



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 09/26/2024 | Report No: ESRSC04457



I. BASIC INFORMATION

A. Basic Operation Data

Operation ID	Product	Operation Acronym	Approval Fiscal Year
P506423	Investment Project Financing (IPF)	R2D	2025
Operation Name	Roads to Development		
Country/Region Code	Beneficiary country/countries (borrower, recipient)	Region	Practice Area (Lead)
Philippines	Philippines	EAST ASIA AND PACIFIC	Transport
Borrower(s)	Implementing Agency(ies)	Estimated Appraisal Date	Estimated Board Date
Department of Finance	MINISTRY OF AGRICULTURE, FISHERIES, AND AGRARIAN REFORM		07-Oct-2024
Estimated Concept Review Date	Total Project Cost		
28-Aug-2024	4,000,000.00		

Proposed Development Objective

8. To improve rural road access in selected MILF camp communities, with an emphasis on connecting farms to markets.

B. Is the operation 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 Activities

[Description imported from the Concept Data Sheet in the Portal providing information about the key aspects and components/sub-components of the project]

This project will rehabilitate and build selected rural roads, including farm to market roads (FMRs), in selected areas of the six formally acknowledged MILF camps, to improve the accessibility and market access of these communities. These roads are part of the long list of priority FMRs included in the Camps Transformation Investment Program (CTIP) of the Bangsamoro Autonomous Region in Muslim Mindanao (BARMM) which was developed through a series of consultations with camp communities. Several road alignment options were validated and investigated on the ground by the Ministry



of Agriculture, Fisheries and Agrarian Reform (MAFAR) from February to March 2024 and subsequently endorsed by the Joint Task Force on Camp Transformation.

D. Environmental and Social Overview

D.1 Overview of Environmental and Social Project Settings

[Description of key features relevant to the operation's environmental and social risks and opportunities (e.g., whether the project is nationwide or regional in scope, urban/rural, in an FCV context, presence of Indigenous Peoples or other minorities, involves associated facilities, high-biodiversity settings, etc.) – Max. character limit 2,000]

The Project is proposed under the Bangsamoro Normalization Trust Fund (BNTF), a pool of investments from various development partners administered by the World Bank to support the peace process in the Bangsamoro Autonomous Region in Muslim Mindanao (BARMM) region. The project (second under BNTF) is also located in former insurgent camps and seek to contribute to attaining peace and prosperity among combatants and their communities.

The Joint Task Force on Camps Transformation (JTFCT) has identified priority projects and for the current project, 6 camps: Rajamuda, Bushra, Bilal, Abubakar, Badre, and Omar, have been identified based on development needs. The roads are located in 5 provinces (North Cotabato, Lanao del Sur, Lanao del Norte, Maguindanao del Norte, and Maguindanao del Sur) in short segments, cumulatively adding to a total length of about 12 km. The roads pass through areas covered with vegetation, coconut trees, corn fields, banana plantations, and forested areas. Some roads are near the Mindanao River and the Atos River, and will cross water bodies. Some roads will involve Indigenous Peoples and pass through ancestral domains. Two roads have been identified to affect structures.

Community demographics vary depending on the location but poverty is a dominant feature. Social structures tend to be patriarchal and decision-making reflects deference to senior male members, local commanders, and politicians. Meaningful participation of women, young people, and Indigenous Peoples is challenging, including the competing interests between informal and formal local power brokers. Despite the relative experience of stability because of the peace process, the camps are still classified as conflict areas with one camp identified to be facing imminent threat to such peace and stability.

The Project will operate under the autonomous government of the BARMM which has own set of legislations and procedures including for environmental and social risk management.

D.2 Overview of Borrower's Institutional Capacity for Managing Environmental and Social Risks and Impacts

[Description of Borrower's capacity (i.e., prior performance under the Safeguard Policies or ESF, experience applying E&S policies of IFIs, Environmental and social unit/staff already in place) and willingness to manage risks and impacts and of provisions planned or required to have capabilities in place, along with the needs for enhanced support to the Borrower – Max. character limit 2,000]

Given the activities involved, their experience, and jurisdiction, Ministry of Agriculture, Fisheries, and Agrarian Reform (MAFAR) has been identified as the implementing agency for the Project. In terms of environment and social risk management capacity, MAFAR has implemented a number of farm-to-market-roads under the Philippine Rural and Development Project (PRDP) financed by The World Bank under safeguards regime. As part of the project preparation, MAFAR has conducted initial field validation for the identified road sections; the results of which helped inform this ESRS. As such, to some extent, there is familiarity with impact mitigation. However, MAFAR has not had any experience



in applying the ESF. In addition, PRDP does not work in the camps themselves which have a different implementation context owing to the sensitive conflict situation.

As part of the project, MAFAR staff capacity will be augmented with environment and social consultants and will be trained on the ESF and on conflict sensitivity assessment to ensure that risk mitigation activities will not ignite nor exacerbate the conflict situation. To further support environment and social risk management, relevant approaches being used in the ongoing BARMM will be applied. For instance, a civil society organization is implementing the first project under the BNTF. However, some of the approaches there can be utilized under the Project especially since some of the camps are the same.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Substantial

A.1 Environmental Risk Rating

Moderate

[Summary of key factors contributing to risk rating, in accordance with the ES Directive and the Technical Note on Screening and Risk Classification under the ESF – Max. character limit 2,000]

Based on the available project description and validation exercise carried out by MAFAR, the proposed roads will pass through existing right-of way, particularly on land areas close to agricultural farms at the six MILF camp areas. The existing road right-of-way does not cross nor anywhere near any critical habitats. The proposed alignment of the FMRs is covered with vegetation (small trees), and agricultural lands which are covered with coconut and banana plantations. Some FMRs are located on relatively steep slopes of about 20-30 degrees. A majority of the FMRs will also be built near the river or across a water body. Thus all roads will require cross drainage works to avoid soil erosion, land slips/ slides, and flooding. The project will be limited only to the improvement of the existing road right-of-way by expanding its width and constructing concrete pavement to improve accessibility and lessen travel time. The environmental risks and impacts of the project are thus expected to be cutting of small trees, possible contamination of nearby water bodies, local drainage issues and construction and safety risks to the labor and nearby communities. Considering that the length of these roads is relatively short (ranging from 0.28 to 5.77 km), the magnitude and significance of the above risks/ impacts are expected to be localized and short-term. The environmental risk hence is rated as 'Moderate'. The rating will be further assessed at the project appraisal stage based on relevant ESF instruments and finalized accordingly.

A.2 Social Risk Rating

Substantial

[Summary of key factors contributing to risk rating, in accordance with the ES Directive and the Technical Note on Screening and Risk Classification under the ESF – Max. character limit 2,000]

Social impacts are moderate owing to the small investment amounts and the length of the roads. Two of the proposed roads have been screened to involve a handful physical displacement of structures. Land acquisition needs to be verified and there is a need to establish if the structures encroached on existing right-of-way. Indigenous Peoples will be involved mostly as beneficiaries and some of the roads traverse or lead to their ancestral domains. Labor influx is not expected as local labor is available and no complex infrastructure work will be involved. However, as the roads will be implemented within the camps, MAFAR has limited experience with World Bank's ESF, and BARMM has its own government and legislation (including for IPs which has not yet been finalized), the rating is



elevated to Substantial. Given the sensitive context, land and acquisition and relocation could become contentious and the road's increased benefits to some groups within the camps could become sensitive issues that could spark new conflicts. The initial screening also revealed that an ongoing threat from the Maute group persists in one of the camps which would make project implementation and supervision difficult. The impacts and mitigation measures will be revisited during project preparation after engaging into a dialogue with MAFAR, JTFCT, and other relevant stakeholders about having a negative list to help ensure faster and smoother project implementation. Initial discussions with MAFAR have indicated that the list could include land acquisition and involuntary resettlement, and imminent threat to safety. The Project will endeavor to align ESF requirements and approaches with existing interventions under the BNTF including for SEA/SH as some of the camps are the same for both projects. Where relevant, the Project will also adopt existing ESF approaches of World Bank projects being implemented in BARMM such as MIADP and PRDP.

Moderate

A.3 Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Risk Rating

[Summary of key factors contributing to risk rating. This attribute is only for the internal version of the download document and not a part of the disclosable version – Max. character limit 2,000]

Based on a GBV policy and institutional mapping done for the Philippines in 2020, the country has a robust legal and institutional framework for preventing and responding to SEA/SH. As such, projects in the Philippines usually have lower SEA/SH risks and common incidences are workplace-related sexual harassment. However, studies such as those done by Conflict Alert have shown that SEA/SH are more prevalent in BARMM. Given the Project's conflict context and the fact that BARMM has its own laws and ministries, the risk rating is rated as moderate with communities more at risk for SEA/SH including for worker-related incidents. The rating necessitates the preparation of a GBV Action Plan in addition to the mandatory GBV requirements for all projects such as having a Code of Conduct for all workers and including the same in the procurement documents, having a GBV-sensitive GRM and referral pathways, etc.

To be consistent with the approach of the Bangsamoro Camps Transformation Project, the local government mechanisms and regulatory frameworks that were/are being tapped will also be coordinated with to mitigate SEA/SH, including the mandated Barangay Child Protection Committee (BCPC), Gender and Development (GAD) committee, and the dedicated women and child desk officers of the Philippine National Police.

B. Relevance of Standards and Policies at Concept Stage

B.1 Relevance of Environmental and Social Standards

ESS1 - Assessment and Management of Environmental and Social Risks and Impacts

Relevant

[Optional Explanation - Max. character limit 1,000]

The project activities are expected to cause moderate impacts such as loss of vegetation (cutting of trees), soil excavation leading to likely contamination of nearby water bodies, local drainage/ponding impacts, construction and community safety impacts at the camps areas. ESS 1 hence is relevant. Accordingly an ESMP or preparation of Initial Environmental Examination (IEE) or checklist according to the requirements of the Philippine EIS System will be prepared. Some roads (to be identified) that pass through environmentally sensitive areas such as water bodies (Mindanao River and Atos River) and communities will require the preparation of ESIA and ESMP. Contextual conflict-



related issues comprise the main social risk where activities related to the project could exacerbate existing or ignite new conflict in the area. Due to the sensitivity and volatility of the situation, understanding the sources of conflict and dynamics among stakeholders is crucial for E&S risk mitigation.

ESS10 - Stakeholder Engagement and Information Disclosure

Relevant

[Optional Explanation - Max. character limit 1,000]

The Project will be prepared and implemented in a complex and sensitive web of stakeholders involved in the normalization of the camps. The Project initiated engagement with key stakeholders including the JTFCT and MAFAR which resulted in the shortlist of six camps, as well as an initial screening of environmental and social risks and impacts of the subproject proposed therein. A Stakeholder Engagement Plan (SEP) will need to be prepared by a BARM conflict expert as soon as possible to guide the project preparation teams on appropriate approaches for engagement early on until project implementation. The SEP will utilize a conflict-sensitive approach, seek to ensure that the project will not ignite new nor exacerbate conflicts, and apply the Mindanao Peace Lens. SEP will also specify disclosure requirements during project implementation. The SEP and all other ESF instruments prepared at project preparation will be disclosed prior to project approval.

ESS2 - Labor and Working Conditions

Relevant

[Optional Explanation - Max. character limit 1,000]

The construction of FMR will involve moderate number of labor, skilled and semi-skilled construction workers, including the use of necessary earth-moving and road construction equipment. Typical construction-related occupational health and safety issues, such as accidents and construction injuries caused by the lack of personnel protective equipment and limited awareness of construction safety practices, and community safety issues associated with road traffic and heavy equipment and construction vehicle movement on roads under construction, especially when constructing nearby communities are likely to be encountered during the construction phase of the R2D project. Safety issues during construction are also expected. These issues are expected to be not significant, but are relevant. Accordingly, the requirements of ESS 2 on labor and working conditions apply for the project.

ESS3 - Resource Efficiency and Pollution Prevention and Management

Relevant

[Optional Explanation - Max. character limit 1,000]

The proposed FMRs are expected to pass closely and/or across some water bodies and rivers. Accordingly, the project activities are expected to cause temporary and short term pollution of water bodies in the immediate impact area. Following good engineering practices, the project is also expected optimize spoils cut-fill during earth work operations and also cutting of trees/ vegetation. The use of nearby water resources or rainwater harvesting for construction purposes could be considered by the contractor to minimize competition for water resources with nearby communities. Vehicle operation and heavy equipment movement during the construction phase will result in the release of greenhouse gases. This can be minimized by preventing vehicles from running idle, and by turning off the engine when not in use. Construction camps (if needed by the workers) can opt to use solar panels and rechargeable lighting fixtures for powering camp facilities. Thus the requirements of ESS 3 are relevant.



ESS4 - Community Health and Safety

Relevant

[Optional Explanation - Max. character limit 1,000]

The proposed roads pass through small communities residing in the five camps of the project area. Hence the project activities are expected to impact the communities, positively during operation phase and negatively during the construction phase. Road construction will cause dust and noise generation and potential accidents due to increased vehicle movement and heavy equipment. Hence, ESS4 is relevant for the project. However, labor influx is not expected and SEA/SH risks to communities from workers is moderate. A GBV Action Plan will be prepared which will include the enforcement of a Code of Conduct and having a GBV-sensitive grievance redress mechanism, among others. Principles of providing universal access to people with disability will also be considered as part of technical designs of the project roads. No security personnel will be hired as all activities in the camps are coordinated with the military who maintain the peace and order in the areas together with the camp leaders.

ESS5 - Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Relevant

[Optional Explanation - Max. character limit 1,000]

Initial screening revealed that in two camps, several structures would need to be affected. It is not clear if land acquisition is required in any of the six camps and if the structures have encroached on the right-of-way. During project preparation, a negative list is envisioned to be developed which will include land acquisition and involuntary resettlement. The relevance of this ESS will be revised accordingly.

ESS6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources

Relevant

[Optional Explanation - Max. character limit 1,000]

The project will not traverse through critical habitats nor will it be built near protected areas. Based on initial screening carried out any need for 'offsetting' is not expected. The project activities are expected to involve cutting trees and clearing vegetation along existing road right-of-way to expand the width of the road and to accommodate vehicle traffic. The status of some parcels of land (forest or not) is yet to be ascertained. Though no sensitive biodiversity areas or natural habitats are reported, given the nature of the project area (mountainous and forested), the requirements of ESS 6 are assessed to be relevant. The presence of IUCN and Philippines Red List species will be verified during site survey and road ground-staking activities and avoiding removal of Red List species will be ensured. Necessary permits will be secured following the the national and BARMM environmental requirements and mitigation measures will be included as part of the ESMP.

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

Relevant

[Optional Explanation - Max. character limit 1,000]

The Project will involve Indigenous Peoples mostly as beneficiaries. Some of the roads traverse through or lead to ancestral domains which, under the Philippines' Indigenous Peoples' Rights Act (IPRA) will require free and prior informed consent (FPIC). However, the Project is not anticipated to trigger any of the circumstances requiring FPIC



under the ESF. Given the subprojects are small-scale, guidance on engagement with Indigenous People will be made part of the Stakeholder Engagement Plan that will be prepared for the Project. It will contain key principles of ESS 7 and aligned with existing approaches of current World Bank projects being implemented in BARMM including due diligence for existing roads that traverse through ancestral domains.

ESS8 - Cultural Heritage

Relevant

[Optional Explanation - Max. character limit 1,000]

Some of the proposed FMRs pass through and/ or close to religious structures such as madrasah, mosque, etc. Road excavation will follow procedures set out in the Chance Find Procedures, to be prepared by the project contractor in compliance with the national requirements and international best practices in tangible cultural heritage preservation. No impacts on intangible cultural heritage are anticipated. Requirements of ESS 8 hence have been assessed as relevant.

ESS9 - Financial Intermediaries

Not Currently Relevant

[Optional Explanation - Max. character limit 1,000]

The project will be implemented through MAFAR and financed with IPF as an instrument. Hence ESS 9 is not relevant.

B.2 Legal Operational Policies that Apply

OP 7.50 Operations on International Waterways

No

The activities proposed by the project doesn't involve interventions in 'international waterways', hence requirements of OP7.50 are assessed to be not relevant at this stage.

OP 7.60 Operations in Disputed Areas

No

The project activities are not proposed in disputed areas and hence the requirements of OP 7.60 are assessed to be not relevant at this stage.

B.3 Other Salient Features

Use of Borrower Framework

No

[Optional explanation – Max. character limit 1,000]

Based on the country safeguards framework assessment, the framework of Philippines' is relatively aligned with Bank's ESF. However, the Project will be implemented under the autonomous government of BARMM which has its own set of legislations and regulations including for E&S risk management. Although the legal framework should not deviate from the national laws, actual experience in the BARMM is very limited. In addition, some of the laws have not yet been completed and a systematic assessment of alignment with the ESF has not been done yet. Nevertheless, the Project will adopt relevant approaches of other World Bank projects in the Philippines that are deemed to be effective in BARMM and to contribute to effective management of identified risks.



Use of Common Approach

No

[Optional Explanation including list of possible financing partners – Max. character limit 1,000]

The Project does not involve co-financing.

B.4 Summary of Assessment of Environmental and Social Risks and Impacts

[Description provided will not be disclosed but will flow as a one time flow to the Concept Stage PID – Max. character limit 5,000]

The project activities are expected to cause loss of vegetation, cutting of trees, localized impacts on rivers and water bodies, soil excavation and spoils generation. Construction stage impacts such as dust, health and safety, local contamination of water and inconveniences to the local communities are also expected. However, given the size and scale of the project activities, these impacts are expected to be short term and temporary. Thus, Environmental Risks for the project are assessed to be 'Moderate'.

Social impacts are moderate owing to the small investment amounts and the length of the roads. Two of the proposed roads have been screened to involve a handful physical displacement of structures. Land acquisition needs to be verified and there is a need to establish if the structures encroached on existing right-of-way. Indigenous Peoples will be involved mostly as beneficiaries and some of the roads traverse or lead to their ancestral domains. Labor influx is not expected as local labor is available and no complex infrastructure work will be involved.

However, as the roads will be implemented within the camps, MAFAR has limited experience with World Bank's ESF, and BARMM has its own government and legislation (including for IPs which has not yet been finalized), the rating is elevated to Substantial. Given the sensitive context, land and acquisition and relocation could become contentious and the road's increased benefits to some groups within the camps could become sensitive issues.

The impacts and mitigation measures will be revisited during project preparation after engaging into a dialogue with MAFAR, JTFCT, and other relevant stakeholders about having a negative list to help ensure faster and smoother project implementation. Initial discussions with MAFAR have indicated that the list could include land acquisition and involuntary resettlement, and imminent threat to safety.

The Project will endeavor to align ESF requirements and approaches with existing interventions under the BNTF including for SEA/SH as some of the camps are the same for both projects. Where relevant, the Project will also adopt existing ESF approaches of World Bank projects being implemented in BARMM such as MIADP and PRDP.

C. Overview of Required Environmental and Social Risk Management Activities

C.1 What Borrower environmental and social analyses, instruments, plans and/or frameworks are planned or required by Appraisal?

[Description of expectations in terms of documents to be prepared to assess and manage the project's environmental and social risks and by when (i.e., prior to Effectiveness, or during implementation), highlighted features of ESA documents, other project documents where environmental and social measures are to be included, and the related due diligence process planned to be carried out by the World Bank, including sources of information for the due diligence - Max. character limit 3,000]



The project is a small trust fund project (less than 5 million) and will be proceed to the approval stage directly, after all activities are prepared. Hence, as part the project preparation, the team proposes preparation of following instruments.

- Negative list of subprojects/ activities (to be included in ESCP)
- ESIA/ ESMP (PDR or IEE as per Philippines EIS) for each sub-project (FMR)
- Labor Management Plan (including community health and safety)
- Stakeholder Engagement Plan (SEP) which includes provisions for engaging with IPs
- GBV Action Plan

III. CONTACT POINT

Contact Point

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IV. FOR MORE INFORMATION CONTACT

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V. APPROVAL

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