



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)
India	SOUTH ASIA	P177917	
Project Name	Multidisciplinary Education and Research Improvement in Technical Education		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	4/7/2022	8/31/2022
Borrower(s)	Implementing Agency(ies)		
Republic of India	Ministry of Education		

Proposed Development Objective

To support the modernization and resilience-building of technical education with a focus on strengthening equitable access and enhancing quality of teaching, learning and research.

Financing (in USD Million)	Amount
Total Project Cost	560.00

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 modernize the technical (tertiary) education sector in India. The reforms are guided by proposals laid out in the National Education Policy 2020 and focus on enhancing the teaching-learning and research environment in participating institutions through the inclusion of advanced technical and 'green' skills as well as multidisciplinary approaches and research partnerships, improving employability and building entrepreneurship capabilities, and strengthening sector steering to improve performance, efficiency and accountability of the technical (tertiary) education sector. The project also focuses on increasing equitable access to engineering education with a focus on women and disadvantaged groups. This will be supported, in part, through strengthening women's leadership in technical/engineering institutions and building inclusive environments. The project will be implemented in select states and institutions piloting new approaches that will serve as a proof-of-concept on implementing NEP-



2020 proposals at scale in the sector. The Ministry of Education (Department of Higher Education) is the main implementing agency.

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 at the national level, over various jurisdictions with different environmental, social, and institutional settings.

India lies to the north of the equator between 8 degree 4 minutes and 37 degree 6 minutes north latitude and 68 degrees 7 minutes and 97 degrees 25 minutes east longitude. It is the seventh-largest country in the world, with a total area of 3,287,263 sq.km. The country measures 3,214 km (1,997 mi) from north to south and 2,933 km (1,822 mi) from east to west. It has a land frontier of 15,200 km and a coastline of 7,516.6 km. India is bound in the southwest by the Arabian Sea and in the southeast by the Bay of Bengal. On the north, northeast, and northwest are the Himalayas.. Country's geography is extremely diverse, with landscapes ranging from snow-capped mountain to deserts, plains, hills and plateaus. The fertile Indo-Gangetic plain occupies most of northern, central and eastern India, while the Deccan Plateau occupies most of southern India. To the west of the country is the Thar Desert, which consists of a mix of rocky and sandy desert. Climate ranges from equatorial in the far south, to tundra in the Himalayan altitudes.

The geographical setting of India makes it vulnerable to natural disasters such as cyclones, floods, extreme heat, severe water scarcity/droughts, storm surge apart from lightening, earthquakes, tsunami, coastal erosion, and landslides. Diverse factors, natural and human induced, geo-climatic conditions, population, environmental degradation, urbanization, industrialization, and unscientific development practices have played a huge role in increasing the intensity and frequency of disasters. These, coupled with the impact of climate change, are accentuating disaster impacts (economic losses and human casualties) and underscore the need for promoting risk reduction practices.

The proposed project focuses on the modernization of the tertiary education sector, steering through multidisciplinary approaches and research partnerships, improving employability, and building entrepreneurship capabilities, and strengthening/improving the sector's performance, efficiency, and accountability. The proposed Project would finance, among other things, the establishment and renovation of research facilities and augmentation of digital infrastructure and refurbishment/renovation of existing buildings (or parts of the building/ block), including laboratories, workshops, library, sanitation facilities, which would involve infrastructure augmentation and associated civil works.

The exact sub-project locations/participating institutions under MERITE will be determined during the implementation stage only though some of the institutions from the previous Bank funded operations (TEQIPI, II and III) are also expected to be included under MERITE. However, no land acquisition is anticipated, and all project activities, including civil works are expected to be carried out within the existing campus or on land that is already the property of the participating institution. Some of the sub-projects/proposed interventions are likely to in districts that have a significant indigenous population and other marginalized and vulnerable communities. In any case, a considerable percentage of the students seeking admission in the various establishments, facilities, and institutions supported by the Project, is expected to be from indigenous and other marginalized/vulnerable communities.



Given that the proposed interventions are small in scale and localized in nature, no large-scale, significant and/or irreversible impacts are expected to be associated with MERITE.

D. 2. Borrower's Institutional Capacity

The Government of India (GoI) is familiar with the World Bank's environmental and social safeguard policies, having implemented a number Bank-supported projects in the Education Sector, including those involving Technical Education. Specifically, the National Project Implementation Unit (NPIU), Ministry of Education (MoE) which will be the Nodal Implementing Agency for this proposed operation (MERITE), is familiar and has prior experience/ exposure to the Environment Management requirements and principles of Equity and Inclusion implemented during the TEQIP series (TEQIP-I, II and III). However, while there is familiarity about the requirements, there were some gaps/deficiencies in applying and implementing the frameworks and requirements, primarily due to weaknesses in the implementation arrangements/staffing. These limitations along with lack of familiarity on Bank's new Environment and Social Framework (ESF), and to prepare and implement the associated environmental and social risk management instruments, constrain the institutional/implementation capacity.

However, the NPIU/MoE's record on specific environmental initiatives, citizen engagement, beneficiary feedback, and GRM implementation was satisfactory during TEQIP-III implementation. A dedicated compliant resolution system was implemented with multiple channels to address questions and complaints/or proposals and queries from different stakeholders.

MERITE would leverage on NPIU/MoE's experience from earlier safeguards regime and use, integrate, and develop to promote the concept of: (a) green-clean-resilient-safe campuses, (b) feedback mechanisms for stakeholder engagement and grievance redressal, (c) approaches for mitigation of risks associated with gender-based violence; and (d) positive interventions targeting vulnerable and disadvantaged groups.

Environmental and Social Assessment (ESA), which will be conducted for preparing the Environment and Social Management Framework (ESMF), will evaluate current institutional capacity, particularly in the post COVID scenario. It will inform the proposed operation and the Bank of additional resources required to prepare, manage, monitor and report on environmental and social risks and impacts, including capacity building needs to achieve objectives materially consistent with the Environmental and Social Standards (ESSs). The overall capacity to deal with the environmental, social, health and safety risks will require dedicated time/resources during project preparation and early part of the implementation phase to put the required systems and procedures in place.

It is proposed that environmental and social experts/focal points be housed at the NPIU/MoE level for overall environmental and social management of the project. The experts will lead the preparation and implementation of relevant E&S instruments (including mitigation/management plans) for the project and contribute in monitoring and reporting on environmental and social impacts associated with each stage of the project cycle. Keeping in mind the scope of this proposed project, capacity building initiatives for key implementation agencies will be taken-up to manage environmental and social risks associated with the project and enhance opportunities to create more sustainable facilities/institutions.

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

A. Environmental and Social Risk Classification (ESRC)

Moderate



Environmental Risk Rating

Moderate

The environmental risks/impacts may arise from upgradation/rehabilitation/refurbishment of existing buildings (or parts of the building/block), establishment and renovation of research facilities and augmentation of digital infrastructure, which will be required to support activities proposed under Components 1 and 2. Proposed interventions under Component 3 offer an opportunity to strengthen systems that promote improved teaching and learning environment in the institutions. The preliminary environmental risk assessment considers, in an integrated manner, the following: (i) type/nature and magnitude of activities; (ii) geographical spread of sub-projects (over 100 institutions across multiple participating states); (iii) baseline conditions, characterized by significant variation in locational setting, natural environmental conditions, student strength, types of courses offered (with associated workshops/laboratories and other infrastructure) and physical/built environment conditions; (iv) involvement of multiple/diverse stakeholders with varying institutional capabilities; (v) risks pertaining to inappropriate design of buildings and infrastructure, including inadequate provisions for 'universal access' and for fire, electrical and safety in laboratories and hostels; (vi) potential impacts related to construction/rehabilitation/renovation works, including on residents/users of the campus and occupational health and safety risks to workers; (vii) lack of experience of small contractors in managing environment, health and safety (EHS) issues associated with construction works; (viii) water stress during construction and operation of buildings (large number of districts in the country face high to extremely high water shortage in summers); (ix) issues associated with operation and maintenance (waste management in laboratories, workshops, hostels, mess/canteen; e-waste management; emergency preparedness, including evacuation; menstrual hygiene management etc.) and; (ix) inadequate coordination and monitoring mechanisms on environment management aspects. While the environmental impacts are likely to be temporary (limited to construction stage), predictable and reversible, dedicated effort, time and coordination will be required during project preparation and in the first year of project implementation to preclude the possibility of any unwarranted effects on the environment and maximize the opportunities of creating environmentally sustainable facilities. To mitigate the identified environment, health and safety risks, Environmental and Social Management Framework (ESMF), Stakeholder Engagement Plan (SEP), Labour Management Procedures (LMP), and the Environmental and Social Commitment Plan (ESCP), will be prepared. The environmental risk rating will be reassessed during project preparation based on additional information and detailed analysis to be conducted as part of the ESA process.

Social Risk Rating

Moderate

The social risks are rated as 'moderate' for the following reasons: • Activities under the proposed project are largely expected to positively impact inclusionary outcomes, especially students from vulnerable groups such as SC, ST, and SEDGs (Socially and Economically Disadvantaged groups). However, the scale and geographical spread of sub-projects (over 100 institutions across multiple participating states) with varied capacities require dedicated and continued staffing to identify, attend, and respond to the needs of students (and teachers) from vulnerable communities. This entails enrollment challenge, given barriers related to geographical, social, economic, and cultural - and other difficulties and deficiencies; (ii) insufficient and lack of gender-disaggregated facilities in the institutions; and (iii) inadequate resources for effective implementation of ESF systems under the project. • No land acquisition will be required for the project. All infrastructure-related civil works such as site development, construction, upgradation, and refurbishment are expected to be carried out within existing infrastructure or on land in possession of the participating institution. However, the likelihood of safety/security issues stemming from the increased labor-student interface during the construction stage and resultant SEA/SH issues are could be a potential



risk . At the concept stage, this is assessed to be low (9.5) based on results from the Bank's SEA/SH Risk Assessment Tool given minor civil works proposed under the project. The social assessment to be taken-up as part of ESA/ESMF preparation, will gauge the SEA/SH risks, and a SEA/SH prevention and accordingly, a response action plan (including sensitization and training requirements for the staff, students, contractors) with an accountability and response framework will be developed as part of the ESMP, if required (if risks are found to be substantial). The current situation of COVID-19 can exacerbate and result in conflict leading to a safety threat if not managed adequately. • Lack of availability and readiness of trained staff, employers, industry to work/partner, particularly in the left-wing extremist (LWE)/conflict areas and due to geographical isolation, difficult terrain, poor connectivity, lack of adequate infrastructure, and poor employment opportunities may lead to the exclusion of a specific group /institutions from the scope of this program, thus creating the risk of further exclusion and increasing social conflict. Interventions will be planned to ensure inclusion and development of marketable skills in such areas, thus contributing to harmonious development.

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:

ESS 1 is relevant for assessing, managing and monitoring environmental and social risks and impacts associated with the project towards ensuring that the operation is environmentally and socially sustainable.

Environmental Impacts: Most activities proposed under the project are likely to be environmentally neutral or may have negligible adverse environmental impacts. However, the civil works associated with upgradation of physical infrastructure that includes construction/refurbishment/renovation of classrooms, workshops, laboratories, toilets, library, and digital infrastructure provision, if not appropriately managed, have the potential to create unwarranted moderate level of environmental impacts in the local context. Potential issues may include: (i) risks pertaining to inappropriate design of building improvement works and associated infrastructure, including inadequate provisions for 'universal access' and for fire, electrical and safety in laboratories and hostels; (ii) potential impacts related to construction and renovation works such as dust, noise, vibration and issues pertaining to movement of vehicles and on-site storage of construction materials on residents and users of the institution's campus; (iii) occupational health and safety (OHS) risks to workers; (iv) water stress (the urban areas in the state face high to extremely high water shortages, particularly in summers); (v) water contamination (including improper management of wastewater) during construction and operation of buildings; (vi) inappropriate storage and/or disposal of debris/construction wastes (including potentially hazardous materials) and; (vii) issues associated with operation and maintenance (waste management in laboratories, workshops, hostels, mess/canteen; e-waste management; emergency preparedness, including evacuation; menstrual hygiene management etc.). The environmental impacts from the proposed project activities while limited and localized in context, are likely to stem from poor design (inappropriate designs, choice of technique/s and timing that don't account for minimization of risks and disruption to services), improper execution of civil works (specifically increasing OHS risks for workers and threats to safety/well-being of residents/users of the campus) and inadequate attention to environment, health and safety during operation and maintenance stage.



Social Risks/Impacts: The project's primary anticipated social risks and impacts, though of manageable scale given that the scale of works is proposed to be within existing footprint relate to the construction-related impacts such as occupational and community health and safety. Construction of new buildings is not envisaged under the project. However, the likelihood of displacement of settlers living within the existing premises will be explored during the sub-project identification/assessments. Other issues need to be addressed through the project will be to ensure that institutions that receive project financing for gender-friendly campuses. Considering that the civil works would be in-situ (within the institution campuses), maintaining the health and safety of students, teachers, non-teaching staff, vendors, visitors, and nearby communities throughout the civil works period would be critical.

Environment and Social Management: Since sub-projects would not be known before Year 1 of project implementation, an Environment and Social Assessment (ESA) will be carried out by the NPIU/MoE based on a select sample of potential participating institutions to identify, assess and plan the management of the environmental and social risks/impacts that are likely to arise on account of project interventions. The assessment will specifically help in: (a) developing comprehensive understanding of potential impacts, (b) identifying and appreciating the details of risks envisaged from project activities, (c) arriving at a set of recommendations to design management/mitigation measures for reducing risks and help strengthen environment and social performance for targeted project interventions, in line with the requirements of national/state legislations and the ESF. This over-all project level ESA will involve desk review of relevant documents/studies, site visits, as well as extensive consultations with the key stakeholders. The ESA will identify institutional capacity needs/gaps (including on staffing and skills) required to apply environmental and social standards (ESSs) and implement the country legal/regulatory framework for the proposed operation. The ESA will be proportionate to the potential risks and impacts of the project, and will assess, in an integrated way, all relevant direct, indirect and cumulative environmental and social risks/impacts, including those specified in ESSs relevant to the project.

Based on the recommendations and findings of the ESA, an Environment and Social Management Framework (ESMF) and Stakeholder Engagement Plan (SEP) will be prepared, consulted upon and disclosed in line with the requirements of the ESF by appraisal. The ESMF will include guidance/template for screening sub-projects and preparing site-specific Environmental and Social Management Plans (ESMPs). The ESMPs will be integrated into the bid documents for the infrastructure upgradation/refurbishment/renovation works. The SEA/SH Prevention and Response Action Plan will form a part of the ESMF to manage risks related to SEA/SH.

Based on the provisions of the ESMF, as well as the other associated frameworks/plans, an Environmental and Social Commitment Plan (ESCP) will be prepared.

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

No, use of Borrower Framework is not being considered. The World Bank’s Environment and Social Framework will apply to the project.

ESS10 Stakeholder Engagement and Information Disclosure

ESS 10 is relevant for ensuring that a consistent, comprehensive, coordinated and culturally appropriate approach is taken for stakeholder engagement and disclosure of project related information. The NPIU/MoE will develop a Stakeholder Engagement Plan (SEP) proportional to the scale and complexity of the project and its associated risks and impacts. The SEP will provide guidance on specific steps and actions to be taken during preparation and



implementation stages of the project. The SEP will lay out a strategy to identify and map critical stakeholders, including representatives from vulnerable and disadvantaged groups. It will also define the mode and frequency of engagement with all stakeholders at various stages of the project cycle, with specific attention to include women/girls and SEDGs (Socially and Economically Disadvantaged groups). Appropriate arrangements for SEP implementation, including reporting and its updating (as necessary) will be a condition in the ESCP.

Given the extensive nature of project activities proposed in different geographical settings of the country, diverse group of stakeholders will be involved in the project's decision-making, design and implementation.

The project involves a broad range of stakeholders that includes over 100 participating institutions, 30 affiliating universities, 50 incubation centers, 19 IITs and IIMs apart from AICTE, NBA, UGC, industry clusters, contractors for small civil works, goods and equipment suppliers etc. Other line ministries and state-level departments, such as the Ministry of Labor and Employment, the Ministry of Tribal Affairs, State Welfare Departments for the vulnerable community, can be categorized as Other Interested Parties. The project will closely collaborate with students, teaching and non-teaching faculty/staff, in establishing and implementing the project interventions. The composition of the stakeholder groups may change depending on the final chosen project interventions and the specific geographical areas where the project will be executed.

The COVID-19 pandemic poses a challenge for stakeholder engagement and disclosure of information, as stakeholder engagement and consultation processes cannot be conducted as per normal ESS 10 requirements. Depending on the situation with COVID-19, a mix of conventional forms/media for information dissemination and virtual modes, mobile phone-based communication etc. for soliciting feedback and engaging different stakeholders will be used during project preparation. As long as COVID-related restrictions place limitations on traditional forms of stakeholder engagement, the requirements of ESS 10 will be met by following guidance set out in the World Bank's "Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings" (March 20, 2020).

The SEP will be prepared consistent with the requirements of ESS 10. The draft document will be disclosed early in the project preparation to serve as a basis for consultation with stakeholders. The SEP will be re-disclosed before appraisal (considering any suggestions/comments received) and will be updated, as necessary, during the project cycle. The NPIU/MoE will actively seek feedback from stakeholders on the project's operation and take measures to incorporate the inputs in implementing the activities. The NPIU/MoE will also maintain records of the consultations and disclose these to the public through appropriate channels.

NPIU/MoE will disclose the ESF instruments that include ESMF, SEP, and ECSP before project appraisal to allow stakeholders to be informed about the proposed project activities, potential environmental risks/impacts and mitigation/management plans. The implementation agencies will continue to engage with project beneficiaries and OIPs during project implementation in a manner appropriate to the nature of their interests and potential environmental and social risks/impacts of the project. Project-related information will be shared with key stakeholders in English and in the local language. All ESF instruments/documents will be disclosed both in-country/locally and on Bank's website in English and the executive summaries will be translated and disclosed in local language.



The three-tier Grievance Redressal Mechanisms established for TEQIP-III were well advertised, and elicited grievances from affected persons, which were redressed within stipulated timelines. During TEQIP-III, NPIU received 367 grievances, and 95 percent of these were resolved within project implementation. Hence, as part of the social assessment and ESMF preparation, the experience of GRM functioning thus far would be reviewed, and feedback from stakeholders would be obtained and factored into designing/expanding a more robust GRM for MERITE.

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

ESS 2 is considered relevant to the Project.

The project will involve: a) direct workers employed specifically by the NPIU/implementation agencies for the project; and b) contracted workers engaged for small scale construction works and consultancy services for specific deliverables and technical support to NPIU. Construction work may require migrant workers from other parts of the state and sometimes from other states depending on the contractors' strategy and requirement of skill sets. However, the majority of the labor force would be generally available within the state as the works largely relate to rehabilitation and construction of buildings. Involvement of community workers is not envisaged given the technical nature of the project.

Conforming with the ESS 2 requirements, a Labor Management Procedures (LMP) will be prepared and disclosed to guide management of labor-related issues associated with the project. It will also include terms and conditions of employment, non-discrimination and equal opportunity, workers' organization and measures for prohibition of child and forced labor. The project's GRM will be expanded, or a specific GRM to deal with instances of labor-related grievance will be set up with the detailed procedures elaborated in the LMP. The grievance mechanism will contain stipulations for sensitive grievances, including those related to SEA/SH. The relevant staff of the Implementation Agencies, line departments and direct workers, including contract workers will also be subject to and trained on codes of conduct, which include SEA/SH prevention measures.

Preparation of ESA will assess occupation health and safety issues/risks, for which required OHS framework/plan will be prepared and integrated into the LMP. All works and operations will be planned, designed and implemented to comply with the World Bank Group's Environment, Health and Safety guidelines. The bidding documents for construction works will include reference to the LMP and the national/state laws on labor welfare to comply with the requirements of both ESS2 and country systems. It will also include protocols for management of COVID-related issues (as needed in the context of prevailing situation during project implementation).

ESS3 Resource Efficiency and Pollution Prevention and Management

The principles and requirements laid down in ESS 3 are relevant to the project.

Activities pertaining to upgradation/rehabilitation/refurbishment of existing buildings (or parts of the building/block), establishment/renovation of research facilities and augmentation of digital infrastructure would consider resource



efficiency and pollution management aspects during design/Detailed Project Report (DPR) preparation and construction stage. The purpose will be to improve the quality of physical environment, enhance health/safety and reduce the environmental footprint linked to use and operation of the buildings in a cost-effective manner.

For improving resource efficiency, the considerations will include: (a) improving natural light and ventilation (when possible depending on the nature/type of renovation work proposed), (b) increasing water efficiency and, (c) enhancing energy efficiency. For pollution prevention and management, focus will be on: (i) debris/construction waste management; (ii) run-off/silt control at work sites to prevent sedimentation and any possible contamination of water sources during construction phase; (iii) measures for controlling dust and noise pollution; (iv) management of hazardous wastes (if any, which will be ascertained as part of ESA) and; (iv) storage and management of construction materials to prevent ground/soil contamination.

To create an enabling mechanism for integrating resource efficiency and pollution prevention/ management, the ESMF will include 'Environmental Guidelines for Civil Works' and 'Guidance for Clean Green Campus'.

ESS4 Community Health and Safety

ESS 4 is considered relevant to the Project.

One risk factor is related to COVID-19 where improper adherence to standard protocols could raise exposure risk to the the beneficiaries and other people/workers in the Technical Education Institutions. To mitigate such risks, the NPIU/MoE will design and implement provisions on how to engage with all categories of stakeholders and beneficiaries to prevent or minimize the spread of COVID-19.

A second factor relates to the risk associated with project induced labor influx which could expose local communities to other public health risks (communicable diseases), and sexually transmitted diseases, such as HIV/AIDS, as well as SEA/SH, child and forced labor. The NPIU/MoE will propose measures for mitigating risks associated with labor influx and other construction related activities, and develop a SEA/SH Prevention and Response Action Plan as part of the ESMF applicable to project workers (direct and contract), community and project beneficiaries. Labor influx and SEA/SH related provisions will be informed by the World Bank's Good Practice Note on Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing and the Guidance Note on Managing the Risks of Adverse Impacts on Communities from Temporary Project Induced Labor Influx.

The third factor relates to health and safety risks to the local communities due to movement of vehicles associated with construction/renovation works. The bidding documents for the construction works will include requirements to prepare and implement site specific community health and safety plans, which would address all the above identified issues. The ESMF will include requirements for monitoring and reporting of aspects covered under ESS 4.

In addition, the project will address potential fire hazards and incidents and will adhere to latest National Building Code and international standards especially the L&FS standards as detailed in the WBG EHS Guidelines. Guidance on required measures for avoidance, minimization and mitigation of such risks, including emergency preparedness would be included in the ESMF. The sub-project level ESMP interventions/plans will be tailored/adjusted to reflect site-specific/ contextual requirements during during project implementation.



ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The proposed project is not expected to require any land acquisition. All the proposed interventions will be within the existing campus and on the land owned by the participating institutions or agencies concerned. However, construction, refurbishment, and infrastructure related civil works may affect squatters and/or disrupt people's livelihoods in the vicinity. A detailed assessment needs to be carried out of the existence of squatters on those lands, and if it turns out that any physical or economic displacement is required, the Environmental and Social Management Plans (ESMPs) during the sub-project preparation will address those impacts as needed. The ESMPs will be reviewed, consulted upon, approved, and disclosed both within the country and on the World Bank's website prior to the commencement of the civil works. The social management sections of ESMPs will address the issues of inclusion, gender, GBV, stakeholder consultations and communication strategy (as described in the SEP), and other issues identified in the ESA.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

Based on the preliminary assessment, impacts on biodiversity and habitats, including 'protected areas', 'critical natural habitats', and/or 'species with critical biodiversity value' are not anticipated on account of proposed interventions under MERITE. Therefore, ESS 6 is currently not relevant for the project.

Provisions will be made in the bidding document to ensure that no materials for construction or operation stage are sourced from any critical habitats, protected areas, forests, eco-sensitive zones, or any recognized areas of high biodiversity. Based on the location of project interventions (which is not known at this stage) and the findings from the ESA (which will be used for the preparation of an ESMF), relevant measures if required, to prevent any possible impact on aquatic life (due to discharges from worksites and/or improper disposal of debris in water bodies) will be included in the ESMPs. Further, in case there is any requirement of tree felling for construction works under the project, requisite permission will be obtained from the Forest Department/Competent Authority prior to initiating civil works and provisions for compensatory plantation in line with regulatory norms will be built into the Detailed Project Report/estimate of the concerned sub-project.

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

MERITE being a national project multiplies the possibility of project locations/institutions falling under scheduled areas with a considerable tribal population. But in all cases, the establishments and institutions under the project are likely to attract students for admission from the indigenous and other disadvantaged and vulnerable communities/ SEDGs. The client will, thus, prepare an Indigenous Peoples Development Framework (IPDF) that will detail the procedures for the active inclusion of students and faculty from tribal background and specify project benefits that are appropriate to the requirements cultural traditions of the social groups involved.

The NPIU/MoE will also carry out due diligence as part of the ESA (to be conducted for preparing the ESMF) on whether tribal peoples are adversely affected by civil works construction under the project. In case such impacts are anticipated, the client will incorporate the necessary mitigation measures into the ESMPs or a separate IPDF following the standard of free, prior, and informed consent of the affected persons.



ESS8 Cultural Heritage

Given the vast geographical area of the country, there is a possibility of cultural heritage related concerns coming-up in case of certain sub-projects/institutions under the proposed operation.

The identified sub-projects/institutions will be screened for potential cultural heritage impacts. Consultation mechanisms with stakeholders will also be utilized to screen any sensitive issues related to tangible or intangible cultural resources. The ESA (to be carried out for preparing ESMF) would evaluate any direct or indirect impact of project activities on cultural assets and determine the presence of any other such resources that may not be listed with national or state governments (Archeological Survey of India) but could be of local significance. Depending on the determination of the nature and scale of the risks and possible adverse impacts, mitigation measures or a plan will be prepared as part of the ESMPs. Such a requirement will be reflected in the ESCP, as appropriate. Any such identified cultural heritage impacts and/or chance finds will be dealt with in line with national legal requirements and Bank's requirements set forth under ESS 8 of ESF. Procedures for handling chance finds will be described in the ESMF and will be included in the ESMPs and the Bidding Documents to handle any such situation that may come-up during execution of civil/infrastructure works.

ESS9 Financial Intermediaries

No involvement of Financial Intermediaries (FI) is proposed or envisaged in the project.

B.3 Other Relevant Project Risks

- 1) The Department of Higher Education in the Ministry of Education will be responsible for project implementation through a National Project Director, who will oversee implementation, with support from a National Project Implementation Unit (NPIU). Previous engagements have followed this implementation arrangement along with additional entities to support implementation at the state and institutional levels. This arrangement has worked well, and previous engagements have built NPIU's capacity in project implementation, monitoring, efficient logistical coordination. However, the capacity to manage E&S risks/ impacts as set forth under ESF is currently lacking, as the instrument is new for NPIU/MoE.
- 2) An additional institutional challenge centers around the need for strong coordination abilities at the NPIU and institution level given the requirement to work closely with a large number of stakeholders/departments/agencies to implement interventions under the project.
- 3) The ongoing COVID-19 pandemic is also poses a risk for project preparation and implementation. Under the prevailing circumstances, preparation and implementation of the project activities, particularly, field surveys, assessments requiring field work and civil works may experience delays. Supervision of activities may also be a challenge if COVID-situation worsens and restrictions come into effect.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

No



OP 7.60 Projects in Disputed Areas

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered?

No

Financing Partners

Not Applicable

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

Actions to be completed prior to Bank Board Approval:

The following actions would be required prior to Bank Appraisal for this operation to allow for an informed decision-making, commensurate with issues/risks identified during project preparation:

- 1) Preparation of Environment and Social Management Framework (ESMF) to guide preparation and implementation of multiple sub-projects/small civil works located across the states of India for standardization/ uniformity and to deal with a situation when sub-projects would be known after appraisal/Board presentation. The ESMF will include an Occupational Health and Safety (OHS) Framework, Guidelines including those for L&FS (life and fire safety) and emergency preparedness, Gender and Social Inclusion Plan (GSIP), Indigenous Peoples Development Framework (IPDF), and Resettlement Policy Framework (RPF) (if required).
- 2) Preparation of Stakeholder Engagement Plan (SEP)
- 3) Preparation of Environmental and Social Commitment Plan (ESCP)
- 4) Consultations and disclosure of ESMF, SEP and ESCP in line with requirements set forth in the World Bank policies on Disclosure and ESF
- 5) Institutional arrangements to facilitate application and implementation of ESF instruments.

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

The following key aspects are likely to be a part of Borrower's Environmental and Social Commitment Plan (ESCP):

- 1) Organizational structure and staffing to manage EHS and social risks/impacts at the NPIU, State and Institution level
- 2) Procedure and timelines for disclosure of ESF documents/instruments
- 3) Preparation, implementation and monitoring of Labour Management Procedures (LMP), including labor GRM, provisions for managing labor influx and GBV/SEA/SH issues
- 4) Preparation and implementation of specific assessments/plans to meet the requirements set forth in ESSs (sub-project instruments such as ESMPs once sub-projects/institutions are identified)
- 5) Provisions for worksite safety and labor management, including OHS aspects
- 6) Prevention and response to Sexual Exploitation and Abuse/ Sexual Harassment (SEA/SH) risks
- 7) Implementation of the ESMF, SEP, and LMP (and updating, as required)
- 8) Management of Contractors



- 9) Processes and timelines for obtaining of requisite statutory clearances/permits
- 10) Training and activities for strengthening capacity of Project Officials and other key staff
- 11) Provisions for managing unanticipated Environmental and Social Risks/Impacts
- 12) Evidence-based reporting requirements, including geo-referenced site data/information to facilitate real time tracking of implementation of actions on the environment and social risk management. including provisions for periodic audits/third party evaluation, as necessary.

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

28-Feb-2022

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Republic of India

Implementing Agency(ies)

Implementing Agency: Ministry of Education

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s):	Namrata Raman Tognatta, Nina Arnhold
Practice Manager (ENR/Social)	Christophe Crepin Recommended on 15-Nov-2021 at 09:17:36 GMT-05:00
Safeguards Advisor ESSA	Pablo Cardinale (SAESSA) Cleared on 22-Dec-2021 at 09:10:2 GMT-05:00