



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)
Micronesia, Federated States of	EAST ASIA AND PACIFIC	P176965	
Project Name	FSM Skills and Employability Enhancement Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Social Protection & Jobs	Investment Project Financing	2/4/2022	5/16/2022
Borrower(s)	Implementing Agency(ies)		
Federated States of Micronesia	FSM National Department of Education		

Proposed Development Objective

To improve the quality of and equitable access to secondary vocational education and skills trainings, and to improve access to and effectiveness of employment support programs.

Financing (in USD Million)

Amount

Total Project Cost

14.00

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 labor market of the Federated States of Micronesia (FSM) is characterized by relatively low formal employment, high unemployment, and a high share of migrant labor . The 2010 census suggested that around half of the FSM’s labor force was in formal employment while a quarter was engaged in subsistence, with the remainder unemployed. The Organization for Economic Co-operation and Development (OECD) migration database reports that as of 2017 (latest available data) over 31,000 Micronesians are living in the United States. More than 60 percent of migrants to the U.S. mainland were most likely to be in paid employment. Wages for paid migrant workers suggest that the majority are in labor-intensive industries. FSM emigrants earn relatively low wages; an average US\$18,258 per



annum, (highest for those living in the US mainland and lowest in Guam). These low wages are likely related to the relatively low skills and educational levels of migrants suggesting both weaknesses in RMI's education system and a lack of focus on migrant needs in the U.S. labor market.

The FSM labor market is further struggling with the challenges of high formal sector unemployment (especially among youth), largely driven by persistent skills gaps. The public sector is the main employer in FSM, with about 39 percent of formal employment located in public administration. Stakeholder discussions identified a number of professions where there is a perceived need for more domestic workers: (i) mechanics; (ii) construction industry, including skilled carpenters, masonry, welding, electricians, plumbers; (iii) business management, especially accountants and middle managers; (iv) agriculture, including greenhouse operations and managers, livestock technicians, and (v) emerging technologies including renewable energy and IT. Better linking skills development with employment opportunities would be important if FSM is to address the dual problem of high formal sector unemployment (especially among youth) and skills gaps.

There are equity issues related to youth living in outer islands of FSM. Due to the significant distances between islands and lack of regular and reliable island connectivity, geographic barriers persist to those living in outer islands. In higher grades, students may need to relocate to attend school and are housed either in dormitories or with host families. Technical and vocational education and training (TVET) options are both limited and fragmented. At the secondary level, TVET is primarily provided via the public school system, focusing on occupational preparation via theory and practical skills training. Programs were once available in 29 high schools but were discontinued in most of these facilities due to lack of teaching staff and outdated equipment. At the post-secondary level, TVET is available through College of Micronesia (COM)-FSM and the affiliated FSM Fisheries and Maritime Institute (FMI). The COM-FSM Career and Technical Education Centre (CTEC) include continuing education classes, English, business management, building technology, customer service, computer skills and cultural courses such as dance and local languages. Non-formal TVET is largely provided and managed by a multitude of NGOs, civil society organizations and faith-based organizations on an ad-hoc basis: Communications the private sector, government and educational providers is virtually non-existent, and data on labor market needs, outcomes and skills gaps are unavailable or outdated.

The National Department of Education (NDOE) of the FSM oversees four State Departments of Education (SDOEs) and is responsible for setting national standards around teacher certification and school accreditation; school curriculum standards and benchmarks; student assessments; special education; coordinating foreign assistance; providing training and other assistance to the states; and providing support to post-secondary education programs and projects. SDOEs retain authority to set their own curricula, tests and standards and are responsible for instruction, while catering to linguistic and cultural diversity. There is currently no dedicated TVET board nor any specific TVET policy. Coordination between employers, TVET graduates and education providers is poor.

Against this background and its development objective, the Project will implement the following components:

Component 1. Facilitating more equitable access to skills training. Activities will support expanding the availability of quality skills training (both-short term and long-term) while providing incentives and support to increase participation of under-represented and disadvantaged groups (such as poor and vulnerable youth, women, persons with disabilities, and geographically disadvantaged Micronesians)

Component 2: Strengthening the relevance and quality of skills trainings. Activities will involve improving the training curriculum, content and pedagogy with greater engagement of employers, establishing standards and quality assurance mechanisms, supporting independent skills assessment and certification (including for the recognition of prior learning), improving the quality of trainers, and supporting the revitalization of a major TVET institution to deliver high quality TEVT to students.



Component 3. Building the foundations for labor market services. Activities will support the provision of comprehensive job search assistance to potential workers, establishing a labor market information system, and supporting workers in getting job experience and getting their skills certified.

The proposed Project is closely aligned with Regional Partnership Framework (RPF) for FY17-FY21 (extended through FY23). The RPF identifies four areas of focus: (1) fully exploiting the available economic opportunities; (2) enhancing access to employment opportunities; (3) protecting incomes and livelihoods; and, (4) strengthening the enablers of growth and opportunities (macro-economic management, infrastructure and addressing knowledge gaps). The Project's scope is closely aligned with the second focus area, specifically objectives 2.1. (Broadened opportunities for access to labor markets) and objective 2.2. (Addressing education and skills gaps).

D. Environmental and Social Overview

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

The Federated States of Micronesia (FSM) is the largest nation in the Micronesian sub-region, comprised of four semiautonomous states: Kosrae, Pohnpei, Chuuk, Yap. It is an independent country in free association with the United States. FSM consists of more than 600 islands scattered over an Exclusive Economic Zone of about 2.6 million square kilometers. The overall population of FSM is estimated to be 113,815 (2019), of which approximately 45 percent live in Chuuk, 37 percent in Pohnpei, 11 percent in Yap, and 7 percent in Kosrae. FSM has also experienced considerable internal migration across states, mostly from outer islands to the main islands' urban areas, and especially to Pohnpei, which hosts the Country's capital Palikir, as individuals are particularly drawn to employment with the National Government. Access to basic services is also generally higher in Pohnpei. Each State is diverse in terms of language, cultural norms, environmental and land tenure laws.

FSM is reported to have the highest estimated rates of poverty among the nine small remote islands (PIC9) covered in the Regional Partnership Framework (RPF) which found that about 41 percent of FSM's population is struggling to meet basic needs and 10 percent are living below the food poverty line. The survey also documented stark variation across FSM, with the basic needs poverty rate most severe in Chuuk (46 percent), followed by Pohnpei and Yap (39 percent), and Kosrae (21 percent).

FSM's economy is largely driven by public sector, agriculture, and fisheries. The public sector is a major part of the FSM economy, accounting for around 32 percent of GDP and 48 percent of formal sector employment. Outside of the public sector, agriculture and fisheries are the main economic activities, contributing around 23 percent of GDP. Small scale service industries, such as inbound tourism, wholesale and retail trade, make up the remainder of the economy. Most goods are imported and there are few exports.

Other salient characteristics of FSM include that; the economy and market are largely reliant on the United States; the impact of COVID-19 on FSM has been significant with reduced remittances from United States residents (around 40 percent of FSM families received remittances in 2009); gender barriers continue to persist with lower levels for women than men in all the following: employment participation, government representation, wage levels and positions of seniority in employed positions, and; Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) remain to be a major risk.



There are important equity issues related to children and youth living in outer islands. Due to the significant distances between islands, geographic barriers persist to those living in outer islands, which contributes to equity issues. In higher grades, students may need to relocate to attend school and are housed either in dormitories or with host families. Costs of transportation and food can be prohibitively high, and families may struggle to cover expenses. Nonetheless, Technical and vocational education and training (TVET) options are both limited and fragmented in FSM. TVET at the secondary school level is primarily provided by public schools but the number of schools providing this education has declined due to a shortage of teaching staff and outdated equipment.

2010 census data shows women are only 34% of the workforce. Women are less likely to enroll in TVET (47% of enrollments).

D. 2. Borrower’s Institutional Capacity

This is the first engagement by the World Bank in the FSM education sector but it follows several previous World Bank projects in other FSM sectors. The project will be implemented by the National Department of Education (NDOE) who do not have any prior experience with World Bank operational policies or Environmental and Social Framework (ESF). Similarly State education authorities are not familiar with the ESF and Environmental and Social Standards and do not have designated environmental and social staff.

The FSM Department of Finance and Administration in the Ministry of Finance and the Centralized Implementation Unit (CIU) is familiar with the preparing and implementing projects under the ESF and the associated project-specific environmental and social risk management instruments. Recent projects prepared under the ESF include Digital FSM, the Strategic Climate-Oriented Road Enhancements (SCORE) Project (currently in preparation) and the Prioritized Road Investment and Management Enhancements (PRIME) Project .

The CIU Safeguards Team will assist the NDOE to undertake stakeholder engagement and prepare the environmental and social risk instruments for Project appraisal. The team supports project preparation, appointment of E&S consultants as required, review of documentation, and also supports implementation and monitoring of World Bank funded projects. The team has a full time International Environmental Specialist and a full time Safeguards Advisor and is in the process of recruiting a full time International Social Specialist. The CIU is also in the process of engaging State Focal Points, who will be a resource for this Project in supporting stakeholder engagement, Project monitoring and other activities in each State.

During implementation the PIU will be integrating social safeguards in the design and implementation of component activities. They will take the lead with implementing the social aspects of the Environmental and Social Commitment Plan, Labor Management Procedures and Stakeholder Engagement Plan, and will be supported by the CIU Social Specialist. During preparation the task team will assess the skills and capacity requirements and ensure the relevant resources are included in the PIU team. The NDOE and PIU will require training and support from the CIU and World Bank task team to ensure the ESF standards are applied in the project. The CIU will also support with record keeping, reporting and grievance and incident management. The CIU environmental safeguards advisors will manage the PATS ESMP implementation because they have the relevant skills and experience to update ESMP, review bid documents, review Contractors ESMP and supervise works. The above approach of the PIU supported by the CIU is considered adequate to support the integration of environmental and social risk management into the Skills and Employability Enhancement Project.



Ongoing direct support will be provided by World Bank staff to the CIU and NDOE to ensure the requirements of the ESF are satisfied.

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

A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Moderate

The environmental risks are low to moderate and primarily relate to the design, construction and operation of the rehabilitation of the Ponepe Agriculture and Trade School (PATS). The PATS campus is located in a rural area of Pohnpei State, adjacent a marine area of biological significance. The campus includes classrooms, dormitories, workshops, laboratories, chapel, and other ancillary buildings, all of which are derelict or in major disrepair. Environmental risks are building waste (hazardous and non-hazardous), pollutants such as stormwater and sediment discharges and health and safety risks from construction, and the management of water use, energy use and waste during building operations. Risks also may occur from the use of raw materials and creation of waste from vocational training facilities. The environmental risks relating to non-physical works, including downstream or future risks, are low. A Preliminary Environmental and Social Management Plan (ESMP) will be prepared for the PATS renovation, which will contain guidelines and good practice approaches to managing design and construction-related environmental, health and safety risks. The Preliminary ESMP will need to incorporate all relevant ESF requirements and will be cleared by the Bank prior to implementation. All other environmental risks will be managed through actions in the ESCP. A moderate risk rating is proposed because the Project is not complex and / or large, does not involve activities that have a high potential to harm people or the environment, and is not likely to significantly adversely impact sensitive environmental areas. Furthermore, construction impacts are temporary, predictable and readily mitigated with well-proven controls.

Social Risk Rating

Moderate

The Project is expected to have overwhelming positive social and economic benefits through boosting the educational outcomes of young Micronesians by assisting them to obtain equitable access to market-relevant secondary vocational education, and skills training and employment support programs. The risk of poor E&S risk management because of weak institutional capacity and lack of coordination between PIU and CIU could undermine the project’s risk management strategy, particularly as the project will target the outer islands making E&S risk management logistically more challenging both in terms of implementation and monitoring. These issues will be explored in a more detailed assessment of capacity needs during project preparation and relevant social specialist resources will be identified in the Project Appraisal Document and ESCP. Operational procedures for CIU/PIU coordination will be necessary in the POM and reinforced during engagement with the task team. Social risks relating to exclusion of vulnerable and marginalized people is addressed in the Project design itself. The Project components target vulnerable, under-represented and disadvantaged groups including poor and vulnerable youth, women, people with disabilities and geographically disadvantaged groups such as students or trainees from outer islands. During project preparation, gender gaps in participation and outcomes as well as the risks of increased gender based violence as a direct or indirect impact of participation in the project will also be assessed and addressed in Project design and Grievance Redress Mechanism (GRM). Stakeholder engagement will ensure that the beneficiaries are engaged in the identification of issues and associated project benefits. Institutional and specialist technical stakeholders will be involved in the design of component activities, key stakeholders for information



dissemination and beneficiary targeting will be included in the Stakeholder Engagement Plan. The social risks relating labor relate to the rehabilitation activities associated with the Ponepe Agriculture and Trade School (PATS) under Component 2 relate to workers health and safety. Labor risks, including SEA/SH can be managed through effective codes of practice, training of workers and good supervision and oversight of mitigation measures. Furthermore the Project will support internships for students who will be placed in local businesses to gain training and experience. The labor, H&S and SEA/SH risks associated with this activity will be managed through clear communication of roles and responsibilities (for NDOE, employer and intern), transparent contract conditions, presence of a labor GRM and active monitoring by NDOE. A Draft Terms of Reference will be prepared for an Environmental and Social Management Plan for the PATS renovation, which will contain guidelines and good practice approaches to managing design and construction-related social risks, particularly relating to labor management, worker and stakeholder feedback and grievances and the risks of sexual exploitation, abuse and sexual harassment. All other social risks will be managed through development of a Stakeholder Engagement Plan, Labor Management Procedure and actions in the ESCP. A moderate risk rating is proposed because the Project is not complex and / or large, does not involve activities that have a high potential to harm people or the environment. The moderate risk rating will be validated during project preparation, particularly to focus on integrating the mitigation of social harm and maximizing benefits into Project design.

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 screening of risks has been completed virtually as no missions have been possible. Information has been retrieved from online resources and from the FSM CIU and NDOE, including a rehabilitation assessment report for the PATS facility.

ESS1 relates to the entire project. The environmental risks are moderate and relate primarily to rehabilitating the physical infrastructure at Ponepe Agriculture and Trade School. The environmental risks are easily identifiable and standard mitigation measures are readily identifiable and applied. Hazardous and non-hazardous construction and demolition waste will be generated, but the nature of risks will not be identified and quantified until project implementation. Waste and landfill issues are described under ESS3. Typical emissions from renovations includes noise, dust, sediment and stormwater run off. There are few residents nearby the PATS and the nuisance impacts are expected to be low. Sediment and stormwater run off may affect the habitat and water quality of the coastal area, which is an Area of Biodiversity Significance (described in ESS6). The physical works may impact on cultural heritage but this will be further assessed during project preparation. ESS8 screening identifies a chapel on site and there may be other buildings or locations on site or within the Project Area of Influence that could be affected by works.

Aggregate sourcing for building materials is likely to come from local quarries on Pohnpei. Other materials, such as timber and steel, are likely to be imported. The source of materials will be screened during project preparation.



The PATS renovation activity has the opportunity to include resource efficiency and pollution prevention and control measures, as well as climate resilience, life and fire design, accessibility and other features to improve accessibility, health, safety and environmental outcomes.

Occupational and community health and safety risks will arise from construction and demolition activities, particularly if works occur when students and staff are present. There is no COVID-19 in FSM and any offshore workers will be required to comply with the border restrictions and infection prevention and control measures issued by the Government of FSM. ESS2 and ESS4 assessments conclude that health and safety risks are low to moderate and will require management to avoid and mitigate hazards and impacts.

The environmental risks of curricula development, training of trainers, purchase of materials and other technical advisory activities, including downstream or future risks, are considered low to moderate. There is an opportunity to include environmental, health and safety training into the curricula to influence the future behavior of graduates. There is the potential for the purpose of equipment or materials under the Project to create environmental harm (such as laboratory equipment, mechanical equipment, solvents and oils etc.) and require a selection of alternatives or the implementation of controls.

The social risks are moderate and relate to (i) ensuring that all Project activities are undertaken according to the ESF and incorporate appropriate E&S objectives, (ii) the Project will be inclusive of vulnerable, under-represented and disadvantaged groups (such as poor and vulnerable youth, women, people with disabilities, and Micronesians in remote areas) through targeted stakeholder engagement with beneficiaries and inclusive project design; and (iii) promoting transparency and public information disclosure.

The PATS is located on government leased land. The lease will be verified during project preparation along with an assessment of any encumbrances, occupiers (formal and informal) and any vulnerable people who may be affected by the renovation. No land acquisition is anticipated as part of the project, nor restrictions on land use or involuntary resettlement. The risks to the community and workers during construction relate to health and safety of active construction sites and of foreign temporary work forces residing in the community; these risks relate in particular to students if construction will occur during school semesters. These types of risks can be managed through effective codes of practice, training of workers and good supervision and oversight of mitigation measures.

The Project is anticipated to produce substantial social and economic benefits through expanding and improving equitable access to market-relevant secondary vocational education, and skills training and employment support program. The project will improve educational opportunities for FSM youth, with a focus on vulnerable and disadvantaged groups, by providing financial assistance, improving the quality and relevance of training and of some facilities, boosting the availability of training places, and delivering labor market information services. Furthermore, the outcomes are anticipated to be a more skilled workforce and more opportunities for people to lift themselves out of poverty, either working in FSM or overseas.

An Environment and Social Commitment Plan (ESCP), Stakeholder Engagement Plan (SEP) and labor management procedures (LMP) will be prepared prior to appraisal. An environmental and social risk screening and preliminary assessment of the PATS renovation will be conducted and a Preliminary ESMP for the activity prepared prior to appraisal. The Preliminary ESMP will identify the key risks and issues to be addressed in full in the Final ESMP, a site



specific environmental and social assessment and site-specific mitigation measures for each phase (design, pre-construction, construction and operation). The ESMP will be finalised during project implementation at or before the concept design stage and the ESMP completed and cleared by the World Bank prior to the finalisation of the bid documents. A Contractor’s ESMP will be required, including health and safety procedures, for the construction activities and cleared by the World Bank prior to mobilisation.

All other environmental, occupational health and safety and social risks will be managed in project design, in the preparation and supervision of technical advisory contracts and the review of procurement of materials. The ESCP will provide relevant actions to be completed during project implementation.

Issues associated with vulnerability and exclusion will principally be addressed in Project design but, if necessary, the ESCP will also include relevant measures to ensure access for all.

The CIU will retain at least two specialists with responsibility for implementation, supervision, training, monitoring and reporting for relevant social and environmental aspects for the duration of the project. Monitoring reports will be produced every 6 months and will include progress against the ESCP.

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

Although the anticipated impacts are assessed as moderate, the Borrower’s E&S Framework will not be relied upon because of a number of gaps in the legislation and capacity to meet World Bank Standards.

ESS10 Stakeholder Engagement and Information Disclosure

The key stakeholders are FSM youth and their families – from around the country, the education sector – including individual school institutions, civil service more broadly and the private and public sector employers in FSM. Stakeholder engagement is critical in the development of the Project to understand the opportunities and risks relating to the proposed components - activities will be designed and implemented based on a sound stakeholder engagement and public disclosure process. Stakeholder engagement activities will be undertaken as part of the preparation of the ESMP, and throughout the life of the Project. Consultations will be carried out in English, Chuukese (Trukese), Pohnpeian, Yapese, and Kosrean and other languages as needed and in culturally appropriate formats.

Where necessary, consultations may be gendered to identify specific education issues relating to gender and SEA/SH. Face to face consultation has been difficult recently due to domestic travel restrictions to prevent the spread of COVID-19. Alternative consultation and disclosure methods using social media and other technology may be used if necessary. A Stakeholder Engagement Plan (SEP), including grievance mechanism, will be prepared prior to appraisal.

B.2. Specific Risks and Impacts

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

ESS2 Labor and Working Conditions



ESS2 is relevant to several aspects of the Project. The Project will require contractors to renovate PATS. The workforce may be Micronesian or foreign, depending on the size of the contracts and nature of the building projects. Foreign contractors will also be involved in training the master trainers and possibly a range of other technical advisory activities such as engagement and systems development. Other direct workers include the project management team for the PIU. Wage subsidies may be paid to employers who employ students / graduates. This benefits jobseekers to gain industry-relevant work experience while at the same time providing employers with incentives to trial employment of jobseekers without experience and / or from a disadvantaged background. There is no expectation of community workers.

An assessment of labor rights and laws as well as occupational health and safety legislation and implementation arrangements will be undertaken during project preparation. The Labor Management Procedures (LMP) will be prepared based on the assessment. It is proposed that the LMP will describe the findings of the assessment, national labor policies and practices, the types of project workers that are likely to be involved, the procedures to apply ESS2, any specific requirements to Project-specific activities, and a labor grievance mechanism. ESS2 requirements will be mandated for building contractors and other contractors through the PATS ESMP, bid documents, contracts, and supervised by the CIU Safeguards Team. The PATS ESMP will include the requirement to assess the occupational health and safety risks relating to construction and demolition activities and develop avoidance and mitigation measures, consistent with WBG EHS general guidelines for Occupational Health and Safety and Construction and Decommissioning and other relevant EHS guidelines. The Contractor will be required to perform site specific risk assessments and prepare and implement occupational health and safety risk registers and management plans and provide all relevant personal protective equipment and other equipment to maintain a safe work place.

There is currently no COVID-19 in FSM. Contractors workers travelling to and around FSM will be required to comply with all Federal and State protocols to avoid introducing the disease into the country and will require operational procedures in the Contractor's ESMP to keep workers safe and free from COVID-19 during their time in the country.

Technical advisory such as development of curricula and training, will need to consider ESS2 topics such as worker health and safety.

ESS3 Resource Efficiency and Pollution Prevention and Management

The Standard is relevant for the renovation of PATS and the provision of training materials. For PATS the nature and scale of demolition and construction waste will not be known until project implementation, but it is likely to contain large volumes of hazardous and non-hazardous solid waste. Demolition material may include asbestos, treated timber or lead-based paints. The SPREP Pac-Waste 2015 assessment of asbestos in buildings in FSM did not sample buildings at PATS, but asbestos was sampled and found present in other education buildings, government offices and public buildings in each State. Therefore building materials will need to be screened for asbestos and, if necessary, tested, during the detailed design process and if asbestos is found to be present protocols put in place to manage asbestos waste. A similar process will be required for other potentially hazardous renovation waste. Construction and demolition waste will require disposal at the Pohnpei municipal landfill if it cannot be reused or recycled. The resource efficiency and pollution prevention and management aspects of the PATS renovation will be screened in more detail during preparation and the relevant tasks to assess impacts and develop avoidance and mitigation



measures will be articulated in the PATS ESMP. The capacity of Pohnpei landfill to accept building waste, including hazardous waste, will be screened during project preparation.

Building renovation design will take into account water and energy use efficiency and climate resilience. Pollution prevention measures for sanitation wastewater and trade training wastes from the upgraded PATS facilities will be incorporated into design. The ESCP will include the requirement for these aspects to be incorporated into the Design TOR.

Building aggregates are likely to come from local, land based quarries on Pohnpei. The source of aggregates, including sand, will be screened during project preparation and will be assessed for potential impacts during the finalisation of the ESMP for the PATS renovation. Other building materials (steel, wood, etc.) are expected to be imported.

Building construction activities can create emissions such as dust, sediment and noise. Due to the proximity of the campus adjacent to the coast, any earthworks, improvements to drainage, sanitation treatment and disposal may all have the potential to pollute the water quality, benthic habitat and food safety of seafood in the immediate coastal area. This impact would be localized. Treatment of emissions prior to discharge will be specified in the ESMP for PATS renovation.

Training materials identified for procurement under the Project (such as laboratory equipment, mechanical equipment, solvents and oils etc.) can be screened for resource efficiency and pollution prevention opportunities and any alternatives proposed or safeguards applied (such as environmental control equipment) prior to purchase and distribution. The ESCP will articulate the actions required during implementation.

Project design can ensure that the curricula improvements and training of trainers includes the resource efficiency and pollution prevention opportunities to influence downstream environmental mitigation at PATS and other training institutions and in the wider economy; for example, improving the management of hazardous waste from mechanical trades. The ESCP will articulate the actions required during implementation.

ESS4 Community Health and Safety

ESS4 is relevant to the Project. The risks to community health and safety from construction activities are considered to be minor and manageable. Works will be contained within the PATS grounds and the public, staff and students can be excluded by fencing and by timing of works to avoid term time. The PATS ESMP TOR will identify the tasks required to assess the community health and safety risks and application of avoidance and mitigation measures be put in place to ensure staff and student safety in the event that construction works need to take place in term time.

The Contractors may bring in limited workers from overseas and while the numbers are not expected to be significant, they may be resident for some time and working in close proximity to students (depending on the timing of works). Foreign contractors will also be involved in training the master trainers and possibly a range of other project activities such as engagement and systems development. During project preparation the social assessment



will include an assessment of a range of issues in FSM relating to imported labor, gender, child labor, demand for sex workers, and trafficking and will identify suitable management measures and mitigation that will be included in the PATS ESMP and the ESCP.

There may be health and safety aspects of education and training and facilities that will need to be integrated into building and facility design, equipment design and procurement, provision of safety equipment, teacher training and curricula development. The requirements to address building accessibility, fire and life design, building code compliance, climate resilience, use of non-toxic materials and other health and safety aspects in the Design TOR will be articulated in the ESCP for inclusion. The ESCP will include actions to ensure that the PIU and CIU screen for health and safety issues in the design, procurement and use of materials procured by the project, and to include health and safety where relevant in the curricula that is prepared by the Project.

Furthermore, the opportunities to promote teacher and student safety through additional guidance will be considered. This may include counselling services, awareness raising or protocols for pastoral care of students. The ESCP will articulate the actions required during implementation.

There is no COVID-19 in FSM. Workers travelling to FSM (contractors and consultants) will be expected to comply with the travel restrictions and infection prevention and control measures issued by the Government of FSM and have protocols in place in case of an outbreak.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

ESS5 will be relevant for the project if additional land is required for improvements in physical infrastructure at PATS. The PATS rehabilitation will be conducted on government-leased land. The leasing agreement will be verified during project preparation, including whether there are any occupants (formal or informal) who may be affected by renovation developments. If there are any issues with the lease, the ESCP will require a land access process to be prepared before the completion of the concept design. A land access process will outline the steps NDOE will take to ensure the lease is current and relevant, in accordance with ESS5, prior to works starting. If there are any people affected by the renovations (such as formal or informal occupiers) that may lead to involuntary resettlement, the ESCP will require the preparation of a Resettlement Action Plan to document the affected people, eligibility and entitlements. The likelihood of this is low, based on the desk-top analysis of the feasibility study for the PATS upgrade, but will be confirmed by appraisal.

No other land is required for the project.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

ESS6 is relevant for the project because the PATS site is adjacent to the Senpehn Lehdau Area of Biodiversity Significance, a coastal marine area. Buildings or renovations will be within the PATS campus and desk-based site screening identifies that there is no natural habitat on the grounds, but there is a low to moderate risk that



emissions such as sediment and treated wastewater, could enter the marine environment during construction or operation. This pollution could affect food gathering or benthic or coastal habitat if left unmitigated. During project preparation the site will be screened for natural habitats and further assessment will be carried out on the Area of Biodiversity Significance to confirm whether it is likely to be within the Project Area of Influence. The ESMP will include appropriate, proportional avoidance and mitigation measures for biodiversity conservation and ecosystem services.

Technical advisory relates to improving the education sector and TVET outcomes; there is no specific relevance to biodiversity conservation and sustainable management of living natural resources. The ESCP will include actions that TOR are reviewed to ensure any ESS6 aspects are screened and, where relevant, suitable measures included.

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

ESS7 is not considered relevant. The majority of people in FSM are Micronesian, around 90%, consisting of various ethnolinguistic groups, and will be the overwhelming beneficiaries of the project.

While the population identify as Micronesian, here is huge cultural and linguistic diversity amongst the islands of the four states. Traditional and cultural institutions have a strong presence in Micronesian life with extended family the keystone of Micronesian society.

While English is the official language of FSM, there are eight major indigenous languages spoken in FSM, and many of them are official State languages. Outside of the main capital towns, the local languages are primarily spoken.

The preparation of the environmental and social risk management instruments and project consultations will be tailored to the cultural and linguistic preferences of the local people.

ESS8 Cultural Heritage

ESS8 is currently relevant to the project. Building renovations for PATS is on Government-leased land. A desk-top review of the site identified a chapel. There may be other historical or cultural artefacts or sites requiring protection. During project preparation the site will be screened for cultural heritage sites. The ESMP will include relevant procedures to avoid or mitigate impacts on cultural heritage and the requirement for chance find procedure.

Technical advisory relates to improving the education sector and education outcomes; there is no specific relevance to tangible or intangible heritage. The ESCP will contain actions that require TOR to be reviewed for ESS8 risks and, where relevant, measures included.

ESS9 Financial Intermediaries

This standard is not relevant to the project, as no financial intermediaries will be involved in the operations.



C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

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

None

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

Actions to be completed prior to Bank Board Approval:

Environmental and Social risk screening and preliminary assessment of impacts from renovations of the PATS facility.

The following instruments will be prepared prior to appraisal:

Preliminary ESMP for the PATS renovation design, construction and operation, reflecting the outcomes of the risk screening and preliminary assessment, ESF requirements, Bank policies and good international industry practice.

Draft Stakeholder Engagement Plan

Environmental and Social Commitment Plan.

Labor Management Procedures (includes code of conduct)

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

Implementation of the safeguard instruments and Stakeholder Engagement Plan throughout the project, both for technical assistance and physical investments.

Actions to include in technical advisory terms of reference and supervision of outputs, including the design TOR for PATS renovations.

Actions to review procurement of materials for environmental, social, health and safety risks and application of safeguards.

Actions to finalize the PATS ESMP prior to bid documents being completed for the PATS renovation.

Public Disclosure



The preparation of contractor’s bid documents to include the PATS ESMP (with the contractor to prepare a C-ESMP) and requirements of the Bank’s Environmental and Social Standards.

Grievance Mechanism is set up and operational throughout the life of the project.

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

17-Jan-2022

IV. CONTACT POINTS

World Bank

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Borrower/Client/Recipient

Borrower: Federated States of Micronesia

Implementing Agency(ies)

Implementing Agency: FSM National Department of Education

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s):	Saurav Dev Bhatta, Sandor I. Karacsony
Practice Manager (ENR/Social)	Susan S. Shen Recommended on 27-Sep-2021 at 12:49:56 GMT-04:00
Safeguards Advisor ESSA	Nina Chee (SAESSA) Cleared on 27-Sep-2021 at 15:33:1 GMT-04:00

Public Disclosure