



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 12/23/2022 | Report No: ESRSA02465



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Paraguay		P180015	
Project Name	Joining Efforts for an Education of Excellence in Paraguay		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	1/5/2023	3/7/2023
Borrower(s)	Implementing Agency(ies)		
Government of Paraguay	Ministry of Education and Science, Ministry of Education and Sciences		

Proposed Development Objective

To improve learning environments in selected compulsory education and teacher training institutions, enhance institutional capacity for better service delivery in core priority areas, and contingently respond to an eligible crisis or emergency.

Financing (in USD Million)	Amount
Total Project Cost	180.00

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

No

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

The Project aims at significantly improving learning conditions and governance of the education system in Paraguay in support of the 2040 National Plan for the Transformation of Education (PNTE 2040, in its Spanish acronym)'s strategy to significantly improve the quality of education in Paraguay in the next two decades.

To achieve this goal, the Project Development Objective (PDO) is articulated around two clear objectives. First, to significantly improve learning environments in targeted 'upgradable compulsory education institutions' (UCEIs) and



selected Teacher Training Institutes (IFDs, in their Spanish acronym) that would be converted into university-level Experimental Centers for Specialized Teacher Training (CEFEDs, in their Spanish acronym) by providing any needed major infrastructural adaptation and/or improvements. Second, to enhance institutional capacity for better service delivery around key areas identified in the PNTE 2040, including the areas of educational infrastructure, the new CEFEDs, EdTech, and evaluation. The first objective of the PDO would be supported under Component 1, and the second objective would be supported under Component 2.

The objective of Component 1 is to support the GoP in significantly improving learning environments in Paraguay through a comprehensive suite of structural interventions. This goal is framed within an overarching policy that aims to revamp the material conditions under which learning takes place in Paraguay. Two types of learning environments would benefit from these interventions: (i) targeted educational institutions providing compulsory education (locales escolares a potenciar or UCEIs); and (ii) selected Teacher Training Institutions (Institutos de Formación Docente or IFDs). The “intervention package” to be provided to learning environments in these institutions would comprise: (i) civil works; (ii) learning material; (iii) educational equipment and furniture; (iv) digital devices; and (v) information and communication technologies (ICT)-based connectivity.

The objective of Component 2 would be to support, through both technical assistance and capacity building activities, in developing high-quality governance frameworks around four key thematic areas identified by the MEC as priorities in line with the implementation roadmap envisaged in the PNTE 2040. These four areas would be: (i) learning environment and infrastructure standards for UCEI’s; (ii) competency frameworks for educational technology and innovation; (iii) teachers’ professional development and the role of CEFEDs; and (iv) educational evaluation and research.

D. Environmental and Social Overview

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

The project will be implemented nationwide in the country’s 17 departments and the Asuncion district across rural and urban areas. At least one compulsory educational institution (CEI) will be upgraded in each of the 261 municipalities of the country, including those serving indigenous communities. All CEIs serving non-indigenous communities are located on public land (owned by MEC) in rural and urban areas. The CEIs serving indigenous communities are mostly in rural indigenous communities. Paraguay has approximately 7,453,695 inhabitants. Around 63.3% of the population lives in urban areas and 36.7% in rural areas. Current projections indicate that the urban population will continue to rise. 28.2% of the total population is under the age of 15 years old.

According to the 2012 Census, there are 117,150 Indigenous Peoples living in Paraguay. They identify with 19 different indigenous groups and speak 5 languages. The percentage of total poverty in the indigenous population is 66.16% and the percentage of extreme poverty is 34.42%. The illiteracy rate in the indigenous population is 33.35%; with a difference between men (25.37%) and women (40.81%). According to data from the Unified Student Registry (RUE Registro Unico del Estudiante) a total of 34,633 indigenous students are enrolled in the RUE. Of the 11,036 children enrolled in the second cycle, only 5,412, almost half, reach the third cycle. There are no figures for indigenous students enrolled in universities though it is expected that this number is small. There are still many boys and girls who are outside the educational system. The indigenous population from 6 to 14 years of age is 30,560 and 11.80% of them do not attend an educational institution. 49.47% of the indigenous population from 15 to 17 years of



age do not attend an educational institution. The average number of years of study of the indigenous population aged 25 and over is 3.39, with a significant difference between men (4.06 years) and women (2.7 years) (EPH, 2018 DGEEC. Principales Resultados. Encuesta Permanente de Hogares 2016. Encuesta Permanente de Hogares 2017 sobre Población Indígena).

Paraguay recognizes the principle of an inclusive education system and establishes the objectives of inclusive education through Law No. 5136/2013. The Law's main objective is the establishment of actions for the creation of an inclusive educational model within the regular system, which removes barriers that limit learning and participation, facilitating the accessibility of students with specific needs. Despite the significant expansion of access to primary education for students with disabilities, a significant number of students with disabilities are being left behind. At the primary level, while the regional average of children out of school is 3.6%, 15.1% of children with disabilities ages 6 to 12 are out of school.

D. 2. Borrower's Institutional Capacity

The project is the first implemented by the MEC using World Bank's financing in the last 20 years. The Project's Implementation Unit will be the Unidad Ejecutora de Programas y Proyectos (UEPP), created by National Decree in 2017 under the MEC. The MEC and UEPP do not have experience implementing projects under the WBG's Environmental and Social Framework (ESF) or the safeguard policies. While the UEPP has experience in carrying out civil works projects including preparation, implementation, and monitoring, it does not have procedures in place to manage environmental and social issues. Nevertheless, the UEPP has participated in the consultation process carried out in the context of the recent country's education reform and has experience in preparing and conducting consultations with different institutional and non-institutional stakeholders. The UEPP has administrative and financial autonomy delegated by the MEC.

The project will also be funded by the public trust fund Fondo Para la Excelencia en la Educación e Investigación (Fund for the Excellence in Education and Research, FEEL) of Paraguay. FEEL was created by national law in 2015 to administer national and external funds for investment in education, health, innovation, research, and technology. FEEL counts on administrative and financial monitoring mechanisms. The MEC and UEPP have experience implementing projects funded by FEEL in infrastructure, early childhood, teacher training, information technology, and learning evaluation, including 14 projects currently active and 5 closed.

At the beginning of project preparation, the UEPP has designated members of its staff to prepare the instruments required by the ESF with the support of experienced consultants (three social and one environmental/construction consultant) and carry out related activities such as environmental and social assessments, consultations, and stakeholders' engagement. The Bank's E&S team is providing close support to the UEPP to build its capacity on the ESF and to prepare E&S instruments in line with the ESF. The UEPP is expected to participate in the general ESF training and in specific trainings on different E&S issues relevant to the project, such as SEA/SH issues, occupation health and safety for workers and communities; and ESF standards of resettlement for temporary relocation. Capacity building efforts will continue during the remainder of project preparation and in implementation in close collaboration with Bank team members. Key elements to provide support in project implementation to the borrower will be (a) to provide training with special attention to key risk areas; (b) to set up institutional mechanisms to ensure implementation and supervision of E&S mitigation measures in the field - to be delineated in the ESMF and specified in the POM; (c) training of implementers including school directors/principals and contractors on different E&S issues, including grievance redress, community safety and security including SEA/SH; OHS issues for workers and in general



ESMP-related issues; and (d) robust information sharing and consultations at subproject level. Given that the implementation of the refurbishments, in minor civil works cases, will be left to the responsibility of school principals, the project will ensure the adequate knowledge, implementation, and monitoring of the E&S standards and mitigation measures through different provisions in the ESMF, Project Operational Manual (POM), bidding and contractual processes.

To implement the project and manage the E&S aspects, the capacity of the staff of the UEPP will be strengthened with two full-time social specialists, including one with expertise on indigenous peoples, one environmental specialist, a communications specialist and a gender specialist. A focal point for the GRM will also be designated. The hiring of social and environmental specialists will be a condition of project effectiveness and established as such in the project Environment and Social Commitment Plan (ESCP).

The role and responsibilities of the staff will be described in the ESMF, and its instruments as needed, and noted in the ESCP.

Additionally, during appraisal, the UEPP and MEC will further define the implementation structure to monitor and supervise the implementation of the ESMF and its instruments in the field. This could mean hiring local personnel that will be located and distributed regionally to cover all 1,300 subprojects areas. The project design currently includes hiring 10 technical staff as supervisors of the civil works. At a minimum, this staff should have capacities to supervise social and environmental aspects. If not, additional staff should be assigned as field social and environmental supervisors. This will be noted in the ESCP and the POM, as needed.

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

A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Moderate

The Environmental risk rating is classified as Moderate (M) at this stage of Project preparation. The environmental impacts and risks associated with the project are mostly related to minor civil works (repairs and/or refurbishment of walls, floors, bathrooms, the electric system, gutters, and ceilings) and major civil works (new construction/retrofitting of classrooms, bathroom , libraries, offices, kitchen and dining hall, recreational and physical education rooms) that will be carried out in around 1,300 (out of 7,315) educational institutions existing on lands owned by the MEC. In addition, the preliminary screening has identified potential pollution conditions because of these works (air, soil, water) including electronic waste. Life & Fire Safety measures will be considered in the subproject design to mitigate the potential risk of fire in the educational institutions. The civil works are expected to have low and moderate temporal and localized negative impacts during the constructions phase due to potential land and air pollution (dust, GHGs), non-hazardous waste generation, noise, and water use. The cumulative impact of the civil works is considered low because of the size of the interventions and the fact that they will be spread across the country's 261 municipalities. The upgrade of 3 Experimental Centers for Specialized Teacher Training will require major civil works in already established institutions. In this case also, the most relevant impact will occur during the constructions phase. After the construction phase the upgraded schools will have positive impact on the health and safety of the communities (students, teachers, parents). During the constructions phase OHS risk to workers are also considered, and measures to address them will be included in the relevant instruments. Investments in school



furniture and learning equipment will have a low impact during construction, transport, and installation. The furniture acquired by MEC will follow institutional standards that takes into consideration the environmental sustainability of the materials used for construction and ergonomic standards. Electronic waste is expected from project implementation, and this will be addressed with disposal protocols.

Social Risk Rating

Moderate

The Social risk rating is classified as Moderate (M) at this stage of Project preparation. The overall social benefits of the project are expected to be positive. Indigenous Peoples and other vulnerable groups are expected to benefit from the Project’s activities aimed at promoting inclusive and accessible education. The project puts special emphasis on improving infrastructural and learning needs of students from all groups, including indigenous populations and students with special needs. Project activities will also include construction and rehabilitation of schools located throughout the country in both urban and rural areas, as well as the expansion of access to digital devices and Internet connectivity in the education system across the country. The Project is not expected to cause social adverse impacts to project affected people, including vulnerable groups who, to the contrary, are expected to fully benefit from the increased access to learning. The Project is committed to ensuring nationwide reach, as defined by having geographical presence in all 261 municipalities of the country, including several indigenous schools. All construction and rehabilitation works will take place on lands already owned by the state or relevant municipalities. In addition, civil works that would require any kind of involuntary resettlement as defined under ESS5 will be excluded from financing under the project. Expansion of access to digital devices and Internet connectivity would also not require any land take or involuntary resettlement. At this stage, the identified social risks are: i) lack of Borrower’s previous experience in working with the Bank’s Environment and Social Standards or safeguards policy; ii) potential concerns and discontent from people who believe that the project may promote closing of some schools especially in remote areas; and iii) potential temporary relocation of students and teachers in the event of civil works delays. Contextually, there is a risk that the project may be associated with some aspects of the overall education reform that have generated some protests in a few segments of the population and may face opposition from the same groups. However, the degree of this risk is considerate moderate as the project is mainly intervening to upgrade the urban school environment, which is widely recognized as necessary. These potential risks and impacts are being assessed in detail through the E&S instruments, and appropriate mitigation measures, including a robust consultation, information and communication process, are set out in the environmental and social instruments that the Borrower is developing. In addition, the borrower’s capacity to manage social and environmental issues in line with the ESF will be supported by external social and environmental hired to assist with the preparation of ESF instruments and planning the consultation process.

Public Disclosure

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

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The project aims to support the GoP in significantly improving learning environments in Paraguay through comprehensive structural interventions in selected beneficiary educational institutions providing compulsory education; and selected Teacher Training Institutions. The “intervention package” to be provided to learning



environments in these institutions would comprise of: (i) civil works; (ii) learning material; (iii) educational equipment and furniture; (iv) digital devices; and (v) information and communication technologies (ICT)-based connectivity.

Sub-component 1.1 provides for interventions to be made in upgradable compulsory educational institutions (UCEIs). Major civil works will finance new construction/retrofitting of classrooms, gender-separate and age-appropriate bathrooms, laboratories, libraries, administrative offices, kitchens and dining halls, and other works as needed. In addition, this activity will target three UCEI groups: (i) UCEIs in urban areas; (ii) UCEIs in rural areas; and (iii) UCEIs that would serve indigenous populations and students with special needs, including the Centers for Inclusive Education Support (CIEEs). Minor civil works will finance a series of transfers to benefit complete-cycle UCEIs to undertake minor repairs and/or refurbishment of: (i) walls; (ii) floors; (iii) bathrooms; (iv) the electric system; (iv) gutters; and (v) ceilings. Each school premise benefiting from these transfers would receive an average of USD 20,000 that would be transferred directly to school principals. The selection of beneficiary UCEIs under the Project would be made following a set of selection criteria and a vulnerability analysis of the eligible schools, that would ensure that at least one UCEI is selected in each existing municipality in Paraguay (261) and that impact in terms of total current (and prospective) enrollment is maximized. Some of the selection criteria are: a) appropriate registration of land and property under MEC's cadastral registration and/or are not located within a geographical area undergoing legal dispute; b) UCEIs that may imply any sort of involuntary resettlement plan of any kind would also be automatically excluded from the project; and c) at least one school premise from each of the 261 municipalities in the country would have to benefit - with major civil works or minor interventions through a School Premise Vulnerability Index composed of different factors. Sub-component 1.2 is geared towards supporting a package of interventions to convert a selected number of tertiary-education degree-granting IFDs in university-education degree-granting Experimental Centers for Specialized Teacher Training. The curricular part of the investment is already at MEC's disposal – and under implementation - through a combined investment of USD56M from the FEEI and the European Union.

The project will not finance permanent closing of schools, nor will it finance civil works that may lead MEC to close schools in surrounding areas under different programs not financed by the Bank. The UCEIs that would be targeted for interventions under the Project are those that do not have other educational institutions within a 5km radius. As such, the project area does not include schools that could eventually be slated for closure as a result of the schools' enhancements financed by the project.

At this stage, the location of the specific investments is unknown. It is expected that this will be defined between project preparation and early stages of implementation. The borrower is preparing an Environmental and Social Management Framework (ESMF), in line with the ESF and the Bank's Environment, Health and Safety (EHS) Guidelines. The ESMF provides guidance on E&S screening and classification of subprojects and procedures for the development of site-specific Environmental and Social Management Plans (ESMPs) or Environmental and Social Specifications to be prepared during implementation. A screening checklist is included in the ESMF. The checklist will be a key tool for risk management as it will define the potential risks and impacts of each subproject and based on this classification, the borrower will define the environmental and social documents required. In the cases where the potential risks and impacts of a subproject are low, an ESMP may not be required and Environmental and Social Good Practices Specifications may suffice. Guidance from other relevant World Bank projects for the construction of educational institutions will be considered.



The draft ESMF has identified risks and impacts that could occur as a result of the project. The main risks and impacts are related to the design, construction, and operation of the minor and major civil works. The most relevant are: soil, water, and air pollution during construction; trees or vegetation cover loss inside school plots due to new building; solid waste generation during construction and operation; health and safety of community and works at risk due to civil works or presence of worker; potential damage to cultural heritage elements; and school activities interrupted because of school interventions, among others. Among the social risks identified are that educational activities may be interrupted temporarily in the areas under construction; that the vulnerable population (children and adolescents, especially those studying in the educational centers) are exposed to inappropriate interactions with workers or other people involved in the civil works and may be victims of harassment or aggression; that vulnerable groups including indigenous people may not be able to fully participate in the consultation process and IPs cultural characteristics may not be taken into consideration in the design and implementation of the project.

The social aspects of the ESMF include an assessment of the ways in which different groups of project beneficiaries may be vulnerable to be excluded from the benefits of the project and will identify measures that can ensure inclusive access to such benefits. Vulnerable groups include students with special needs, girl students, poorer students from remote areas, students from indigenous populations, students from the most vulnerable and disadvantaged groups and areas throughout the country. The ESMF also analyzes the degree of risks of Gender-Based Violence (GBV) that may occur given the amount of work sites and potential close proximity of workers and students during civil works. Mitigation measures, which will also build on MEC's protocol for addressing SEA/SH issues, will include a code of conduct for workers, availability of grievance mechanisms and measures to disseminate information about these. Studies on GBV in the rural areas of the country from other World Bank financed projects may also inform the ESMF.

The draft ESMF includes generic E&S risk management procedures in line with the ESF and the EHS Guidelines, that can be adapted and tailored to specific subprojects and incorporated in the ESMPs and bidding documents.

The draft ESMF will be disclosed for consultation during appraisal. The ESMF will be finalized within 60 days of project effectiveness.

The project provides for technical assistance (TA) activities, mainly under component 2 and 3 for which the requirements set out in paragraphs 14–18 of ESS1 will be applied to TA activities as relevant and appropriate to the nature of the risks and impacts. The TORs for all TA activities will be reviewed to include E&S aspects as necessary, and related outputs will be reviewed as needed to ensure consistency with the ESF prior to completion. The ESMF assessment will also inform the preparation of the TORs.

The project also includes a CERC component. In this respect, the ESMF includes a specific section indicating the a) Identification of potential activities that the CERC could finance (Positive list of goods, services and works), b) Analysis of potential Environmental and Social Risks and Impacts based on the positive list, c) Environmental and Social Management Procedures (screening, clearance and approval, Implementation and M&E, and Completion and Evaluation), and d) Institutional Arrangement for the Emergency Action Plan implementation.

ESS10 Stakeholder Engagement and Information Disclosure



This standard is relevant. A draft Stakeholder Engagement Plan (SEP) was developed by the Borrower and reviewed by the Bank. The draft SEP will be disclosed by appraisal.

The stakeholder engagement for the project builds on the consultation efforts that the Borrower has undertaken to promote the National Plan for Educational Transformation (Plan Nacional de Transformación Educativa). In addition, the Borrower is relying on existing engagement structures within its national system to carry out meaningful consultations with stakeholders and continuously engage. Prior to appraisal, the Borrower organized consultations with representatives of interested parties (e.g., the Consejo Nacional de Educación de Indígenas and the Comisión Nacional por los Derechos de las Personas con Discapacidad) to inform project design and the preparation and finalization of the E&S instruments. These councils are composed of institutional and non-institutional actors, including civil society members, to allow broad representation of their respective representative groups. The first round of consultations about the project took place on November 21, 2022 with representatives from the Consejo de Áreas de Educación Escolar Indígena, the Órgano Indigenista Oficial, the MEC and the Bank. Twenty-one (21) participants were from the Consejo and Órgano, five (5) from the MEC and five (5) from the Bank. The participants from the Consejo and Órgano confirmed their support to the project. In addition, they raised questions around the possibility of including, as part of the project, housing options near some of the educational institutions for mid-level students, given that such options are currently rarely available. Another suggestion was to include the construction of a physical office where members of Indigenous groups can meet. This feedback will be further assessed during project preparation. On November 25, 2022, the MEC held a meeting with members from civil society organizations that make up the Education Subcommittee of the National Commission on Disability (CONADIS). Members of the Bank team were also present. Fourteen (14) persons participated at that meeting; seven (7) linked to CONADIS, six (6) from MEC and FEEL and one (1) from the Bank. The main concerns raised by the participants were around the link between the project and the National Plan for Educational Transformation. Participants raised as a concern the lack of a direct mention of people with disabilities in that National Plan. They also raised the fact that given the current social tensions around the Plan and its potential postponement to 2023, whether the project could move forward independently of the implementation progress of the National Plan. The MEC and FEEL explained that: a) although the project reflects some of the strategic lines and results of the evaluations linked to the development of the National Plan, its implementation does not depend on the Plan's approval; and b) the project is designed using an inclusive education approach, with a special focus on the inclusion of vulnerable groups – including people with disabilities. Participants were told that the focus on inclusion of vulnerable groups relied on their participation in the project's various phases.

The results of the consultations organized prior to appraisal will also be reflected in the draft SEP. Additional consultations will be done after appraisal for the remainder of project preparation and will continue throughout project implementation to ensure all interested and affected groups provide feedback on the proposed project activities and raise any concerns they may have. Building on the consultations process carried out for the National Plan, stakeholders may include associations of parents and their representatives; teachers associations; students associations; representatives of school authorities; different types of educational institutions, Non-Governmental Organizations working on education, and institutional actors, both at national and departmental level as well as municipality and community level where project activities will be implemented. The project will ensure that consultations and consulted groups are fully inclusive and take into considerations concerns and needs of vulnerable groups (e.g., indigenous peoples, women, people with disabilities and others). Consultations will take place physically



and through virtual means to reach as wide range of peoples while accounting for connectivity challenges especially in remote areas.

The project will set up a grievance redress mechanism building on existing systems at national level, such as the office for complaints of the Ministry of Education (Oficina de Quejas y Denuncias del Ministerio de Educación y Ciencias), and potential municipalities, schools, and community grievance systems. These existing systems will be assessed to determine whether they need strengthening, how they can be coordinated to serve as the project GRM, to establish an effective project grievance system that timely addresses grievances, requests for information and other submissions in all areas where the project is intervening.

The final version of the SEP – updated with the feedback collected through the consultation process – will be publicly disclosed within 60 days of Project effectiveness. Within the same timeframe, the GRM described in the SEP will also be established. As the full project GRM builds on and expand the Ministry of Education’s own grievance redress system, grievances can be submitted to the Ministry’s existing mechanism since project preparation.

B.2. Specific Risks and Impacts

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

ESS2 Labor and Working Conditions

This standard is relevant. Project implementation will include both direct and contracted workers. Civil servants that may be involved in implementation of the project will remain subject to the terms and conditions of their existing public sector employment agreement and they will also be subject to the ESS2 provisions on Protecting the Work Force and Occupational Health and Safety (OHS). Community workers might also be involved.

Labor Management Procedures (LMP) currently under preparation will be finalized within 90 days from the project effective date. Given that the hiring of the E&S staff of the PIU is a condition of project effectiveness, potential labor risks that may occur in the period until the finalization of the LMP, such as occupational health and safety risks for direct workers, are addressed in the ESMF, which provides for corresponding mitigation measures. The LMP identifies the different types of workers and risks according to the activities they will be performing. At this stage, foreseeable risks related to employment in the project relate to OHS risks for workers, safety for the community in civil works site, potential sexual exploitation and abuse (SEA/SH) especially in major civil works sites where potential for labor influx and related risks is to be carefully assessed, and potential risks related to contractual and labor conditions for contracted workers in work sites given the high level of informality in the construction sector. These risks are analyzed in the draft LMP, which also identifies the equipment, safety, and emergency protocols that are needed to protect the integrity of every different type of workers. Further the LMP contains measures to address potential risks and impacts that may arise from the interaction between project workers and local communities; measures to ensure the project does not hire workers under the age of 18 including community workers if they are involved in the project. The LMP also analyzes the risk of child labor in the construction sector in rural areas and include provisions in line with ESS2 to address this risk as needed. The LMP provides measures to ensure the project is in line with Paraguayan law and ESS2 in terms and conditions of employment, non-discrimination, and equal opportunity. Should community workers be needed, the provisions of paragraph 34-38 of ESS2 will be specified in the LMP and made operational in the project through the LMP.



A Workers' Code of Conduct (CoC), which contains obligations for all workers employed in the project will be required, including for direct workers. A model Code of Conduct will be developed as part of the LMP. As part of the LMP preparation, the project is also assessing whether direct workers are already subject to a code of conduct as part of their public employment conditions. Adherence to a code of conduct will be a condition of employment for all workers. The LMP also describes capacity building activities on the CoC and how it will be disseminated to workers, particularly contracted workers in all areas of interventions of the project, and to the affected communities. The CoC will explicitly address issues of SEA/SH as well as others, such as non-discrimination and respectful treatment of co-workers and community members and will specify sanctions if violated.

A specific GRM for Project workers under ESS2 will be described in the Project's LMP. The GRM may build on existing grievance systems available at national level to workers to present complaints, which will also be analyzed in the LMP. Both the labor GRM as well as the overall project GRM will include specific procedures and capacity building activities to register and refer potential complaints related to GBV or SEA/SH.

ESS3 Resource Efficiency and Pollution Prevention and Management

This standard is relevant. The project activities including the civil works will potentially generate pollution in air, soil, and water at a local level, especially during the construction phase. During project preparation, the Environmental and Social Assessment (ESA) addresses the potential risks and impacts of the sources of pollution to people, environmental services, and the environment. The ESMF and ESMPs develop measures in accordance with the mitigation hierarchy set out in the ESF to avoid or mitigate the sources of pollution.

The design, construction, upgrade, and/or repair plans will consider technically and financially feasible measures for the efficient use of energy, water and raw material during the construction phase and the operation of the upgraded building. The water use in each site of the educational institutions is considered non-significant. The ESMF includes measures for the management of nonhazardous waste especially related to the civil works during the design, the construction, and the operation of the facilities. The design and construction of the schools will include waste management. Also, for the regular operations of the facilities the design will consider good practices for solid waste management and recycling. The information available indicates that there should be no issues related to management of hazardous waste, chemicals, hazardous materials, and pesticides.

Civil works in Paraguay generally use fired constructions materials (tiles and bricks). Therefore, the risk of using asbestos is considered low. However, during the environmental and social assessment, the risks will be further analyzed, mainly if the rehabilitation works require demolition of old buildings. The ESMF and the local ESMPs should include specific actions for the assessment and identification of hazardous materials of this nature. If applicable, management and final disposal measures will also be established.

Additionally, the investment in digital devices and internet connectivity will generate electronic waste (e-wastes) after their lifetime or by replacing older/outdated equipment. At this stage of the project preparation there is not enough information to estimate the amount of the e-waste generated by the project. The borrower will prepare an E-Waste Management Plan during project implementation and before the disposal of any equipment even if this happens after project closing.



ESS4 Community Health and Safety

This standard is relevant. The project incorporates measures to address the potential risks and impacts to the health and safety of beneficiary's communities (students, teachers, other members of the communities) during the design, construction, and operation of the educational institutions. The project has incorporated universal access as one type of upgrades to current infrastructure. The design, construction and operation of infrastructure will further consider climate change adaptation that might exacerbate extreme weather events in the future (floodings, heavy rain, storms).

The potential impact of project activities to environmental services is low in urban areas and moderated in rural areas, especially in indigenous territories. The ESMPs or Environmental and Social Good Practices Guidelines or Specifications for each site will take specific measures to avoid those potential negative impacts.

Some impacts from the rehabilitation works that may cause inconvenience to local communities may include air emissions, noise, amount of construction waste materials, closure of roads, traffic disruptions, health, and safety hazards for the surrounding communities, including potential spread of Covid-19, among others. These issues are addressed in the ESMF and will be assessed and addressed in the site specific ESMPs.

The community health and safety risks related to waste management in rural areas is moderate. The ESMF and its instruments address the risk and potential impacts during design, construction and operation and measures will be included in site specific ESMPs. This will be further analyzed during project preparation.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

This standard is relevant. While the project will not finance any subproject that may require land taking or permanent involuntary resettlement (this is one of the exclusion criteria in the selection of educational institutions to be included in the project) there is a chance that the civil works that are planned to be carried out during school vacations, may be delayed and thus may require temporary relocation of: i) schools or some classes, as to allow students and teachers to attend classes in a safe environment until works are completed, or ii) people/families who work as janitors (cuidadores) and reside on schools' premises under an employment benefit arrangement. As the school centers in which the project will intervene are still being defined, there is no information yet on how many of these schools have cuidadores residing in the school premises. However, this assessment will be part of the E&S initial screening to be carried out for each school once these are identified. To address this risk a stand-alone Temporary Relocation Framework (TRF) will be prepared, disclosed, consulted and finalized in accordance with the principles and requirements of ESS5 within 90 days from project effectiveness, to guide the preparation of temporary relocation plans as needed. The TRF will focus on two different groups of stakeholders that may be affected by temporary relocations: schools/classes and cuidadores and their families. The framework will include differentiated measures for the two groups to ensure the temporary relocation does not result in risks/impacts to those to be relocated or those receiving them (for example other schools) and that the temporary arrangements are of sufficient standard in accordance with the ESF. The framework will provide for consultation requirements with affected people and other interested stakeholders. In addition, the temporary relocation framework will include a template for the temporary relocation plans to be developed for individual schools in a standardized quality manner.



Under no circumstance will the project lead to loss of residential benefits for cuidadores and to their permanent relocation. The TRF will include provisions and assistance to ensure the cuidadores and their families may return, in a timely matter, to their residences in the school premise after the works are completed.

As to the activities linked to the expansion of access to digital devices and Internet connectivity in the education system across the country, no land take will be needed as (a) the schools that the project will be working on are established in areas where the land title belongs to the MEC or another government dependence, while in indigenous communities, agreements are in place between MEC/Paraguayan government and the leaders of those communities; and (b) all internet wiring/connections are done using the national electricity provider ANDE's poles. ANDE installs poles in public land. In very remote areas where ANDE's service provision may not reach beneficiaries, the project would use internet via satellite.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

This standard is not relevant. The project plans to involve infrastructure works for restoration and repairing of existing schools and reconditioning them for the purposes of the improved educational strategies. The risk and potential impacts on the biodiversity conservation and sustainable management of living natural resources within the sites or in their proximities (wetlands, forests, grasslands) is low and there is no potential for impacts on critical or sensitive areas under ESS6. Nevertheless, at this stage of the project, the locations are still unknown and the potential risks and impacts hard to identify. Therefore, the ESMF defines, under ESS 1, specific environmental and biodiversity conservation screening to assess threats to biodiversity such as habitat loss, degradation and fragmentation of habitats, invasive species, water, and soil changes, in order to avoid any of them. No new constructions will be permitted in ecologically critical areas or core protected areas, this will have special attention for which specific actions will be included in the appropriate site/specific ESMP for each school to avoid risks and impacts to biodiversity and living resources.

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

This standard is relevant. The project will be implemented nationwide and Indigenous Peoples meeting the criteria of ESS7 are present in the project area. Project activities include, among others, the upgrade of schools that serve indigenous populations. The works in institutions located in indigenous areas will be subject to an agreement with the indigenous community that owns the land where the school is located. This will be further defined during project preparation. In addition, the Borrower will prepare an Indigenous Peoples Planning Framework (IPPF) that will include guidance to ensure the IP communities fully benefit from project activities, particularly to promote inclusive and intercultural education for indigenous students. As appropriate, sub-project specific Indigenous Peoples Plan(s) (IPP) - setting out the measures or actions proposed to enhance benefits, minimize, avoid, or manage risks – will be developed.

The concerns or preferences of Indigenous Peoples will be addressed through meaningful consultation and project design, and documentation will summarize the consultation results and describe how Indigenous Peoples issues have been addressed in project design. Arrangements for ongoing consultations during implementation and monitoring will also be described. The Stakeholder Engagement Plan will describe the overall approach to engaging with



indigenous communities. Project activities at this stage are not expected to cause impacts requiring free prior informed consent as laid out under ESS7. However, the IPPF will also include an assessment of national legislation and corresponding standards of consultations with IPs to ensure the higher standard of engagement and participation is applied.

The final version of the IPPF (revised to incorporate the outcome of consultations with IPOs and IP communities and other relevant stakeholders) will be adopted and disclosed in the Project’s dedicated website within 90 days of Project Effectiveness.

ESS8 Cultural Heritage

This standard is relevant. The project involves infrastructure work in already existing educational institutions and indigenous communities’ territories. Chance Finds Procedures are included in the ESMF to address the possibility of finding previously unknown or even already registered elements. The ESMF also assesses if there are cultural heritage elements previously registered in educational institutions. The ESMF addresses the existence of cultural heritage elements in indigenous territories, including intangible cultural heritage to provide guidance for assessing and addressing these aspects as needed on a case-by-case basis.

ESS9 Financial Intermediaries

The standard is not relevant. There are no financial intermediaries involved in this project.

B.3 Other Relevant Project Risks

N/A

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

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

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

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

N/A

Public Disclosure



IV. CONTACT POINTS

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VI. APPROVAL

Task Team Leader(s): Juan Diego Alonso
Practice Manager (ENR/Social) Maria Gonzalez de Asis Cleared on 14-Dec-2022 at 14:59:57 GMT-05:00