



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 05/17/2023 | Report No: ESRSA02813

**BASIC INFORMATION****A. Basic Operation Data**

Operation ID	Product	Operation Acronym	Approval Fiscal Year
P181200	Investment Project Financing (IPF)	Ukraine HOPE	2024
Operation Name	Ukraine Housing Repair for People's Empowerment Project (HOPE)		
Country/Region Code	Beneficiary country/countries (borrower, recipient)	Region	Practice Area (Lead)
Ukraine	Ukraine	EUROPE AND CENTRAL ASIA	Urban, Resilience and Land
Borrower(s)	Implementing Agency(ies)	Estimated Appraisal Date	Estimated Board Date
Ministry of Finance of Ukraine	Ministry of Communities Territories and Infrastructure Development	05-Jun-2023	30-Aug-2023

Proposed Development Objective

The Project development objective is to increase households' access to repaired housing units damaged by Russia's invasion.

Financing (in USD Million)	Amount
Total Operation Cost	800.40

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

Yes

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



The proposed project is structured around 3 components described below. The project will include i) repair of residential units with partial damage ii) Preparation of design documents for, and repair of, partially damaged multi-family apartment buildings and iii) Project management and capacity building.

D. Environmental and Social Overview

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

The proposed project aims to support the Government of Ukraine (GoU) to partially address the ongoing emergency situation by responding to urgent needs in the housing sector and building institutional capacity to undertake and scale up housing and urban repair works consistent with climate smart and resilience approaches. The project is targeted toward the critical repair needs of partially damaged single-family houses (SFHs) and multi-family buildings (MFBs) in territorial communities (hromadas) under the GoU control that have been affected by the war, characterized as a predominantly urban setting. At the same time, the project will provide direct support to national level policy reforms and to local self-governments (LSGs) to improve rebuilding outcomes and facilitate their alignment with EU integration targets.

Component 1 will fund compensations to households for the repair of damaged residential units both for SFHs and MFBs. Affected households will make the request for the compensation by submitting an application using the Unified State Web Portal of Electronic Services (Portal DIIA) or in-person at the local administrative centers. The compensation to be disbursed to each household will be determined by the commissions (comprised of 5 people from LSG) upon inspection of the extent of damage and needs of construction works for repair. Funds will be disbursed directly to eligible and prioritized households. Households are thereafter expected to procure eligible goods and labor and carry out the repair works within 12 months of receiving the compensation amount. This component will only finance repairs of residential units that have suffered minor damages such as broken doors and windows, minor roof and wall damages and will not include any repairs of structural damages, with an upper limit of US\$ 5,400 for subcomponent 1.1. and an upper limit of US\$ 9,500 for subcomponent 1.2.

Compensation framework is governed by the Compensation Law (7198) and the related compensation procedure 381 covering subcomponent 1.1 scale of repairs. The Government procedure 381 is being updated as per Bank requirements (including ES requirements) and is expected to become operational by the end of May 2023. The retroactive financing will be applied to the portion of compensations paid following the updated procedure 381. Procedure for subcomponent 1.2. will be drawn after project effectiveness in compliance with Bank requirements. Project PIU established in the Ministry for Communities and Territories Development (MoCTID) will take on support and capacity building role for LSGs.

Component 2 entails preparation for, and capital repair of medium damaged multi-family apartment buildings. The activities to be financed under this component include (2.1) the preparation of design and project documentation for the repair works of moderately damaged MFBs in selected hromadas (2.2) the capital repair of these MFBs and (2.3) the formulation or updates of the necessary recovery and reconstruction planning documents in the selected hromadas, including Comprehensive Recovery Programs (CRP) and associated Comprehensive Plans of Spatial Development (CPSD) or General Plan of the Settlement (GPS). The project PIU will define (i) the criteria and rationale for the selection of hromadas and (ii) the prioritization and selection framework to guide the identification and selection of eligible buildings in the POM. It is expected that up to 160 MFBs will be repaired under this component. Project PIU will take on implementing role for Component 2 by ensuring procurement, fiduciary and ES compliance check, supervision and capacity building for local governments.



Component 3 will support all costs related to implementation of project activities, through establishing and strengthening the capacity of MoCTID and the LSGs, including for, but not limited to, monitoring and evaluation, reporting, procurement, financial management, environmental and social management, grievance redress mechanism, citizen engagement, and project communication and outreach.

In addition to the monitoring, evaluation and verification procedures established by the PIU and MoCTID, a separate Third-Party Monitoring (TPM) will be responsible for establishing checks at each stage of the procedure, including verification of repair works completed and ES compliance for works performance. The TPM terms of reference will be drafted by the MoCTID and reviewed by the WB task team. Results from the third-party verifications will be conditions for disbursement for component 1 following initial advances, if more that 25% of TPMA's verification comes back with over 25% ineligible expenditures or ES incompliances, a full audit will be done.

The project will be implemented on the government-controlled territories, including territories of possible hostilities (close to war zone) and territories where hostilities have ended on application submission date (deoccupied territories) but not at territories where hostilities are being waged and not the territories temporarily occupied by the Russian Federation. Component 1 will be implemented nationwide, while the PIU will choose specific hromadas for implementation of Component 2 at a later stage.

The war damage has created up to 12 million tons of construction and demolition waste in the country, parts of demolition waste resulted from the residential units that the project targets to rehabilitate. This waste is likely to contain hazardous chemicals, given the types of material known to be normally used for construction in Soviet times, such as asbestos-containing materials, lead pipes, and various types of heavy metals.

There are no plans to use military or police for security purposes under the project. The sites are likely to still be exposed to the risk of indiscriminate or targeted aerial bombardment that is currently being experienced across the country. There is also a risk that healthcare infrastructure facilities and nearby communities may be impacted by such attacks.

D. 2. Borrower's Institutional Capacity

Ministry for Communities, Territories and Infrastructure Development of Ukraine (MoCTID) will implement the project. MoCTID is also Implementing Agency for another WB financed project Repairing Essential Logistics Infrastructure & Network Connectivity (RELINC) Project (P180318) and is familiar with Environmental and Social Standards however have limited practical experience with the standards implementation and will require capacity building on environmental and social risk management. The draft ESCP includes relevant commitment to develop a training plan for staff, with adequate budget, providers, and timeframe.

A new Project Implementation Unit (PIU) will be established at the Ministry level for the day-to-day implementation of the project. The PIU will consist of an environmental specialist and a social specialist. PIU will hire additional E&S consultants to prepare ESMF, third-party monitoring, and capacity-building activities as needed. Local-self-governments (LSGs) will lead the implementation of Component 2 activities, and some LSGs have experience with WB-financed projects under safeguard policies and ESF. The proposed E&S specialists in the PIU will support the LSGs during the implementation.

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Substantial

Environmental Risk Rating

Substantial



The project's environmental risk is rated to be Substantial. The project is envisaged to have positive environmental and social impacts by restoring climate-resilient and safe-for-living houses, as well as paving the way for build-back-better approach during future restoration and planning of new urban spaces. However, the project activities are expected to have various environmental impacts and risks, especially from Component 1 (mostly small-scale civil works) and Component 2 (medium to large-scale civil works) activities. They include: (i) consumptions of energy, water, and building materials (paints, cement, steel, sand, electrical supplies, etc.) for residential units and buildings rehabilitation; (ii) the generation of solid waste domestic, demolition, and hazardous waste (such as asbestos-containing materials, lead pipes, and various types of heavy metals); (iii) nuisance, related to dust generation, air quality, water quality, vibration, and noise; and (iv) occupational health and safety (OHS) as workforce hazards, including the increased risk of accident from inadequate working conditions at construction sites (risk of falling from height settings, etc.) and from COVID-19 infection, (vi) community health and safety (CHS) hazards resulting from work activities, particularly for residents leaving in or neighboring the proposed rehabilitation housing buildings, (vii) increased traffic. Further, these risks may be exacerbated by potential aerial bombardments and other military actions which add an element of extreme uncertainty and risk of fatality or serious injury that cannot be entirely mitigated by environmental and social management measures. Also, there is a risk that project sites may become a target for aerial bombardment which will endanger nearby communities. Other war-related risks include possible site contaminations with hazardous compounds (including asbestos contained in demolition waste) and explosive remnants of war (ERW). The project is being prepared rapidly and involves implementing agency (MoCTID) with limited experience engaging with or implementing the requirements of WB ESF. At the same time, some LSGs have experience with WB-financed projects, both under safeguard policies and ESF. Furthermore, safety issues undermine the Borrower's and Bank's ability to supervise the project activities, thus, the project will have to rely on ES instruments and ES capacity of implementing parties. It will be important that a trained environmental specialist is engaged for the PIU to screen, assess and manage environmental impacts associated with the project activities, as well as provide ESF-related guidance to local implementing parties. Considering all these potential risks and the limited capacity of the implementing agencies, the project's environmental risk rating is rated Substantial.

Social Risk Rating

Substantial

The social risk rating for the project is Substantial. The project is mainly associated with overall positive social impacts as it involves (i) the rehabilitation of damaged buildings affected by the war which will be selected following prioritization procedures; and (ii) necessary recovery and reconstruction planning documents to allow for inclusive, climate-resilient and more sustainable urban environment. The grants for repairs under the proposed project will greatly reduce the economic burden of the affected population. The social risks can be summarized as follows: (i) under Component 1, there is the risk of perception of exclusion of certain vulnerable groups like refugees, displaced people, poor households, female-headed households, persons with disabilities, and the elderly - this may result in social tensions due to perceptions of elite capture, discrimination or other potential conflict arising from the project benefits; (ii) issues on the assessment of damages, (iii) ownership issues where damages have occurred as not all eligible recipients of the project will have proper digitalised proof ownership of the assets documented in Diya application and will have to obtain in Property Rights Registry and upload those into eRecovery ; (iv) weak communication/outreach and transparency on the eligibility criteria under Components 1 and 2; and (v) an inadequately functioning grievance mechanism to handle complaints and concerns. Social risks and impacts associated with project-related civil works include community health and safety risks and lack of workers' awareness of OHS requirements, such as the use of Personal Protective Equipment (PPE) and safe workplace practices. These risks are site-specific and temporary, but they may be exacerbated by potential targeted or indiscriminate aerial bombardments and other military actions. Additional threats to workers are posed by explosive remnants of war



(ERW). This adds an element of extreme uncertainty and risk of fatality or serious injury to project workers and nearby communities that cannot be entirely mitigated by environmental and social management measures. Preventative measures required to be in place for the project activities under emergency conditions will be described in the project's Environmental and Social Commitment Plan (ESCP) and Project Operations Manual (POM). These include principles for information disclosure and consultation, grievance redress, monitoring, ESIRT reporting by the designated social focal point, as well as Emergency Preparedness and Response Plans (EPRPs) for dealing with war-related risks and impacts on project beneficiaries. A draft Stakeholder Engagement Plan (SEP) will be adopted and implemented by MoCTID outlining a comprehensive outreach program that will need to be set up to ensure access to the program information among different stakeholders groups. PIU shall hire a social specialist providing overall coordination and support on assessment and management of social risks. A Grievance Mechanism (GRM) will be readily accessible to all project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10. The grievance mechanism will also be able to receive, register and address concerns and grievances related to SEA/SH in a safe and confidential manner, including through the referral of survivors to gender-based violence service providers.

Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Risk Rating

Low

Gender-based Violence, Sexual Exploitation and Abuse and Sexual Harassment (GBV, SEA and SH) risks related to activities under the project are low due to the following factors: (a) the project will not involve labor influx into communities, but rather rely on local services at a moderate scale; (b) there is convincing evidence that the government assistance programs in Ukraine have helped decrease the poverty-related stress and, thus, reduce the risk of physical, sexual, and intimate partner violence. The areas in the project are not at risk of being invaded by enemy troops.

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 Operation:

This standard is relevant as the project involves rehabilitation activities of a select number of damaged residential buildings due to war with impacts related to air quality, water quality, waste production, including hazardous waste, noise, health and safety, and nuisance and increasing traffic jams, as well as cumulative risks. The risks associated with the project activities include both usual construction-related risks as well as war-related enhanced OHS risks such as potential for community and worker health and safety incidents, Explosive Remnants of War (ERW) and demining concerns.

The retroactive financing will be applied country-wide subcomponent 1.1 for which the legal procedure includes obligation to follow standardized ESMP Checklist embedded into application form - the ESMP Checklist has been assessed by the Bank and found acceptable for the foreseen scale of works under subcomponent 1.1. Procedure for country-wide subcomponent 1.2. will be drawn after project effectiveness in compliance with Bank ES requirements. The locations of buildings to be rehabilitated under Components 1 and 2 will be identified during the project implementation. However, to address the potential ES risks associated with these components, the project will prepare an Environmental and Social Management Framework (ESMF) in compliance with the Bank, and GoU requirements. The ESMF will be prepared no later than 90 days after project Effectiveness and before the start of any civil works



During the preparation of the ESMF, the Borrower will meaningfully consult with relevant stakeholders, including local populations, government agencies, CSOs, NGOs, and vulnerable groups and disclose the cleared instruments in local language. The ESMF will also serve as a guide to prepare subsequent, appropriate instruments for sub-projects to adequately mitigate all site-specific E&S risks and impacts once their location and scope are known - at this stage, it is envisaged that Component 1 will require ESMP Checklist, subcomponent 2.1-2.2 will require standardized ESMP and subcomponent 2.3. will require a set of ES requirements and build-back-better guidelines defining the environmentally and socially sustainable mode of undertaking civil works and urban planning.

The ESMF will include instructions and template for preparation of Emergency Preparedness and Response Plans (EPRPs). EPRPs will include measures to protect the safety and security of project workers and nearby communities from war-related hazards, as well as information on warning system and designated shelters, and will be prepared as part of subproject ESMPs, as applicable.

The ESMF will include Labor Management Procedures which will, inter alia, address the risk of SEA/SH incidents and a grievance process for workers with contact details for service providers.

Safety issues undermine the Borrower's and Bank's ability to supervise the project activities; thus, the project will have to strongly rely on the proposed ESMF and E&S capacity of implementing parties. It will be important that trained dedicated environmental and dedicated social specialists are engaged by the PIU to screen, assess and manage impacts associated with the repair works, as well as general and war-related OHS and community health and safety impacts, and to provide guidance to the local implementing parties. The PIU will be responsible for supervising and ensuring compliance of all project activities to the requirements of the ESF, ESMF, ESMPs/Checklists and other site-specific E&S instruments. In addition to the monitoring, evaluation and verification procedures established by the PIU and MoCTID, a separate Third-Party Monitoring (TPM) will be responsible for establishing checks at each stage of the procedure, including verification of repair works completed and E&S compliance of the civil works. Results from the third-party verifications will be conditions for disbursement for component 1 following initial advances if more than 25% of TPM's verification comes back with over 25% ineligible expenditures or E&S non-compliance, a full audit will be done.

The Borrower has prepared an Environment and Social Commitment Plan (ESCP) that details the timing for the finalization of the above mentioned documents as well for preparing other E&S instruments, as needed.

The Stakeholder Engagement Plan (SEP) for the project has been prepared and discussed with relevant stakeholders responsible for operationalization of each component, given the sensitivity of the investment. Further public consultations with the broader groups of stakeholders and NGOs will be regularly conducted throughout project preparation and implementation under the relevant provisions of the martial law requirements.

ESS10 Stakeholder Engagement and Information Disclosure

The standard is relevant. The current state of martial law and military activity contexts mean that there are extremely limited engagement and consultation options. It is inadvisable to encourage large in-person meetings of local stakeholders due to the risk of aerial bombardment and virtual consultations will only reach a limited number of representative stakeholders without additional support measures. Project information and guidance on options for feedback and grievance redress will be disseminated through virtual consultations, with participating organizations and local administrations. The MoCTID has used similar approaches during the preparation of the Repairing Essential Logistics Infrastructure & Network Connectivity (RELINC) Project (P180318) and is familiar with conducting regular stakeholder consultation virtually. Given the emergency context, dissemination of information associated with exact location of project activities will be controlled in order to minimize risk of strategic aerial bombardment. A draft



Stakeholder Engagement Plan (SEP) proportional to the nature and scale of the project and associated social risks has been prepared based on the feedback received and will be updated throughout project implementation. The SEP has identified potential project-affected and other interested parties and outlined measures for engagement with these stakeholders. It has been prepared, based on limited online consultations with representatives of key stakeholder groups. The SEP has specified the institutional roles and responsibilities, timeline, and budget for conducting the stakeholder engagement during implementation.

An accessible grievance redress mechanism (GRM) for the project will be established, publicized, maintained and operated in a transparent manner that is culturally appropriate and will be tailored to address any SEA/SH issues. The GRM will be readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10. The grievance mechanism will also be able to receive, register and address concerns and grievances related to SEA/SH in a safe and confidential manner, including through the referral of survivors to gender-based violence service providers. The Project Operation Manual (POM) for the project will outline procedures on the GRM procedures and management. A Social Specialist under MoCTID will be responsible for coordinating the GRM.

B.2. Specific Risks and Impacts

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

ESS2 Labor and Working Conditions

This standard is relevant. The project will involve direct workers, contracted workers and governmental workers. At this stage, it is unknown if the involvement of the community workers will be required under project activities and will be determined later during project implementation.

The direct workers will be the project implementation unit (PIU) staff at the MoCTID and consultants who will be following the day-to-day activities of the project's components. The contracted workers will include (i) workers engaged under the TPM Consultancy and (ii) workers who will be involved in the rehabilitation of the damaged households. Employees of local self-governments (LSGs) who will comprise evaluation/verification commissions would be considered governmental workers.

LSG workers and TPM Consultancy workers (who will include different CSO representatives) will continue to be governed by the terms and conditions of their existing contractual arrangements.

The main labor-related risks are related to exposure to war-related hazards and occupational health and safety. Key OHS issues of the Project are the following: accidents during repair works, traffic accidents, exposure to construction airborne agents (dust, asbestos), lack of workers' awareness on occupational health and safety requirements such as the use of Personal Protective Equipment (PPE) and safe workplace practices. Additional threats to workers are posed by explosive remnants of war (ERW) and indiscriminate or targeted aerial attacks – these risks will be covered by the EPRPs developed and implemented as part of ESMF.

Ukraine's Labor Code includes measures on equal opportunity and non-discrimination, regulates hiring and firing procedures and allows for collective organization and bargaining. Given the extraordinary circumstances, principles for protecting against harmful labor and ensuring occupational health and safety will be described in the ESCP, including ensuring access to service providers responding to sensitive incidents such as those related to SEA/SH and other forms of violence that may be associated with the war context.

Labor Management Procedures (LMP) will be prepared as part of the ESMF and aligned with ESS2 requirements on OHS risks, health, non-discrimination, equal pay, prevention against risks of child and forced labor, and a labor-



specific grievance mechanism (GM). The LMP will be cleared by the Bank and disclosed before engagement of workers. The LMP, which is a living document, can be updated throughout project implementation as needed. Labor risks will be addressed through the Client's commitment in the ESCP and clear guidance provided in the POM to comply with the relevant requirements of ESS2.

ESS3 Resource Efficiency and Pollution Prevention and Management

This standard is relevant. Civil works planned for the damaged housing buildings could consume relatively large quantities of raw and construction materials (paints, cement, sand, wood, iron, and so on). Rehabilitation works might have potential impacts on air, dust, land and water pollution as well. Should the project utilize raw materials for construction activities, ESMF will provide measures to address environmental and social impacts associated with material sourcing.

Air emissions will include exhaust from heavy vehicles and machinery, and fugitive dust generated by repair activities. Mitigation measures such as dust suppression, vehicle maintenance etc., will be applied to minimize the impacts and residual impacts are expected to be limited in scope and duration. Noise will likely be generated from use of construction machinery and vehicle movements. The relatively short-term and small-scale nature of the works suggest that noise levels will not be excessive.

Liquid and solid waste will mainly include metal and glass pieces from demolished walls, old equipment, excavated soil, oils from construction machinery, concrete blocks, etc. Waste will be segregated (with separate collection of hazardous waste following the protocols outlines in national legislation), stored and disposed at approved sites. The ESMF will determine the source, type, and risks associated with the waste likely to be generated (debris, household waste, hazardous waste) and, if such waste cannot be avoided, the ESMF will specify appropriate waste management practices for collection, storage, transportation and disposal of construction waste, including hazardous waste and specify for which cases a separate Waste Management Plan should be prepared.

Repair works under Component 2 may require clearance of vegetation to accommodate for improved designs and accessibility features (such as ramps) and may lead to soil loss and erosion. This could lead to substantial impacts in the areas with steep slope and vulnerable to disaster or climate variation or sensitive habitats. Soil erosion can lead to blockage of drainage or change of surface water flow or sedimentation.

The ESMF will provide guidance to screen and assess impacts and provide mitigation measures including application of good practice and close supervision of works to: (i) ensure that cutting of trees and vegetation is limited to a minimum and justified by technical requirements and that relevant national legislation is followed, and replacement where vegetation clearance is unavoidable; and (ii) soil loss and erosion is minimize/protected.

In keeping with ESS3, ESMF (or subproject-specific ESMPs) will propose adequate guidelines for the resource-efficiency measures, such as LED lighting, insulation of exterior walls, energy-efficient heaters and air conditioners. The project will also further promote the utilization of environmental and climate friendly construction techniques, minimizing resource use and energy use by adopting "green design" concept that has the potential to increase resource efficiency and energy savings, and reduce pollution, waste, and Greenhouse Gas (GHG) emissions.

ESS4 Community Health and Safety

This standard is relevant. The potential risks and adverse impacts on community health and safety are associated with repair-related impacts, structural safety of the buildings, universal access features in new designs, fire safety, adequate water and sanitation facilities, etc. Only buildings where technical assessment confirmed intact structural



integrity will be eligible for project financing. An ESMF will be prepared for this project, including recommendations for site-specific environmental and social assessments (ESMPs) with the necessary measure to provide restrict community access to the construction sites during the entire work period, along with all the other measures needed to keep communities safe during construction. ESMF will provide guidance on provision of accessibility features, fire safety and water/heating/sanitation facilities in repair designs, as well as new urban planning documents. Cumulative impacts of construction activities at project sites in the same hromada (for Component 2) will also be considered in the site-specific ES instruments. Plans to mitigate/avoid duplicate of impacts/risks of such activities will be suggested, such as changing of working period, using alternative routes, etc. The E&S Instruments will make use of general and sector-specific Environment, and Health and Safety Guidelines (EHSGs) for identified subprojects in relation to community health and safety. Works contracts will also require that contractors do not expose communities to any hazardous activities, materials or substances that may be used in the project.

Also, there is a potential for safety incidents due to the indiscriminate or targeted aerial attacks during the delivery of repair/civil works supported by the project and associated risks and impacts. The EPRPs and the ESMF will include measures to address community health and safety risks associated with the operating context, including measures to promote community awareness of these risks.

There is no anticipated large-scale movement of workers for project activities that would increase risk of SEA/SH among these groups. The ESMF will include measures to ensure that all activities would be screened; protective measures should be communicated clearly to prevent risk of SEA/SH and prohibit use of forced labor and harmful child labor.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Not relevant. No new construction is envisaged under project activities. All rehabilitation activities will be done within existing footprints. While very unlikely, the project will include in the E&S instruments measures to address any informal encroachment or occupation prior to commencing civil works.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The proposed Project activities are expected to be restricted to existing facility footprints. However, some of the repairs (repairs to water/heating/electricity supply facilities for MFBs, repairs to communal spaces), under Component 2 may require vegetation clearance to accommodate for improved designs but such impacts on habitats (modified by urban development) are limited and short-term. The ESMF will have provisions that vegetation clearance should be kept to a minimum and be done during non-breeding period.

Additionally, design standards under subcomponent 2.3 will provide additional guidance to ensure climate-resilient, sustainable and overall 'green' designs for future reconstruction of urban areas.

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

This standard is not relevant. No indigenous peoples who meet the criteria described under this standard reside in the territory of Ukraine.

ESS8 Cultural Heritage



This standard is relevant. Damage to cultural or archaeological heritage has been extensive due to deliberate targeting by aerial bombardment, and project activities may involve repair works for such assets. Activities will be screened for potential impacts on known heritage sites and practices; where necessary, the project will prepare Cultural Heritage Management Plans specific to each site.

The Chance finds procedure will be outlined in the ESMF in order to guide the preparation of the subsequent E&S instruments (e.g. ESMPS/ESMP Checklist) to be prepared later on.

ESS9 Financial Intermediaries

This standard is not relevant. Involvement of FIs is not envisaged by project implementation arrangements.

C. Legal Operational Policies that Apply

OP 7.50 Operations on International Waterways No

OP 7.60 Operations in Disputed Areas No

B.3. Reliance on Borrower's policy, legal and institutional framework, relevant to the Operation risks and impacts

Is this operation being prepared for use of Borrower Framework? No

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

N/A

IV. CONTACT POINTS

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Borrower: Ministry of Finance of Ukraine

Implementing Agency(ies)



Implementing Agency: Ministry of Communities Territories and Infrastructure Development

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VI. APPROVAL

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