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)
Tanzania	AFRICA	P170480	
Project Name	Tanzania Secondary Education Quality Improvement Project (SEQUIP)		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	6/28/2019	10/8/2019
Borrower(s)	Implementing Agency(ies)		
Ministry of Finance and Planning	President's Office, Regional; Administration and Local Government, Ministry of Education, Science and Technology		

Proposed Development Objective(s)

To increase girls' access to safe, gender-responsive learning environments and improve completion of quality secondary education of girls and boys.

Financing (in USD Million)	Amount
Total Project Cost	400.00

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]

Boosting Tanzania's human capital, especially among women, is critical to accelerating shared economic growth. Girls' Access to and completion of quality secondary education is associated with many socio-economic benefits. Over the last three years, secondary education outcomes have improved. The number of children in secondary school grew substantially, largely due to the Fee Free Basic Education Policy (FBEP) introduced in 2016. However, three main challenges in secondary education remain, which the project aims to address: (i) improving access to and completion

of quality secondary education for girls and boys; (ii) ensuring a safe, supportive learning environment to keep girls in school longer; and (iii) expanding effective Alternative Education Pathways (AEP) to enable girls who drop out of lower secondary school, especially young mothers, to finish the lower secondary education cycle and enter upper secondary schools. The project will consist of the following four components: (i) Component 1: Empowering Girls Through Secondary Education and Life Skills; (ii) Component 2: Digitally-Enabled Secondary Schools and Effective Learning Environments; (iii) Component 3: Facilitating Access to Secondary Schools and Reducing Barriers to Girls' Education; and (iv) Component 4: Technical Assistance, Impact Evaluation and Project Coordination. SEQUIP will contribute to three pillars of the World Bank Group's Country Partnership Framework (CPF) 2018-2022: (i) diversify growth and enhanced productivity; (ii) boost human capital and social inclusion; and (iii) make institutions efficient and accountable.

D. Environmental and Social Overview

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

The Project will be implemented nationwide (in rural and urban areas) and as such the exact locations of the new schools and AEP facilities are currently unknown.

Tanzania is a large country with 21 Regions (administrative) expanding mountainous, plateau and costal areas. Tanzania holds unique ecosystems (40% forest cover), but also there are areas with land degradation. The project will avoid cutting down trees and the use of local trees as school materials. Many schools use rain harvesting to provide water; but this option has been unsuccessful in many regions due to rainfall patterns and water quality which is not measured or controlled. The project will ensure technical designs take into consideration: materials that do not increase pressure on natural resources, proper Water and Sanitation for Health (WASH) systems and solid waste management at the schools. Floods, droughts, heavy rainfall and earth quakes must be considered in site selection and safety construction parameters for civil works. A major physical characteristic relevant to the project is the water resources scarcity and water quality issues in the country with the need to build schools for communities; the bank team will discuss the importance of site selection to avoid possible indirect environmental and social impacts.

Tanzanian labor laws include provisions to protect workers' rights, including Occupational Health and Safety (OHS). However, implementation especially for individuals or small local contractors/independent builders in rural areas may be weak. No accident or life insurance are secured for these type of workers; possible solutions will be discussed with the government.

Local Government Authorities play a role in development planning with ward representative and village committees. Engagement with these groups taking into account regional/district norms will be important. Primary and secondary schools are generally seen as community assets. Community relations with schools will need to be considered in the engagement approaches as well as community monitoring.

In Tanzania there are a number of pastoralists and hunter-gatherers who are living traditional lifestyles. These groups include the Maasai, Hadzabe, Akie, Sandawe and Barbaig who generally live in the North of the country. The Akie, Sandawe and Hadzabe are predominantly hunter-gathers while the Maasai and Barbaig are traditionally pastoralists. Within these groups the sense of ownership of schools and the perceived importance of education may be lower in addition access to education for children is influenced by the groups economic/ livelihood activities. These groups

relationships with schools will need to be taken into account in both the engagement approaches as well as ensuring equitable access to benefits.

According to the 2008 Disability Survey in Tanzania 7.8% of the population aged over 7 have a disability. Data on enrolment rates for children with disabilities is very variable but may be as low as 0.1-0.5% (CCBRT Education Study) with most children with disabilities traditionally attending special schools. Other vulnerable are present in society who may be less able to access Project include albinos, the poorest children, those with limited English language skills etc. Measures under Componenta 1 and 2 aim to address these issues. Secondary schools are often several miles walk from pupils homes, generating challenges in accessing schools safely; this is especially true for girls who can be subject to Gender Based Violence or Sexual Exploitation and Abuse, potentially resulting in girls dropping out of the education system. Girls who are also subject to other forms of vulnerability (poverty, disability etc) may be at a higher risk of GBV/SEA compared to their fellow students. Land is public property and rights to the land are issued in the form of leases and rights to occupancy. However many land owners do not have documented rights.

D. 2. Borrower's Institutional Capacity

Main central units

1. Ministry of Education, Science and Technology (MoEST) is responsible for education policy and planning and overall coordination/implementation, setting of standards and strategies.

2. President's Office – Regional Administration and Local Government (PO-RALG) is responsible for implementation of school-level activities through the Local Government Authority (LGA).

3. Cross-Ministerial Project Coordination Team consisting of members from MoEST and PO-RALG will be implementing the project.

4. Vice President's Office, Environment Division oversees operations of the National Environment Management Council (NEMC) which is responsible for ensuring compliance with the National Environmental Act (EAI regulations).

5. Ministry of Natural Resources and Tourism is responsible for management of protected areas, wildlife, cultural and tourism resources.

6. The Division of Antiquities is responsible for the protection of cultural heritage.

7. The Ministry of Lands, Housing and Human Settlement Development is responsible for formulation of land policy and matters pertaining to land.

8. The President's Office, Labour and Employment is responsible for labour, social security and employment.

Regional Level:

1. Local Government Authorities (LGAs): will be responsible for the implementation and supervision of construction works, and their completion at good quality and compliance to the ESS. These agencies are affected by uneven

allocation of staff. It is unclear if the LGAs have the capacity to handle environmental, social health and safety aspects of the project. LGAs will need strengthening to apply the World Bank Environmental and Social Framework (ESF) and be able to supervise the School Boards construction monitoring activities.

2. LGA Environmental Units: represent NEMC at the district level. Based on due diligence field work, technical capacities and operational support are low (lack of transportation, internet, fuel, instruments).

3. LGA Engineers: part of the LGA responsible for supervising the works. Despite substantial training of LGA Engineers that has taken place as part of previous WB projects, challenges remain such as frequent staff transfers, inadequate staffing or time and resources for supervision.

Local Level:

1. School Boards are responsible for complying with all national laws regarding the environment and with all social guidelines and targets; implementing the school construction program and the mitigation measures, technical and engineering designs and drawings, and civil works contracts. They will play an important role in the supervision of civil works and contractors at the project sites. It is unclear experience their experience in Environmental and social supervision.

2.Local contractors: the project design will include the use of local contractors (builders-called 'fundies') which might not require traditional Bank bidding documents. The team will determine mechanisms to ensure that these builders implement the mitigation measures defined for the site and works. Based on previous education projects involving MoEST and PO-RALG their capacity for managing environmental and social risks is low. Based on due diligence field work and meetings with counterparts, to date their safeguards experience is limited. Furthermore, the ESF is new to both ministries and the LGAs since they have been implementing PfR projects. Therefore, support will be needed to increase borrower capacity at all levels to develop the environmental and social management instruments and to undertake effective monitoring during implementation.

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

A. Environmental and Social Risk Classification (ESRC) — Substantial

Environmental Risk Rating — Substantial

The project is rated as Substantial because of the following reasons:

- The project will support a large number of civil works disperse nationwide which location are not known at this stage.
- The limited experience and capacities that the government at different levels might have with the application of the new Environmental and Social Framework (ESF) and proper supervision.
- The high number of stakeholders that will participate in project implementation from national agencies (Ministries), regional, districts and wards which experience and capacities to supervised, evaluate, mitigate and prevent environmental impact will be challenging.

- The project will need to secure water resources supply for construction and drinking needs of students and teachers and local communities; and water is currently overused, contaminated or scarce in some areas.

Potential impacts: Land use change could occur in some areas due to the installation of the schools and waste management that will be needed. The cumulative impact of the works and presence of contractors and machinery at each targeted district is unknown at the moment, but careful supervision will be needed to avoid accidents, loss of cultural assets and potential conflicts with local communities. Other potential impacts at the sub-project area level are related to (i) waste generated at construction sites which can pollute land and water bodies (cement mixing areas, metal, wood and paint residues, diesel and other residues); open pits in the soil can cause accidents; (ii) food residues can attract wildlife; (iii) cutting of trees to use as building material; (iv) road accidents; amongst others.

Othes risks are linked: to the numerous actors which will be participating in the project and environmental management and supervision can be diluted. The use of standard drawings for civil works are undergoing review and may need to undergo changes to increase safety and reduce negative environmental effects and increase sustainability of the works, which will require strong government willingness to implement the changes. In previous construction by the same counterparts, schools have shown technical deficiencies due to the lack of beams, vertical columns and lack of application of security factors in the design, associated with weaknesses in supervision of construction. Thus, safety aspects are important to be considered since the country has experienced earthquakes (Bukoba 2016) which kill people and caused collapsed of public infrastructure. Water supply and sanitation aspects are also challenging. Water served to children at schools is usually rain-harvested or collected from near streams and water quality is not usually monitored.

Occupational Health and Safety (OHS): this will be challenging to monitor since many areas are isolated, district engineers are few, and there is no culture of maintaining records (accidents, injuries, emergencies). During preparation, institutional arrangements will be made to ensure proper management of environmental and OHS aspects of the project.

Regulations: Even though Tanzania has ample environmental legislation, enforcement is weak and the many entities participating in the project, many of which have participated in the implementation of education projects in the past, have shown low capacity to assess, manage and report on environmental and health and safety issues. There will be many small works all over the country, with limited supervision capacity from the government side. This poses a major challenge to supervision and risk management. The project will need to include budget and mitigation measures in the project and management system design (proper environmental staffing at the regional/ district level, transportation, field equipment and ICT-supported monitoring).

Social Risk Rating Substantial

The rating is substantial at this stage as while, the potential risks and adverse impacts are not likely to be significant for any given school (subject to appropriate mitigation measures being implemented) the Project will be implemented nationwide and a wide range of impacts may occur, which the borrower has limited capacity to manage. Supervision of the Project will also represent a challenge for the Project Coordination Unit due to the need to monitor a range of impacts of geographically dispersed projects for which there is limited local capacity.

The primary social risks include the possibility of resettlement associated with land acquisition for new schools and negative community health and safety impacts, including the risk of Gender Based Violence (GBV) or Sexual

Exploitation and Abuse (SEA) associated with any construction workforce. As this is a nationwide project, such risks will need to be considered differentially in relation to different societal groups including any relevant groups under ESS7 Indigenous Peoples/ Sub-Saharan African Historically Under Served Traditional Local Communities. In the absence of appropriate engagement and mitigation there is the potential for ESS7 communities to be excluded from project benefits (in particular in relation to components 1 and 3). In addition, risks associated with labour and working conditions will also need to be managed including occupational health and safety risks. Girls are currently at risk of being subjected to GBV and SEA, both while travelling to school and when at school. The Project will increase access to secondary education and reduce the distance some girls have to walk to school. However the risk of GBV and SEA remains. Within school the risk will be higher while the good schools program is being established but is expected to decrease once the program is in place. Similarly, the development of measures to protect girls (and boys) on the way to schools will help to address the risk. Accessible and appropriate GBV/SEA grievance mechanisms and access to survivor services will also need to be provided for girls. Access to project benefits should be available for all students (including girls, persons of different ethnicity or religion, persons with disabilities, etc.) regardless of geographical location or demographic characteristics.

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:

Assessment and management of environmental and social risks and impacts are required for the whole project, but at this stage, the activities of Component 3 are identified as the most likely to potentially generate environmental and social risks and impacts. Component 3 will include civil works to build new or rehabilitate existing secondary government schools (classrooms, offices, multi-purpose labs, latrines) and potentially support construction of teachers' accommodation and potential upgrading of AEP facilities in urban, peri-urban and rural areas. The project will also facilitate access to water and electricity and internet connections through other Bank projects.

For this assessment, the team has performed interviews with team members from previous education projects, reviewed ISR, ICRs and reports from previous education projects. During preparation, the team will perform field visits, meet the counterparts, stakeholders (LGAs, school boards, villages) and review documents from past investments to complete the due diligence.

1. Preparation Subprojects-multisite. The project involves financing of multiple small subprojects (rural, urban and peri-urban areas), construction and rehabilitation of schools, with basic infrastructure packages (WASH facilities and multipurpose science labs), the upgrade of facilities for AEP, nationwide. Therefore, the assessment of the capacities of the different entities at the national level to manage the environmental and social risks during preparation is possible, but will need to be tested at the regional and local level at the implementation stage. Strengthening of capacities and definition of roles and responsibilities on environmental and social management will need to be defined in operational manuals.

2. Since the ESF is new and there are several actors involved in the project, with limited knowledge of the ESF as well in environmental and social issues, there will be need for additional resources for training and capacity building at all project levels.

3. Assessment, screening tools, permits and monitoring. The team will support the client in the preparation of the environmental and social assessment and of the screening and monitoring tools according to the mitigation hierarchy. The Project will prepare an Environmental and Social Management Framework (ESMF) that will incorporate national and the Bank's ESF requirements. The project ESMF will include: (i) screening criteria to identify any subprojects with potential significant irreversible adverse impacts on natural habitats, physical cultural resources and existing land uses so that alternative sites can be identified or if necessary exclude the subproject (ii) supervision and reporting procedures, (iii) mitigation measures etc; and (iv) guidance on engagement as per the Stakeholder Engagement Plan (SEP). The borrower will assess the subprojects according to the same risk categories described in ESS1 and manage, supervise and monitor the environmental risks and impacts of the subprojects through the project life cycle. All subprojects will be required to develop a site-specific Environmental and Social Management Plan (ESMP) taking into consideration the Environmental, Health and Safety Guidelines (EHSGs) of the Bank to define specific mitigation and prevention measures to prevent and reduce risks and impacts. Site specific RAPs may also need to be prepared. Site specific ESMPs (and RAPs where applicable) will need to be approved and implemented in line with the respective schedules before the construction activities can start.

Environmental Impacts:
1. Construction Phase: The main environmental impacts would be those common in construction works such as noise, waste, dust, soil erosion, water effluents, sedimentation, air emissions, health and safety issues, effects on public access roads etc. Potential impacts also relate to cutting of trees/vegetation, contamination of soil, generation of domestic wastes. The counterparts at all levels (national, regional, local) will be responsible for the implementation of the project ESCP and relevant safeguard instruments to avoid, minimize, reduce and if necessary compensate, direct, indirect, cumulative and residual impacts. For project implementation and supervision of the works, the project will need to hire full time environmental staff (number to be defined during preparation) to cope with the number of project activities and support the regional and local needs of environmental requirements and supervision.

2. Operational Phase: For the operations phase, the government will implement all measures agreed in the ESCP, including Environmental and Social Management Plans (ESMPs) and Health and Safety minimum protocols (fire, accidents, earth quakes, flooding, among others). Some of the potential risks and impacts that could occur during school operations are: (i) due to poor design or construction quality, water can infiltrate classrooms, walls can crack and eventually affect the security of the room; (ii) poor management of rubbish could bring wild fauna close to the school or can generate vector-borne diseases which are common in the country; (ii) burning of rubbish and other waste can cause breathing of toxic fumes by students and teachers; (iii) poor water provision and quality can affect wellbeing or cause diseases.

Social Impacts

1. Construction Phase: The construction of new schools will generate social impacts, which will need to be avoided, mitigated or compensated. Potential impacts during construction include community health and safety associated with disease transmission and road traffic accidents, labour and working conditions, including conditions not aligned with workers rights under national laws, as well as the risk of child labour. In addition, impacts to cultural heritage could occur. Access to land for the construction of schools may result in physical and / or economic displacement.

The construction of new schools will also need to take into account considerations of inclusion for all students including disabled students as well as parents and teachers. As the project is being developed nationally, these impacts could have differential effects on different groups in society. Capacity to monitor the implementation of the project and the implementation of social risk mitigation measures is limited.

2. Operational Phase: During operation the Project aims to create safe school environments which will reduce the risk of GBV and SEA especially to girls, by among other things reducing distance to schools and raising community awareness for the need to ensure protection of girls and boys on the way to school. Poor management of schools (especially in relation to wastes and sanitation) can result in increased disease transmission, and in children (especially girls) being unwilling to attend school. Therefore, it will be important to maintain sanitary facilities and implement waste management.

3. Inclusion and stigmatization: Girls are more likely to face risks of exclusion (bullying and stigmatization) at school than boys. Other vulnerable groups include those with disabilities, albinos, the poorest children etc. This will be addressed through the Good Schools Toolkit and ensuring all groups are able to access learning programs under Component 2. The Project will work with AEPs to develop similar measures. Girls who become pregnant can be stigmatized due to their condition and may be less willing to continue their education in any form and this will require specific measures to avoid stigmatization, ensure quality of education delivered in the AEPs and remove barriers to re-entry in the mainstream education system, including specific follow up with these girls and their families to reduce self-exclusion. The risk of social conflict over project impacts or benefits also needs to be considered, but based on current information is expected to be limited.

Areas where "Use of Borrower Framework" is being considered:

Reliance on Tanzania's Environmental and Social Framework is not being proposed in whole or in part for this project.

ESS10 Stakeholder Engagement and Information Disclosure

Engagement: The Project focuses on access to quality secondary education for girls and boys across Tanzania, with a special focus on girls, although benefits will also be felt by all pupils. The project will prepare a Stakeholder Engagement Plan (SEP) and will identify the relevant project stakeholders including project-affected parties and other interested parties. Potential project affected parties would include national and local authorities (District Authorities and LGAs), school boards and local communities in particular Village Councils, local NGOs. The borrower will also identify project affected parties (individuals or groups) who, because of their circumstances, may be disadvantaged or vulnerable. Engagement will need to take place with representatives of local communities/villages (including elders, women and influential people such as religious leaders) that might be affected because of the works, as well as of communities along the transportation route for construction materials or where materials might be extracted. Engagement will also be needed with land owners of selected project sites; local environmental NGOs and Community Based Organizations (CBOs). Other interested parties may include any administrative regions that do not benefit from the project as well as local, national and international NGOs. Following the requirements of ESS10, all stakeholders (including beneficiaries-students, professors, NGOs working with pregnant girls, villages, local governments, as well potential affected groups) will need to be engaged with on the various components of the

Project. Engagement activities will need to be culturally sensitive and inclusive and consider the presence of groups covered by the provisions of ESS7.

Grievance Mechanism: As part of the Stakeholder Engagement Plan (SEP), a grievance mechanism will also need to be established (or existing mechanisms adapted) to address any complaints that arise as a result of any of the elements of the project. Due to the national scope of the project, the team will identify methods that are accessible to the local communities and beneficiaries or potential groups that can be affected by the project.

Meaningful consultations: The government will facilitate consultations through the project preparation with project stakeholders so they can express their views, feedback, concerns, risks and proposed changes and mitigation measures for the project. Consultation activities, scope and timing will be defined in the SEP. The government needs to document these consultations and disclose them in the format agreed with the Bank.

Disclosure: The project will also have a dedicated webpage where it will disclose project information and ES required documents to inform stakeholders of the benefits, risks and impacts of the proposed project. The information needs to be disclosed in relevant local languages, in a culturally appropriate manner, and in ways that can reach the communities where the project will be implemented.

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

Working Conditions and Management of Worker Relationships: Risks associated with labor and working conditions are mainly associated with the construction works (primarily under component 3) and other potential risks associated to the other project components to trainers, consultants, facilitators, community workers. These contractors will mainly be hired by the community (school boards) and a number of labor risks may exist within the workforce including failure to abide by national legislation in relation to working hours, rest periods, pay, and other benefits. The project will not finance teacher salaries. The potential for the use of child labor will also need to be assessed and if cannot be ruled out addressed by measures to ensure that the project workforce will not include any underage workers. Any service providers or organizations that offer technical assistance during implementation will also need to align with the labor and working conditions outlined in ESS2. In order to address these risks and potential impacts, a Labor Management Procedure setting forth the mitigation and management measures will need to be included in the ESMF and the ESCP. It is expected that training and capacity building activities will be undertaken by MoEST and / or PO-RALG, who are existing civil servants.

Occupational Health and Safety (OHS): The project is planning to undertake the civil works through the community who will then hire local contractors, more often “local builders” (no firms, building companies, or engineers). Supervision is to be carried out by the LGA engineers, whose numbers are limited. Consequently, local builders and LGA engineers will need support from the project for the application of national legislation, the ESS2 and Good International Industry Practice (GIIP) with respect to OHS. Accidents in the type of construction that the project will support might include: road accidents, construction related fractures, lacerations or more serious injuries. The

project might include community workers (as part of the effort to maximize local benefits). In such cases the project must ensure that Personal Protective Equipment (PPE)are distributed and used. In case of accidents, these community workers will need to be able to receive the same care as other project workers. The government will include in the implementation of the project OHS measures that address: (i) potential hazards for workers (materials, activities, substances); (ii) protective and prevention measures, (iii) provision of training; (iv) first aid and (v) hygiene facilities. The arrangements to respond to the requirements of ESS2 will be described in the labor management component of the ESMF and will consider the national requirements, the Environmental Health and Safety Guidelines on Occupational Health and Safety and GIIP.

ESS3 Resource Efficiency and Pollution Prevention and Management

Risks to the application of the ESS3 include Government focus of cost reduction or maintenance of the estimated value for a school, leading to use the cheapest materials or those more locally found, without considering resource efficiency, or the safety and wellbeing of users. This approach can induce negative impacts to local natural resources, workers and students. The project will review the subproject design and incorporated construction materials in relation to ESS3 and identify measures to reduce or eliminate the use of wood in beams in the roof, windows, chairs and other construction works, reduce potential environmental impacts and ensure the use of the most durable and efficient materials to reduce impact and increase local benefits and make maintenance easier (in addition to reducing costs). During construction, the local contractors will be required to protect the soil and nearby streams from use for cleaning machinery and disposing hazardous construction wastes or residues. The government will need to define construction disposal sites according to acceptable parameters of ESS3 and to ensure that contractors do not leave hazardous wastes in the villages (paint containers, cement bags, diesel/oil containers, batteries, etc.).

Energy use: it has been identified that the lack of electricity in many rural areas, may result in the need to provide schools with basic energy sources through the installation of solar panels. Solar panels can break or become non functional and many times are not replaced. Batteries (which are connected to solar panels) storage requirements need to be addressed and their disposal provided for so they do not become hazardous electronic waste in rural communities.

Water use: access to water is a very important success factor for the project. Water is needed for the construction of the works and the WASH systems expected to be installed in each subproject. However, in some areas, water is scarce and its uses, collection, storage, access and management and potential pollution as part of project design will need to be addressed during construction and operation. Also, there are many different water-borne diseases that are common in the area which will require prevention measures. Also, in order to support girls health, specifically, menstrual health, will need to be included in the design of latrines and hand washing).

In the ESMF, the government will include a chapter to respond to all requirements of the ESS3, including those outlined above, for both the construction and operational phases with measures to ensure the efficient use of resources and to manage, prevent, mitigate and reduce pollution (air, surface and groundwater and soils) and ensure the proper management of wastes and the handling of hazardous materials. Also a detailed water resources availability study will be implemented by the project which will describe the specific water volume that will need to

be secured by each subproject for construction and implementation, measures for its protection and solutions for proper water quality delivery at schools. No pesticide use is expected in the project activities.

ESS4 Community Health and Safety

The project will support investments nationwide which involves civil works (subprojects); there is the potential for impacts to community health and safety which will need to be assessed and mitigated through a site specific Environmental and Social Impact Assessment (ESIA) that will need to include an Environmental and Social Management Plan (ESMP) or only ESMP, this will depend of the screening of the sub-projects. Some sub-projects might require environmental licenses and construction permits as well municipal permits for the construction and water discharge areas.

Potential social impacts may include increased risk of GBV/SEA associated with the presence of the construction workforce, and the transmission of communicable and/ or vector borne diseases. However, the use of local contractors close to the communities may help in limiting these risks. In addition, any increase in vehicle movements associated with the construction activities, and local sourcing of materials, could also increase the risk of accidents involving members of the community and workers. The government will prepare an ESMF that will assess these potential impacts and risks associated to the project activities and an ESCP that will include all agreed commitments to maintain community health and safety, reduce road accidents (road safety plans), engage local authorities to enforce supervision of works and other measures to be defined in project preparation.

There is a potential risk of exclusion of pupils with disabilities from Project benefits especially in relation to access to remedial education (component 2) and facilitating access to new schools. The Project will address requirements for universal access through the schools construction and maintenance strategy that will be advanced during Project Preparation. This will be in line with the Government of Tanzania's 5-years National Strategy for Inclusive Education 2018-2021 which requires classroom blocks and sanitation facilities are accessible.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

In order to construct the proposed additional schools (and potentially upgrade existing ones and AEP facilities), land will need to be acquired. As the locations of schools and facilities are not currently known, it is not possible to determine the exact nature or extent of any physical and / or economic displacement that may occur. The Project will need to consider those with formal rights to the land as well as households that have been informally using the land historically.

This will also need to consider vulnerable groups. Key to minimizing impacts associated with resettlement will be appropriate siting of facilities to avoid impacts to land owners and users. A Resettlement Policy Framework will be prepared outlining the overall approach to settlement including the process to develop, approve and implement site specific Resettlement Action Plans for each school or facility site as required. Particular attention will be given to ensuring that any proposed voluntary land donation is fully consulted with all parties involved, community approved, and in line with all Bank requirements, including not significantly impacting the livelihoods of vulnerable households or individuals and being well documented.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

Tanzania is a country rich in biodiversity and ecosystems. The Project will support civil works in some remote areas where wildlife and protected areas are present. Since Project intervention areas are not known, it is not possible to know if protected areas or biodiversity could be affected by the Project. Some potential impacts might include increased poaching during construction periods due to presence of workers in the area; cutting of trees or natural vegetation as source of materials for the schools; construction ditches that can affect local fauna; fires caused by the burning of trash, among others.

The ESMF will assess potential direct, indirect and cumulative impacts and it will apply the mitigation hierarchy to defined measures to protect and reduce impact on ecosystems (natural and critical habitats) and biodiversity, and support preventive and mitigation measures, such as restoration of nearby areas using native species that could be affected by clearing to restore landscape and provide shade for the schools and increase biodiversity conservation in the area. No invasive alien species are expected to be introduced by the project. No biodiversity offsets are expected to be needed.

Human and domestic animals (cows, goats, dogs, etc) and wildlife conflict will be present in different locations and these could be minimized by installing fences at the schools (many schools directors consulted requested fences not only to avoid animal conflict but for girls safety). However, some schools properties are very large and the government would need to consider to include the cost of fences in the construction budgets, as these are not currently part of the standard unit cost of schools.

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

The Project will be implemented throughout Tanzania, including in areas where groups who live traditional lifestyles consistent with the definitions in ESS7 are present. These groups include the Maasai, Hadzabe, Akie, Sandawe and Barbaig . The Project will need to consider these groups during Project preparation and implementation to ensure equitable access to benefits (notably access to schools, inclusion in tracking systems and alternative education pathways through site and interventions selection) to avoid exclusion and to avoid any negative impacts on their way of life including as a result of siting of facilities. These groups are considered more vulnerable to negative impacts associated with the Project development. Children belonging to these groups, especially pastoralist communities, may be less likely to participate in mainstream education or alternative education pathways and while this project focuses on secondary education, efforts should be made to avoid their exclusion both currently (recognizing that many children will not have completed primary education) and in the future. A Vulnerable Groups Management Framework will need to be prepared to guide consideration of these groups in relation to the Project.

ESS8 Cultural Heritage

Tanzania is world renown country rich of archeological, paleontological and cultural heritage which include ruins such those of Kilwa Kisiwani and Songo Mnara, archaeological sites in conservation areas such as in Ngorongoro, Serengeti and Selous; petroglyphs of the Singida and paleontological sites such as the Olduvai George. In some areas of

Tanzania is common to find archaeological materials scattered on the floor such as potsherds, slag, bones and lithic artifacts.

The construction of new schools may have an impact on cultural heritage including disruption to/ loss of locally important sites (including those belonging to vulnerable groups) or as a result of previously unknown archaeological or historical sites, graves or community sacred or cultural sites, depending on the location of the school.

Impacts to cultural heritage will be addressed through the ESMF and during excavations and extraction of construction materials the project will be careful to avoid direct or indirect impacts to cultural resources; stakeholder engagement and site specific ESIAs and ESMPs measures will be include provisions for a chance finds procedure.

ESS9 Financial Intermediaries

The Project will not involve the use of financial intermediaries.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

OP 7.60 Projects in Disputed Areas

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? No

Financing Partners

No financing partners are being considered.

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

Actions to be completed prior to Bank Board Approval:

Prior to Bank board approval the following documents will need to be developed:

(i) Environmental and Social Management Framework (ESMF) which will need to cover all risks and impacts associated with ESS1,2,3,4,6 and 8 as well as GBV/SEA risks during construction and operation, and exclusion and stigmatization risks.
(ii) Resettlement Policy Framework (RPF)
(iii) Vulnerable Groups Management Framework
(iv) Stakeholder Engagement Plan

(v) Environmental and Social Commitment Plan

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

The following issues will need to be addressed in the ESCP:

(i) The need for site specific ESIAs and ESMPs (including labor management requirements) for the individual schools and any upgrades as well as any associated permits and environmental licenses as described in detail in the ESMF.

(ii) The development of Site Specific Plans including Resettlement Action Plans, Vulnerable Groups Plans, Stakeholder Engagement Plans, Grievance Redress Mechanisms and Emergency Response Plans as required per each ESS.

(iii) Monitoring and reporting requirements on environmental and social risk management, grievances and accidents and incidents.

(iv) Assignment of a budget to cover cost of environmental and social specialists in the project team at the national and regional level and provide training to build capacity for implementation/ management of environmental and social risk at the local level.

(v) Development and implementation of a GBV/SEA Action Plan during the construction and operational phase.

(vi) Any Project wide frameworks/plans and complementary measures related to contextual risk management.

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS 28-Jun-2019

IV. CONTACT POINTS

World Bank

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Borrower/Client/Recipient

Borrower: Ministry of Finance and Planning

Implementing Agency(ies)

Implementing Agency: President's Office, Regional; Administration and Local Government

Implementing Agency: Ministry of Education, Science and Technology

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s):	Cornelia Jesse, Samer Al-Samarrai
Practice Manager (ENR/Social)	Robin Mearns Recommended on 30-May-2019 at 22:48:40 EDT
Safeguards Advisor ESSA	Nathalie S. Munzberg (SAESSA) Cleared on 11-Jul-2019 at 14:48:40 EDT