use of technology as well as more traditional means of communication including radios and traditional leaders.

The SEPs will include a description of a Project Grievance Mechanism which will include confidential mechanisms for receiving complaints of sexual exploitation and abuse and sexual harassment, as well as other forms of GBV and establish a protocol to enable survivor-centered responses. The GRM will address complaints and suggestions coming from both project-beneficiaries and other interested parties. Consideration will be given to utilizing or strengthening existing grievance redress mechanisms which may exist in the participating countries if relevant.

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

Project workers will include (i) Direct Workers who will be directly engaged by the Borrowers to work on the project; (ii) contracted workers employed by third parties to undertake activities including construction, provide technical inputs and support the TA activities; and (iii) primary supply workers to provide goods or materials needed for the project. At this stage, the use of community workers is not anticipated but this will be confirmed during preparation.

OHS issues are one of the anticipated risks of the Project especially in digital infrastructure development activities. Occupational Health and Safety (OHS) measures will be applicable to all project workers. Attention will be given to training of workers on OHS risks and awareness to minimize the risks.

In addition, workers may be subject to labor risks including terms and conditions of employment which are not in line with national law and/ or ESS2 including in relation to hours of work, remuneration, living conditions etc. Risks associated with Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) may also occur especially affecting women and girls e.g. in return or maintain employment opportunities.

Labor Management Procedures (LMP) which identify the main labor requirements and labor risks associated with the Project will be prepared based on the requirements of ESS2 and national labor laws, prior to project appraisal. The LMP will provide procedures to address labor issues including, but not limited to: (i) child and forced labor; (ii) Contracts of employment and terms and conditions of employment, (iii) protection of wages including fair treatment, non-discrimination and equal opportunity of project workers, (iv) occupation, health and safety issues, (v) labor influx and associated risks (vi) SEA/SH risks; and (vii) grievance mechanism for workers with accessible means to raise workplace concerns including SEA/SH grievances in a confidential manner.

The OHS measures will be designed and implemented to address: (a) identification of potential hazards to project workers; (b) provision of preventive and protective measures, including elimination of hazardous conditions or substances; (c) training of project workers and maintenance of training records; (d) documentation and reporting of occupational accidents, diseases and incidents; (e) emergency prevention and preparedness and response arrangements to emergency situations; and (f) remedies for adverse impacts such as occupational injuries, disability and disease. Contractors in the digital infrastructure development will be required to prepare and implement Occupational Health & Safety Plans (OHSP) following the World Bank Group Environment, Health and Safety (EHS)



Guidelines, adopt a code of conduct for all workers and establish GRM (accessible for direct and contracted workers) before commencement of the civil works.

The security risk assessment and security management plans will need to consider risks to project workers based on the contextual situation and develop appropriate mitigation to address the risks to the extent possible.

Bidding documents for the digital infrastructure shall include budget for all OHS provisions as well as other costs associated with labor management e.g., the operation of a grievance redress mechanism, security of project personnel and SEA/SH prevention measures. The Project implementing entities in the participating countries will regularly monitor the contractor's performance in implementing the LMP and OHS measures.

ESS3 Resource Efficiency and Pollution Prevention and Management

The project activities such investments activities such as broadband connectivity infrastructure deployment including fiber optic and mobile networks, as well as broadband services can lead to an increase in e-waste stream in the East Africa. Operations and maintenance activities may result in the generation of electronic wastes (e.g. nickel-cadmium batteries and printed circuit boards from computer and other electronic equipment. The operation of certain types of switching and transmitting equipment may require the use backup power systems consisting of a combination of batteries (typically lead-acid batteries) and diesel-fueled backup generators for electricity. Greenhouse gas emissions may result from the use of backup power generators and cooling and fire suppression systems. Construction activities could contribute to environmental pollution such as air, construction waste, noise and water pollution. The project could lead to an increase in use energy resource for the telecommunication facilities which need to be sourced and used following measures described in the Good International Industry Practices (GIIPs).

These risks could be minimized with appropriate waste management and efficient resource management strategies. To this end, appropriate pollution prevention and management including e-waste management will be measures will be implemented by each participating country. The WBG EHS Guidelines for Telecommunications will be followed while addressing the potential risks.

Construction activities may also account for an increased demand for resources. Potential risks to potential resource efficiency shall further be investigated during environmental and social assessment. To extent possible, the project implementing agency shall put appropriate measures to ensure resource efficiency (including water, energy and raw materials) in place in the course of implementation of the project.

ESS4 Community Health and Safety

If e-wastes (described in ESS1 and ESS3) are not properly managed, they could have considerable impacts on community health. For example, people can be exposed to e-waste-related toxicants though air (e.g. open burning of e-wastes), soil (e.g. random disposal of e-waste), water via ingestion (e.g. food chains contamination due to disposal and primitive recycling processes), inhalation, and dermal absorption (e.g. dust and direct exposure of workers who labor in poor recycling areas and their families). E-waste is not biodegradable with strong tendency to bioaccumulate in agricultural lands posing a community health concern. These risks could become more apparent in the long term perhaps during and post project implementation.



Given the scale of the works, some labor influx is considered to be likely but will vary depending on the nature of the civil works and geographical location. Skilled and semi-skilled workers are likely to be sourced from outside the local areas, but it is expected that unskilled workers can be sourced from the community close to the project sites.

Labor influx can lead to an increased risk of sexual exploitation and abuse (SEA) notably of women and girls especially associated with construction activities and locations where camps are established. Sexual exploitation and abuse (SEA) especially due to extreme poverty situation which may see even young girls engaging in survival sex; transaction sex, sexual harassment (SH) and other forms of GBV. Sexual violence and GBV in the countries proposed under Phase 1 are very high. In particular, sexual violence against women has been used as a tool of war with many forms of SEA including child marriage, FGM/C, rape and intimate domestic violence being normalized especially in conflict areas. Exploitative transactional sex, including for basic survival is seen as accepted practice although official data is lacking. Risk factors for GBV arise at multiple levels from societal level due to gaps in the law, weak enforcement, poor and uneven economic development, and societal attitudes and norms; community level with peer pressure and weak community sanctions; family level arising from household poverty and women's economic disempowerment; as well as various factors which heighten individual vulnerability. SEA/SH risks are also linked to the fact that the project will be implemented in areas where there are variable provisions for SEA/SH service providers (referral services), and weak law enforcement capacity which may contribute for exacerbating the risks of SEA/SH. SEA/SH risks will need to be addressed through a SEA/SH Action Plan to be developed by participating countries and the prevention and response measures including worker codes of conduct.

In addition, transmission of communicable diseases is also a concern including Covid-19 and Sexually Transmitted Diseases notably HIV/AIDS. Workers may also increase the rates of crime, social conflict and violence especially if they are unfamiliar with cultural norms in the areas where they are working. Construction activities may pose potential health and safety concerns for the inhabitants within the vicinity of works especially when construction is carried out near a village/community. Transport of materials, equipment and workers will use existing roads which may cause disruption or accidents resulting in injuries. These risks will need to be assessed as part of the ESMF and appropriate mitigation measures included. In addition, the need for engagement with communities around these issues will be included in the SEP.

Security is a key risk given the locations where the project will be implemented. Given the conflict context in countries in Eastern Africa and notably those countries being proposed under phase 1 there is likely to be a need to secure project workers and assets during construction and operation including maintenance activities. Deployment of security forces may be required to prevent vandalism, theft or attacks on assets as well as protect workers during construction and operation but presents risk to the community include SEA/SH. The presence of security can result in risks to the community including undue use of force, inappropriate conduct to the community, increased risk of SEA/SH etc. The use of security personal will need to be assessed further during project preparation and may require the development of security risk assessments and security management plans including Codes of Conduct and other measures that will govern their interaction with the local communities. in some of the participating countries. Security Risk Due Diligence will also be undertaken as part of the Bank's Due Diligence to inform the level of risk and appropriateness of management plans.



ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Land use and rights vary across the countries participating in Phase 1. In many countries for example Somalia land is subject to unregistered communal land rights meaning arrangements for land transfer of formal tenure is challenging. In other countries such as Sudan there is a combination of national laws and regulations on land tenure and expropriation which needs to be considered against the realities of customary land tenure especially in rural communities including communally owned and used land. In such settings, agricultural practices are usually based on individual small holdings while pasture, range land and water resources are often communal resources. In rural areas, most of the land is either public or held under customary land rights authorities who determine land uses. Even in Ethiopia, despite the national and regional proclamations on land expropriation and rural land administration, respectively, customary practices prevail, where land is communally owned and managed. As such land acquisition, restrictions on land use (potentially in the form of easements and involuntary resettlement is likely to be complex.

Land related risks include (i) conflict over rights to the land and resources; (ii) exclusion of land users (especially seasonal users) in decision making and provision of resettlement support including compensation; (iii) pressure on owners or users to donate land on a voluntary basis; (iv) failure to acquire land in line with the requirements of ESS5 given the potentially limited capacity and (v) impacts to livelihoods (both land and marine based). Key to mitigating these risks will be coordination with all stakeholders including the customary land rights authorities of the respective areas as well as members of the communities and seasonal users to ensure that their land usage is not affected. Where relevant, voluntary donation procedures will need to be developed, including parameters where donation is not an acceptable approach based on extent of any land take but also the vulnerabilities of affected people (such as female headed households, extreme poor etc). Livelihood losses will also need to be considered and assessed including from temporary disruption due to construction activities, easements and permanent loss of access to land. If submarine landing stations are constructed, the project will need to determine if this results in any livelihood losses e.g. from loss of access to fishing grounds (both temporary and permanent), fish landing sites or markets. The extent of these impacts will be considered further during project preparation as the sub-project activities and locations are further defined/ prioritized and screened to determine if they are environmentally and socially sustainable. This will include assessing the nature, extent and risks of any potential resettlement.

Country specific RPFs will need to be prepared for countries which have civil works confirmed under Phase 1 which will outline the approaches to avoid and minimize physical and economic displacement where possible. The RPF will also include the approach to acquire land including voluntary land donation if this is expected to occur, the potential risks and impacts of land acquisition associated with the various activities and likely geographical areas as well as assessing livelihood losses and associated restoration plans. Subsequent Resettlement Action Plans (RAPs) in line with national law and ESS5 will be prepared during implementation for site specific investments. This requirement will be captured in the ESCP.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

Activities to be financed by the Project, especially by Component 1, could stimulate development of telecommunication facilities/infrastructure by the private or public sector that could adversely affect natural habitats and biodiversity. Terrestrial and aquatic habitats can be altered primarily during the construction of communications infrastructure depending on the type of infrastructure component and proposed location. Potential impacts to



habitat may be more significant during construction and installation of linear infrastructure, such as long-distance fixed line cables, as well as access roads to other types of infrastructure. The project activities could account for alteration of terrestrial and aquatic habitats which could have adverse impacts especially if linear digital infrastructure may pass through critical habitats or biodiversity hotspots during construction periods and possibly during maintenance. The installation of fixed line components, including shore approaches for long distance fiber optic cables, and access roads to transmission towers and other fixed infrastructure, may require construction of corridors crossing aquatic habitats with the potential to disrupt watercourses, wetlands, coral reefs, and riparian vegetation. The ESMF will establish a clear exclusion list for activities that can have significant adverse impacts on biodiversity and critical and natural habitats. Biodiversity risk management measures will be included in the ESMF.

Recommended measures to prevent and control impacts to terrestrial habitats during construction of the right-of-way include: siting fixed line infrastructure (e.g. fiber optic cable) and other types of linear infrastructure rights-of-way, access; roads, lines, and towers to avoid critical habitat through use of existing utility and transport corridors, whenever possible; avoidance of construction activities during the breeding season and other sensitive seasons or times of day; revegetation of disturbed areas with native plant species (the WBG EHS Guidelines for Telecommunications).

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

Traditional Local Communities are present in a number of countries in Eastern Africa for example Ethiopia and Sudan. In other countries such as Somalia distinct (often minority) tribal or clanic groups exist who may not meet the requirements of ESS7 but may need differential measures to ensure inclusion and access to benefits are present.

The presence of Traditional Local Communities will need to be assessed further during project preparation as part of the screening of priority projects to identify the likely presence of Traditional Local Communities and likely risks and impacts.

However, Traditional Local Communities presence will be determined based on proposed location of civil works following feasibility studies and the Environmental and Social Assessments of the sites to be undertaken during implementation. Where Traditional Local Communities are present the Project will develop site specific timebound Indigenous Peoples Plans setting out the measures or actions proposed. If other people are also affected by the risks and impacts of the Project a broader community development plan may be prepared to address all beneficiaries. The plan will need to be consulted on and disclosed prior to the commencement of any works at site. Furthermore, where relevant and in line with the requirements of ESS7 Free Prior and Informed Consent will also be obtained.

In relation to the proposed TA activities, the SESAs will inform the project on the scope and depth of stakeholder engagement that would be required for the different TA activities – including with IP/SSAHTLC for countries in which they are present. If necessary, a planning framework with the approach to engagement with IP/SSAHTLC will be developed for inclusion in the country SEP. This will require engagement with IP/SSAHUTLC to determine their perceptions and concerns around digital data as part of the SESA preparation. The SESA will also evaluate ways to engage IP/SSAHUTLC communities to ascertain how they can best benefit from the project so that they are not excluded, and the digital divide is not exacerbated.



ESS8 Cultural Heritage

The potential risks activities on tangible and intangible cultural heritage will be assessed during preparation of the ESMF. However, it should be possible to avoid impacts to cultural heritage through site screening. Chance Find Procedures shall be adopted for precautionary reasons for infrastructure investments to address unknown archeological or historical remains and objects and the procedure will clearly be described in the ESMF.

ESS9 Financial Intermediaries

The Project does not involve the use of Financial Intermediaries as such this standard is not relevant.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways	TBD
OP 7.60 Projects in Disputed Areas	No

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? No

Financing Partners

N/A

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

Actions to be completed prior to Bank Board Approval:

The following documents shall be prepared prior to appraisal:

1. Environmental and Social Management Framework for each country participating in phase 1 (including capacity assessment and relevant action plan)
2. Environmental and Social Commitment Plan for each country participating in phase 1 and EAC
3. Stakeholder Engagement Plan for each country participating in phase 1 and EAC
4. Resettlement Policy Framework for countries with confirmed civil works in phase 1
5. ToR for SESA including consideration of data security, elite capture, inclusion, fragility and conflict.
6. Environment and Social Screening of Sub-Projects.
7. Draft ToR for E&S Assessments for major civil works, if any defined.

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

The issue to be addressed in the ESCP among other will include:



- Establishment of a functioning E&S risk management implementation arrangement including hiring of qualified staff;
- Implementation of the Project activities in compliance with the applicable Environmental and Social Standards;
- Preparation of site specific environmental and social risk management plans following the requirements of the ESMF;
- Development of country specific Labor Management Procedures
- Development of site-specific resettlement action plans including livelihood restoration measures as required in line with the national law and ESS5
- Development of site specific time-bound IPPs or Community Development Plans for activities where IPs are present including requirements for FPIC where relevant.
- Development of SEA/SH Action Plans including prevention and response measures
- Security Risk Assessment and Management Plans for the proposed project sites
- Allocating budget for environmental and social risk management activities
- Compliance monitoring and reporting;
- Developing policy and regulatory frameworks related to e-waste management, data protection and security (where such legal frameworks have not been enacted) which address public and private services online, foundational ID systems and Big Data Analytics.
- Strategic Environmental and Social Assessment (to be prepared by the Regional Organizations during implementation stage)
- Update of the ESMF and other relevant instruments based on the outcomes of the SESA.

Public Disclosure

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

01-Aug-2022

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Republic of the Sudan

Borrower: Federal Republic of Somalia

Borrower: Federal Democratic Republic of Ethiopia



Implementing Agency(ies)

Implementing Agency: East African Community (EAC)

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s):	Cecilia Maria Paradi-Guilford, Naomi J. Halewood
Practice Manager (ENR/Social)	Iain G. Shuker Recommended on 08-Oct-2021 at 05:33:6 GMT-04:00
Safeguards Advisor ESSA	Peter Leonard (SAESSA) Cleared on 14-Oct-2021 at 14:25:15 GMT-04:00