



# Appraisal Environmental and Social Review Summary

## Appraisal Stage

### **(ESRS Appraisal Stage)**

Date Prepared/Updated: 07/31/2020 | Report No: ESRSA00805



**BASIC INFORMATION**

**A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
Liberia	AFRICA WEST	P172705	
Project Name	Liberia Learning Foundations Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	7/13/2020	9/15/2020
Borrower(s)	Implementing Agency(ies)		
Liberia Ministry of Finance and Development Planning	Liberia Ministry of Education		

Proposed Development Objective

To improve access to early childhood education in targeted counties with improved teacher deployment.

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]**

Investing in human capital is critical to ensure any country's economic and social development and enable economic, social and political stability. The Human Capital Index (HCI), a composite index based on measures of health, education and nutrition, estimates that a child born in Liberia today can expect to live to the age of 62, receive 4.4 years of schooling, and be 32 percent as productive as (s)he would have been had (s)he had access to full and 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 HCI with a score of 0.31, lower than the average for the region and amongst the lowest in the world.



A peaceful transition of power in 2017 ushered in a new government administration and, subsequently, the new administration developed and adopted 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 young people to reach their potential to enable economic and social development and political stability.

The Liberia Learning Foundations Project will have three components:

- (i) improving access to early childhood education in targeted counties;
- (ii) improving learning outcomes through increased equity, efficiency and accountability; and
- (iii) strengthening project management and sector support and coordination.

The target counties are Bomi, Grand Kru, Maryland, Rivercess, River Gee, and Sinoe.

#### **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 of Liberia: Grand Kru, Rivercess, Bomi, River Gee, Maryland, and Sinoe. The construction of ECE classrooms and other facilities will be undertaken at the existing schools’ premises. The exact locations of the proposed civil works have not been finalized. 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 targeted counties, except Bomi, are very far away from Monrovia, and generally there is short supply of skilled labor in these remote places.

Salient Environmental Overview:

Liberia has rich natural resources. There are several National Parks and Key Biodiversity Areas (KBA) within the six counties targeted by the project implementation. Some of them are as follows; Grand Kru-River National Park and KBA, Cestos-Senkwen National Park and KBA, Lake Piso multiple sustainable use reserve and KBA. Civil works planned within the scope of the project, however, will be undertaken at existing schools. Therefore, negative impacts to biodiversity due to project activities are not expected. Construction and operation of WASH facilities planned within the scope of the project will be carefully planned so as not to lead soil and ground water contamination.

Salient social overview:

The six targeted counties by LLFP have high incidence of poverty and low access to ECE and primary education services. The targeted counties have been selected based on an index of extreme poverty, severe stunting, Net Enrollment Ratios (ECE and primary) and proportion of unqualified ECE and primary teachers using the Demographic and Health Survey (DHS, 2013) and Education Management and Information System (EMIS, 2015-16). Geographic selection was coordinated with an on-going early grade literacy project and out-of-school project funded by USAID to avoid overlap and harmonize national coverage across donor partner projects.

It is reported that chronic poverty is prevalent in the six targeted counties and many children are not receiving meals at home and food insecurity is a major concern. Students in the targeted 54 schools and 18 districts are vulnerable to malnutrition. The lack of adequate food or underfeeding children at the early stage of their development could impair



their ability to concentrate and perform well in the 54 targeted school and could also lead to higher levels of behavioral and emotional problems from early childhood education through adolescence.

Overage enrollment in targeted counties and in education sector as whole is a persistent challenge to improving access, efficiency and quality of education. This phenomenon begins in ECE and impacts every grade, driven by low levels of at-age enrollment, poverty and high rates of grade repetition. The disadvantaged counties targeted by the project, suffer from some of the worst overage enrollment patterns.

Schools and students overcrowding in the targeted 54 schools is a common phenomenon. This seems to have led to unequal or uneven access to schools' facilities such as classrooms, latrines and water pumps. Furthermore, this trend if not tackled could reduce targeted students' ability to pay attention and could also increase school violence or bullying in the targeted 54 schools. In these schools, students' achievement is less, teachers' quality is poor, and availability of learning materials is acute in all the targeted counties and in Liberia as a whole.

Overall, the successful implementation of the LLPF promises great potential to improve Human Development Index (HDI) of Liberia and will also improve social and education sectors outcomes. It will open opportunities to children to grow and have better life. The Early Childhood Education (ECE) is targeting to benefit a total of 2,538 students in the 54 targeted schools. It plans to improve equitable access to classrooms, latrines and water facilities as well as to improve access to and ensure availabilities of learning and teaching material and resources - both to the students and teachers.

#### D. 2. Borrower's Institutional Capacity

The Ministry of Education (MoE) will be the implementing agency for the proposed project. Currently 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 and socially 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 EPML 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 Delivery Team (PDT) will be responsible to implement the project. Though the MoE has experience in implementing World Bank-financed projects following the operation policies, the previous projects under OP/BP implemented by the Ministry were mostly capacity enhancement projects. The MoE's capacity to develop and implement environmental and social (E&S) requirements need to be re strengthened. Capacity for safeguard/ESF implementation needs to be developed. In the short term, the project will be required to hire or appoint dedicated one environmental and a social safeguard officers with experience in GBV/SEA risks management to support the screening of sub-project sites, preparation of E&S instruments during subprojects preparation, and to oversee E&S risks and impacts mitigation measures during LLFP implementation and issues related to GBV/SEA risks management.



II. SUMMARY OF 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. 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 project includes small scale civil works including addition of 3 classrooms, 1 latrine and 1 water systems at 18 selected schools located in 6 counties. 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 with proper screening and implementation of sub-project ESMPs. The MoE which is the project implementing entity has no experience in developing and implementing E&S instruments for Bank financed projects. The project will be required to appoint dedicated E&S safeguard officers to support the screening of sub-project sites and the preparation and implementation of E&S instruments during project implementation.

Social Risk Rating

Moderate

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

Notwithstanding the potential social benefits of the project, initial screening of project's likely social risks and impacts indicated the project's activities have the potential to generate unintended social risks and impacts that will likely to result from: i) involuntary resettlement, ii) Labor influx, iii) GBV, iv) water contamination, v) uneven provision and use of school facilities, vi) uneven distribution of resources and learning material, vii) COVID 19 -overcrowded classrooms. The main social risks are summarized below:

Land acquisition and income losses: The project will likely require small size land for advancing its activities. While the proposed construction of 54 ECE classrooms, 18 latrines, 18 water system are expected to be within schools premises, it is also expected that construction of these structures may require some additional land to fit in some structures as per the design, usability or other technical requirements - which may likely result to land acquisition, loss of means of livelihoods and restriction on the land use. It is estimated that civil work activities under sub-component 1.1 may likely impact about 250 Project Affected Persons (PAPs).

Labor influx: Civil work activities related to the constructions of school facilities in 54 schools will likely require a total of 180 construction workers of which small number of workers will be required to be on the site at a given time. This workforce is likely to come outside of the project communities. The workforce requirement of school facilities construction activities, if not managed properly, is likely to generate minor or manageable labor influx from other areas. The influx is most likely to increase; a) the prevalence of GBV, b) commercial sex workers, and c) the spread of STDs.

Gender Based Violence (GBV): The GBV risk rating for the project is moderate while the contextual risk is substantial . The presence of construction workers and person hired to distribute Teaching and Learning Material among students

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in the proximity of poverty stricken rural villages would likely skew the power balance in favor of those who have the money and predictable income. The power imbalance could affect the ability of the poor and the most vulnerable to negotiate for fair, respectful and equal treatment and this may lead to GBV prevalence, to SEA relationship and, other forms of over-exploitation for people living in school facilities constructions vicinities.

Contamination of water sources: The proposed rehabilitation and construction of water and sanitation facilities including latrines, wells, and handwashing facilities in the 18 schools and 18 districts have the potential to contaminate groundwater. If groundwater in schools' proximities contaminated, it'll likely expose drinking groundwater facility users and communities to serious health effects - nearby communities could suffer from diseases such as hepatitis and dysentery from septic tank waste.

Public health risks likely to result from overcrowded schools and classrooms: The 54 targeted schools in the 18 targeted districts are reported to be overcrowded, latrine and water facilities needs improvements. Sub- component 1.1 aims to reduce ECE overcrowding and improve infrastructure quality in the targeted schools. However, if the 54 classrooms to be built by sub- project are unable to address the existing problem, under the evolved COVID 19 situations, the continuation of running overcrowded classrooms, latrines and water facilities is likely to put students and their immediate families at health risks.

## **B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered**

### **B.1. General Assessment**

#### **ESS1 Assessment and Management of Environmental and Social Risks and Impacts**

##### ***Overview of the relevance of the Standard for the Project:***

The 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. To put the scale of the civil works in perspective, it is roughly 3 ECE classrooms, 1 latrine, and 1 water system per sites. 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 minimal given the small-scale nature of the activities and nature of the construction sites. The risks and impacts of the civil works will include construction site waste generation, soil erosion and sediment from materials sourcing areas and site preparation activities, fugitive dust and other emissions (e.g. from vehicle traffic, land clearing activities, and materials stockpiles). Increased in vehicular traffic may lead to increase in traffic incidents and accidents. Given the small-scale nature of civil works per site, a significant increase in vehicular traffic is not expected. Improper use of local resources such as extraction of water, sand, timber and crushed rocks has the potential to generate additional impacts beyond the construction sites. The impacts could include pollution and over exploitation of community resources.

Latrines and wells will need to be sited properly. Improper siting and construction of latrines may pollute groundwater resources including community drinking water resources with implications on community public health. Similarly, improper siting of wells in close proximity to potential sources of contamination including dumpsites, burial sites, pit latrines, and septic tanks may lead polluted water to be extracted at schools with potential adverse public health consequences. Periodic monitoring of water quality from wells financed under the project will be required to ensure early detection of any deterioration in water quality and implementation of mitigation measures to safeguard



community health. Both during construction and operation, all health and safety measures will be taken to ensure safety of workers and students. Wells will be enclosed by locked fences, they will be covered, access to wells will not be permitted to students, precautionary signs will be placed in visible places in local language, all measures will be in place not to lead students falling into wells. In addition, siting, technical design, and construction of these water and sanitation facilities will need to be informed by the World Bank Group (WBG) Environmental, Health, and Safety Guidelines (EHSGs) for Water and Sanitation, WBG General EHSGs, the Guidelines, laws and regulations for Water and Sanitation Services in Liberia, and relevant Good International Industry Practices (GIIPs).

Since the specific sites for project activities are not known at this stage, the MOE is required to develop RPF and ESMF and disclose prior to appraisal. The ESMF will guide the preparation of sub-projects ESMPs which will be developed prior to the commencement of civil works to manage construction related risks and impacts. The sub-project ESMPs will include, amongst others, sub-project risks, impacts and mitigation measures. The sub-project ESMPs will incorporate OHS risks, hazards and control measures, chance find procedure as well as measures to prevent pollution and encourage efficient use of community resources. The RPF will guide preparation of ARAP/RAP, if required at the locations identified for civil construction.

Project Delivery Team (PDT) of the MOE will hire or appoint dedicated E&S safeguard officers for the establishment and implementation of an Environmental and Social Management System (ESMS) for the project in line with WB ESF, national requirements and GIIP, which includes but not limited to support the screening of sub-project sites, preparation of E&S instruments during project preparation, and to oversee E&S safeguards during implementation phase. E&S Safeguard officer will take trainings on WB ESF as per training plan of the Project.

COVID-19 Transmission risks: Workers mobilized for the rehabilitation works could be a potential pathway for spreading COVID-19 among workers and the communities. The project ESMF and ESMP will include clear procedures and mitigation measures to avoid or limit the chances of infection among project workers and the communities. The mitigation measures will follow the April 7, 2020 World Bank interim guidance on COVID-19 consideration in construction or civil works, stakeholder engagement tip-sheet and WHO guidelines on COVID-19 preparedness and prevention.

### **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 of all stakeholders and consultation with them including affected and interested parties in the early stage of project preparation and during project implementation is key to achieve 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) including communication strategy, iii) disclose project information to relevant stakeholders, and iv) conduct meaningful consultation with affected and interested parties. The SEP will be prepared and updated 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 identify and continuously update the characteristics, influence and interest of the relevant stakeholder groups, timing of engagements, methods of engagement, method and structure of Grievance Redress Mechanism (GRM) and cost involved to successful implementation of the SEP. The MOE has prepared and disclosed the SEP during preparation phase which will be updated and disclosed before appraisal. The SEP will also guide consultation exercises to be carried out while advancing works for the preparation of RAPs and identifications of subprojects in the 18 sites.

During the project preparation phase, the MOE has undertaken various engagement activities involving project's interested parties. The Project application is prepared by the Technical Working Team (TWT) from the MOE with closed guidance from the World Bank TTLs. Key education stakeholders including the Senior Management Team (SMT) of MOE, Education Sector Development Committee (ESDC), Local Education Group (LEG), Education Officers and MoE's Central Office staff were consulted at every stage of the project application preparation process. The program areas of the project have already been discussed with and endorsed by the SMT, ESDC and LEG as major stakeholders in the Sector. The expansion of subcomponents, new activities and revised targets under the LLFP were developed as AF in consultation with the LEG to increase the development impact of the parent project. Prior to its endorsement by the SMT, ESDC and LEG, education officers and other education stakeholders across the country were briefed about the Project through the Joint Education Sector Review (JESR) 2018 and updated through the JESR 2019.

The MOE believes that strong citizen and community engagement are preconditions for the effectiveness of the LLFP. Stakeholder engagement under the LLFP will be carried out on two fronts: (i) consultations with stakeholders throughout the entire project cycle to inform them about the project, including their concerns, feedback and complaints about the project and any activities related to the project; and to improve the design and implementation of the project, (ii) awareness-raising activities to sensitize the 18 district communities on risks of COVID-19. Consultations with stakeholders on the subprojects' design, activities and implementation arrangements will be incorporated in the revised SEP that is expected to be updated within 30 days after the project effectiveness date.

## **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 sub-component 1.1 will finance small-scale civil works including construction of classrooms, latrines and water and sanitation facilities. The potential occupational health and safety (OHS) risks are expected to be minimal. The project will incorporate OHS risk and mitigation measures in the project ESMP and LMP.

In order to address social risks associated with failures to promote sound workers - management relationship, the project will prepare LMP 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.

With uncertainties around COVID-19 and when the pandemic will be over, workers mobilized for construction activities could be a source of transmission of the virus. ESS2 requires the MOE to promote sound workers and management relationships and enhance the development benefits of the project by treating workers fairly and by providing safe and healthy working conditions. This will include:

- Ensure adequate supplies of PPE (particularly facemask, gowns, gloves, helmet, handwashing soap and sanitizer) are available;
- Ensure adequate OHS protections in accordance with General EHSs and industry specific guidelines and follow evolving international best practice in relation to protection from COVID-19;
- Prohibit the use of forced labor or conscripted labor, Sexual exploitation and Abuse and Sexual Harassment;
- Include OHS code of conduct (CoC) and CoC for GBV prevention in workers contracts;
- Provide ongoing training on the procedures to all categories of workers, and post signage in all public spaces mandating hand hygiene and PPE;
- Develop a basic, responsive grievance mechanism to allow workers to quickly inform management of labor issues, such as a lack of PPE and unreasonable overtime.

The project will make these provisions part of the ESMF and contractor ESMPs.

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

By virtue of the nature and scale of project activities, the environmental footprint is anticipated to be small, as construction works are small scale and brownfield. The following specific aspects in relation to ESS3 will be considered:

Inefficiency from sourcing of raw materials: the nature and source of the raw materials used in construction work is key to the success of the project. Materials shall be selected to reflect the prevailing climatic conditions, whilst taking into cognizance the convenience of the occupants or users of the facilities. Cement, sand, timber, aggregates and sticks will be obtained from certified or licensed suppliers, or approved local sources, in close proximity to the project site to reduce transportation related impacts. Materials will not be obtained from sources that could exacerbate



deforestation, community potable water, coastal erosion or global warming. Due diligence will be conducted to ascertain the environmental compliance of suppliers and third party.

**Air emissions:** Air emissions will include exhaust from heavy vehicles and machinery, and fugitive dust generated by compaction and construction activities. Those most likely to be affected are people living close to the project site, and those prone to respiratory infection, such as children and the elderly. While the scale, intensity and duration of the impact is expected to be small, dust and noxious substance emission should be minimized through dust suppression and regular vehicle maintenance.

**Noise:** Noise levels will vary with the project environment. Remote areas are more likely to experience a higher impact due to the difference between ambient levels and the elevated noise from contractor mobilization. Work will be limited to daytime and on week days. The contractor will observe the decorum and calendar for local events by suspending all noise generating activities during religious or cultural/traditional occasions to prevent conflict with the community.

**Waste management:** Liquid and solid waste will mainly include scraps from buildings, construction wastes, excavated soil, oils from construction machinery, concrete blocks, metal and glass pieces and domestic wastes. Waste will be segregated, stored and disposed of at approved sites. Hazardous materials and waste will be handled and disposed according to national requirements, and GIIP. Of particular importance is the assessment of whether asbestos wastes are likely to be present and, if so, the proper mechanism of handling, transporting, and disposal by competent contractors.

Assessment and management of adverse environmental risks and impacts during construction, operation, and decommissioning will be done according to ESS3 and Environmental Health and Safety Guidelines (EHSG).

Green house gas (GHG) emissions associate with the project are anticipated to be not significant. Hence GHG emission estimation is not relevant for the project. Provisions to assess impact of climate change on the project will be included in the ESMF.

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

Community health and safety risks and impacts of this project are expected to be moderate. Large-scale civil works are not intended. The labor influx is also very low due to the small-scale nature of the activities to be financed ( 54classrooms, 18 latrine, and 18 water in 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 local communities near the project site. 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. Given the potential health risks that will likely stem from water contaminations, the project will be required to identify the locations of groundwater users with the proximity of the school facilities and determine how siting of latrines and WASH infrastructures will affect the nearby groundwater user communities. The identifications of these facilities and the associated risks and impacts assessments shall be carried out prior to the start of civil works. In addition, siting, technical design, and construction of these water and sanitation facilities will need to be informed by the World Bank Group (WBG) Environmental, Health, and Safety Guidelines (EHSGs) for



Water and Sanitation, WBG General EHSs, the Guidelines, laws and regulations for Water and Sanitation Services in Liberia, and relevant Good International Industry Practices (GIIPs).

Another potential community safety risk may arise from open wells. Wells will be enclosed by locked fences, they will be covered, access to wells will not be permitted to students and public, precautionary signs will be placed in visible places in local language, all measures will be in place not to lead students, publics and workers falling into wells.

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.

GBV and contractor works: Civil work activities related to the constructions of school facilities in 54 schools will require workers from outside the project communities. The workforce requirement of school facilities construction activities is likely to generate labor influx from other areas. The influx may increase a) the prevalence of GBV, b) commercial sex workers, c) the spread of STDs and, d) the pressure or put stress on scarce community resources. The MOE will be required to evaluate these risks and put in place robust mitigation measures.

In order to address potential risks and impacts associated with GBV, the construction contractor and the supervision consultant shall be required to: i) sensitized their workers on acceptable code of conduct and desirable interactions with local communities, ii) provide STDs prevention awareness campaign, iii) require their workers to sign a CoC before commencing work with the project, iv) clearly state to the their workers – both in their written CoC and verbally – that the project is “zero” tolerance to GBV related incidents, v) have standard time for opening and closing staging sites and workers camps, vi) requires every visitor to sign visitor's log and vii) identify community resources on which labor influx will likely put pressure on, if any.

Public health risk is likely to result from overcrowded schools and classrooms: the 54 targeted schools in the 18 targeted districts are reported to be overcrowded, latrine and water facilities needs improvement. Sub component 1.1 aims to reduce ECE overcrowding and improve infrastructure quality in the targeted schools. However, if the additional classrooms unable to address the problem and if schools are to run under overcrowded conditions, under the evolving COVID 19 situations, it could put students at health risks.

Given the public health risks of overcrowded school facilities, the MOE is required to adhere to its own COVID response plan, national policy or strategy for health communication & WHO's “COVID-19 Strategic Preparedness and Response Plan -- Operational Planning Guidelines to Support Country Preparedness and Response” (2020) when advancing the LLFP activities that are subject to financing under this project.

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

In fulfillment of its appraisal requirements, the MoE has prepared and presented the RPF for the project. The RPF stated that the project is likely to require additional small size land for the construction of 54 ECE classrooms, 18 latrines, 18 water systems in 18 sites in order to fit in some structures as per the design, usability or other technical requirements of subprojects. The RPF reported that the additional land take will likely impact 250 people in the 18 sites. While the magnitude of impact of the land take is not yet known, the likely impacts on livelihoods includes; i)



temporary and permanent land loss, ii) houses and other structures, iii) crops and trees, iv) small businesses including kiosks and, v) income losses.

If land is to be acquired and access to land is restricted, it is very likely that Project Affected Persons (PAPs) will likely experience some degree of hardship including loss of full or partial structures, loss of means of income/livelihoods and, access to income sources. Where it is feasible, the LLPF is encouraged to avoid and minimize land take through project design considerations. Land shall be undertaken if and when the land take cannot be avoided or minimized. Once it is determined that land take cannot be avoided and land is required to advance schools construction facilities, it is imperative that site specific screening exercise be undertaken to determine the magnitude of impact of the land take. The screening exercise should lead to identification of assets to be likely impacted by the subproject. The site screening exercise shall start 30 days from the effectiveness of the project.

Upon determining and developing the list/inventory of assets to be impacted by subcomponent 1.1 activities, PAPs will be consulted and shall be informed on their rights and choices. During consultations with PAPs, all choices be offered to PAPs, and mitigation measures be identified and agreed with PAPs. Following the consultations and the screening exercises, the MoE will prepare RAP(s) for all impacted locations. PAPs will be compensated for their lost assets and losses of livelihoods at “full replacement cost.” Grievance Redress Mechanism (GRM) shall be established and operationalized to handle complaints from affected parties. The RPF guides the preparation of the RAP(s). The MOE is required to prepare “Compensation and Resettlement Assurances Completion Report” and submit the report to the Bank before clearing the impact sites and before commencing civil works at each of the 18 sites.

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

The project activities show 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 sub-component 1.1 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.

Uneven provisions and use of school facilities: Likely unevenness or inequities risks associated with the provisions and use of schools facilities include; i) design and provisions of disabled unfriendly classrooms, latrines and water facilities, ii) absence or lack of disaggregated latrine facilities for girls and boys, iii) discrimination in accessing the 54 ECE schools (between poor and reach children), v) barrier to school enrollment associated with distance from locations of students villages or households to the respective schools and, v) denial of students’ enrollment because of birth certificates or other documents requirements. In order to mitigate the impact of risks associated with unevenness or inequities, it is recommended that the project design follows universal design requirements as required by good practice and the Bank’s universal design requirements.

Uneven distribution of resources and learning material: There is a risk that students from most influential and well positioned families are likely to benefit more than students from poor families including, uneven distribution of books and learning material. In order to ensure that distributions of teaching and learning material reached the intended beneficially, the LLFP consider creating and operationalizing PTAs at each of the 54 schools with objective of ensuring accountability and transparency to resources meant an directed to its participating schools.

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**C. Legal Operational Policies that Apply**

<b>OP 7.50 Projects on International Waterways</b>	No
<b>OP 7.60 Projects in Disputed Areas</b>	No

**III. BORROWER’S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)**

DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED	TIMELINE
<b>ESS 1 Assessment and Management of Environmental and Social Risks and Impacts</b>	
The MoE is required to develop and disclose ESMF (including COVID-19 provisions) and RPF prior to appraisal.	06/2020
Conduct A Rapid Social Impact Assessment in the 54-participating school before commencement of civil construction.	10/2020
<b>ESS 10 Stakeholder Engagement and Information Disclosure</b>	
Preparation, Disclosure & Implementation of Stakeholder Engagement Plan (SEP)	06/2020



Creation and establishing functional GRM constituting GRC after providing training and facilitating required input to every member of the GRC.	07/2020
<b>ESS 2 Labor and Working Conditions</b>	
LMP (including COVID-19 provisions) will be developed in consonance with ESS2 and the Liberia national labor laws including the Decent Work Act (2015) and Standing Order of the Civil Service (2012) to guide mitigation measures of labor related risks	06/2020
Functional GRM for Labor issues and their concern	10/2020
ESMP for Occupational Health & Safety Measures	10/2020
PROJECT WORKERS TRAINING	10/2020
<b>ESS 3 Resource Efficiency and Pollution Prevention and Management</b>	
ESMP for Resource Efficiency and Pollution Prevention and Management	10/2020
<b>ESS 4 Community Health and Safety</b>	
ESMP for Traffic and Road Safety; Community Health and Safety	10/2020
SEXUAL AND GENDER-BASED VIOLENCE AND EXPLOITATION RISKS: develop GBV risks assessment for the project	06/2020
Update GBV risks assessment & GBV action plan development include in the ESMP for implementation and monitoring	10/2020
Conduct training for communities and project affected stakeholders to create awareness of risks and to mitigate impacts.	10/2020
<b>ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</b>	
Resettlement Policy Framework	06/2020
Screening of the Subprojects, preparation and implementation of ARAP/RAP	09/2020
<b>ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>	
<b>ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities</b>	
<b>ESS 8 Cultural Heritage</b>	
Chance find procedure would be included in ESMF	06/2020
<b>ESS 9 Financial Intermediaries</b>	

Public Disclosure



**B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts**

**Is this project being prepared for use of Borrower Framework?**

In Part

**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.

**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): Janssen Edelweiss Nunes Teixeira, Oni Lusk-Stover

Public Disclosure





Practice Manager (ENR/Social)

Senait Nigiru Assefa Cleared on 06-Jun-2020 at 15:51:23 EDT

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