

UNITED REPUBLIC OF TANZANIA



PROGRAM-FOR-RESULTS

EDUCATION AND SKILLS FOR PRODUCTIVE JOBS

ENVIRONMENT AND SOCIAL SYSTEMS ASSESSMENT (ESSA)

PREPARED BY THE WORLD BANK

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List of Acronyms

CAS	Country Assistance Strategy
CRB	Contractor Registration Board
CSO	Civil Society Organization
EMA	Environmental Management Act
EMP	Environmental Management Plan
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Mitigation Plan
ESSA	Environmental and Social Management System Assessment
NACTE	National Council for Technical Education
NEMC	National Environmental Management Council
NEP	National Environmental Policy
NGO	Non-Governmental Organization
NSC	National Skills Council
NSDS	National Skills Development Strategy
MoESTVT	Ministry of Education, Science Technology & Vocational Training
OHS	Occupational Health and Safety
OSHA	Occupational Safety and Health Authority
PAP	Project Affected Person
PBD	President's Delivery Bureau
PDO	Program Development Objective
PEDP	Primary Education Development Program
PforR	Program for Results
PO-RALG	President's Office – Regional Administration & Local Government
SEDEP II	Secondary Education Development Program II
SWOT	Strengths, Weaknesses, Opportunities and Threats
TAC	Technical Advisory Committee
TCU	Tanzania Commission for Universities
TEA	Tanzania Education Authority
ToR	Terms of Reference
TVET	Technical and Vocational Education and Training
ULGSP	Urban Local Government Strengthening Program
USAID	United States Agency for International Development
WASH	Water, Sanitation and Hygiene
HESLB	Higher Education Student Loans Board
VETA	Vocational Educational and Training Authority

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EXECUTIVE SUMMARY

- 1. The Education and Skills for Productive Jobs (ESPJ) Program-for-Results (PforR) supports the implementation of the Government of Tanzania’s National Skills Development Strategy (NSDS) and implementation plan over the 2016 – 2021 period.** In line with the NSDS, the focus of the PforR will be on (i) strengthening the institutional capacity of the skills development system; and (ii) promoting the *expansion and quality of* skills development opportunities in select economic sectors. The ESPJ PforR will support the implementation of a sub-set of the NSDS and its implementation plan in two key results areas: (i) strengthening the institutional capacity of the skills development system; and (ii) promoting the expansion and quality of skills development opportunities in select economic sectors. The design and boundaries of the ESPJ PforR were defined based on strategic importance, government request, technical soundness, and the World Bank’s value added.
- 2. The Program’s Development Objective** is to strengthen the institutional capacity of the Recipient’s skills development system¹ and to promote the expansion and quality of labor market driven skills development opportunities in select economic sectors. Program Key Results for ESPJ are divided into two key result areas:
 - Results Area 1: System level: Strengthening the institutional capacity of the skills development system
 - Results Area 2: Service delivery level: Promoting the expansion and quality of labor market driven skills development opportunities in select economic sectors
- 3. The Environment and Social Systems Assessment (ESSA) for the ESPJ has been undertaken to ensure consistency with six “core principles,”² outlined in the World Bank’s Operational Policy 9.00 – Program-for-Results Financing** – in order to effectively manage environmental or social effects so as to strengthen the performance of the program. The ESSA has been undertaken by Environmental and Social Specialists of the World Bank and examines Tanzania’s existing legal, regulatory, and institutional framework guiding the program’s environmental and social management systems. It also defines measures to strengthen the systems and integrates these measures into the overall program.
- 4. The ESSA process included extensive stakeholder consultations and disclosure of the ESSA Report following the guidelines of the World Bank’s Access to Information Policy.** Consultations with stakeholders indicated that there is a willingness to address issues that are compromising efficient and effective application of the environmental and social management processes, and this feedback has been instrumental in designing and revising the program’s action plan, indicators, and issues such as availability of water, gender and disability issues, etc.

¹ The skills development systems consist of alternative (informal, short term), vocational, technical and university level training programs.

² Detailed in Section I.

5. The ESPJ ESSA analysis identifies strengths, gaps and opportunities in Tanzania’s environmental and social management system with respect to effectively addressing the environmental and social risks associated with the program. The analysis identified the following main areas for action in order to ensure that the program’s interventions are aligned with the Core Principles 1, 2, 3, 4 and 5 of OP/BP 9.00. The following table defines the measures to strengthen system performance, which will directly contribute to the program’s anticipated results and objectives.

Measures to Strengthen System Performance for Environmental and Social Management	
Objective	Measures
Defining the System for Environmental and Social Management	<p>The programmatic approach of the ESPJ provides significant opportunity to enhance the recognition of environment, health and safety, and long-term sustainability aspects in training institutions and programs at the technical, vocational and the university levels. In this context, the broad environmental goals of the ESSA would be to mainstream environmental and social due diligence and awareness into the program, through inclusion of environmental sensitivity and management into the formal curricula and to train teachers in its content.</p> <p>The program also offers the possibility of improved skills and capacity along with increased coordination among various ministries, agencies and donor partners on environmental and social aspects.</p> <p>The ESPJ will finance limited civil works related to upgrading and improving infrastructural conditions of the educational facilities confined to existing premises and within the boundaries of the existing facilities. The anticipated adverse environmental and social effects are not expected to be very significant. It has been determined that the Environmental and Social Management Framework (ESMF) under the World Bank funded Secondary Education Development Program II (SEDEP II) is a comprehensive document being used by the the Ministry of Education, Science, Technology and Vocational Training (MoESTVT) for management of construction issues. Borrower capacity has been deemed reasonably satisfactory for the implementation of the ESMF, although it requires some strengthening of capacity and technical enhancement.</p> <p>However, if there are any changes to the current scope or if the PfoR program is expanded to include constructions and/or upgrades and physical/civil works and/or usage or acquisition of new land, then the ESSA will need to be revised to ensure that all impacts are well</p>

	assessed and appropriate measures are incorporated to mitigate the higher risks that may arise.
Technical Guidance and Implementation Capacity	If SDF training providers require training on environment and social management, the technical guidance tools will be refined to support enhanced environmental and social sustainability.
Addressing Capacity Constraints	Where feasible, training and awareness of the importance of environmental and social sustainability will be included in the technical and vocational courses for longer term sustainability
Improved systems for Information Disclosure and Stakeholder Consultation	<p>Accountability and transparency of institutions would be essential to ensure that the program support is used in a productive manner to reach as many training providers and trainees as possible who are eligible for the program. The Program design will include a strengthened and documented Grievance redress mechanism and training and capacity building in stakeholders' and community involvement and participatory decision making, whichever is applicable will be undertaken. Dissemination and awareness raising activities for environmental and social due diligence measures will be built into PforR program.</p> <p>Grievance redressal mechanism has been discussed with stakeholders and laid out in the ESSA. At the national level there is a government portal available for registering complaints.</p> <p>The Operational Manual of the ESPJ will need to review the existing system and provide timelines and a monitoring mechanism for the Grievance redress mechanism (GRM). The GRM will also need to be widely disseminated to all stakeholders.</p>

1. BACKGROUND

1. The Education and Skills for Productive Jobs program is being supported under the World Bank's Program-for-Results (PforR) financing instrument, which innovatively links the disbursement of funds directly to the delivery of defined results. This instrument builds on increased reliance on borrower safeguard and oversight systems. The Environmental and Social Management System Assessment (ESSA) for this program examines Tanzania's existing environmental and social management system that is the legal, regulatory, and institutional framework guiding the program. It defines measures to strengthen the system and integrates these measures into the overall program. The ESSA is undertaken to ensure consistency with six "core principles" outlined in paragraph 8 of the World Bank's OP/BP 9.00 Program-for-Results Financing in order to effectively manage program risks and promote sustainable development.
2. Those six principles are:
 - a. Promote environmental and social sustainability in the program design; avoid, minimize, or mitigate adverse impacts, and promote informed decision-making relating to the program's environmental and social impacts.
 - b. Avoid, minimize, or mitigate adverse impacts on natural habitats and physical cultural resources resulting from the program.
 - c. Protect public and worker safety against the potential risks associated with: (i) construction and/or operations of facilities or other operational practices under the program; (ii) exposure to toxic chemicals, hazardous wastes, and other dangerous materials under the program; and (iii) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards.
 - d. Manage land acquisition and loss of access to natural resources in a way that avoids or minimizes displacement, and assist the affected people in improving, or at the minimum restoring, their livelihoods and living standards.
 - e. Give due consideration to the cultural appropriateness of, and equitable access to, program benefits, giving special attention to the rights and interests of the Indigenous Peoples and the needs or concerns of vulnerable groups.
 - f. Avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.
3. The ESSA analyzes the system for environmental and social management as relevant for the program vis-à-vis each of these principles. The gaps identified through the ESSA and subsequent actions to fill those gaps directly contribute to the program's anticipated results to enhance institutional structures in education. The ESSA analysis presents a detailed description of the program activities and baseline conditions for existing environmental and social management systems. This report presents an analysis of the existing system vis-à-vis the core principles for environmental and social management in OP/BP 9.00, and presents an action plan that will be incorporated into the overall program.

2. BASELINE DATA

1. The Government of Tanzania formulated its National Vision 2025 which envisages the country's graduation from a least developed into a middle income country, having eliminated abject poverty and maintaining a high economic growth rate of at least 8 percent per annum. One of its five main goals is to have a well-educated and learning society imbued with an ambition to develop within a competitive economy capable of producing sustainable growth and shared benefits.
2. **The National Strategy for Growth and Poverty Reduction adopted to guide the Vision 2025, envisages a concentrated effort to facilitate private sector growth in sectors with potential for export performance and job creation.** These sectors include hospitality and tourism, construction, agriculture, agribusiness/-processing, oil and gas, ICT, and transport and logistics among others. Tanzania has already made strong progress toward this goal, with the expansion of key industries contributing to GDP growth of almost 7 percent per annum over the past decade. Strong economic growth has led to a reduction in poverty, but a large share of Tanzanians is still vulnerable.
3. **Tanzania's efforts to upgrade the skills of its young workforce are driven by two imperatives: the need to have a skilled labor force which can support the growth of key economic sectors, and the need to accommodate large numbers of young people entering the labor force every year in search of productive jobs.** Approximately 15 million young people are expected to enter the labor market over the next 15 years. Those who have recently joined the labor force also have high aspirations for moving out of poverty, entering higher earning jobs and building a better future for themselves and their families. The skills of these young people will determine to a large extent whether Tanzania will combine growth with poverty reduction and shared prosperity.
4. **Targeting students in the vocational, technical and higher education sector will be the key to harnessing economic growth through a skilled workforce in Tanzania.** Over the past decade, the number of candidates passing form 4 and form 6 examinations has nearly doubled, providing a considerable stock of students who could enter tertiary education. However, slightly less than 1 percent of individuals aged 24-55 have a higher education qualification. This can be attributed to factors such as prohibitive cost structures, particularly amongst families in the lowest three quintiles, where higher education completion rates are virtually zero. This calls for greater investments in technical and vocational education, especially in the light of the fact that returns to technical, vocational and continued education in Tanzania are considerable. There is evidence that private sector firms face an inadequate quantity and quality of low, medium and highly-skilled workers needed to grow and create jobs. This makes improving the quality, quantity and relevance of skills critical for continued growth and job creation.

3. PROGRAM DESCRIPTION

1. **The Education and Skills for Productive Jobs (ESPJ) Program-for-Results (PforR) supports the implementation of the government’s National Skills Development Strategy (NSDS) and implementation plan over the 2016 – 2021 period.**
2. **The ESPJ PforR will support the implementation of a sub-set of the NSDS and its implementation plan in two key results areas:** (i) strengthening the institutional capacity of the skills development system; and (ii) promoting the expansion and quality of skills development opportunities in select economic sectors. The design and boundaries of the ESPJ PforR were defined based on strategic importance, government request, technical soundness, and the Bank’s value added.
3. **The PforR supports several pillars of the World Bank’s Country Assistance Strategy (CAS) 2010-2015.** More specifically, it will contribute to the third CAS pillar of *Strengthening Human Capital and Safety Nets* and within this pillar, support both *improved access to and quality of education*, as there is wide recognition that both quality and quantity of skills pose constraints to the growth of key industries. The proposed IDA PforR focus on skills development in the agriculture and transport sectors will contribute to achieving outcomes under two additional CAS pillars, notably *improved productivity and commercialization of agriculture* under the *Inclusive and Sustainable Private Sector-Led Growth* pillar, and *increased access to and quality of transport services* under the *Build Infrastructure and Delivery Services* pillar, respectively.
4. **A new Country Partnership Framework (CPF) is currently under preparation and expected to be completed by July 2016.** Given the challenges and opportunities facing Tanzania, one area of focus will be economic empowerment of the poor, which will include enhancing human capital opportunities as a key lever for economic empowerment.³ In addition, the proposed skills program would also contribute to supporting private sector productivity and a competitive business environment by reducing the skills gap.
5. **The ESPJ PforR objectives will be accomplished through** (i) the establishment of the National Skills Council (NSC) and sector skills councils that will harmonize and improve the efficiency of the skilling ecosystem; and (ii) a competitive results-based Skills Development Fund (SDF) and a Trainee Voucher Scheme (TVS) to introduce a competitive mechanism in public funding (and subsequently the SDL) and invite competition from private sector training providers. The ESPJ PforR will cover all six key economic sectors identified in the National Skills Development Strategy, notably: (a) Agriculture, agribusiness and agro-processing; (b) Construction; (c) Energy (d) Information and communications technology; (e) Transport and logistics; and (f) Tourism and hospitality.

³ World Bank. 2016. Tanzania Systematic Country Diagnostic (SCD), draft. February.

6. The **Program's Development Objective** is to strengthen the institutional capacity of the Recipient's skills development system⁴ and to promote the expansion and quality of labor market driven skills development opportunities in select economic sectors. Program Key Results for ESPJ are divided into two key result areas:
 - Results Area 1: System level: Strengthening the institutional capacity of the skills development system
 - Results Area 2: Service delivery level: Promoting the expansion and quality of labor market driven skills development opportunities in select economic sectors.
7. **Progress towards the achievement of the PDO will be measured through the following PDO indicators:**
 - Institutional framework in place for NSDS and institutional strengthening complete (including: approval of NSDS; establishment of National Skills Council and Secretariat, and Sector Skills Councils, improvement in sharing of institutional data, and strengthening of regulator capacity);
 - Number of trainees enrolled in alternative, TVET and university level training programs in select economic sectors supported by the SDF or TVS; of which percentage female;
 - Number of trainees completing alternative, TVET and university level training programs in select economic sectors supported by the SDF or TVS; of which percentage female;
 - Percentage of trainees who did an internship, apprenticeship or entrepreneurship training employed or self-employed 1 year after training completion.
8. **The PDO indicator serves as the primary measure of training quality.** Intermediate indicators also measure student satisfaction with TVET and alternative training programs, the proportion of programs delivered by a trainer with recent private sector professional experience, and the number of students benefiting from work-based training opportunities.
9. In addition to the indicators in the results framework, the National Skills Council and regulatory bodies will be responsible for tracking a range of additional indicators, including the total number of programs, enrolled students, and graduates in priority sectors; the employment status of graduates six months, one year and two years after graduation; and the performance of graduates on a standardized test of soft skills which will be administered by SDF-supported programs.
10. **Oversight for skills development is largely the responsibility of the Ministry of Education, Science, Technology and Vocational Training (MoESTVT).** A considerable number of other entities are also involved in supervising and managing training programs at different levels. Many public colleges are run by different line ministries and agencies other than MoESTVT. For example, the Tanzania Ports Authority oversees Bandari College, and

⁴ The skills development systems consist of alternative (informal, short term), vocational, technical and university level training programs.

the Ministry of Natural Resources and Tourism supervises the National College of Tourism. Registration of public and private training providers, individual training program accreditation, monitoring, and quality assurance are delegated to the following dedicated quality assurance (regulatory) bodies reporting to MoESTVT: The Vocational Educational and Training Authority (VETA) for vocational training centers; the National Council for Technical Education (NACTE) for technical colleges; and the Tanzania Commission for Universities (TCU) for universities.

4. SCOPE AND METHODOLOGY

ESSA is an ongoing process that began with the collection of baseline data/information, followed by laying out the measures and actions to strengthen system performance that will continue throughout implementation of the program.

1. The following activities were undertaken for ESSA:
 - i. Review of the relevant laws, regulatory frameworks, and guidelines and identification of inconsistencies with the social and environmental elements of OP/BP 9.00;
 - ii. Review and assessment of institutional roles, responsibilities, and coordination, and analysis of current capacity and performance to carry out those roles and responsibilities; and
 - iii. Consideration of public participation, social inclusion, and grievance redress.
2. The process used to assess the environmental and social management system included: (i) analysis of the national system for environmental and social management for planning and implementing programs in the education sector for consistency with the standards outlined in OP/BP 9.00; (ii) identifying where there are procedural and policy gaps with OP/BP 9.00 as well as performance constraints in carrying out environmental and social management processes; and (iii) developing a set of viable actions to strengthen the system and improve performance.
3. The baseline information/data reviewed include socioeconomic, infrastructure, and environmental (existing conditions), the potential environmental and social effects (including benefits and negative impacts) of program activities, and then the relevant system for managing those effects.
4. For the purposes of the ESSA, the groups identified as most vulnerable in the Tanzania Participatory Poverty Assessment are: children, persons with disabilities, youth (unemployed, females, youth with unreliable incomes), people living with long illnesses (e.g. HIV/AIDS), women (widows and those not able to support themselves), drug addicts, and alcoholics. While there is little data on these specific groups, the experience with affected groups in similar projects found that a high proportion of Project Affected People (PAP) with respect to resettlement had at least one vulnerable member in their household.⁵

⁵ Resettlement Action Plan for TSCP – Mbeya City Council.

5. The ESSA Analysis was conducted using a Strengths, Weaknesses, Opportunities, and Threats (SWOT) approach. The “weaknesses,” or gaps with OP/BP 9.00, are considered on two levels: (i) the system as written in laws, regulation, procedures and applied in practice; and (ii) the capacity of program institutions to effectively implement the system.
6. The World Bank Specialists have worked closely with MoESTVT and other stakeholders’ agencies to develop the ESSA and prepare the action plan as a guide to identify and mitigate risks and strengthen the management system. The ESSA has benefited from various inputs, including a legal and regulatory analysis; a desk review of World Bank implementation reports from related projects (Big Results Now Education; Secondary Education Development Project; and the Science and Technology Higher Education Project); various Bank donor reports; and the Government of Tanzania’s statistics (from the CAS progress report; the DFID Social Appraisal and gender analysis of Education Project; the Global Partnership for Education-Literacy and Numeracy Education Support; and the Government of Tanzania’s Basic Statistics in Education - BEST 2012); field visits in various institutions; and meetings with government agencies, development partners, and other stakeholders.
7. The Analysis section focuses on the strengths, gaps, potential actions, and risks associated with the program’s systems with respect to nature, scale and scope. It is structured to examine arrangements for managing environmental and social effects (i.e. benefits, impacts and risks). The analysis also examines whether the system, as written in policies, laws, and regulations, compares to how it is applied in practice at national and local levels. In addition, it examines the efficacy and efficiency of institutional capacity to implement the system as demonstrated by performance to date.
8. Finally, the analysis presents a scenario on whether the current system: (i) mitigates adverse impacts; (ii) provides transparency and accountability; and (iii) performs effectively in identifying and addressing environmental and social risks. The overarching objectives are to ensure that the risks and impacts of the program activities are identified and mitigated, and to strengthen the capacity to deliver the program in a sustainable manner. The ESSA proposes measures to strengthen the system, and translates these gaps and opportunities into a viable strategy to strengthen environmental and social management capacity and performance at the national and local level.

5. POTENTIAL SOCIAL AND ENVIRONMENTAL EFFECTS OF ESPJ

5.1 Potential Environmental Benefits and Risks

- a. The ESPJ focuses on creating an enabling environment for service delivery and promoting the expansion and quality of training service delivery. It does not finance physical constructions or civil works. The anticipated adverse environmental and social effects of such a program are therefore not expected to be hugely significant or detrimental. There could be some civil works related to upgrading and improving infrastructural conditions of the training facilities confined to existing premises and within the boundaries of the existing facilities. Increase in numbers of students that this project is expected to generate could lead to the development of more facilities (such as classrooms, student/teacher accommodation, etc.) which could result in increased pressure on utilities such as water supply, water abstraction and waste water treatment. This program provides an opportunity to improve due diligence measures related to management of construction related issues, good practices for asbestos management, improved waste management, and enhancement of sanitation, specifically provision of safe and sufficient toilets along with adequate and clean water supply systems.
- b. While the program activities are not expected to have significant environmental footprint, the ESSA also provides an opportunity whenever possible to enhance the recognition of environment, health and safety and long-term sustainability aspects in training institutions and programs at the technical, vocational and the university levels. This will be reflected in the proposed programs related to (i) Tourism & Hospitality; (ii) Agriculture, Agribusiness, Agro-processing; (iii) Transport & Logistics; and (iv) Construction.
- c. In this context, the broad environmental goals of the ESSA would be to mainstream environmental and social due diligence and awareness into the programs, through inclusion of environmental sensitivity and management into the formal curricula and to train teachers in its content. The key environmental and social risks associated with the proposed programs are related to issues such as:
 - i. **Tourism**
 - Land degradation and water pollution
 - Pressure on local resources like energy, food, and other raw materials
 - Loss of biodiversity and sensitive ecosystems
 - Encroachment on protected areas and parks
 - Increased solid waste and sewage
 - Introduction of exotic species
 - ii. **Agriculture:**
 - Usage of pesticides and fertilizers
 - Soil erosion and sedimentation
 - Loss of soil nutrients due to poor cropping patterns
 - Water pollution and depletion of natural water resources

- iii. **Agro-processing:**
 - Inadequate treatment and disposal of solid waste and wastewater
 - Water pollution
- iv. **Transport:**
 - Direct impacts (air pollution, congestion, and accidents, etc.)
 - Climate change
 - Taking land for enforcement and expansion of right of way for roads, etc.
- v. **ICT and Energy**
- vi. **Construction**
 - Poor site selection
 - Poor quality design impacting ventilation, lighting, and access for students with disabilities, etc.
 - Inadequate management of solid waste and wastewater
 - Use of illegally procured or unsafe building materials
 - Occupational health and safety measures for workers and community

d. The major environmental problems in Tanzania include:

- i. Deforestation, soil erosion, overgrazing, and unsustainable pastoral grazing practices have resulted into land degradation. This has been aggravated by poor agricultural practices such as shifting cultivation, lack of crop rotation practices, lack of agricultural technology and land husbandry techniques. Mining activities have also been a major cause of environmental degradation.
- ii. The main threats for deforestation include settlement and agricultural expansion, charcoal and fuel wood production, overgrazing, uncontrolled fires, shifting cultivation, and illegal logging.
- iii. Many types of human-caused pollution are a threat natural habitats or species. This is evident in the release of excessive amounts of nitrates and phosphates from sewage and agricultural run-off; persistent organic pollutants; pharmaceuticals used for people and in livestock production that are toxic to wildlife; heavy metals; herbicides and pesticides; and plastics.
- iv. The main sources of freshwater pollution are sedimentation, agricultural runoff, domestic and industrial effluents. Eutrophication is a prevalent phenomenon in Tanzania whereby lakes and river waters become increasingly rich in plant biomass as a result of the enhanced input of plant nutrients, mainly nitrogen and phosphorus.
- v. Pollutants from mining and industrial activities (such as lead, cadmium, iron and copper), spillage of oil due to marine accidents, and leakage from reservoir tanks and organic wastes from leaking sewage systems can accumulate in rivers and other freshwater bodies and affect water quality and species survival.
- vi. Waste disposal in natural habitat like fresh and sea water has contaminated the habitats and resulted in loss of biodiversity
- vii. Improper treatment and disposal of solid and liquid wastes are the major contributors to urban pollution.

- viii. It is estimated that fuel wood and agricultural residues account for 92 percent of the total energy consumption in the country, which has resulted in deforestation and environmental degradation.
- e. Inadequate instruments of enforcement of the existing legislation, insufficient resources, and poor enforcement, including weak institutions and laws on environmental management, are cited as reasons for poor compliance with existing national policies.

5.2 Potential Social Benefits and Risks

- a. The anticipated social effects of the program are not expected to be significant but sufficient to require attention to improve the quality of the program. On the positive side, the physical interventions are not expected to have significant footprints in terms of loss of land or assets/livelihood etc. since land acquisition is not envisaged. Besides, the just ended complementary project by the Government of Tanzania applies a Social and Environmental Management Framework to mitigate negative social impacts from either construction or inclusion challenges for all beneficiaries. The social implications of the interventions the program is expected to address include, among others:
 - i. Poverty (participation of students from low income households)
 - ii. Challenges in labor market relevant skills development (Access to quality skills development opportunities)
 - iii. Gender (opportunities for both men and women)
 - iv. Security and better facilities (better training environment for retention, etc.)
 - v. Stakeholder participation (at national, subnational and facility levels)
 - vi. Location of training institutions (equity in their distribution)
 - vii. Inclusion (better vs. poor performers, the vulnerable and disadvantaged, etc.), focus on all regions (including underserved areas)
 - viii. Existence of a grievance redress mechanism at community, coordinating agency, and education facility levels
- b. In Tanzania, despite the decline in poverty and general improvements observed in households' living conditions, only 30 percent of the population has been able to significantly improve its economic status and move to higher income classes. Around 12 percent of those at the bottom of the consumption distribution remain trapped in chronic poverty. Around 13 percent of the population has moved down to the lowest quartile (bottom 25 percent) of the consumption distribution. The movement across the welfare classes occurred mainly among households in the middle classes, with those lacking assets and experiencing a worsening of their incomes moving to lower economic status.⁶ Further, 47 percent of the total population comprises of dependents, and only 9 percent in the 15-24 years age bracket is gainfully employed.⁷ The proposed program therefore includes a

⁶ Tanzania Mainland Poverty Assessment, 2015

⁷ National Bureau of Statistics, Integrated Labor Force Survey, 2014

mechanism to subsidize student's direct costs in obtaining education and training through formal, accredited training institutions through a Trainee Voucher Scheme for low income youth. The challenge lies in the operationalization of the scheme to ensure consistent inclusion of the beneficiaries in the low income household category and those in underserved locations.

- c. Human development outcomes such as education, health, nutrition improved as well, but overall levels remain low. Enrollments in primary education increased in 2001-7 but declined in 2007-11/12. However, there has been a remarkable expansion in lower secondary education albeit from very low levels. There are also growing concerns that education outcomes across all levels remain weak.⁸ The program will establish a Skills Development Fund (for training providers) which will consist of results based competitive grants for training institutions in the priority sectors, and be incentivized for linkages with private sector, with various windows at technical education, vocational training and short term firm based training. The funds management will however require setting up a dedicated management unit, a selection committee and evaluation committees. Transparency and accountability for the establishment and functioning of this unit will be a very important aspect to ensure achievement of the intended objectives in increasing access to, quality and relevance of training programs.
- d. Gender issues exist in most countries where women are disadvantaged due to lower initial asset endowments than men. In Tanzania, with a gender ratio of 95 males per 100 females,⁹ women are poorer in terms of asset ownership (including land), financial endowments, and human capital development (including education levels). This is also due to the type of economic activities they pursue. Culture also greatly influences the gender balance and sustains the inequality. The Government of Tanzania has undertaken a number of initiatives to improve the status of women and promote gender equality, including the establishment of the Ministry of Women Affairs and Children; the creation of a gender committee to oversee and ensure that sectoral investments respond to the priority needs of both women and men; and recent land legislation providing women the right to inherit, own, and dispose of property. Although significant progress is visible across gender in the primary school cohort, the gap between boys and girls' enrollment tends to widen at the secondary and higher education levels. Furthermore, the quality of education is not tied to the number of years spent in school and this affects the benefits women derive from education both in terms of employment opportunities and contribution to life skills. Therefore, more focused attention is required to improve the educational attainments of girls at different levels, more specifically for girls at the higher secondary level, short term, technical and vocational, and university education levels.
- e. The success of all program initiatives would require ownership of the participants, the target groups, and relevant stakeholder groups at all levels. The extent and nature of stakeholders' participation will encourage training attendance and completion, and ensure

⁸ Tanzania Mainland Poverty Assessment, 2015

⁹ National Census, Tanzania, 2012.

better institutional results/achievements through social accountability and stakeholders' monitoring of the functioning of the institutions and the agreed upon results.

- f. The epidemic of HIV/AIDS has impacted not only the life expectancy (48 years) but also influences the coverage and quality of education. The demand for education in such a scenario is constrained by fewer resources from reduced income (related to HIV/AIDS) and alternative uses of resources with health care consuming a major chunk. The HIV/AIDS epidemic has had a two-fold impact on education. It has led to more children becoming orphans, dropping out of school to seek work and contribute to household income and/or to care for sick parents. On the supply side, it affects the delivery of training services through reduced personnel due to increased mortality, morbidity and absenteeism.
- g. The Government of Tanzania is making an effort to be inclusive of all groups without discrimination. The inclusion of all social/economic groups, vulnerable and other less advantaged groups, and underserved regions is important in terms of equity in distribution and to allow for holistic development of the sector with no student left behind. The government's efforts must continue to ensure that equal benefits reach all these groups.
- h. In technical and vocational institutions, depending on their founding bodies, councils and boards exist for monitoring. However, at higher institutions levels such grievances redress mechanisms are obscured by the general administration of the institution and need to be clarified. Their existence, representation and functionality require further clarity.
- i. The social risks may include the following;
 - i. *Land requirements*: The normal practice in the education and skills sector is for land to be contributed by the community and local authorities. Land has not been a constraint in the past in Tanzania, even though land issues are now getting more pronounced and require strong measures to ensure the protection of local people from land grabbing. However, for this program there is no land acquisition expected in any form, and in the absence of any new civil works, considered a low level risk.
 - ii. *Weak participatory decision making*: Participatory decision making, transparency and stakeholder involvement are major aspects of the program. Even though the key stakeholders are represented and involved through the boards of training institutions, institutional leadership determines their level of involvement. At alternative and higher education facilities, participatory decision making even gets more blurred since decisions are often far removed from key stakeholder groups like parents and local councils that are historical agents of participatory approaches. However, decision making that takes into consideration the active involvement of all relevant actors at the training institutions should be encouraged by the program. This would require sustained planning and outreach.
 - iii. *Conflict management*: Conflicts/complaint management mechanism is an important part of any development activity involving various players at different levels, particularly when new ways of working and innovations are introduced. In particular, activities that will require transparency and collective decision making include Trainee

- Voucher Scheme or grants made to training institutions. If unmitigated, this risk may upset the expected outcomes.
- iv. *Equity between regions/ethnic and vulnerable groups/low income households; elite capture of most incentive programs; and politicization of decision making.* Since the program is spread across the country, these are relevant risks and need to be addressed. Targeting students from low income households is a significant challenge that requires an ‘impermeable’ mechanism to avoid abuse of the system. Regular monitoring can point out signs of capture or inequity that require mitigation.

6. RELEVANT GOVERNMENT ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEMS

6.1 Description of policy and legal framework

The Government of Tanzania has a number of policies, instruments and laws which support environmental and social management and impact assessment processes. There are a number of sectoral policies that provide directives to integrate environmental and social considerations in the decision making process to avoid or minimize impacts associated with program implementation, specifically related to operation and provision of utilities.

6.1.1: Environment:

- a. **The National Environmental Policy (1997):** The NEP provides the framework for incorporating and mainstreaming environmental and social considerations into decision-making in Tanzania. The overall objectives are to:
 - i. Ensure sustainability, security and the equitable use of resources without degrading the environment or risking health or safety.
 - ii. Prevent and control degradation of land, water, vegetation and air.
 - iii. Conserve and enhance the natural and manmade heritage, including biological diversity of Tanzania’s unique ecosystems.
 - iv. Improve the condition and productivity of degraded areas, including rural and urban settlements.
 - v. Raise public awareness and understanding of the essential linkages between environment and development, and promote individual and community participation in environmental action.
 - vi. Promote international cooperation on the environmental agenda.
- b. The NEP is a comprehensive attempt to guide the conservation and management of natural resources and the environment. It provides for cross-sectoral and sectoral policy guidelines, instruments for environmental policy, and the institutional arrangements for environmental management for determining priority actions and monitoring. The environmental policy instrument provided by NEP is the environmental impact assessment – environmental legislation, which was adopted in 2004. The NEP requires **environmental education and awareness-raising programs** to be undertaken in order to promote informed opinion. It encourages environmental education to be introduced into primary and secondary school

curricula to inculcate values that support responsible environmental care, and discourage attitudes that are incompatible with sustainable ways of life.

- c. As stated in the NEP, the environmental objective of the Water, Sewerage and Sanitation sector is to support the overall national objective of providing clean and safe water within easy reach, to satisfy basic needs, protect water sources and prevent environmental pollution. The NEP requires planning and implementation of water resources and other development programs in an integrated manner, and in ways that protect water catchment areas and vegetation cover and promote technology for efficient and safe water use.
- d. There is a lack of systematic monitoring of progress of implementation of the NEP and there are no reviews of environmental performance on an annual basis. There are no published documents/reports on monitoring and reviewing environmental performance.¹⁰ The NEP has also not been widely distributed in the Kiswahili language, which is used by the majority of the implementers, most of whom do not speak English.
- e. The Environmental Management Act No. 20 of 2004: This is a framework Act in that it is the legislation governing environmental aspects in Tanzania. It includes provisions for sustainable management of the environment, prevention and control of pollution, environmental quality standards, public participation, and the basis for the implementation of international environmental agreements.¹¹ The Act sets out the mandates for various actors to undertake enforcement, compliance, review and monitor environmental impact assessment, facilitate public participation in environmental decision-making, and exercise general supervision and coordination matters relating to the environment. Institutionally it provides for the continuation of the National Environmental Management Council (NEMC), which is mandated to oversee environmental management issues and review programs to decide whether they need to undertake EIAs and prepare Environmental Impact Statements (EISs).
- f. The EMA has established environment units in all ministries and environmental committees at the regional, district and village levels. Within each ministry, it is the Environmental Section's responsibility to ensure that environmental concerns are integrated into the Ministry's developmental planning and project implementation in a way that protects the environment.
- g. Water Utilization (Control and Regulation) Act, (No. 42) 1974: This Act, with its amendments, is the principal legislation dealing with the protection of water resources and control of water extraction for different uses. The extraction of water for different users is controlled through a "water right permit". The projects need to undertake the procedures for acquiring and managing water rights, discharges to open environment, and maintenance of water quality, all of which are provided by this Act.

¹⁰ A Review of Current Tanzanian National Environmental Policy July 18, 2008 By Maro, Paul S.

¹¹ Pallangyo, Daniel Mirisho. 2007. Environmental law in Tanzania: How far have we gone? 3/1 Law, Environmental and Development Journal 2007, p.26.

- h. Energy and Water Utilities Regulatory Authority (EWURA), 2001: The general functions of EWURA are to regulate the provision of water supply and sanitation services by a water authority, including the establishment of standards relating to equipment and tariffs chargeable for the provisions of water supply and sanitation services.
- i. The legal framework for water supply and sanitation is based on the **Water Supply and Sanitation Act no 12** enacted in May 2009. The Act outlines the responsibilities of government authorities involved in the water sector, establishes Water Supply and Sanitation Authorities as commercial entities. The National Water Sector Development Strategy (NWSDS) 2006-2015 sets out a strategy for implementing the National Water Policy, which aims to achieve sustainable development in the sector through an "efficient use of water resources and efforts to increase the availability of water and sanitation services." The National Water Sector Development Program (WSDP) of 2006-2025 sets out to promote the **integration of water supply and sanitation with hygiene education**.
- j. The Occupational Safety and Health Authority (OSHA) has been set up to administer occupational health and safety at workplaces in the country. The role of OSHA is to improve health and safety (wellbeing) of workers and workplaces by promoting occupational health and safe practices in order to eliminate occupational accidents and diseases, hence achieve better productivity in the workplaces. The Prime Minister's Office of Labor and Employment is the main actor with the oversight role of ensuring that decent work is practiced and maintained in Tanzania. It provides directives, technical advice, enforces legislations, proposes amendments, allocates resources, oversees all activities carried out by OSHA and ensures that OHS rules and regulations are adhered to and maintained at workplaces.

6.1.2 Social:

- a. Land Policy (1997): The Land Policy and the laws emanating from it address issues of land tenure; promotion of equitable distribution of land access to land by all citizens; improvement of land delivery systems; fair and prompt compensation when land rights are taken over or interfered with by the government; promotion of sound land information management; recognition of rights in unplanned areas; establishment of cost effective mechanisms of land survey and housing for low income families; improvement of efficiency in land management and administration and land disputes resolution; and protection of land resources from degradation for sustainable development.
- b. Land Act No 4 of 1999: Private property is given either through Granted Rights in General and Reserved Land (Land Act, Section 19) or through Customary Rights in Village land (Village Land Act, Section 22). Provision is also made for holding land by joint occupancy or occupancy in common (Land Act, Part XIII). This is under the Ministry of Lands and Human settlements.
- c. Village Lands Act, No. 5 of 1999: This Act requires each village to identify and register all communal land, and obtain the approval of all members of the village for identification

and registration (Village Assembly, Section 13). A Register of communal land (section 13(6) is to be maintained by each village land council, and land cannot be allocated to individuals, families or groups for private ownership (section 12(1) (a)). This is also under the Ministry of Lands and Human Settlements.

- d. Land Act, Cap.113 R.E. 2002: The major function of the Land Act is to promote the fundamentals of the “National Land Policy”, through giving clear classification and tenure of land, land administration procedures, rights and incidents of land occupation, granted rights of occupancy, conversion of interests in land, dispositions affecting land, land leases, mortgaging of land, easements and analogous rights, co-occupation and partitioning and settlement of land disputes. Section 1(4) classifies Tanzanian land into three categories: Tanzanian land falls into three categories, namely:
- Reserved Land: Set aside for wildlife, forests, marine parks, etc. Specific legal regimes govern these lands under the laws which established them e.g. Wildlife Conservation Act, Cap 283 National Parks Ordinance, Marine Parks and Reserves Act, etc.
 - Village Land includes all land inside the boundaries of registered villages, with Village Councils and Village Assemblies given power to manage them. The Village Land Act, Cap 114 governs the land and gives details of how this is to be done.
 - General Land is neither reserved land nor village land and is therefore governed by the Land Act and managed by the Commissioner.
- e. All urban land falls under General Land Category, except land which is covered by laws constituting reserved land, or that which is considered hazard land. General land is governed by the Land Act. Reserved land includes environmental protected areas as well as areas intended and set aside for spatial planning and (future) infrastructure development.
- f. Rights of occupancy is given in two categories that separate the rights of citizens and non-citizens to occupy land. Section 19 (1) confers right to all citizen to occupy land; 19 (2) and 20(1) excludes non-citizen to occupy land except for purpose of investment (Tanzania Investment Act 1997). Property rights can be created over surveyed general land or reserved land; for a period of 33, 66 or 99 years; confirmed by a Certificate of Title.
- g. Land Acquisition Act Cap118, 1967 R.E. 2002: The Land Acquisition Act is the principal legislation governing the compulsory acquisition of land in Tanzania. Sections 3-18 of the Act empower the President to acquire land, and provide the procedures to be followed when doing so. The President is empowered to acquire land in any locality provided that such land is required for public purposes, and those who will be adversely affected to the acquiring of land by the government are eligible for the payment of compensation.
- h. The Local Government Act, 1982 (as revised in 2002) and its amendments: The village, district and urban authorities are responsible for planning, financing and implementing development programs within their areas of jurisdiction. Each authority has to suppress crime, maintain peace, good order and protect the public and private property. LGAs are

also capable of holding and purchasing, or acquiring and disposing of any movable or immovable properties.

- i. Gender Policies: There are a number of policies positively impacting gender. Important among them include: i) A Gender Policy with positive implication; ii) Affirmative Action Policy; iii) The Sexual Offences Act passed in 1998; and iv) an Action Plan against Gender Based Violence enacted in 2010.
- j. **Constitution of Tanzania 1977 (amendments in 1998) Article 11**
 - Every person has the right to self-education, and every citizen shall be free to pursue education in a field of his choice up to the highest level according to his merits and ability.
 - The Government shall endeavor to ensure that there are equal and adequate opportunities to all persons to enable them to acquire education and vocational training at all levels of schools and other institutions of learning.
- k. **Rights of the Child:** Tanzania is a signatory to the Convention on the Rights of the Child and has submitted three reports in 2013.

6.2 Technical guidelines

- a. The Government of Tanzania, through MoESTVT established a Development Grant (DG) in 2004 with the overall objective to improve the quality of and access to secondary education in Tanzania. The architectural and engineering standards and construction guidelines, along with verification, reporting and monitoring instructions were defined in a series of **Technical Guidelines and Handbook**. Here are the requirements for all existing and new schools/constructions,¹² which to some extent could be reflected in the rehabilitation of beneficiary training institutions where required/ applicable:
 - i. Drinking water facilities must be available or included as part of the community or DG contribution.
 - ii. Latrines or toilets must be available or included as part of the community or DG contribution. The Head of School must ensure that hygiene awareness training is available to students and separate latrines or toilets are allocated for girls.
 - iii. An effective School Construction Committee must be in place for new schools, and should be made up of at least 30 percent women.
- b. The standardized guidelines for monitoring quality control of works include aspects related to the location and siting of the school building, habitat conservation, foundations, and school building design, among others.
- c. All World Bank funded projects in the education sector in Tanzania have to some extent successfully implemented **Environment and Social Management Frameworks (ESMFs)**, which have been developed after disclosure and consultation with key

¹² Ministry of Education: Construction Guidelines for Secondary Education Development Plan, 2004 – 2009.

stakeholders. As per World Bank supervision records, all these ESMFs have been implemented by their respective agencies. The ESMFs identified environmental and social impacts of the projects and clearly outlined mitigation measures, even though capacity at all levels has been a limiting factor for both implementation and monitoring.

6.3 Description of institutional framework

The main institutions with key responsibilities for environmental and social management in the education sector are:

- a. The Office of the Vice President: The vision of the Ministry of Environment of the VPO is “to attain sustainable human development, eradication of poverty, security and equitable use of resources on a sustainable basis to meet the basic needs of the present and future generations without degrading the environment or risking health or safety and also maintain the union between the mainland Tanzania and Zanzibar”. VPO is the ministry responsible for policy, planning and implementation oversight on issues relating to the Environment in Tanzania. The VPO is therefore responsible for overall policy guidance and advice on the development of strategic environmental vision, including formulation, analysis and appraisal of broad environmental policy, as well as formulation and review of broad environmental goals, in conformity with such vision. The VPO provides a basis for a broad political legitimacy for the administration of strategic policy decisions on a routine basis for coordinated environmental management. PO-RALG, through the Local Government Authorities (LGAs), is responsible for the actual implementation of the primary and secondary education programs.

Primary and Secondary education is overseen by MoESTVT. Primary education is administered by local authorities, which report to the President’s Office - Regional Administration and Local Government (PO-RALG), while secondary schools and Teacher Colleges preparing primary school teachers are directly under MoESTVT. Technical and Vocational Training as well as Higher Education is also overseen by MoESTVT, as well as its regulatory bodies, the Tanzania Commission for Universities (TCU), the National Council for Technical Education

- b. The MOESTVT has overall responsibility for the management and administration of education and training in mainland Tanzania. It is mandated to develop and implement education policies which provide equal opportunity to quality education for all Tanzanians and ensure development of a productive quality human resource base through education and training. Since the function of administration of primary and secondary school education has been decentralized to Local Government Administrations (LGAs), MOESTVT puts in place mechanisms for strengthening the quality assurance and regulatory organs so as to ensure that education is provided in accordance with the set standards. The MoESTVT is also responsible for hygiene education and the provision of clean water and sanitation in schools.

- c. MoESTVT will be jointly responsible for the government’s implementation plan for the program. Implementation will rely on existing institutional capacity, monitoring templates and protocols, including drawing from and building on those established through implementation of BRNEd.
- d. The National Environment Management Council (NEMC) is responsible for ensuring that development programs comply with all relevant environmental laws and regulations. It is responsible for enforcing pollution control and performs the technical arbitration role in the undertaking of Environmental Impact Assessments. The sectoral and district environmental units are responsible for developing sectoral guidelines within the framework of the national guidelines, issuance of EIA registration forms and provide relevant information on policies and other administrative requirements. The NEMC provides periodic monitoring to ensure no adverse cumulative impacts from school construction program at the national level. It provides oversight and technical assistance to the Local Government Authorities when required.
- e. The Ministry of Water and Irrigation is the agency responsible for co-ordination, monitoring and regulating community water supply. The promotion of hygiene and sanitation rests with the Ministry of Health and Social Welfare. Due to decentralization in the water and sanitation sector Local Government Authorities (LGAs) are responsible for service provision of water and sanitation in their administrative areas, with advice from the PO-RALG.
- f. Key beneficiaries of the program are low income enrolled students in short-term, TVET and university-level training programs in selected economic sectors.

7. OPERATIONAL PERFORMANCE AND INSTITUTIONAL CAPACITY ASSESSMENT IN MANAGING ENVIRONMENTAL AND SOCIAL IMPACTS

1. Based on a review of the baseline data and detailed analysis of the environmental and social effects of the Program and the institutional context, the analysis presented here is organized by each of the six Core Principles outlined in OP/BP 9.00 and synthesizes the main findings using the SWOT (Strengths-Weaknesses-Opportunities-Threats) approach, which is adapted and applied to the PforR context in the following way:
 - Strengths of the system, or where it functions effectively and efficiently and is consistent with OP/BP 9.00;
 - Inconsistencies and gaps (“weaknesses”) between the principles espoused in OP/BP 9.00 and capacity constraints
 - Actions (“opportunities”) to strengthen the existing system.
 - Risks (“threats”) to the proposed actions designed to strengthen the system.

Summary of System Assessment

Core Principle 1: General Principle of Environmental and Social Management

<p><i>OP 9.00:</i> Environmental and social management procedures and processes are designed to (a) promote environmental and social sustainability in program design; (b) avoid, minimize or mitigate against adverse impacts; and (c) promote informed decision-making relating to a program’s environmental and social effects.</p>	
<p><i>BP 9.00:</i> Program procedures will:</p> <ul style="list-style-type: none"> ▪ Operate within an adequate legal and regulatory framework to guide environmental and social impact assessments at the program level. ▪ Incorporate recognized elements of environmental and social assessment good practice, including (a) early screening of potential effects; (b) consideration of strategic, technical, and site alternatives (including the “no action” alternative); (c) explicit assessment of potential induced, cumulative, and trans-boundary impacts; (d) identification of measures to mitigate adverse environmental or social impacts that cannot be otherwise avoided or minimized; (e) clear articulation of institutional responsibilities and resources to support implementation of plans; and (f) responsiveness and accountability through stakeholder consultation, timely dissemination of program information, and responsive grievance redress measures. 	
<p>Applicability: Overarching across the program.</p>	
<p>Summary findings – The potential impacts of the ESPJ program are considered minimal. However, there is opportunity to improve environmental and social management and sustainability across the programs that will be rolled out under this PforR. The program could support the strengthening of technical guidelines and enforcement for overseeing and monitoring of implementation of environmental and social measures.</p>	
<p>System Strengths: In the MoESTVT there is recognition of environmental sustainability and the desire for program interventions to contribute to improved sanitation, reduced pollution and a better quality of life, as well as strengthened institutions. Field studies and consultations carried out as part of this analysis show that there is a willingness to address issues that are compromising efficient and effective application of environment and social management processes.</p> <p>The World Bank funded Secondary Education Development program (SEDP II) Program, implemented by the MoESTVT, has an Environmental and Social Management Framework (ESMF), a</p>	<p>Gaps: <i>Weak implementation:</i> Although the direct impacts and risks are generally modest and implementation of the ESMF has been reasonably adequate, environmental management activities are weak in some areas, such as systematic inspection, monitoring and enforcement. This is primarily due to (i) weak and insufficient institutional and technical capacity; and (ii) poor coordination and weak inter-institutional coordination between various related agencies.</p> <p>While clearances for construction are clearly defined, a gap could be the lack of clearly defined roles and responsibilities for ongoing and continued supervision and monitoring of quality and quantity of drinking water and sanitation facilities.</p>

<p>comprehensive document which includes a screening mechanism to identify key environment and social issues and potential impacts associated with civil works involving new construction/expansion/upgrades of buildings; good practices for mainstreaming environment and social issues in building design and construction of civil works with clearly defined mitigation measures for any adverse impacts; monitoring indicators; and reporting requirements for environmental and social indicators. Borrower capacity has been deemed satisfactory for the implementation of the ESMF. Supervision reports and field visits confirmed impacts have been modest and measures to mitigate potential impacts have been done through the ESMFs.</p> <p>The system for clearances and approvals is well established. There are also Technical Construction Guidelines under complementary programs. After clearance of designs, construction is required to be done by only certified contractors and all civil works, laboratory and fire equipment need to conform to the standard guidelines. The Regional Engineers and the Inspectorate unit at MoESTVT approve quality of construction and operations capacity within educational facilities.</p>	<p>Technical guidelines need updating to include emerging issues such as (i) greener solutions in new buildings, (ii) ways of retrofitting old buildings with recycling and energy efficient measures, and (iii) climate adaptation and resilience measures. Public disclosure of documents for those programs requiring a full ESIA is a requirement, but the actual process of public review and comments can be onerous and public hearings are at NEMC’s discretion during the ESIA review and approval process. However, this is not a requirement under the ESPJ.</p> <p>Under EMA, there is a procedure related to grievances with respect to decisions about granting the EIA certificate. There is no requirement that ESMPs include a mechanism for handling grievances, though ESMPs in Development Partner-funded programs do tend to include them. There are processes at the local level for handling general grievances and disputes, although it has been difficult to assess if this functions well in practice to resolve grievances tied to environmental and social impacts.</p>
<p>Actions and Opportunities: Technical Guidance and Implementation Capacity: There is opportunity to strengthen implementation capacity for monitoring, evaluation and reporting, along with public participation and disclosure. Additionally, systemic changes to promote sustainable and “greener” building designs will allow better resource management</p> <p>Strengthening cooperation and inter-sectoral coordination around the environmental issues and use of Environmental and Social</p>	<p>Risks: Poor coordination between the various responsible ministries could prevent sound technical guidance being developed and rolled out. Poor enforcement could prevent implementation of good practices in environmental and social enhancements.</p>

<p>Management Frameworks/Plans would improve their implementation.</p> <p>The MoESTVT supports measures to strengthen the system, and is familiar with issues and mitigation measures required for education programs. These initiatives are still being mainstreamed in a systematic manner in the education sector and can be strengthened under the current Program.</p>	
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Core Principle 2: Natural Habitats and Physical Cultural Resources

<p>OP 9.00: Environmental and social management procedures and processes are designed to avoid, minimize and mitigate against adverse effects on natural habitats and physical cultural resources resulting from program.</p>	
<p>BP 9.00: As relevant, the program to be supported:</p> <ul style="list-style-type: none"> ▪ Includes appropriate measures for early identification and screening of potentially important biodiversity and cultural resource areas. ▪ Supports and promotes the conservation, maintenance, and rehabilitation of natural habitats; avoids the significant conversion or degradation of critical natural habitats, and if avoiding the significant conversion of natural habitats is not technically feasible, includes measures to mitigate or offset impacts or program activities. ▪ Takes into account potential adverse effects on physical cultural property and, as warranted, provides adequate measures to avoid, minimize, or mitigate such effects. 	
<p>Applicability: The provisions in Core Principle 2 are considered as part of the ESIA process analyzed under Core Principle 1. The analysis confirmed that program investments would neither impact nor convert critical natural habitats and therefore this is not applicable</p>	
<p>System Strengths: The Tanzanian ESIA process considers physical cultural resources, including screening for archaeological, historical and cultural sites. The assessment shows that impacts on cultural sites are taken into account in program design and implementation and appropriate mitigation measures adopted.</p>	<p>Gaps: There are no significant inconsistencies between OP/BP 9.00 and Tanzania’s policies, laws, and regulations related to natural habitats.</p>
<p>Actions and Opportunities: The opportunities and actions identified for strengthening the system for Core Principle 1 are applicable to Core Principle 2.</p>	<p>Risks: The risks identified for strengthening the system for Core Principle 1 are applicable to Core Principle 2.</p>

Core Principle 3: Public and Worker Safety

<p><i>OP 9.00:</i> Environmental and social management procedures and processes are designed to protect public and worker safety against the potential risks associated with (a) construction and/or operations of facilities or other operational practices developed or promoted under the program; (b) exposure to toxic chemicals, hazardous wastes, and otherwise dangerous materials; and (c) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards.</p>	
<p><i>BP 9.00:</i></p> <ul style="list-style-type: none"> ▪ Promotes community, individual, and worker safety through the safe design, construction, operation, and maintenance of physical infrastructure, or in carrying out activities that may be dependent on such infrastructure with safety measures, inspections, or remedial works incorporated as needed. ▪ Promotes use of recognized good practice in the production, management, storage, transport, and disposal of hazardous materials generated through program construction or operations; promotes use of integrated pest management practices to manage or reduce pests or disease vectors; and provides training for workers involved in the production, procurement, storage, transport, use, and disposal of hazardous chemicals in accordance with international guidelines and conventions. ▪ Includes measures to avoid, minimize, or mitigate community, individual, and worker risks when program activities are located within areas prone to natural hazards such as floods, hurricanes, earthquakes, or other severe weather or climate events. 	
<p>Applicability: The provisions in Core Principle 3 are considered as part of the ESIA process analysed under Core Principle 1. Complementing that analysis, the review found that Core Principle 3 is not applicable to the ESPJ Program, as there is no physical infrastructure being financed and no procurement of hazardous or dangerous materials or pesticides.</p>	
<p>Strengths: By law in Tanzania it is the duty of urban local governments to provide for the health and safety of the public.¹³ The EMA and regulations contain several provisions for public and worker safety, which are consistent with OP/BP 9.00. The ESIA process contains robust procedures for worker safety, requiring plans for accident prevention as well for health and safety of workers and communities, which are also part of contracts for civil works.</p>	<p>Gaps: Public and worker safety are adequately covered in the EMA regulations and the CRB, and no major inconsistencies between the system and Core Principle 3. However, the worker safety provisions are not always included in civil works contracts. Other gaps identified in Core Principle 1 are also applicable to Core Principle 3.</p>

¹³ See The Local Government (Urban Authorities) Act, 1982.

<p>Tanzania has a Contractor Registration Board (CRB) that monitors and enforces occupational health and safety regulations. The Rules of Conduct requires that contractors must maintain accident registers, provide workers with protective gear, and standards for construction sites.</p>	
<p>Actions and Opportunities: The opportunities and actions identified for strengthening the system for Core Principle 1 are applicable to Core Principle 3.</p>	<p>Risks: The risks identified for strengthening the system for Core Principle 1 are applicable to Core Principle 3.</p>

Core Principle 4: Land Acquisition

<p><i>OP 9.00:</i> Land acquisition and loss of access to natural resources are managed in a way that avoids or minimizes displacement, and affected people are assisted in improving, or at least restoring, their livelihoods and living standards.</p>
<p><i>BP 9.00:</i> As relevant, the program to be supported:</p> <ul style="list-style-type: none"> ▪ Avoids or minimizes land acquisition and related adverse impacts; ▪ Identifies and addresses economic and social impacts caused by land acquisition or loss of access to natural resources, including those affecting people who may lack full legal rights to assets or resources they use or occupy; ▪ Provides compensation sufficient to purchase replacement assets of equivalent value and to meet any necessary transitional expenses, paid prior to taking of land or restricting access; ▪ Provides supplemental livelihood improvement or restoration measures if taking of land causes loss of income-generating opportunity (e.g., loss of crop production or employment); and ▪ Restores or replaces public infrastructure and community services that may be adversely affected.
<p>Applicability: Overarching across the program.</p> <p><i>Summary Findings</i> In the absence of any land acquisition for construction, impacts on loss of land/asset/formal and informal livelihood from civil works are not likely. Based on experience in similar education and skills projects there has been no relocation or other related impacts. Loss of access to natural resources is also a low risk, nor are there any risk of impacts on crops where involuntary land acquisition is not eligible for financing under this program. Hence presently, this principle does not apply to the ESPJ program. However, should there be any land acquisition/land take for civil works, for any land related losses the program will adhere to the best practice to mitigate unanticipated emerging risks. Any land acquisition leading to economic or physical displacement will be supervised and reported on annually. Additionally, the experience with other programs/projects suggests that where PAPs have participated in consultations with the government starting at an early stage of program/project preparation, resettlement and compensation has had a more positive track record.</p>

System Strengths:

Clear staff roles and responsibilities:

While the Land Act does not yet have regulations that outline a process for land acquisition, but for this program, land is contributed by the community and is usually communal land.

Grievance procedures and dispute resolution

There is a system where complaints are channeled upward, starting with the Mtaa,¹⁴ Ward Executive Officer, District Commissioner, then to the Region, and up to MLHSD. If still unsatisfied PAPs can seek recourse for grievances in the courts (specifically the Court of Land Arbitration).

Consultations:

For community or local authority land consultations is an internal process and followed at the community or local authority level to ensure there is consensus on the donated land and if there are impacts on any group, community mitigation is undertaken. For land acquisition, the valuation process includes a sensitization meeting with PAPs, which must be attended by local leaders as well. The intent is to explain the program, the valuation process, valuation rates, and arrangements for physical inspection of properties.

Analysis and Guidance

There is good guidance on resettlement and compensation in Tanzania that goes beyond the Land Act and Regulations – there has been a comprehensive gap analysis between World Bank OP 4.12 and the Tanzanian system, and all of the elements of Core Principle 4 are visible in previous education projects RPFs. Furthermore, for any unanticipated emerging risk the program will apply best

Gaps:

While the content of the screening and analysis for Environmental and Social Impact Assessment (ESIA) under EMA are comprehensive with respect to the principles of OP/BP 9.00, there are gaps in the content of ESIA requirements, including: (i) The screening process does not explicitly take into account: Land acquisition and resettlement/relocation (although this is not an issue in this program), restricted access to resources, and Indigenous Peoples; If land acquisition be invoked the following gaps would need to be filled. **However the risk related to land acquisition is low, given that the program is not expected to acquire land for construction purposes and the focus of the program is on quality, capacity and performance of the sector.**

While there are policy gaps between OP/BP 9.00 and the Tanzanian system for land acquisition and resettlement, there are no direct conflicts between the Tanzanian land laws and OP/BP 9.00, which indicates that gap-filling measures in the Program (if required) will not be contrary to the law should it be required.

Tenure: Tanzanian law has clear procedures for landholders and generally extends eligibility for compensation to recognized or customary land users or occupiers lacking full title. But it does not recognize tenants, squatters or encroachers as being entitled to assistance or any allowances for transportation or disturbances, etc. In Tanzania, land compensation is paid to non-titled persons if they have been in possession of the land for more than 12 years. This is covered under the law of limitation. However, compensation would not be provided to non-titled persons occupying land already demarcated for a particular purpose. There is no

¹⁴ A small urban area or geographical division of a ward.

<p>practices to mitigate land acquisition related risks.</p>	<p>clear policy on resettlement and relocation of large groups of people.</p> <p>Market value: Tanzania law provides for the calculation of compensation on the basis of the market value of the lost land and unexhausted improvements, plus a disturbance, movement, and accommodation allowance, and loss of profits where applicable. However, a depreciated replacement cost approach is used, which does not result in full replacement cost of the lost assets which is inconsistent with OP/BP 9.00. Additionally, market values and valuation procedures tend to be outdated and there is little baseline data for land values, which risks the valuation being at the discretion of the Land Valuation Officer.</p> <p>Lost Assets and Livelihood Restoration: “Replacement assets” under the Land Act in Tanzania are restricted to land and developments on land, and where relevant, loss of profits. OP/BP 9.00 goes beyond physical assets and includes livelihoods and standard of living, seeking to improve them or at least to restore them to pre-displacement levels. While profit losses are included in Tanzanian law, this is more narrowly defined as formal business profits and compensation for crops. While the Land Act does entitle compensation for business losses, there are no legal provisions requiring the government to restore livelihoods or to provide assistance towards the restoration of such livelihoods. Land users such as tenant farmers are only entitled to compensation for crops (the valuation method is outlined in the 2001 Regulations).</p> <p>Payment of Compensation: Legally, compensation for the acquired land is to be paid “promptly,” but does not have to be paid before possession of land is taken.</p> <p>Community Infrastructure: It does not appear that public infrastructure is specifically addressed in the Land Act and Regulations. For projects/programs prioritized and implemented</p>
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	<p>by the community, risks that community infrastructure will be impacted is low where most of the work will be on existing land and if required, the communities decide what land to offer to the program as donation.</p> <p>Consultation and Disclosure: As resettlement in practice is done as part of the ESIA, consultation and disclosure generally follow this process with the addition of a sensitization meeting with PAPs as part of the valuation process. PAPs are also publicly informed toward the end of the process when they can collect their compensation payments. Community Development Officers have a role during this process as well, as do Ward Officers. However, this process is geared only toward the land valuation process, and may not include tenants, informal land users, and other types of resettlement and compensation that are not covered by Tanzanian law. For this program consultation and disclosure will take place but compensation is not expected to be required in the absence of land acquisition by this program.</p>
<p>Actions and Opportunities Technical Guidance and Implementation Capacity: Because there are no earmarked funds under the Program for resettlement and compensation, it will be particularly important that there is awareness in the MoESTVT for the need for an ESIA and/or ESMP and/or RAP, should land acquisition leading to economic or physical displacement be required by a sub program. In such a scenario training in the preparation /implementation of the ESMF would also need to be included in training for education sector implementers. In the present program, focus of the training will be on consultations, grievance and complaint redressal/conflict management etc.</p>	<p>Risks The risk of not addressing the gaps identified described above, could result in inconsistency with the Core Principles of OP/BP 9.00, if there is large scale land acquisition that is unmitigated.</p> <p>Presently, the risk is low in the absence of land acquisition and related impacts.</p>

Core Principle 5: Indigenous Peoples and Vulnerable Groups

OP 9.00: Due consideration is given to cultural appropriateness of, and equitable access to, program benefits giving special attention to rights and interests of Indigenous Peoples and to the needs or concerns of vulnerable groups.

BP 9.00:

- Undertakes free, prior, and informed consultations if Indigenous Peoples are potentially affected (positively or negatively) to determine whether there is broad community support for the program.
- Ensures that Indigenous Peoples can participate in devising opportunities to benefit from exploitation of customary resources or indigenous knowledge, the latter (indigenous knowledge) to include the consent of the Indigenous Peoples.
- Gives attention to groups vulnerable to hardship or disadvantage, including as relevant the poor, the disabled, women and children, the elderly, or marginalized ethnic groups. If necessary, special measures are taken to promote equitable access to program benefits.

Applicability:

Overarching across the program.

Summary Findings:

While the program seeks to improve the conditions of poor and vulnerable groups, if impacts are not well-managed it is possible that assets and livelihoods of vulnerable groups could be negatively impacted. The analysis confirmed that, at present, there is currently no specific legislation or policy in place in Tanzania related to Indigenous Peoples.

However, the investments under this program targets all enrolled students as direct beneficiaries. Thus while considering the applicability of this Core Principle, the analysis found that it was relevant in terms of ensuring that vulnerable groups are included in the planning process and program prioritization; that vulnerable groups have access to program benefits; and that the needs of vulnerable groups are considered with respect to the program’s impacts. For ESSA, the analysis of vulnerable groups focused on those defined in the Tanzania Participatory Poverty Assessment: children, persons with disabilities, youths (unemployed, females, youths with unreliable incomes), people living with long illnesses (e.g. HIV/AIDS), women (widows and those not able to support themselves), drug addicts and alcoholics, and any other disadvantaged communities. The government’s approach is to ensure that all vulnerable groups are consulted and benefit from its programs.

System Strengths:

The education and skills sector is inclusive of all groups and consultations revealed that no group is excluded. Vulnerable groups have been identified, and there are special schools with access and other facilities for those suffering from disabilities. Schools also have hostels for those with severe disabilities. For

Gaps:

The analysis identified a number of critical gaps in the system, including:

Identification of Vulnerable Groups:

Vulnerable and marginalized groups are not explicitly included in the screening process for

marginalized groups such as low income youth, there is a trainee voucher program with a transparent selection process. Tanzania also has policies specific to vulnerable groups, such as the National Gender Policy and National Policy on HIV/AIDs, in order to prevent discrimination and promote equity. There is also strong guidance for community participatory planning by PO-RALG through the “Opportunities and Obstacles to Development Handbook,” which promotes inclusion of vulnerable groups throughout the planning process.

ESIA through EMA nor in the Tanzanian system for land acquisition and resettlement.

Indigenous Peoples: As mentioned above, there is no system in place that confers any right, status, or special position upon any citizen of Tanzania on the basis of lineage, tradition or descent, including Indigenous Peoples. There is also no track record of any program for the capacity to undertake free, prior, informed consultations with Indigenous Peoples. However, the project does involve extensive consultations with project beneficiaries, in particular, vulnerable groups.

Resettlement: This requires further examination, but there are particular issues with respect to gender and vulnerability in the practice of resettlement and compensation. As mentioned above, there are no specific requirements for considering gender and vulnerability in resettlement and compensation processes beyond payment of compensation for lost land. But for this program this is not an issue since the focus is on education and all students will be targeted to poor performers (who generally belong to less advantaged groups).

The experience with follow-up with vulnerable groups and vulnerable PAPs could benefit from further information – it is clear that at least in donor-funded programs with Resettlement Action Plans, vulnerability is screened for and taken into consideration. However, there is little information on how vulnerability is considered in the actual practice of compensation and/or relocation where necessary.

Monitoring: Monitoring of gender, poverty, and HIV/AIDS in the development planning process is in need of strengthening. In the education sector there is no common method of analysis and collection of baseline to aid development planning on these issues in the sector.

<p>Actions and Opportunities:</p> <p>Technical Guidance and Implementation Capacity: While there are some criteria for vulnerable groups in the ESIA process, these need to be strengthened. If requested by the government, the program can support the current undertaking by NEMC to better mainstream gender and HIV/AIDS in the ESIA process.</p> <p>Addressing Resource Constraints: It is unclear if any staff in the education and skills sector is trained to provide inputs on identifying, consulting with, and assisting vulnerable groups, which may be impacted by the types of activities financed with the inclusion of the Unreached People Group (UPG) to benefit from the project activities. The program’s capacity building plan can include measures for good practices on inclusion of UPG.</p> <p>Higher Order Opportunities: The Bank is currently discussing its policy regarding Indigenous People with the Government. As the ESSA is intended to be living document, the results of these discussions will be incorporated once completed.</p>	<p>Risks:</p> <p>It is clear from the analysis that if the gaps identified and opportunities presented in this core principle (where applicable) are not addressed, the program would risk not generating the desired environmental and social effects and remain inconsistent with the guiding principles of OP/BP 9.00.</p>
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Core Principle 6: Social Conflict

<p><i>OP 9.00:</i> Avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.</p>
<p><i>BP 9.00:</i> Considers conflict risks, including distributional equity and cultural sensitivities.</p>
<p>The ESPJ will not entail social conflict in fragile states, post-conflict areas or areas subject to territorial disputes, nor will the program cause social conflict or impact distributional equity or associated cultural sensitivities. As such, the ESSA did not consider the program with regards to Core Principle 6 as this Core principle and key element are not applicable to the ESPJ operation. It is important to note that distributional equity and cultural sensitivities are covered under the analysis of system with respect to the main considerations of Core Principle 5.</p>

2. **Based on the findings of the ESSA Analysis, the following table aggregates the risks discussed above, and proposed measures to mitigate those risks.** These are included in the Program’s integrated risk assessment.

Risk Description	Risk Management
<p>Potential environmental and social impacts of ESPJ are not identified, mitigated, and monitored, or program scope is changed to include construction or large-scale civil works.</p>	<p>The potential environment and social risks and impacts of the program are expected to be moderate since the infrastructure rehabilitation and construction works will be confined to existing educational institutions premises and within the boundaries of the existing land. There are no large or new constructions expected.</p> <p>Additionally, the programmatic approach to the skills sector provides an opportunity to enhance the recognition of environment, health and safety, and long-term sustainability aspects in training institutions and programs at the technical, vocational and the university levels.</p> <p>Monitoring and supervision of due diligence measures related to environmental and social issues will be a part of World Bank supervision. The program will include a process of ongoing consultations during the implementation of various activities to ensure implementation of measures meet the needs of the program beneficiaries.</p>
<p><i>Grievance Redress Mechanisms:</i> There is no formalized and effective complaint mechanism to address social and environmental issues in vocational, technical and higher education institutions systems. However, there exist the court system and grievance redress systems for local councils.</p>	<p>ESPJ program will use and strengthen the existing systems of complaint receiving and feedback mechanisms and will train program staff (where required) to implement and monitor it.</p>
<p><i>Staffing and skills mix:</i> The current staffing and skills mix in MoESTVT is insufficient to handle environmental and social management issues</p>	<p>MOESTVT will appoint environmental and social focal points for monitoring and implementation of the ESSA. Technical guidance will be built into capacity building program.</p> <p>Where necessary, ESPJ will be incentivized to provide adequate resources to environmental and social management as performance is a minimum condition to access the Unreached Peoples Groups (UPG).</p>
<p><i>Annual Performance Audit</i> does not include the requirement or the technical expertise to assess performance of the ESSA</p>	<p>Monitoring of the ESSA implementation should be included in the Terms of Reference for consultants who will undertake the Annual Performance Audit.</p>

	The MoESTVT will ensure that adequate skills are present to assess implementation of ESSA
<i>Stakeholders involvement, transparency and social accountability</i> with participatory decision making needs to be undertaken in spirit and not led by a single individual	Dissemination and awareness raising activities for environmental and social due diligence measures, will be built into ESPJ program. Further, this aspect would be incentivized in the program.

3. The Grievance/Complaint Redress Mechanism:

- a. At the national level, there is a government portal available for registering complaints. In addition, MoESTVT has a well-established Complaints Handling Mechanism (CHM) with a fully dedicated office and personnel. The system is largely paper-based, but also includes email complaints sent to the ministry’s website. The focus of the CHM is on ministry personnel and clients, including providers of goods and services as well as the general public. The existence of this mechanism needs to be made more widely known. Particularly, the proposed program establishes a clear link between the Ministry’s CHM with that of other key players in the sector. In our case this would be HESLB and TEA, as well as the regulators, VETA, NACTE and TCU.
- b. **Government institutions including Vocational Training Centers, Technical Colleges and Universities have CHM, with common characteristics that:** (i) they are paper-based and are administered by the department responsible for Human Resources and Administration; (ii) they are rarely promoted and included in information provided to clients; (iii) management follow-up of complaints provided is weak.
- c. **To ensure that all program participating entities and beneficiaries are aware of the program outputs as well as the CHM in place, the MoESTVT needs to establish an awareness program, led by the respective department that is responsible for the system.** The purpose of this awareness program will be to ensure all participants know their roles and responsibilities in ensuring the CHM is effectively maintained, and to provide information on fraud and corruption, together with the CHM reporting procedures. The awareness program should be part of the program’s kick-off activities. The Open Government Project in the pipeline will also assist in this area and lay out a streamlined process that can be followed by all government ministries.
- d. The Operational Manual of ESPJ will need to review the existing system and provide timelines and a monitoring mechanism for the Grievance redress mechanism (GRM/CHM). The GRM will also need to be widely disseminated to all stakeholders.

8. RECOMMENDED REMEDIAL MEASURES TO STRENGTHEN SYSTEMS PERFORMANCE

The ESPJ ESSA analysis presented above identifies strengths, gaps and opportunities in Tanzania’s environmental and social management system with respect to effectively addressing the environmental and social risks associated with the program. This section translates these gaps and opportunities into a viable strategy to strengthen environmental and social management capacity and performance at the national and local level. The analysis identified the following main areas for action in order to ensure that the program interventions are aligned with the Core Principles 1, 2 3, 4 and 5 of OP/BP 9.00. These could be further defined during implementation, as required. The ESSA therefore identifies the following key measures to be taken for improved environmental and social due diligence in the ESPJ.

Measures to Strengthen System Performance for Environmental and Social Management	
Objective	Measures
<p>Defining the System for Environmental and Social Management</p>	<p>The programmatic approach of the ESPJ provides significant opportunity to enhance the recognition of environment, health and safety, and long-term sustainability aspects in training institutions and programs at the technical, vocational and the university levels. In this context, the broad environmental goals of the ESSA would be to mainstream environmental and social due diligence and awareness into the program, through inclusion of environmental sensitivity and management into the formal curricula and to train teachers in its content.</p> <p>The program also offers the possibility of improved skills and capacity along with increased coordination among various ministries, agencies and donor partners on environmental and social aspects.</p> <p>The ESPJ will finance limited civil works related to upgrading and improving infrastructural conditions of the educational facilities confined to existing premises and within the boundaries of the existing facilities. The anticipated adverse environmental and social effects are not expected to be very significant. It has been determined that the Environmental and Social Management Framework (ESMF) under the World Bank funded Secondary Education Development Program II (SEDEP II) is a comprehensive document being used by the the Ministry of Education, Science, Technology and Vocational Training (MoESTVT) for management of construction issues. Borrower capacity has been deemed reasonably satisfactory for the implementation of the ESMF, although it requires some strengthening of capacity and technical enhancement.</p>

	<p>However, if there are any changes to the current scope or if the PforR program is expanded to include constructions and/or upgrades and physical/civil works and/or usage or acquisition of new land, then the ESSA will need to be revised to ensure that all impacts are well assessed and appropriate measures are incorporated to mitigate the higher risks that may arise.</p>
Technical Guidance and Implementation Capacity	<p>If SDF training providers require training on environment and social management, the technical guidance tools will be refined to support enhanced environmental and social sustainability.</p>
Addressing Capacity Constraints	<p>Where feasible, training and awareness of the importance of environmental and social sustainability will be included in the technical and vocational courses for longer term sustainability</p>
Improved systems for Information Disclosure and Stakeholder Consultation	<p>Accountability and transparency of institutions would be essential to ensure that the program support is used in a productive manner to reach as many training providers and trainees as possible who are eligible for the program. The Program design will include a strengthened and documented Grievance redress mechanism and training and capacity building in stakeholders' and community involvement and participatory decision making, whichever is applicable will be undertaken. Dissemination and awareness raising activities for environmental and social due diligence measures will be built into PforR program.</p> <p>Grievance redressal mechanism has been discussed with stakeholders and laid out in the ESSA. At the national level there is a government portal available for registering complaints.</p> <p>The Operational Manual of the ESPJ will need to review the existing system and provide timelines and a monitoring mechanism for the Grievance redress mechanism (GRM). The GRM will also need to be widely disseminated to all stakeholders.</p>

9. STAKEHOLDER CONSULTATIONS

1. The ESSA process includes extensive stakeholder consultations and disclosure of the ESSA report following the guidelines of the World Bank’s Access to Information Policy. At present, the ESSA consultation process is embedded in the program consultation

process. Feedback from stakeholders has been instrumental in designing and revising the program’s action plan, indicators, and technical manual.

2. Initial consultations held by the government with a large group of stakeholders over a period of time led to the formulation of ESPJ. The outcomes of those consultations influenced its design. For the preparation of this ESSA, World Bank specialists undertook a series of meetings, consultations with different stakeholders including government agencies, development/funding partners and followed up with limited fieldwork including visits to vocational and technical institutions. Supervision aide-memoires were reviewed for understanding the implementation record of complementary Bank-funded projects. Further consultations were undertaken during the project’s appraisal with a large group of stakeholders, along with smaller meetings with selected stakeholders. (See annex III for list of participants)
3. *Document Dissemination and Public Comment Period:* The draft ESSA has been publicly disclosed and shared with the donor partners and stakeholders involved with environmental and social management issues in Tanzania. The final report will be translated and available publicly as well as at the World Bank Infoshop.
4. *Consultation Event:* A one-day public consultation was held where the ESSA was presented and stakeholders were invited to offer inputs on the findings and recommended actions in an interactive format. Overall, the workshop agreed with the recommendations of the ESSA but requested some changes in language and addition of some issues. These have been incorporated as suggested. The issues discussed and information provided during the various consultation events are as follows.

Issues Raised	Response
Land use is determined by the Ministry or Council.	<p>Rehabilitation and upgrades will be made to existing facilities and other institutions will be encouraged to share facilities.</p> <p>This has been documented in the ESSA as an issue that needs to be addressed.</p>
Women’s drop-out at higher levels can be due to pregnancy, poverty, lack of toilets or clean water, and location.	This has been reflected in the ESSA as a social risk.
Stakeholder participation is a good idea. There are numerous agencies involved in this program and if there is no participation and transparency with information sharing and feedback, only a small number of people would benefit.	This will be undertaken by the program implementers and incentives will be put in place to encourage stakeholders’ participation and decision making. In addition, documents will be made public so that people see who gets what, the guidelines followed, etc.

<p>The bottom up planning is very important and this can be strengthened by engaging CSOs that have expertise in this area.</p>	<p>This has been noted. Infact, the preparation of the ESPJ PforR Co-Creation Workshop included wide stakeholder participation, including CSOs.</p>
<p>There is lack of awareness about environmental and social issues in construction areas.</p>	<p>The ESSA does not include the issue of civil works as this is not a part of the ESPJ funding. However, where rehabilitation and upgrading of existing facilities does take place, issues of safety and environmental concerns like waste, or those associated with designs will be addressed.</p>
<p>Overall monitoring needs to be strengthened.</p>	<p>ESPJ provides for enhanced monitoring, which that includes all the relevant stakeholders for adequate decision making.</p>
<p>What if results are not achieved? Will there be no funding?</p>	<p>There are measures for course correction and some DLIs have the provision for catching up. Funding is pro-rated in terms of results achieved.</p>
<p>What are outcomes? Is it better performance? How will it be measured?</p>	<p>Outcomes are a part of the performance. Other components of the program will all contribute towards the outcome, e.g. grants reaching the target. Short and long term outcomes will be monitored based on the Program Results Framework.</p>
<p>As safety measures, will new construction will have fire alarms?</p>	<p>The ESSA does not provide for new civil works. However, for rehabilitation of the facilities the safety measures could be part of the works.</p>
<p>Although there is compensation for land, there is no clear policy on resettlement or relocation of large groups of people.</p>	<p>This would be considered as an issue in cases of land acquisition with resettlement and relocation. Presently this ESSA does not envisage any land acquisition.</p>
<p>How will the data verification/validators be undertaken?</p>	<p>The operational manual will show how this will be done. It will be decided by the various stakeholder groups during the preparation of the OM. Validators will be carefully selected.</p>
<p>Identification and inclusion of the right beneficiaries for student vouchers can be abused.</p>	<p>The targeting criteria must be well thought out. Transparency and ensuring information is in the public domain is important. This and other aspects of the program will be put in place by the program implementers.</p>

Guidelines and processes for preparing and submitting proposals should be simple in order to increase opportunities for service providers' participation in the program. Otherwise the program risks being high jacked by large service-providers and those in urban areas	All possible measures will be used to help increase awareness about the program. This includes the use of open channels, local languages, and simplification of format for proposal preparation, among others.
Create a networking and learning event annually for outreach and feedback purposes	Well noted. This will be included through the communications strategy and other initiatives.
Consider school of origin in the selection criteria. Also use local authorities, religious leaders, etc. to identify the right beneficiaries since some may already be out of school.	Best practice mechanisms will be used for testing and targeting. Other existing initiatives like TASAF/PSSN will be explored for this purpose. Existing poverty maps might come in handy to determine areas with pockets of poverty as well as underserved regions.
Who will judge the quality of training?	The program will establish the criteria for assessing the quality of the training across institutions and sectors. This will be known by all institutions and students beneficiaries.
How will any information on the program, requirements, etc., be disseminated?	The program will put a communications strategy in place to facilitate both information dissemination and seeking feedback. The ESSA has also recommended strengthening of the stakeholder participation and grievance redress mechanisms to enable general outreach. A list of registered technical and vocational institutions exists. However varied channels of communication will be used, and translation of these materials into Swahili is important.
How will the program achieve a regional balance? Not all institutions are similar. Consider categorization of institutions in terms of size and location and level of offer for services.	This will be addressed through the communications strategy and other initiatives like targeted competitive proposal writing. It is also addressed through the creation of different windows for the Skills Development Fund.
There is a need to reach out to other stakeholders for implementation support on issue such as water and sanitation, waste management and recycling, etc.	This has been reflected in the ESSA
Registration of the institutions is still a problem.	There is no registration requirement under SDF, however, minimum technical quality standards will be established for eligible institutions to apply for funding. Small training providers are encouraged to partner with larger ones. Other issues related to implementation of

	the program will be laid out to a stakeholders group that will look into them. This is why the ESSA emphasizes stakeholder participation and decision making as a key principle.
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ANNEX I: ESSA Core Principles

Paragraph 8 of OP 9.00 outlines what the ESSA should consider in terms of environmental and social management principles in its analysis. Those core principles are:

1. Promote environmental and social sustainability in the program design; avoid, minimize, or mitigate adverse impacts; and promote informed decision-making relating to environmental and social impacts
2. Avoid, minimize, or mitigate adverse impacts on natural habitats and physical cultural resources resulting from the program
3. Protect public and worker safety against the potential risks associated with: (i) construction and/or operations of facilities or other operational practices under the program; (ii) exposure to toxic chemicals, hazardous wastes, and other dangerous materials; and (iii) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards
4. Manage land acquisition and loss of access to natural resources in a way that avoids or minimizes displacement, and assists the affected people in improving, or at the minimum restoring, their livelihoods and living standards
5. Give due consideration to the cultural appropriateness of, and equitable access to, program benefits, giving special attention to the rights and interests of the Indigenous Peoples and to the needs or concerns of vulnerable groups
6. Avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.

The ESSA considers the consistency of the program systems with these principles on two levels: (1) systems are defined in laws, regulation, procedures, etc., and (2) the capacity of program institutions to effectively implement the program's environmental and social management systems. ESSA Vol. 1 (Analysis) considers the baseline information presented in this volume and compares this to how the system performs in practice vis-à-vis the core principles in the ESPJ policy outlined below.

Core Principle 1: General Principle of Environmental and Social Impact Assessment and Management

OP 9.00: Environmental and social management procedures and processes are designed to (a) promote environmental and social sustainability in the program design; (b) avoid, minimize or mitigate against adverse impacts; and (c) promote informed decision-making relating to a program's environmental and social effects.

BP 9.00: Program procedures will:

- Operate within an adequate legal and regulatory framework to guide environmental and social impact assessments at the program level.
- Incorporate recognized elements of environmental and social assessment good practice, including (a) early screening of potential effects; (b) consideration of strategic, technical, and site alternatives (including the "no action" alternative); (c) explicit assessment of potential induced, cumulative, and trans-boundary impacts; (d) identification of measures to mitigate

adverse environmental or social impacts that cannot be otherwise avoided or minimized; (e) clear articulation of institutional responsibilities and resources to support implementation of plans; and (f) responsiveness and accountability through stakeholder consultation, timely dissemination of program information, and responsive grievance redress measures.

Core Principle 2: Environmental Considerations – Natural Habitats and Physical Cultural Resources

OP 9.00: Environmental and social management procedures and processes are designed to avoid, minimize and mitigate against adverse effects on natural habitats and physical cultural resources resulting from program.

BP 9.00: As relevant, the program to be supported:

- Includes appropriate measures for early identification and screening of potentially important biodiversity and cultural resource areas.
- Supports and promotes the conservation, maintenance, and rehabilitation of natural habitats; avoids the significant conversion or degradation of critical natural habitats; and if avoiding the significant conversion of natural habitats is not technically feasible, includes measures to mitigate or offset impacts or program activities.
- Takes into account potential adverse effects on physical cultural property and, as warranted, provides adequate measures to avoid, minimize, or mitigate such effects.

Core Principle 3: Environmental Considerations – Public and Worker Safety

OP 9.00: Environmental and social management procedures and processes are designed to protect public and worker safety against the potential risks associated with (a) construction and/or operations of facilities or other operational practices developed or promoted under the program; (b) exposure to toxic chemicals, hazardous wastes, and otherwise dangerous materials; and (c) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards.

BP 9.00: Promotes community, individual, and worker safety through the safe design, construction, operation, and maintenance of physical infrastructure, or in carrying out activities that may be dependent on such infrastructure with safety measures, inspections, or remedial works incorporated as needed.

- Promotes use of recognized good practice in the production, management, storage, transport, and disposal of hazardous materials generated through program construction or operations; promotes use of integrated pest management practices to manage or reduce pests or disease vectors; and provides training for workers involved in the production, procurement, storage, transport, use, and disposal of hazardous chemicals in accordance with international guidelines and conventions.
- Includes measures to avoid, minimize, or mitigate community, individual, and worker risks when program activities are located within areas prone to natural hazards such as floods, hurricanes, earthquakes, or other severe weather or climate events.

Core Principle 4: Social Considerations – Land Acquisition

OP 9.00: Land acquisition and loss of access to natural resources are managed in a way that avoids or minimizes displacement, and affected people are assisted in improving, or at least restoring, their livelihoods and living standards.

BP 9.00: As relevant, the program to be supported:

- Avoids or minimizes land acquisition and related adverse impacts;
- Identifies and addresses economic and social impacts caused by land acquisition or loss of access to natural resources, including those affecting people who may lack full legal rights to assets or resources they use or occupy;
- Provides compensation sufficient to purchase replacement assets of equivalent value and to meet any necessary transitional expenses, paid prior to taking of land or restricting access;
- Provides supplemental livelihood improvement or restoration measures if taking of land causes loss of income-generating opportunity (e.g., loss of crop production or employment); and
- Restores or replaces public infrastructure and community services that may be adversely affected.

Core Principle 5: Social Considerations – Indigenous Peoples and Vulnerable Groups

OP 9.00: Due consideration is given to cultural appropriateness of, and equitable access to, program benefits, giving special attention to rights and interests of Indigenous Peoples and to the needs or concerns of vulnerable groups.

BP 9.00:

- Undertakes free, prior, and informed consultations if Indigenous Peoples are potentially affected (positively or negatively) to determine whether there is broad community support for the program.
- Ensures that Indigenous Peoples can participate in devising opportunities to benefit from exploitation of customary resources or indigenous knowledge, the latter (indigenous knowledge) to include the consent of the Indigenous Peoples.
- Gives attention to groups vulnerable to hardship or disadvantage, including the poor, the disabled, women and children, the elderly, or marginalized ethnic groups, as relevant. If necessary, special measures are taken to promote equitable access to program benefits.

Core Principle 6: Social Considerations – Social Conflict

OP 9.00: Avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.

BP 9.00:

Considers conflict risks, including distributional equity and cultural sensitivities.

ANNEX II
List of Persons Consulted

Consultation meetings have been held with the following people:

Member of Education Unit in PDB

Mr. Petro Masatu

MDU:

Mr. Pedro Makuru

Ms. Hilda Mtandawire

Mr. Bon Mall Mwenda

Mr. Lawrence Sanga

Ms. Hadija M. Maggid

Mr. Hashim Kakwekwe

MOESTVT:

Mr. Gilbert Bakula

World Bank Staff

Kaboko Mathus Nkahigi

Consultation Workshop: February 10, 2016 at the World Bank Offices

N	Names	Organization	Position
1	Ghati Mwita	Statoil Tanzania	Production Engineer
2	Julius Muungano	TNMET	Network Member
3	Tamali Mn dolwa	TYUA	Member
4	Paul A. Makunda	TAWOMA	FACETER/ Coordinator
5	Fabio Siani	SDC	Program Manager
6	Robert L. Mkola	Future World Vocational Institute	Director
7	Helena Reuterward	Swedish Embassy	Education Officer
8	Saddam Khalfan	Tanzania Youth Vision Association	Deputy Executive Secretary
9	Ochek Msiva	Bridge for Change	Co- Founder and Executive Director

10	Ezekiel Mario	Kilimanjaro institute of Technology and Management	Principal
11	Naiman Mbise	National College of Tourism	Director of studies and Professional activities
12	Justine Mponda	Tanzania Youth Vision Association	Program Manager

Discussions were also held with the following institutions during the preparation of the ESPJ Program:

Vocational:

VETA center Morogoro
VETA training center Arusha
VETA Dar es Salaam

Technical College:

Arusha Technical College

University:

University of Dar es Salaam
Ardhi University, Dar es Salaam
Sokoine University, Morogoro
Nelson Mandela Institute, Arusha

Potential alternative training providers visited:

Hotel & Tourism Association of Tanzania
Tanzania Tour Operators Association (TATO, Arusha)
VSO, NGO
Board of Contractors
Board of Engineers
SIDO
SUGECO, Morogoro

**ANNEX III:
Technical Reports and Government Sources**

In addition to the laws, policies, and regulations cited in this report, the ESSA has drawn from a range of sources including academic journals, government documents, technical reports, and project documents. This annex lists sources that were consulted in the preparation of the ESSA.

- a. PO-RALG. June 2006. National Framework for Urban Development and Environmental Management (UDEM) in Tanzania: Draft Framework Design.
- b. Sosovele, Hussein. February 2011. "Governance Challenges in Tanzania's Environmental Impact Assessment Practice." African Journal of Environmental Science and Technology, Vol. 5(2), pp. 126-130.
- c. Universalia. April 2009. Institutional Assessment of the Division of Environment.
- d. Universalia. April 2009. Institutional Assessment of the National Environmental Management Council.
- e. Secondary Education Development program II (SEDP II) 2010 - 2014. Environmental and Social Management Framework. March 2010.
- f. URT. MKUKUTA II - Poverty and Human Development Report 2011.