



# Concept Environmental and Social Review Summary

## Concept Stage

### **(ESRS Concept Stage)**

Date Prepared/Updated: 06/15/2020 | Report No: ESRSC01002



**BASIC INFORMATION**

**A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
Liberia	AFRICA	P172705	
Project Name	Liberia Learning Foundations Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	6/29/2020	7/28/2020
Borrower(s)	Implementing Agency(ies)		
Liberia Ministry of Finance and Development Planning	Liberia Ministry of Education		

Proposed Development Objective(s)

To improve equitable access to and enhance the quality of Early Childhood Education (ECE) and primary education services in targeted counties with system accountability improvement.

Financing (in USD Million)	Amount
<b>Total Project Cost</b>	<b>5.61</b>

**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]**

As a country in fragility, conflict and violence (FCV), Liberia’s human development outcomes are among the lowest in the world as evidenced by Liberia’s ranking on the Human Development Index and on the 2018 Human Capital Index (HCI). The HCI – a composite index based on measures of health, education and nutrition - estimates that a child born in Liberia today could expect to live to the age of 62, receive only 4.4 years of schooling, and be 32 percent as productive as (s)he would have been had (s)he had access to full, quality health and education services that would have enabled that child to reach their full human capital potential. The country ranks 153 out of 157 countries on the Human Capital Index with a score of 0.31, lower than the average for its region and one of the lowest in the world. A



peaceful transition of power in 2017 ushered in a new government administration and, subsequently, the new administration's development and adoption of the Pro-Poor Agenda for Prosperity and Development (2019-2023) (PAPD). Central to the Government's agenda is a focus on developing Liberia's human capital and building the capacity of the country's youth to reach their potential which will, in turn, create a qualified and skilled labor force that can contribute to and participate meaningfully in the economy.

The proposed project will: (i) support early childhood education (ECE) through classroom construction, a program to reduce the proportion of overage students in ECE and the dissemination of teaching and learning materials; and (ii) strengthen system accountability at the ECE and primary levels.

#### **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 project intends to address institutional and governance issues in the education sector, focusing on improving access, equity and efficiency within the sector. The civil work component will be implemented in six targeted counties in Liberia: Grand Kru, Rivercess, Bomi, River Gee, Maryland, and Sinoe. The construction of ECE classrooms and other civil works will be undertaken at existing schools' premises. The Ministry of Education (MOE) is in the process of finalizing the list of schools where the civil works will be carried out at the district and community levels. The exact locations of the proposed civil are being finalized. The targeted counties, except Bomi, are very far away from Monrovia, and generally there is short supply of skilled labor in these remote places.

D. 2. Borrower's Institutional Capacity

The Ministry of Education (MoE) will be the implementing agency for the proposed project. Current the MoE has a Project Delivery Team (PDT) which manages and coordinates the implementation of one Global Partnership for Education-funded project and another IDA-financed project. The Environmental Protection Agency (EPA) of Liberia has the statutory mandate to safeguard the environment in Liberia. The national environmental regulatory framework is fairly adequate to ensure that environmental and social concerns are incorporated in the designs of projects and that projects are implemented in environmentally sustainable ways. The Environmental Protection and Management Law of Liberia (EPML), Section 6, requires an Environmental Impact Assessment (EIA) license or permit for projects or activities in Annex I of the EPML. The Environmental Compliance and Enforcement Unit of the EPA is responsible to ensure that EIA requirements are met as defined in the EMPL and other relevant environmental standards, guidelines and policies. The Unit monitors and enforces environmental compliance through environmental inspectors deployed in various parts of the country. Due to inadequate funding, manpower and logistics, compliance monitoring and enforcement is usually inadequate.

The MOE through its project implementation unit will be responsible to implement the project. Though the MOE has experience in implementing World Bank-financed projects, previous projects implemented by the Ministry were mostly capacity enhancement projects. Capacity for safeguard implementation needs to be developed. In the short term, the project will be required to hire or appoint a dedicated environmental and social safeguard officer to support the screening of sites, preparation of required safeguard instruments during project preparation, and to oversee safeguard implementation during project implementation.

## **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 risk rating for this project is rated Moderate under the World Bank ESF. This risk rating takes into consideration, amongst other things, the type of project and nature of its activities, the sensitivity of project areas as well as safeguard implementation capacity of the project implementing entity. The main civil works are limited to the construction of 54 new classrooms, 18 latrines and 18 water systems at 20 sites. Besides the small-scale nature of the works, the works will also be carried out at existing schools' facilities. This further reduces the environmental footprint of the project. The potential risks and impacts associated with small-scale civil works, including generation of construction related wastes, pollution (air, water, and soil), will be short-term, local, and easily manageable.

### **Social Risk Rating**

Moderate

The social risk rating of this project is classified as Moderate under the World Bank ESF, based on the type of project, nature of its activities and borrower institutional capacity to manage social risks and impacts. Overall social impacts of the project are expected to be positive.

Notwithstanding the potential enormous socio-economic benefits of the project, initial screening of project indicates that some activities to be financed have the potential to generate social risks and impacts. While it is very difficult to determine specific risks associated with the project, the likely social risks that might emerge are mainly associated with exclusion: i) disability, ii) equity in accessing schools (between poor and reach children), iii) distance and accessibility to the school and, iv) social stigmas' related to age and HIV/AIDs. These risks will be closely evaluated and this SEP will be updated accordingly.

The proposed construction of 54 ECE classrooms, 18 latrines, 18 water system are within the school premises. In case, construction of these structures may require some additional land to fit in these structures as per the design, usability or other requirements. In view of such additional land requirement, the PIU shall prepare a Resettlement Policy Frameworks (RPF) to guide preparation of Abbreviated Resettlement Action Plan (ARAP)/ Resettlement Action Plan (RAP) as and when required. The proposed civil works in rural areas, where skilled labor is generally in short supply or not available, could trigger labor influx and its attending social risks and concerns related to GBV, SEA, over-exploitation of community resources amongst others. The GBV risks screening rated Moderate GBV risks due to the project activities and locations.

Risks related to GBV and SEA considered and the anticipated need to manage incidences of GBV, if any, related to the project occur. A dedicated staff shall be appointed in the team of implementing agency and supervision consultant's team, GBV action plan shall be developed. GBV mitigation measures will be adopted. The implementing agency shall also undertake the GBV risks screening and assessment tool developed by the Global GBV Task Force of the World Bank, identify a local grievance resolution structure and coordination with organizations working on women and children's rights. The implementing agency shall also evaluate the contractor's GBV response proposal in the C-ESMP and confirm the contractor's ability to meet the project's GBV requirements prior to finalizing the contract. The Project Delivery Team will be required to develop a GBV referral and service providers mapping in the project area and clearly define the project's GBV requirements including Code of Conduct (CoC) as per risks rating and need, engage women organizations, GBV-specialized agencies and partners to work, and develop a GBV action plan including accountability and response framework, as part of project ESMP. If the GBV risks rating is escalated, mitigation measures shall follow the GBV risk level as appropriate.



## 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:**

Concept Note for the proposed project has been the main document referenced and reviewed during the E&S screening. The project will finance small-scale civil works under component 1. The civil works will include the construction of 54 ECE classrooms, 18 latrines and 18 water systems at 18 sites in six counties of Liberia. The MOE has confirmed that all civil works proposed under the project will be carried out at the premises of existing schools. Overall, the environmental footprint of the civil works will be small given the small-scale nature of the activities and nature of the construction sites. The MOE is finalizing an ESMF to facilitate project preparation and will develop an ESMP prior to the commencement of civil works to manage construction related risks and impacts.

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

As indicated above, EIA is a legal requirement in Liberia. The Environmental Protection Agency Act, Section 37, provides a mechanism for balancing development and environmental concerns, while the Environmental Protection and Management Law (EPML) of Liberia requires EIA license or permit for projects or activities in Annex I of the Law. In addition to the EPA Act and the EPML, the EPA has developed detailed procedural guidelines for conducting EIA in Liberia. The civil works proposed under Component 1 fall under the EIA mandatory list. The project will be required to prepare site-specific management plan acceptable to the EPA of Liberia, while satisfying the Bank’s Environmental and Social Standards, and obtain an EIA permit from the EPA prior to the commencement of civil works. The project will therefore rely partly on the borrower’s system in this regard.

#### ESS10 Stakeholder Engagement and Information Disclosure

The project activities will directly and indirectly affect wide range of stakeholders during pre-construction, construction and operation phases. Identification and consultation of the affected and interested parties in the early stage of project preparation and during project implementation is key to achieving project objectives.

To facilitate meaningful stakeholders’ engagement during project preparation, the project implementation agency, the MOE will be required to: i) conduct stakeholders’ identification and analysis, ii) prepare a Stakeholders Engagement Plan (SEP), iii) disclose project information to relevant stakeholders, and iv) conduct meaningful consultation with affected and interested parties. The SEP will be prepared in consultation with interested and affected parties. The Stakeholder Engagement Plan (SEP) to be prepared during project preparation phase shall serve as a tool through which coordination and information dissemination among the relevant stakeholders can be achieved. This will establish a systematic approach to stakeholder engagement, to assess the level of stakeholder interest and support for the project, to promote and provide means of effective and all-inclusive engagement with affected and interested people throughout the project life cycle. The SEP will outline the characteristics, influence and interest of the relevant stakeholder group, timing, methods of engagement, method and structure of Grievance Redressal Management (GRM) and cost involved to successful implementation of the SEP

The MOE is in the process of finalizing the SEP which will be disclosed at the early stage of the project preparation, and before 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**

Potential social risks and impacts relevant to the project could emerge from the MOE failure to promote sound workers - management relationship including failure to: i) promote fair treatment, non-discrimination and equal opportunity to its workers; ii) protect its workers, including vulnerable workers such as women, persons with disabilities, children of working age, and migrant workers, contracted workers, community workers and primary supply workers, as appropriate; iii) prevent the use of all forms of forced labor and child labor; iv) support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law; and v) provide project workers with accessible means to raise workplace concerns.

The project under Component 1 will finance small-scale civil works including construction of classrooms and water and sanitation facilities. The potential occupational health and safety risks are expected to be minimal. A stand-alone OHS Plan is not required. The project will incorporate OHS risk and mitigation measures in the project ESMP. In order to address social risks associated with failures to promote sound workers - management relationship, the project incorporate in the ESMP labor management procedures that satisfy requirements of the national labor law of Liberia and World Bank ESF standards.

The procedures will set out the way in which project workers will be managed, in accordance with the requirements of national law and ESS2, specifically addressing issues related to i) terms and conditions of employment, ii) provision on non-discrimination and equal opportunity, iii) provision on workers' organizations, iv) provision on protecting work force-child labor and forced labor and provide workers with a clearly defined and accessible workplace GRM – different from that of ESS10 GRM and GRM for Project Affected People (PAPs). The LMPs shall also: (a) identify the different types of project workers that are likely to be involved in the project, and (b) set out the ways of meeting the requirements of ESS2 that apply to the different types of workers.

### **ESS3 Resource Efficiency and Pollution Prevention and Management**

During construction phase, there is a potential for air pollution from earth moving activities. This is expected to be minimal, localized and transitory. Some amount of construction related wastes will be generated that need to be managed. In cases where raw materials, such as sand, aggregates, timber and water can have significant effect on the environment and local communities if not managed properly. Improper siting of sanitary facilities such as latrines/septic tanks could potentially contaminate groundwater sources.

### **ESS4 Community Health and Safety**

Community health and safety risks and impacts of this project are expected to be minimal. Large-scale civil works are not intended. The works to be financed do not require the use of heavy machinery, and the potential for increased traffic is low. The labor influx is also very low due to the small-scale nature of the activities to be financed ( 3 classrooms, 1 latrine, and 1 water point per site for 18 sites) coupled with the fact that construction activities themselves do not demand large amount of skilled workers. The labor force will be predominantly drawn from the



project communities. The MOE will need to ensure this is highlighted in construction contracts and monitored. A small but important potential risk to community health that needs to be managed is the risk of surface and groundwater contamination. Contamination of surface and groundwater supplies with infectious organisms from human excreta is especially serious. Contamination may be caused by poorly sited, designed, operated or maintained sanitation facilities.

The World Bank Group Environmental, Health, and Safety Guidelines for Water and Sanitation as well as the Guidelines for Water and Sanitation Services in Liberia will be followed during siting, design, construction, and operation of these facilities.

The project risks and impacts on community health and safety will be assessed continuously throughout the life of the project as with other risks and impacts. When need be, the MOE shall be required to develop and implement appropriate plans and procedures to mitigate any emerging risks and impacts to community and health and safety

#### **ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

The MOE has confirmed that all the civil works proposed under this project will be carried out within the premises of existing schools and on government owned land. So, project-related land acquisition and restrictions on land use is not expected. However, since the MOE is yet to finalize the exact locations of the proposed civil works, the Bank team could not verify and confirm during preparation of this ESRS that the proposed locations are on the premises of existing schools and that they are owned by government and encumbrance free. As matter of precaution, the Bank has asked MOE to prepare a Resettlement Policy Framework (RPF) that spells out overall principles and objectives of ESS 5. The MOE is in the process of finalizing the RPF. This will guide the preparation of a Resettlement Action Plan (RAP)/Abbreviated Resettlement Action Plan (ARAP) in case the need arises.

#### **ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

Initial screening of project activities shows that ESS6 is not relevant for this project.

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

No community or group of people identified or classified as the Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities are in Liberia. Thus, ESS7 is not relevant for this project.

#### **ESS8 Cultural Heritage**

Project activities under Component 1 will involve excavations and other changes in the physical environment. Therefore, the potential for Chance Finds exists notwithstanding the small-scale nature of the civil works. The project ESMF which is being finalized includes a generic chance finds procedure which will be upgraded into a detailed chance find procedure in the project ESMP.

#### **ESS9 Financial Intermediaries**



The project does not intend to involve FI. ESS9 is not relevant.

**B.3 Other Relevant Project Risks**

The project will finance water and sanitation facilities. Though this is not a water and sanitation project, incorporating considerations in the project which guarantee environmental soundness and sustainability of these facilities are important. For environmental health benefits to be achieved, beneficiaries must use the provided facilities as well as adopt complementary behaviors such as hand-washing after defecating. The project will need to make provision for these soft components in order to realize the full benefits. The choice of technology and providing training for beneficiary schools to be able to maintain these facilities are very important.

**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**

No, there are no other financing partners.

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

**Actions to be completed prior to Bank Board Approval:**

- Preparation of ESMF;
- Preparation of RPF;
- Preparation of Stakeholder Engagement Plan (SEP); and
- Preparation of Environmental and Social Commitment Plan (ESCP)

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

- Preparation of ESMP prior to commencement of civil works
- Preparation and Implementation of RAP/ARAP prior to commencement of civil works, if required
- Preparation of GBV/SEA Action Plan prior to commencement of civil works
- Preparation of Labor Management Plan (LMP) prior to commencement of civil works
- Implementation of SEP throughout the project life
- Establishment of GRC & Implementation of GRM

Public Disclosure





**C. Timing**

**Tentative target date for preparing the Appraisal Stage ESRS**

20-Feb-2020

**IV. CONTACT POINTS**

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**Borrower/Client/Recipient**

Borrower: Liberia Ministry of Finance and Development Planning

**Implementing Agency(ies)**

Implementing Agency: Liberia Ministry of Education

**V. FOR MORE INFORMATION CONTACT**

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**VI. APPROVAL**

Task Team Leader(s): Xiaonan Cao, Oni Lusk-Stover

Practice Manager (ENR/Social) Senait Assefa Recommended on 10-Dec-2019 at 08:55:42 EST

Safeguards Advisor ESSA Johanna van Tilburg (SAESSA) Cleared on 15-Jun-2020 at 18:13:13 EDT