



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

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BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Eastern and Southern Africa	EASTERN AND SOUTHERN AFRICA	P177816	
Project Name	Eastern and Southern Africa Food Systems Resilience Program (Phase 3)		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Agriculture and Food	Investment Project Financing	3/27/2023	5/17/2023
Borrower(s)	Implementing Agency(ies)		
Republic of Mozambique, The Republic of Kenya, The Union of Comoros, The Republic of Malawi, The Federal Republic of Somalia, African Union Commission	ProAzul Blue Economy Development Fund, Mozambique, National Agriculture Research Institute of Mozambique (IIAM), Mozambique, Ministry of Agriculture, AGCOM, Malawi, Integrated Development and Competitiveness Project (PIDC), Comoros, Ministry of Agriculture & Livestock Development (MoALD), Kenya, Ministry of Agriculture and Irrigation (MoAI), Somalia, African Union Commission		

Public Disclosure

Proposed Development Objective

To increase the resilience of food systems and preparedness for food insecurity in Project areas

Financing (in USD Million)

Amount

Total Project Cost

678.00



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 MPA's goal is to increase the resilience of the region's food systems, thereby putting all people in the region, including the most vulnerable, on a path to having reliable access to adequate, safe, and nutritious food, while contributing to enhancing rural livelihoods and healthy ecosystems. While priority is given to medium-term investments, the Program also offers short-term support in case of deteriorating food security situation. Program activities will be designed with a view to empowering women and youth.

The overall Program is organized around five technical pillars, a contingent emergency response pillar, and a project management pillar. The five technical program pillars are: (1) Responding to a Deteriorating Food Security Situation, (2) (Re-)Building Resilient Agricultural Production Capacity, (3) Supporting the Sustainable Development of Natural Resources for Resilient Agricultural Landscapes, (4) Getting to Market, and (5) Promoting a Greater Focus on Food Systems Resilience in National and Regional Policymaking. A detailed description of these pillars and the activities they cover can be found in the description of Phase 1 (PAD 4981).

Phase 3 of the MPA is organized around four technical components, a contingent emergency response component, and a project management component. It will carry out technical activities under Pillars 2–5 of the overarching MPA. Hence, its four technical components are: (1) (Re-)Building Resilient Agricultural Production Capacity ("MPA Pillar 2"); (2) Supporting the Sustainable Development of Natural Resources for Resilient Agricultural Landscapes ("MPA Pillar 3"); (3) Getting to Market ("MPA Pillar 4"); and (4) Promoting a Greater Focus on Food Systems Resilience in National and Regional Policymaking ("MPA Pillar 5").

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 MPA aims to implement national and regional approaches to increase food systems resilience. Phase Three of the MPA will include Comoros, Kenya, Malawi, Mozambique, Somalia and AUC. The Union of the Comoros is an archipelagic state situated between the coasts of Mozambique and Madagascar in the Southwest Indian Ocean. The Comoros has jurisdictional rights over approximately 1,800 km² of land and a marine Exclusive Economic Zone (EEZ) nine times as large - 162,000 km². The Comorian economy is characterized by stagnating GDP per capita growth, political fragility, and weak formal institutions. Limited economic growth has gone hand in hand with modest poverty reduction with approximately 44.8 percent of the population living below the national poverty line of \$5 per day. Kenya: The county level and farmer level investments will be undertaken in 13 counties - Baringo, Marsabit, Wajir, Mandera, Garissa, Tana River, Lamu, West Pokot, Laikipia, Isiolo, Turkana, Samburu and Elgeyo-Marakwet. These target counties are geographically situated in Northern Half of Kenya that consists of poor and extremely poor people with limited access to social services and poor infrastructure, limited livelihood options and conflict over natural resources. The project area has vast rangelands that cover most of the landmass comprising open grazing in the semi-arid areas with a large pastoral and agro-pastoral population with the main source of livelihood being rearing of livestock and subsistence farming. Malawi: The exact locations of specific subprojects will be determined during



implementation once successful farmer organizations have been selected. The concept has preliminarily identified Bwanje, Lembani, and Mwenilondo irrigation schemes in the Dedza, Ntcheu, and Karonga districts characterized by plains, hills, rivers, valleys, and forests, respectively, as possible beneficiaries. Mozambique: the project will be of national scope except for Cabo Delgado province due to the conflict situation. The project will focus both on areas that have high agricultural potential as well as areas characterized by high levels of food insecurity and climate vulnerability. Specifically, the project will prioritize the development corridors, Pemba Lichinga, Nacala, Zambezia Valley, Beira, Limpopo, and Maputo. Additionally, it will invest in wetland, semiarid, and arid areas that are prone to soil degradation, highly vulnerable to climate and market shocks, and experiencing high rates of food and nutritional insecurity. Aquaculture activities will prioritize high-potential districts with medium to high levels of food insecurity in the southern provinces of Inhambane, Gaza and Maputo. Somalia: The project is envisaged to be implemented in Jubbaland, South-West, Galmudug, Hirshabelle, Puntland, and Somaliland, with each participating FMS expected to sign a subsidiary agreement. Situated in the Horn of Africa, Somalia is bordered by Ethiopia to the west, Djibouti to the northwest, the Gulf of Aden to the north, the Guardafui Channel and Somali Sea to the east, and Kenya to the southwest. Somalia has the longest coastline on Africa's mainland. The country's terrain consists mainly of plateaus, plains and highlands. Climatically, hot conditions prevail year-round, with periodic monsoon winds and irregular rainfall. Somalia is a generally dry and arid country, with poor rainfall. AUC: Climatic shocks and conflicts have contributed to the recent steep increase in food insecurity and malnutrition in the region due to shocks to food production that have continued in Sub-Saharan Africa such as, droughts and floods. Maintaining long-term per capita production growth is becoming increasingly difficult with more frequent weather-induced setbacks, as food security is estimated to decline by 5-20 percent on average with each major episode of flooding or drought.

D. 2. Borrower's Institutional Capacity

The Comoros FSRP will be managed and implemented by the MAPETA. The majority of the proposed activities will be implemented by a national Project Implementation Unit (PIU). At the island level, one regional PIU (RPIU) for each island will implement the project. The Kenya FSRP will benefit significantly from the existing implementation capacity and strong community institutions developed under KCSAP, NARIGP and ELRP both at the national level and county level. At the national level, a fully functional National Project Coordination Unit (NPCU) has been established with subject matter specialists, trained financial management, procurement and environment and social safeguard specialists that are supporting county implementation units. All the 13 counties already have fully functional implementation and coordination units (CPCUs) with trained subject matter specialists, financial management, procurement and environment and social safeguard specialists. Strong technical, and fiduciary systems have been developed under NARIGP, KCSAP and ELRP which will allow the project to have higher implementation efficiency. The project will also leverage the existing three-tiered community institutional arrangement developed under KCSAP, NARIGP and ELRP for implementation. The existing national and county institutions will be merged, and the integrated teams will lead the implementation at their respective levels. This will help in streamlining and consistent approaches to E&S in the Agricultural sector operations. However, given the requirements of ESF and need for greater focus on E&S issues unique to the project area a continuous capacity building and training would be required of the county and community level teams. MALAWI: The Ministry of Agriculture (MoA) is implementing Agriculture Commercialization Project (P158434) that preceded FSRP, Malawi chapter. MoA established Project Implementation Unit (PIU) with Environmental and Social Safeguards capacity to manage environmental and social risks of the project. The project utilized old safeguards policies and the environmental and social risk management performance has been rated satisfactory. Though the PIU has Environmental and Social capacity, it is not sufficient in members to manage all ES requirements for farmer organizations. Although the MoA and the PIU have not yet implemented an activity using the new Environmental Social Framework (ESF), given the PIU's considerable experience with safeguard policies, it is not expected to have difficulties meeting ESF requirements. Moreover, the World Bank Safeguard team conducted



training sessions with the PIU to orient them with respect to ESF compliance requirements. MOZAMBIQUE: The Project will be implemented by the Ministry of Agriculture and Rural Development (MADER) and the Ministry of Sea, Inland Waters and Fisheries (MIMAIP). Most of the proposed activities will be implemented by a national PIU hosted at the Agricultural Research Institute of Mozambique (IIAM) For certain activities, MADER will associate with other agencies. MADER has recently created a safeguards unit which is still under-trained and understaffed and has very limited experience in preparing and implementing Bank financed projects either under the Bank Safeguards Policies or the ESF. SOMALIA: Environmental and social risk management in Somalia is highly complex; combined with only a nascent government system, the capacity to manage project risks in line with the ESF is limited and will require strong handholding during project preparation and implementation. The portfolio has been consistently growing over the last years, moving from UN-based implementation to government implementation, thereby allowing government PIUs to strengthen their understanding of the ESF. The AUC will mainly provide technical assistance and has prior experience in implementing projects financed by the World Bank, such as P126848 and P180117.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Substantial

Environmental Risk Rating

Substantial

The project will bring positive development impacts with respect to food and income security, improved soil health, sustainable agricultural practices, and sustainably managed catchments. However, the project presents substantial environmental risks, such as those related to construction, Occupational Health and Safety (OHS) in areas that will see infrastructure developments, dam safety, community and health safety. There are also risks to natural habitats and biodiversity and cultural heritage. In addition, agricultural production and processing may result in solid and liquid waste generation with the attendant impacts on soil and water pollution, while digital interventions may result in e-waste from digital activities. Other environmental risks include soil erosion, siltation, flooding emanating from irrigation designs, water and soil salinity, water related vector borne diseases if irrigation systems are not properly maintained, hydrological flow impacts of irrigation schemes operation,. Hence, a comprehensive assessment of project interventions will be required. Even though some of the implementing institutions have some capacity to address some of the risks, the scope of the project warrants an environmental risk rating of 'Substantial.' It is important to note that the participating countries are all vulnerable to climate change. This may affect the project and require management and mitigation to safeguard investments. Given the risks mentioned above, the following Environmental and Social Standards (ESS) apply: ESS1, ESS2, ESS3, ESS4, ESS5, ESS6, ESS8, and ESS10. The project activities to be implemented by AUC are of type 2 TA, they will be undertaken in compliance with the World Bank's Advisory Note on Technical Assistance and the ESF. For the downstream impacts and risks associated with the development of a continental framework, drafting policy documents, development of appropriate training programs, strategy development, a systematic examination of environmental and social risks and impacts i.e., strategic environmental and social assessment (SESA) will be prepared in consideration of the full range of environmental and social standards. The SESA will be designed to scope the full measure of the environmental and social risks and impacts as well as the depth and breadth of benefits of the program. The assessment will establish the baseline for all the countries, screen and evaluate the impact of the planned investments in food systems, identify the institutional capacities and challenges as well as environmental and social risks, review the the impact and risks monitoring measures and make recommendations to be implemented by the AUC in partnership with the participating countries.

Public Disclosure



Social Risk Rating

Substantial

The Social risk is classification is rated as Substantial due to the scope of the proposed operations including the technical assistance activities and proposed civil works which may lead to impacts that are mostly temporary, predictable and/or reversible, there is a medium to low probability of serious adverse effects to human health and there are known and reliable mechanisms available to prevent or minimize such incidents. The classification also considers contextual aspects such as project intervention in conflict prone areas, weak client capacity and remote locations. Overall, the intended beneficiaries are expected to benefit from the Program through the creation of job opportunities (for youth and women) as a result of enhanced resilience of farmers, increased agricultural yields, increased access to diverse food and nutrition, improved livelihoods, improved access to finance and an overall improved skill base. However, the project is also expected to induce adverse social risks and impacts, in particular; (i) land acquisition; involuntary resettlement, land take or restrictions on land use in particular, loss of land or other assets, social and gender exclusion, inadequate consultations and engagement, lack of compensation at replacement cost, lack of access to grievance mechanisms, etc.; (ii) creation or exacerbation of the existing tension and conflicts, social discrimination or exclusion and vulnerability of SSAHUTLC as well as other disadvantaged and vulnerable groups in the project areas and insufficient community and other stakeholder engagement; (iii) labor influx and associated risks including risks on community health and safety, sexual exploitation and abuse and sexual harassment (SEA/SH) and other forms of gender-based violence (GBV), as well as transmission of communicable diseases, such as HIV/AIDS, COVID 19, etc.; (iv) potential risks of employer non-compliance with OHS requirements and terms and conditions of employment, as well as risks associated with the use of forced/trafficked labor and child labor. Child work is known to be present in the agricultural sector; (v) project activities may be implemented in areas where people meeting the criteria of ESS7 are present and may negatively impact such persons; and (vi) unknown cultural heritage may be encountered during project activities. Other risks that have been considered are: (i) operational concerns due to remoteness and insecurity, including monitoring and supervising social risks including grievance management; and (ii) weak implementation capacity especially at grassroots level with limited functional structure and trained manpower. Technical assistance activities in participating countries are mainly to build resilience through technical assistance, capacity building, and institutional strengthening that will help enhance ability of selected entities and communities to prepare for, respond and develop food systems resilience, as such there are limited social risks associated with these activities themselves. AUC is expected to implement activities under component 4 focusing on regional dialogue, monitoring, and facilitation of interventions corresponding to activities related to food systems resilience notably around cross-sectoral policies and institutional coordination. Such activities are classified as Type 2 activities (supporting formulation of policies, programs, strategies and legal frameworks) as well as Type 3 activities (strengthening borrower capacity). These activities are expected to have low social risks and impacts, limited to labor conditions and stakeholder engagement, as the region includes countries where people meeting the criteria of ESS7 are present, ToRs shall include relevant provisions of ESS 7 to ensure (among other things) that principles of cultural appropriateness are included in any activities where this may be relevant. Type 2 activities may also result in moderate to substantial downstream risks and impacts.

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:



Overall, the Program will bring about positive benefits such as increasing rural employment opportunities and improving rural livelihoods through improved agricultural productivity. Its positive environmental outcomes include resilient and sustainable water supply for productive food system and water and soil moisture conservation and soil health investments. The Program recognizes that building resilience is a long-term process that requires linkages across levels (regional, national, sub-national and local).

Pillars 2, 3, and 4 include various types of civil work that could lead to land acquisition and possibly involuntary resettlement. Under those pillars, the Program may invest in agricultural infrastructure, SSI schemes, small dams, water points, market infrastructure, and small feeder roads. The E&S risks and impacts associated with project activities have been identified as the following: risks associated with land acquisition, poor labor conditions and child labor, OHS, waste generation, hazardous material management, noise and vibration, wastewater discharges and air quality as well as community H&S including transmission of communicable diseases, such as HIV/AIDS, COVID 19, etc. , sexual exploitation and abuse (SEA) and sexual harassment (SH) and other forms of gender-based violence (GBV). Given that the civil works are expected to be minor and rely largely on national contractors, the Project is not expected to lead to significant labor influx. There is also a potential for activities to be implemented in locations where Sub-Saharan African Historically Underserved Traditional Local Communities (SSAHUTLC) are present for seasonal use or occupy lands and natural resources (this is relevant for Kenya and potentially also for Somalia). Program activities may also create or exacerbate the existing tension and conflicts, social discrimination or exclusion and vulnerability of these SSAHUTLC as well as other disadvantaged and vulnerable groups in the project area. Other potential social risks could be related to: operational concerns due to remoteness and insecurity, including monitoring and supervising social and environmental risks including grievance management; security issues in some of the project countries; and weak implementation capacity especially at grassroots level with limited functional structure and trained manpower.

Other risks and impacts include those associated with the operational phase of these improvements/new construction/rehabilitation as well as with the subprojects of the matching grant program: beneficiary selection, child and forced labor, poor labor conditions, occupational health and safety, water and energy consumption, hygiene and food requirements, land and water management, the use of pesticides, manure and veterinary waste management.

Pillar 5 on 'National and Regional Policymaking' includes TA activities (Type 2 and Type 3) for strengthening the national and regional public policies and systems' response capacity to various shocks and stressors, thus enabling them to contribute to greater food system resilience. As such, the role of AUC will be to provide technical assistance, support knowledge management and communications related to innovations and technologies and organize capacity-building, training programs and increase capacity and cooperation. Risks associated with the TA by AUC and participating countries relate to inclusion in engagement, ensuring the requirements of the ESF are fully reflected in TA activities, access to information, consideration of vulnerable groups. This is in addition to contextual issues, including droughts, climate change, overexploitation of natural resources and cumulative impacts. The Program will ensure that consultancies, studies, capacity building, training and any other TA activities are carried out in accordance with the relevant requirements of the ESF. Any outputs from the TA activities and, any environmental and social (E&S) assessments shall also be consistent with the ESF. These requirements will be captured in the Environmental and Social Commitment Plan (ESCP) as well as requirements to build the capacity of the regional institutions on the ESF. In addition, the ToRs for TA activities will be prepared in line with ESF requirements and reviewed and approved by the Bank.



For pillar 2,3 and 4 activities, in order to manage these risks, the implementing ministry in each of the participating countries will prepare prior to appraisal an ESCP and a Stakeholder Engagement Plan (SEP). The participating countries will each prepare and disclose (a) an Environmental and Social Management Framework (ESMF) including Labor Management Procedures (LMP) and a SEA/SH Action Plan prior to appraisal (Malawi, Comoros, Somalia) and prior to Board (Mozambique, Kenya) and an Integrated Pest Management Plan (IPMP) prior to appraisal (Malawi, Comoros, Somalia) and prior to Board (Mozambique, Kenya); (b) a Resettlement Framework prior to appraisal (Malawi, Comoros, Somalia) and prior to Board (Mozambique, Kenya); (c) Vulnerable and Marginalized Groups Framework (VMGF) after project approval and within the stipulated timeline in the ESCP (Kenya, Somalia) and (d) an IPMP after project approval and within the stipulated timeline in the ESCP. The ESMFs will avoid high risk subprojects through the screening process that will include an Exclusion List.

The ESMF will outline: i) the selection process and beneficiary eligibility criteria; ii) screening process for subprojects; iii) requirements and process to develop subsequent E&S Assessments and/or Plans for the proposed civil works, once these are identified; iv) a checklist to monitor implementation of mitigation measures (i.e. review of bidding and contractual documents, field supervision mission); v) The ESMFs will avoid high risk subprojects through the screening process that will include an Exclusion List.

Furthermore, screening will be conducted and site-specific risks management instruments and plans (including ESMPs, ESAs, RPs, VMGPs depending on the nature and scope of the subprojects) will be prepared during Project implementation, following the requirements of the ESF. Associated Facilities, if any, will be clearly identified in the course of preparation of the Project and the ESMFs will also cover the potential risks and mitigation measures of the Associated Facilities.

For Pillar 5 activities, the AUC will (i) ensure that the consultancies, studies, capacity building, training and any other technical assistance activities are carried out in accordance with terms of reference acceptable to the Bank and duly incorporate and take into consideration the requirements of the ESSs; (ii) develop a ToR for the preparation of a Strategic Environmental and Social Assessment (SESA) to address any potential downstream E&S risks and impacts. The AUC shall develop, review and disclose SESA within 6 month starting from the project effective date.

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

The use of Borrower Framework is not being considered for this project.

ESS10 Stakeholder Engagement and Information Disclosure

Stakeholder engagement and information disclosure shall be at the heart of the Program and are envisaged as a continuous, ongoing process throughout its lifecycle. This approach will ensure participation, inclusiveness and transparency. Details of the stakeholder engagement activities are outlined in the Stakeholder Engagement Plans (SEP) prepared by the participating countries and as well as integrated in the ESCP for the AUC and will be disclosed prior to appraisal.

The main stakeholders of the program, depending on components being implemented, may include: (i) project affected parties (PAPs) - those individuals or groups who are directly affected or likely to be affected by the Program.



PAPs include positively affected beneficiaries, mainly smallholder and commercial farmers; formal registered farmer cooperatives and associations; informal farmer organizations or producer interest groups including groups of women and youth who will be involved in agro-processing, marketing and service provision activities. (ii) other interested parties (OIPs) - those individuals or groups who may have an interest in the Program. The OIPs are likely to include regional entities, national and local government ministries and associated line departments, businesses providing agricultural services or inputs; private sector agricultural and related service providers; agro-processors and input dealers; and public agricultural service providers, civil society who have an interest in food security in the regions; etc. (iii) disadvantaged and vulnerable groups - those individuals or groups highly vulnerable to potential Program impacts and often do not have a voice to express their concerns or understand the impact and risk of the Program. The vulnerable groups may include landless and marginal farmers, female headed households, persons living with disabilities, households designated below the poverty line, unemployed rural youth and ESS7 communities.

The SEPs will present the engagement methods to be undertaken with relevant stakeholders ensuring that the techniques are culturally appropriate and relevant local languages are used to ensure meaningful stakeholder engagement and information disclosure. Engagement activities are likely to include community meetings, focus group discussions as well as one to one meeting as needed, learning training, demonstration session, sharing workshop. The needs of vulnerable groups will be fully considered in designing the engagement processes including timing, location, accessibility and use of written materials. The SEPs also clearly outline and define approaches to disseminate beneficiary eligibility criteria and the selection process.

The SEPs will include a description of a Grievance Mechanism (GM) which will include confidential mechanisms for receiving complaints of sexual exploitation and abuse (SEA) and sexual harassment (SH), as well as other forms of GBV and establish a protocol to enable survivor-centered responses. The GM will address complaints and suggestions coming from both beneficiaries and other interested parties. In Kenya, the ongoing projects ELRP and KSCAP and NARIGP have set up a GM that shall be integrated and adopted by this project. The performance has been satisfactory. In Mozambique, the FSRP 3 will use the existing and operational GM hosted by ProAzul implementing a number of Bank projects. The performance has been satisfactory. For other participating countries, it is not yet determined if an existing GM will be used or a new one will be created.

The SEPs will serve as planning tool that guides the Project implementing agencies stakeholder engagements, incorporate stakeholder's views and concerns during Project design and implementation and set feedback through monitoring. All E&S documents/reports will be made accessible to stakeholders and will be publicly disclosed prior to the Project proposal. The SEPs have been prepared in accordance with the requirements of ESS10 and considering the COVID-19 related restrictions during community and stakeholders' consultations.

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

ESS2 is relevant due to potential risks to labor and working conditions for applicable workers including direct and contracted workers and potentially also use of community workers. The project anticipates moderate to a substantial



levels of labor risks to be associated with the project activities. Direct workers and contracted workers will experience a low level of Labor risks since most of the work will be performed in offices and/or rooms such as project management, training, profiling, and similar works. All direct and contracted workers will be formally employed and guided by the Labor Management Procedures (LMP) and the provisions of ESS2. In the event that there will be government civil servants working in connection with the project, whether full time or part time, they will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement. ESS2 will not apply to such government civil servants, except for the provisions of Protecting the Work Force (child, forced labor) and Occupational Health and Safety. For community workers, provisions on working conditions and OHS will be applied in accordance with ESS2 and the LMP.

It is anticipated that community workers will carry out the works on farms which may increase the level of labor risks. The potential sub-projects and number of community workers required for the activities have not been identified at this stage of project preparation, however, the number of laborer's engaged in a particular sub project is expected to be small in numbers. These may involve risks associated with occupational health and safety (OHS), and working conditions such as long working hours, lack of rest and working under high-temperature weather conditions. In general, there is a risk of child labor and forms of forced labor in the agriculture sector in the participating countries. However, the project design includes measures to minimize these risks such as the minimum working age of eighteen years and formal employment of workers engaged in agricultural works. Due to the nature of work in the agriculture sector, workers are exposed to fertilizers and pesticides and handle machinery which may cause various health and safety risks. Risk mitigation and prevention procedures are included in the project design, LMP and ESMF. Other key labor risks which may be associated with the project activities could include: the conduct of hazardous work, such as the use of chemicals and use of heavy machinery, possible accidents due to the use of rotating and moving equipment, health problems are caused by contact with animals and plants, such as bites and poisoning, possible exposure to infectious diseases, such as Covid-19, electrical safety due to the use of faulty electrical devices, such as cable plugs, cords, and hand tools, risks of sexual harassment, sexual exploitation and abuse and labor exploitation cases.

Labor Management Procedures (LMP) will be prepared for the participating countries to identify the main labor requirements and labor risks associated with the Project and to address labor issues based on the requirements of ESS2 and national labor laws and will be disclosed one month after effectiveness. Contractors will be required to prepare and implement Occupational Health & Safety Plans (OHSP) following the World Bank Group Environment, Health and Safety (EHS) Guidelines, adopt a code of conduct for all workers and establish a worker-specific GRM (accessible for direct and contracted workers) before commencement of the civil works. Bidding documents for the small infrastructure activities shall include budget provisions for management of labor issues including all OHS provisions.

For Kenya, in particular, the project anticipates the use of community labor only for specific sub projects e.g. water related, Natural Resource Management related or cottage industry. The use of community labor will be undertaken through two mechanisms: (i) when the community voluntarily contributes labor as their part of the beneficiary (counter-part) contribution; (ii) when the local youth will provide unskilled labor for off-season employment programs and will be paid for the work done. For the first mechanism, the project will have a standardized and comprehensive guideline (agreement/ memorandum of understanding) to ensure that there is no risk of any negative impacts to the community providing labor as contribution for FSRP sub-projects/activities. For unremunerated



community workers, LMP and ESMF will address 1) process to document voluntary participation; 2) working conditions particularly OHS; and 3) no disadvantage to those who are not able to participate (elderly, disabled, women, etc.) Similarly, for the second mechanism, there will be standardized terms of engagement for the targeted youth and the Government Department of labor will provide guidance to ensure that remuneration and other working conditions comply with the national legal/regulatory framework for labor that includes domesticated ILO conventions. The Labor Management Procedures will include all the potential negative risks for both mechanisms and the corresponding measures towards their avoidance/minimization including the prevention of child/forced labor. In addition, the LMP will specify the institutional framework the corresponding roles/responsibilities for monitoring of community workers, and the grievance mechanism.

For the AUC, specific mitigation measures (including code of conduct for SEA/SH risk management in the work place) will be included in the ESCP rather than developing a standalone LMP due to the nature of activities which are only TA and use of consultants and AUC staff.

ESS3 Resource Efficiency and Pollution Prevention and Management

For the participating countries, ESS3 is considered relevant to the Program. The Program is multi-sectoral and will involve activities likely to generate pollution. The infrastructure rehabilitation activities could result in pollution to land, water, and air as well as use of natural resources. The project activities may generate some adverse impacts from disposal and management of waste during the renovation works and pose non-significant public health concerns due to air emissions such as exhaust from vehicles, noise emission and fugitive dust generated during transportation of materials, and rehabilitation works and to nuisance vibration. Therefore, there are potentially significant environmental liabilities that may arise due to the ambitious nature of the activities in the Program - and the ESMFs shall, as a result, include appropriate remediation mechanisms, including physical remediation techniques for land and water protection from adverse environmental impacts.

Agricultural activities might induce potential risks associated with the use of pesticides such as groundwater pollution and wind drift beyond the target application area. An Integrated Pesticide Management Plan (IPMP) will be developed as part of the ESMF. The IPMP will include: (i) a relevant survey on the local bio-pesticides and agronomic technical practices to reduce the impacts of pests on the some agriculture value chains in project zones; (ii) a number of relevant actions to reduce the exposure of farmer groups to pesticides used in agricultural production systems, including an analysis to minimize the use of pesticides; (iii) guidelines to be adopted on the possibility of agrochemical application and disposal; (iv) training sessions to strengthen the capacity of different actors (farmers, local vendors, regional agricultural agents, etc.) on the use, storage and disposal of agrochemical products with a coherent budget available in the project financing. In particular, the teams implementing the Program in the participating countries will take measures and avoid agrochemicals banned from international standards and conduct an analysis of alternatives for use of less hazardous products.

The Program is not anticipated to result in consumption of significant quantities of energy, water or raw materials or emit significant quantities of greenhouse gases, but may result in wastes being generated. The ESMPs will highlight



the procedures for management of wastes generated, including their typologies, and clarify the requirements for waste treatment and disposal in line with ESF requirements

The need for the development of SESA, type-2 TA activities of the project will consider including relevant ESS3 requirements (as well as WBG EHS Guidelines) during the project implementation will be reflected in the ESCP.

ESS4 Community Health and Safety

For the participating countries, ESS4 is considered relevant to the Program as the proposed activities may pose community health and safety risks to nearby communities. Community health and safety issues are associated with risks and impacts of minor civil works, such as dust, noise and vibrations and solid waste, and traffic and road safety hazards associated with increased traffic volume on public roads and at construction sites. There are also potential risks associated with the operation of the agricultural production or processing activities, such as pollution, waste generation, and risks associated with the use of pesticide and fertilizers.

Risks related to community health and safety include community exposure to health issues such as water-borne and vector-borne diseases from irrigation activities. Health risks also include communicable diseases such as STDs, including HIV/AIDs associated with labor influx and spread of COVID-19. Risks related to Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) associated to labor influx and the economic empowerment of beneficiaries could also increase during project implementation.

The use of security personnel for the participating countries is yet to be determined. To address these risks, the ESMF and site specific ESMPs will outline detailed management and mitigation measures for community health and safety management during construction and operation. Relevant mitigation measures to address these risks include SEA/SH Action Plan prepared as part of ESMF, which requires integrating Codes of Conduct. In addition, the ESMFs shall include as standard assessment and mitigation of natural disaster risks for each of the participating countries.

Furthermore, small-scale irrigation dams shall be designed and implemented following the requirements of ESS4 and other international good practices so that potential risks to the community health and safety could be avoided. The small irrigation schemes to be financed by the Program will need to meet the Bank's requirements for small dams. In particular, the participating countries shall pay due attention to the requirements specified in the World Bank's Good Practice Note on Dam Safety (October 2020). In addition, each ESMF will screen large or high risk dams out (i.e., via Exclusion List). The small dams to be financed in this Project shall be designed and implemented in compliance with ESS4 and other good international industry practices. In the design of the small dams, the country teams shall make due considerations regarding sedimentation issues and the requirements for environmental flows from the dams. The Program shall exclude any large dams as well as small dams that could cause significant safety risks.

Other potential community health and safety risks, including local conflict, and security risks have been assessed and proposed mitigation measures included in the ESMFs in line with the requirements of ESS4 and the World Bank Group Environment, Health and Safety Guidelines (EHSG) (Component 1-3).



ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

For the participating countries, ESS5 is considered relevant as the construction and rehabilitation of rural infrastructure, including irrigation infrastructures, rural feeder road and other small water works and storage infrastructure and other post-harvest management facilities, could involve minor land acquisition impacts. Potential social impacts and risks are expected including economic impacts on Project Affected People from permanent land acquisition. Physical resettlement is not expected. The Program does not include land certification and regularization of agricultural land. Since the exact location of small infrastructure interventions is not known, a Resettlement Framework (RF) will be prepared prior to appraisal (Malawi, Comoros, Somalia) and prior to Board (Mozambique, Kenya) in line with the requirements of ESS5 and applicable national legislation. The RF will provide resettlement principles and procedures for land acquisition and will provide guidance for preparation of site-specific Resettlement Action Plans (RAP) as required before civil works take place. The document will incorporate an assessment of country-specific situations and requirements, e.g. clan-based land management systems in Somalia. In addition, for the livelihood losses due to land acquisition, the subproject will develop and implement livelihood restoration plans (LRPs) to address any economic losses due to land use change/displacement of land users/workers because of sub-project activities as part of the RAPs. In the case of small-scale land acquisition through voluntary land donation (VLD), the client will strictly adopt and implement voluntary land donation procedures to ensuring adherence to the principles and VLD protocol outlined in the RF satisfactory to the Bank. A Grievance Mechanism (GM) will be established to be used during the preparation of site-specific instruments to address potential land acquisition issues.

For Comoros , under component Supporting resilient fisheries 1.3. there is a possibility that strengthening sustainable fisheries management may impose access restrictions on fishing activities. This impact will be further assessed during appraisal and if confirmed as a potential impact, the project will prepare a Process Framework. For Mozambique, the component does not include activities that would impose access restrictions (e.g., access to fishing areas or fish quotas) and it is therefore not anticipated as a potential risk.

For the AUC, the standard is not considered relevant.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

ESS6 is considered relevant for the project . As country teams implementing the respective projects try to enhance the land area under sustainable land management practices, there is a risk of expansion of project activities into sensitive biodiversity hotspots, including localized ones. The global food system is the primary driver of biodiversity loss, with agriculture alone being the identified threat to 86% of species at risk of extinction worldwide. The volcanic islands of the Comorian archipelago have considerable plant life. The country's location and topography are among the most climate vulnerable in the world, and 54% of the population live in at-risk areas. Many of the farming lands in Mozambique are contiguous to areas that have importance for biodiversity: the country has rich flora, with over 6,000 plant species, of which over 300 species are on the IUCN Red list and 22% are endemic. Implementation of project interventions in and around the fragile biodiversity in these regions may, therefore, cause impacts such as possible loss of biodiversity, habitat fragment. Therefore, the Program activities will not be implemented in locations which have high biodiversity conservation value or in ecologically sensitive habitats. All investments related to improvement of the food systems will take place in the existing agricultural lands and project teams will take due



care and constant monitoring to ensure that project interventions do not lead to conversion of natural habitats to agricultural lands. The ESMFs and the ESCPs exclusion criteria shall cover any activities that may involve alien species and any significant risks to biodiversity, animal welfare, land conversion or legally protected natural resources. The ESMFs will include prohibition for activities in or Critical Habitats. Where the Program interventions shall finance the development of fisheries infrastructure, due consideration shall be given to screening for biodiversity risks associated with the construction and operation of the fisheries infrastructure.

Inappropriate use of pesticides or waste disposal can result in contamination of air, soil and water resources that in turn could cause loss of biodiversity including destroying beneficial insect populations which act as natural enemies for some pests. The IPMP will help to mitigate potential risks to biodiversity by reducing reliance on chemical methods that can have direct or indirect impacts on biodiversity. It is noted that in some cases, Program activities related to strengthening rangeland management may actually lead to positive impacts on biodiversity through agroecology, reforestation, watershed protection or use of fast-growing species for fuelwood.

The Program shall follow measures outlined in the IFC Good Practice Note on Improving Animal Welfare in Livestock Operations. This would entail among others that genetic selection should always take into account the health and welfare of animals; animals chosen for introduction into new environments should be suited to the local climate and able to adapt to local diseases, parasites and nutrition; the physical environment should allow comfortable resting, safe and comfortable movement, including normal postural changes, and the opportunity to perform types of natural behavior that animals are motivated to perform; etc. Further details are available in the Good Practice Note, which will be used for the purposes of ESMFs. The Program will not finance any activity that could lead to conversion of critical habitats. No risks to biodiversity and living natural resources is anticipated because of AUC activities as they focus on technical assistances that are not anticipated to have downstream E&S risks.

Most of the construction/rehabilitation works related to feeder road rehabilitation or water management and irrigation services improvement, will take place in highly modified agricultural areas. It is therefore not anticipated that those constructions will impact negatively natural habitats or modified habitats of biodiversity significance. Only, the rehabilitation of rural feeder road networks might induce the clearance and loss of areas of vegetation and fauna habitat when it comes to widen the right-of-way of those road-sections. In that case, a very little vegetation will be destroyed or damaged along the feeder roads. The overall environmental risk for ESS6 is therefore deemed moderate to low. Based on that, the risk will be managed by applying known mitigation measures to be included in the ESIA's and ESMPs. The natural resource management intervention could generate impacts on watershed, biodiversity, and ecologically sensitive areas. The profile of natural habitat will be assessed following their classification to IUCN list and ecosystems in the site-specific ESIA's and ESMP to be prepared before the financing of these activities.

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



ESS7 is relevant in Kenya as the project activities may potentially impact people meeting the criteria of ESS7 are present in 12 counties (referred to as Vulnerable and Marginalized Groups (VMG) in Kenya). A VMG Framework (VMGF) will be developed, consulted and will be disclosed prior commencement of activities in such locations impacting VMGs. The ESMF and RPF will include a screening checklist that will exclude any sub-projects that could lead to adverse impacts on such groups requiring Free, Prior and informed Consultation. VMGF will outline the process for the preparation of 12 VMGPs at county level.

The VMGPs will then ensure that the Participatory Integrated Community Development Plan (PICD) for selected interventions and Community Development Plans are meaningfully consulted, that VMG have equitable access to benefits of these plans and that VMGs concerns on the plans are addressed. The social specialists in the NPMU will work closely with the project communication team to ensure that the communication and outreach activities outlined in VMGF and SEP are rolled out and they reach all the targeted populations. As required, separate meetings with the minority groups and ensure engagement with VMG women and youth as well as with the “leaders” should be organized that is considerate of their language and cultural norms. The project will ensure that VMG communities are informed and consulted about the project impacts and benefits in the language and communication channels as appropriate; and that they share in the benefits in an inclusive and culturally appropriate manner. The GM details will be shared with the VMG communities and appropriate measures put in place to ensure that the members are able to channel their complaints and receive feedback in a culturally appropriate and timely manner. The SEP, ESMF and VMGF shall provide additional provisions on ESS7.

In Somalia, there is still a lack of full knowledge on the presence of communities meeting the ESS7 criteria and the decision on the relevancy of ESS7 in Somalia will be based on the results of an ongoing analysis as well as potentially project-specific analyses. In any case, the project will need to ensure the inclusion of vulnerable groups under ESS1 and ESS10, if ESS7 would not be considered relevant, and respective information included in the social assessment process. The project will restrain from any activities which would lead to adverse impacts on such groups requiring FPIC in Somalia.

In Mozambique, Comoros and Malawi, there are no Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities that meet the criteria of IP/SSHAUTLCs, per the requirements of this Standard, in the project areas.

For the AUC, while Indigenous Peoples/ SSAHUTLC are present in several member states impacts on ESS7 communities associated with their activities are not expected. However, the ToR and outputs for any consultancies, studies, capacity building, training and any other technical assistance activities under the Program will need to be undertaken in line with ESS7 to ensure that the needs of these groups in relation to food security are considered.

ESS8 Cultural Heritage

ESS8 is considered relevant. However, the Program activities are unlikely to affect tangible and intangible cultural heritage as they will mainly be implemented in the existing farmlands. Key physical investments will be undertaken in the existing agricultural lands where the likelihood of existence of tangible and intangible cultural heritage is low. Chance Find Procedures shall be adopted for precautionary reasons for infrastructure investments to address



unknown archeological or historical remains and objects and the procedure will be described in the ESMF for the participating countries. Project workers shall be trained on Chance Find Procedures. The exclusion criteria in the ESMF shall expressly mention that sub-projects shall avoid cultural heritage sites.

ESS9 Financial Intermediaries

ESS9 is not considered relevant for this project.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways Yes

OP 7.60 Projects in Disputed Areas No

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? No

Financing Partners

No other financing partners are envisioned.

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

Actions to be completed prior to Bank Board Approval:

The following E&S Instruments will be prepared and disclosed prior to Bank Board approval:

- 1) An Environmental and Social Commitment Plan (ESCP) – all participating countries, including AUC
- 2) A Stakeholder Engagement Plan (SEP) and Grievance Mechanism (GM) – all participating countries
- 3) An Environmental and Social Management Framework (ESMF) including a SEA/SH Prevention and Response Action Plan, Labor Management Procedures (LMP); Integrated Pest Management Plans (IPMPs) - Somalia, Malawi, Comoros
- 4) A Resettlement Framework (RF) - Somalia, Malawi, Comoros

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

The following material measures and actions will be captured in the ESCP:

- 1) Organizational structure for implementation of the Program – all participating countries
- 2) Monitoring and reporting (Regular and Incidents and accidents) – all participating countries

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- 3) Prepare, disclose, and implement an Environmental and Social Management Framework (ESMF) including a SEA/SH Prevention and Response Action Plan and Labor Management Procedures (LMP), Integrated Pest Management Plans (IPMPs) - Mozambique, Kenya
- 4) Update and implement SEA/SH Prevention and Response Action Plans - Somalia, Malawi, Comoros
- 5) Prepare and disclose a Resettlement Framework (RF) – Mozambique, Kenya
- 6) Prepare, disclose, and implement an Integrated Pest Management Plan (IPMP) – Kenya, Mozambique, Malawi, Comoros
- 7) Prepare, disclose, and implement a Vulnerable and Marginalized Groups Framework (VMGF) – Kenya

For the AUC the following issues will be captured in the ESCP:

- 1) Organizational structure for implementation of the Program
- 2) Monitoring and reporting (Regular and Incidents and accidents)
- 3) Ensure that the consultancies, studies, capacity building, training and any other technical assistance activities including any environmental and social assessments and related environmental and social instruments, are carried out in accordance with terms of reference acceptable to the Bank and duly incorporate and take into consideration the requirements of the ESSs.
- 4) Specific measures for labor management
- 5) Specific measures for stakeholder engagement & grievance management
- 6) A ToR for the preparation of Strategic Environmental and Social Assessment (SESA) to address any potential downstream E&S risks and impacts

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C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

22-Mar-2023

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Republic of Mozambique

Borrower: The Republic of Kenya

Borrower: The Union of Comoros

Borrower: The Republic of Malawi

Borrower: The Federal Republic of Somalia

Borrower: African Union Commission

Implementing Agency(ies)

Implementing Agency: ProAzul Blue Economy Development Fund, Mozambique

Implementing Agency: National Agriculture Research Institute of Mozambique (IIAM), Mozambique

Implementing Agency: Ministry of Agriculture, AGCOM, Malawi

Implementing Agency: Integrated Development and Competitiveness Project (PIDC), Comoros

Implementing Agency: Minsitry of Agriculture & Livestock Development (MoALD), Kenya

Implementing Agency: Ministry of Agriculture and Irrigation (MoAI), Somalia

Implementing Agency: African Union Commission

Public Disclosure

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s): Mampionona Amboaraso, Tomas Ricardo Rosada Villamar, Bobojon Yatimov, James Muli Musinga, Vinay Kumar Vutukuru

Practice Manager (ENR/Social): Helene Monika Carlsson Rex Recommended on 13-Mar-2023 at 03:13:47 EDT



Safeguards Advisor
ESSA

Martin Henry Lenihan (SAESSA) Cleared on 13-Mar-2023 at 10:10:1 EDT