



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)
Iraq	MIDDLE EAST AND NORTH AFRICA	P178824	
Project Name	Iraq Social Safety Net Enhancement Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Social Protection & Jobs	Investment Project Financing		6/23/2022
Borrower(s)	Implementing Agency(ies)		
Republic of Iraq	Ministry of Labor and Social Affairs (MOLSA)-Social Protection Commission		

Proposed Development Objective

The project will seek to: (i) strengthen the Ministry of Labor and Social Affairs’ (MOLSA) capacity to deliver effective and efficient SSN programs; and (ii) support the ministry to further develop its social registry as an integral component of the national single registry.

Financing (in USD Million)	Amount
Total Project Cost	4.20

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 proposed grant will advance the systems building agenda which is critical to support the reforms of the White Paper. A Social Registry is the cornerstone of a resilient social safety net system, and it will constitute an important tool for the inclusion of poor and vulnerable populations into the government social programs that are provided by MOLSA, particularly given the possible subsidy reform (PDS targeting reform, currently supported by WFP). The grant



will be linked to the pipeline Human Capital Recovery Project which will support the expansion of the ongoing Cash Transfer Program.

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 is of a national scope which will (i) strengthen the Ministry of Labor and Social Affairs' (MOLSA) capacity to deliver effective and efficient Social Safety Nets SSN programs, and (ii) support the ministry to further develop its social registry as an integral component of the national single registry. In the past decade, the World Bank has been supporting the Government of Iraqe (GOI) to strengthen its SSN. The Bank has played a key role in the articulation of a strategic roadmap for social protection reform in 2013, and the passing of the Social Protection Law 11/ 2014 which governs the current system. This law shifted social assistance targeting from categorical to poverty-based and established the Social Protection Commission (SPC) within the MOLSA to be in charge of managing the Cash Transfer Program CTP. The Bank has also supported advancing the systems building agenda, with emphasis on MOLSA's social registry as a key constituent of a national unified registry, as well as important delivery systems and functions such as case management, Grievance Redressal Mechanism (GRM) and Monitoring and Evaluation (M&E). Over the past two years, and with financing from the I3RF (Iraq Social Protection Support Program – SPSP), the Bank worked with MOLSA and the SPC on assessing existing Information and Communication Technology ICT systems and infrastructure, cleaning the existing databases, as well as building the capacity of IT team in enhancing the cyber security and installation of servers. This milestone allowed the Ministry to secure its databases and manage more effectively its programs. Under this new project, MOLSA will further develop the Social Registry, strengthen the key functions across the delivery chain of the Cash Transfer Program CTP, with a view to improving effectiveness and efficiency, and support to facilitate the integration of MOLSA's social registry into the Single Registry.

D. 2. Borrower's Institutional Capacity

The project components will be led by MOLSA in close collaboration with Ministry of Trade (MOT). The work will involve relevant government entities, notably the Ministry of Planning, Ministry of Finance, Ministry of Interior, Ministry of Communications, and others. MOLSA will be responsible for the management of the project, the Project Management Unit (PMU) that will be responsible for the day-to-day implementation. The PMU will be headed by a program manager and would include, inter alia, specialists in communications, operations, database administration, payments, IT, field operations, M&E, Environmental, Social a Health and Safety (ESHS) Specialist, financial management and procurement.

As the project will be implemented according to the World Bank's Environmental and Social Framework (ESF) requirements, the Environmental and Social capacity of MOLSA to manage the associated environmental and social risks is assessed to be limited at this stage. Moreover, the Ministry does not have assigned in-house environmental and social management capacity. Due to capacity constraints of the recipient, the Project Management Units (PMU)



will include an Environmental, Social a Health and Safety (ESHS) Specialist to support management of Environmental, Social, Health and Safety (ESHS) risks and impacts of the project in accordance with the ESF requirements. The Bank ESF team will support PMUs in developing TORs for the ESHS staff to ensure that all key functions needed for managing risks and engaging with stakeholders are well and upfront formulated and that the appropriate candidates are assigned for this purpose. The ESF team will also provide guidance to ensure that the project operational manuals (POM) include rules and guidelines on environmental and social safeguards, mitigation measures, information on the grievance redress mechanism system, and criteria and procedures to be applied for selection of beneficiaries.

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

A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Low

There are no significant adverse environmental impacts associated with the project. The project does not include any physical works. The other expected environmental impacts associated with the installation and use of electronic are waste in case of damage or at end life of equipment, their management and disposal, in addition to non-hazardous waste, especially papers from workshops, training and meetings throughout the project. As explained in borrower capacity, this is the first operation for MOLSA that follows the ESF, thus it is expected that there will be need for some work on building the capacity and increase the knowledge of the environmental and social (E&S) specialist to adapt to the new ESF. Consequently, the environmental risk rating is estimated to be low. An ESCP and SEP will be prepared to a standard acceptable to the World Bank and disclosed on the MOLSA website and on the World Bank website prior to project Appraisal .

Social Risk Rating

Moderate

Social risk of the project is assessed as Moderate. The Project is expected to have positive social impacts on the vulnerable as its main objectives are intended to improve access of the extreme poor to the selected social protection programs and improve effectiveness and build MOLSA capacity to deliver effective and efficient SSN programs; and support the ministry to further develop its social registry as an integral component of the national single registry. There are limited direct adverse social impacts resulting from project activities since there are no civil works, and it does not involve any land acquisition. The initial screening of project social risks and impacts indicated the following potential indirect social risks and impacts include 1) potential perception of exclusion amongst vulnerable groups (women, persons with a disability (PWD), youth and poor communities, and internally displaced persons (IDPs). ,2) exclusion of some intended beneficiaries due to weak outreach or communication plans; 3) weak grievance mechanism which is not able to capture and address concerns in a timely or responsive manner 4) risks related to labor and working conditions 5) Occupational Health and Safety (OHS) and Community Health and Safety Risks due to exposure to COVID-19 contagion during project activities. The project does not affect indigenous peoples.

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:

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Physical activities under the project are associated with component 1 which will support investments to further develop MOLSA's Social Registry; and strengthen the key functions across the delivery chain of the CTP, with a view to improving effectiveness and efficiency, data quality and cybersecurity enforcement, as well as required software and hardware. With respect to component 2, it will contribute to the development of the structural architecture of the system according to the international practices and will finance investments in ICT capacity necessary to ensure interoperability of MOLSA's social registry with other relevant registries.

The Environmental risks are low, issues relate to the handling/disposal of (i) obsolete electronic equipment from upgrading computers and other hardware and (ii) project-financed equipment at the end of its useful life. Dismantled electronic equipment may cause risks to human health and the environment if not disposed of in an environmentally sound and safe manner. As the country lacks electronic waste recycling/disposal facilities, obsolete equipment shall be safely stored until the licensed facilities are established in the country or before exporting abroad. The potential issues related to the project components such as water consumption, energy efficiency, and waste management will be mitigated through a detailed section in the POM.

From the social perspective, Given that the limited number of project workers and labor risks, labor management procedures will be incorporated into POM (rather than a stand-alone document) and will entail provisions to ensure labor aspects, including child labor and labor influx, are properly addressed in the documents. Amongst the social risks identified the risk of exclusion of vulnerable groups including women, Person with Disability (PWD) and other poor communities, the perception of inadequate prioritization or delays in addressing stakeholders' needs. The SEP will ensure proper consultation with project beneficiaries and other vulnerable groups. SEA/SH screening assessment tool was used, and the outcome indicated that various aspects of the program bring the GBV risk to "Low" risk rating and as such the implementing agency will need to adapt needed measures in line with the World Bank's Good Practice Note (GPN) and follow the recommended actions for a low GBV risk rating in the GPN. The project will prepare, disclose and implement appropriate mitigation measures, including the management and monitoring of mitigation measures to ensure the inclusion of disadvantaged or vulnerable individuals or groups.

Areas where "Use of Borrower Framework" is being considered:

"Use of Borrower Framework" is not considered under this project.

ESS10 Stakeholder Engagement and Information Disclosure

Citizen engagement and stakeholder engagement are a core part of the project design as the project aims to facilitate access to key public services for citizens, enterprises, and public agencies. The Borrower MOLSA will prepare a Stakeholder Engagement Plan (SEP) by Appraisal, which will outline the activities and timeframe for engaging with different stakeholder groups throughout the life of the project, define roles and responsibilities, human resources and budget needed for implementing SEP activities. Key objectives of the SEP are to maintain a constructive relationship with stakeholders, ensure that their views are taken into account in project design and implementation, specifically in the management of environmental and social performance, provide means for inclusive engagement with all project-affected parties, and ensure that appropriate project information is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format. The SEP will ensure appropriate representation and participation of various groups of stakeholders, including women, children, persons with disabilities, minorities, the elderly and other vulnerable groups. Stakeholders that have been identified for this project include: project-affected parties (PAPs) who might be positively and adversely affected other interested



parties include private sector, civil society and international institutions and different line of ministries e.g. MOF, MOP, MOLSA, and MOT mass media, research institutes, and local universities. SEP activities will envision measures to ensure that disadvantaged and vulnerable groups have equal opportunity to obtain information and benefit from project activities, as well as have channels for grievance and redress if negatively affected. Such activities include tailored awareness and information campaigns, distributing information materials through multiple channels such as media, social media, and local municipality / community leaders, emphasizing the rules and principles of equity and non-discrimination. These groups will be identified in SEP and differentiated measures will be proposed to ensure their participation. The borrower will establish a grievance mechanism for the project to ensure that citizens have an accessible mechanism to raise any questions, feedback, or complaints on project-related activities. The grievance mechanism will incorporate multiple intake channels and be widely communicated so that all interested parties and the general public can be informed on its existence and use. The details of the grievance mechanism – intake channels, advertisement, processing of feedback and complaints, recording of grievances, response to complainants, monitoring and reporting on the GM, etc. will be described in the SEP.

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

The project will likely deploy 2 categories of workers, namely: a) direct workers of the Project Management Unit PMU, and b) contracted workers employed or engaged through third parties, and international and national NGOs Labor and occupational health and safety (OHS) risks under the project are likely to be low and will be mitigated by strict adherence to national law and ESS2 standards, safety standards related to the installation and operation of equipment following good international practice and establishment of grievance mechanism for all project workers.

The project will develop and implement Labor Management Procedures (LMP) which will be incorporated in the project operation manual (POM) . The project will introduce CoC for all employees, and protocols for safe and confidential handling of SEA/SH concerns. Component 1 activities and all associated TORs for contracting services will include a focus on equity and nondiscrimination, and gender sensitivity, to ensure that project-financed activities in the realm of civil service reform promote principles of inclusion and non-discrimination consistent with the ESF. The project will likely deploy 2 categories of workers, namely: a) direct workers of the Project Management Unite PMU, and b) contracted workers employed or engaged through third parties, and international and national NGOs; A separate grievance mechanism system will be set up for all direct workers, and contracted workers to raise and resolve workplace-related concerns.



ESS3 Resource Efficiency and Pollution Prevention and Management

Relevant, the project shall not be financing activities that cause pollution risks. The project will support the establishment of a Project Management Unit to be in charge of implementing its activities and will finance the purchase of needed equipment (laptops, printers, etc.). This will reduce the use of paper and consequently the waste, however, it may lead to increase energy consumption. The provisions and mitigation measures required to cover the above implications will be proposed in the ESCP and in the POM.

ESS4 Community Health and Safety

ESS4 is relevant. The project shall not be financing activities that directly affect community health and safety. However, potential risks related to Covid-19 infection may arise during training and awareness sessions for the different counterparts interested in or affected by the project interventions. Appropriate measures provided by the national authorities and WHO will be followed and documented in the ESCP. The project will provide adequate facilities and PPEs to the project workers and beneficiaries as appropriate. These measures will be described in the project that E&S instruments to be prepared and disclosed prior to project appraisal. Appropriate measures will be prepared for the project to address risks of SEA/SH in a way that is commensurate to the Low risk level and will include primarily the need to have a code of conduct for all staff involved in the project, training/awareness raising of SEA/SH, and a GM channel for SEA/SH grievances. No new infrastructure is being constructed under the project, however accessibility of training facilities for the disabled will be considered where technically and financially feasible to select the convenient places. Service providers shall specify the accessibility for disabled, of their facilities in their bids, and accessibility will be incentivized.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

ESS5 is not considered relevant. The project will not acquire any land or result in involuntary resettlement.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

This ESS is not relevant at this stage as the project will not support rehabilitation, construction activities, civil works, or procurement of heavy equipment and accordingly will not result in any risks or impacts to biodiversity or living natural resources.

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

ESS7 is not relevant at this stage. No groups qualifying as Indigenous Peoples are among the beneficiaries of the project.



ESS8 Cultural Heritage

ESS8 is not considered relevant to the project at this stage. Project activities are not expected to affect tangible or intangible cultural heritage.

ESS9 Financial Intermediaries

ESS9 is not considered relevant. No FIs are expected to be involved.

B.3 Other Relevant Project Risks

The main risk facing this program, like many other projects in Iraq, relates to the fragility of the Iraqi environment and its consequences on launching and continuing important interventions. Overall stability and security risks can force the temporary halt, and consequently prolongation, of the project. A second risk relates to the internal coordination of the Ministry of Labor and Social Affairs, the technical team, and program stockholders, including delays in further solidifying program design, preparation, and governance issues that may relate to procurement.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways	No
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 financing partner is required

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

Actions to be completed prior to Bank Board Approval:

The Implementing agency (MOLSA) will prepare and disclose the following instruments prior to appraisal:

- (1) Environmental and Social Commitment Plan (ESCP)
- (2) Stakeholder Engagement Plan (SEP)

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

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- (1) Dedicate ESHS .specialist.
- (2) If deemed necessary assign an E&S consultant with experience and skills to support the E&S focal point in the preparation and implementation of the E&S instruments.
- (3) Implement and update the SEP if necessary.
- (4) Establish a Functional GRM.
- (5) Delivering ESS-related training programs to the relevant staff as required. and consultants prior to start of their respective activities on project ES requirements (including LMP, CoC, GM).
- (6) Incorporate and implement the relevant energy efficiency use measures within the POM.
- (7) E-waste management plan integrated with the project operation manual (POM)
- (8) Labor Management Plan (LMP) Integrated with the Project Operation Manual (POM) to be prepared by Effectiveness date and adhere to it throughout project implementation;
- (9) Prepare Project Operation Manual (POM).

Public Disclosure

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Republic of Iraq

Implementing Agency(ies)

Implementing Agency: Ministry of Labor and Social Affairs (MOLSA)-Social Protection Commission

V. FOR MORE INFORMATION CONTACT



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VI. APPROVAL

Task Team Leader(s):	Khalid Ahmed Ali Moheyddeen
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