



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)
Haiti	LATIN AMERICA AND CARIBBEAN	P179038	
Project Name	Haiti: Promoting the Productive Inclusion of Persons with Disability		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Social Protection & Jobs	Investment Project Financing		9/29/2023
Borrower(s)	Implementing Agency(ies)		
Republic of Haiti, Ministry of Economy and Finance	Ministry of Social Affairs and Labor, Agency for Persons with Disabilities BSEIPH		

Proposed Development Objective

16. The PDO is to improve the economic inclusion of vulnerable adults with disabilities in selected locations. The total number of direct beneficiaries to be reached is 2,490. The PEI intervention will target 1,500 beneficiaries (half of which will be women, 33 percent will be youth aged 18-29 years old). Selected CSODPs will receive capacity building to improve their ability to advocate for the economic inclusion rights of persons with disabilities vis a vis the private sector and local governments. The project aims to reach 33 CSODPs and 990 direct beneficiaries defined as the members of the CSOs which will receive capacity building trainings . The targeted location of the pilot is the Grand’Anse region of Haiti and the capital city of Port-au-Prince.

17. To promote the economic inclusion of persons with disabilities, the proposed project will provide access to selected beneficiaries to a poverty graduation-type program specifically designed for disability inclusion. Graduation type programs reach the most vulnerable groups and usually include a combination of cash or in-kind transfers, skills training, coaching, access to finance, and links to market support. Participants of the proposed project will benefit from a multi-pronged package of interventions and services tailored to help people living in poverty and with disabilities achieve higher socio-economic empowerment and resilience.

18. The project will also provide technical assistance to BSEIPH and CSODPs to promote the economic inclusion of persons with disabilities. The project will build the capacity of BSEIPH to play a stronger role in enforcing existing employment legislation for persons with disabilities and in supporting the access of persons with disabilities to productive (self-)employment opportunities. Support will also be provided to selected CSODPs to strengthen their economic inclusion advocacy capacity. CSODPs are local grassroots CSOs for persons with disabilities. They engage in advocacy for the rights and needs of persons with disabilities. They also provide various types of services to their



members (health, education, microfinance, etc.). The majority of CSODPs have a legal CSO status and pay a registration fee to BSEIPH and MAST.

Financing (in USD Million)	Amount
Total Project Cost	2.76

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 Project will finance training, services, and capacity building to increase access to PEI opportunities for persons with disabilities in Haiti. The Project will include three components:

Component 1: Capacity building, diagnostics, and raising awareness for improving economic opportunities for disabled adults. This component will aim to nurture an enabling economic environment for persons with disabilities. Several activities will be financed, including capacity building of BSEIPH and CSOs to assess and determine disability and design and execute employment and self-employment programs.

Component 2: PEI program for disabled adults capable of working. This component will provide access to selected persons with disabilities to a comprehensive PEI program to address major constraints to productive inclusion.

Component 3: Project management and M&E. It will finance administrative costs, operational monitoring and evaluations of the PEI program’s impact on the livelihoods and welfare of the beneficiaries.

D. Environmental and Social Overview

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

Persons with Disabilities (PwD) are among the most vulnerable and most likely to be discriminated against in Haiti. Their economic empowerment and resilience are severely limited. PwD are largely excluded from the labor market. They face important barriers in accessing education and vocational skills development. They need to bear additional out-of-pocket costs to obtain accessible transportation to training sites, personal caregiving services, or assistive devices. They also face societal prejudice that impacts the scale and quality of training opportunities they receive. There is also bias and discrimination in where and how PwD obtain skills and access training opportunities. Being often at a disadvantage, they enter the labor market with a skills deficit and a lack of previous work experience. On the demand side, they face constraints such as low awareness and confidence among employers on how to include PwD in the workplace. Insufficient access to financial and business support services are also important constraints faced by persons with disabilities.

Public Disclosure



The PDO of the proposed project is to improve the economic inclusion of vulnerable adults with disabilities. The total number of beneficiaries to be reached is 2,800 (half of which women). The anticipated targeted location of the pilot is the Grande Anse department of Haiti (Haiti is divided into 10 departments) and Port-au-Prince. The geographic scope will be finalized during project preparation. Grand Anse is one of the three departments with the highest level of vulnerability (according to the Haitian Deprivation and Vulnerability Index).

The proposed JSDF pilot is complementary to the ongoing Adaptive Social Protection for Increased Resilience (ASPIRE) IPF (P174111). ASPIRE provides unconditional cash transfers to the most vulnerable households in the Grande Anse department. It also provides accompanying measures to these beneficiary households so that they can better prepare for and adapt to shocks (information on best practices in hygiene, nutrition, maternal health, COVID-19 prevention, and financial inclusion). Some beneficiary households of ASPIRE have PwDs, but the majority don't. The proposed JSDF pilot will instead provide a productive inclusion package specially tailored for PwDs (startup capital, hard and business skills training, coaching, behavioral interventions, etc.). ASPIRE's implementation status rating for environmental and social risk management is currently Moderately Satisfactory. The Project developed all E&S instruments during preparation in the required timeframe, becoming effective on April 21st 2021 and has included relevant E&S clauses in the contract with the World Food Programme (WFP), the delegated implementation authority hired by the Client. An E&S specialist is mobilized at the Ministry of Social Affairs and Labor (MAST) and a WFP E&S focal point has been appointed. The Grievance Redress Mechanism has been established and is functioning effectively though needs to be expanded to include workers grievances. The MS rating is due primarily to increased insecurity in Haiti which is affecting the project: two security incidents have been reported and final incident report and corrective measures have been pending completion and needs attention by the PIU. Some areas needing additional attention to ensure compliance with E&S instruments were identified during the May 2022 mission including: i) using the E&S monitoring tool at distribution sites, ii) applying the risk mitigation measures related to the deployment of security personnel as part of project activities, iii) including COVID and waste management protocols in the semester reports, iv) developing the sensitization campaign on GBV prevention and response and v) ensuring all project workers sign the code of conduct. The WFP E&S specialist committed to work more closely with the MAST E&S specialist to ensure application of all relevant E&S risk management instruments.

D. 2. Borrower's Institutional Capacity

Implementation of project activities will be overseen by the Agency for Persons with Disabilities (BSEIPH) of the Ministry of Social Affairs and Labor (MAST), with the support of a Project Coordinator and relying on the MAST PIU under the ongoing ASPIRE project to carry out the fiduciary and E&S functions. The MAST PIU has adequate experience to support the BSEIPH in the management of the grant and to deliver the outcomes to the beneficiaries, particularly their rightful access to services and safety net programs. The MAST PIU E&S specialist under the ASPIRE project (P174111) will be tasked to oversee the environmental and social risk management aspects under the proposed JSDF pilot, with dedicated time and resources to adequately manage and report on potential risks and impacts associated with the Pilot.

BSEIPH will be the Recipient of the RETF and it will hire a qualified NGO/CSO/CBO with World Bank IPF-type implementation experience to implement the grant activities. There will be the possibility of having 2 NGO/CSO/CBOs to implement the grant activities given the geographic size of the department and a number of NGOs and Community-based Organizations are readily available on the local market, some of whom have experience in supporting implementation of World Bank financed projects across a range of sectors. The BSEIPH will issue one (or two) comprehensive contract(s) for one (two) reputable NGO service provider(s) to execute all project activities (except standard management and supervision activities and related costs, and technical assistance for building BSEIPH



capacity). The NGO(s) will be required to designate an E&S focal point as part of the key staff to oversee E&S risk management aspects.

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

A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Low

The environment risk rating is classified as Low (L) at this stage of project preparation. The core project activities are providing capacity building, studies, awareness raising and start-up capital. While the specific skills and sectors are not yet known at this stage it is expected that the pilot will favor those skills and competences which will allow PwD engage in own-account work or as wage employees in firms able to offer them adequate working conditions in existing facilities or centers. The training will take place in training centers (with no retrofitting financed under Project funds), and will be required to offer an inclusive environment to learning and apprenticeship. As such, the main adverse environmental risks and impacts related to these activities are likely to be minimal or negligible. The main anticipated environmental risk is likely to be around waste management, particularly the need for project workers to dispose of their PPE in a safe manner during the period when COVID-related protective measures are to be followed.

Social Risk Rating

Moderate

The social risk rating is classified as Moderate (M) at this stage of project preparation. While the overall social benefits are expected to be positive, key social risks and impacts include: i) security risks to project workers given the country’s deteriorating security situation, ii) project workers exposure to COVID-19 and transmission of the virus to local beneficiaries and communities and iii) the potential for exclusion of beneficiaries in line with the use of an existing SIMAST social registry. Stakeholder engagement activities will also be carried out and include a stakeholder mapping and a communication strategy to guide the interactions with the wide range of beneficiaries and ensure that a Grievance Redress Mechanism (GRM) will be in place for addressing concerns and grievances during the project execution, as will be detailed in the SEP.

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

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The environmental risks associated with this project are considered Low. The main potential risk is inadequate or improper use and disposal of project-procured PPE to ensure worker safety during COVID, should such conditions persist, in the existing facilities or centers where adequate working conditions, as assessed by BSEIPH, can be provided.

Social risks are assessed as Moderate. The overall social benefits are expected to be positive through supporting the economic inclusion of vulnerable adults with disabilities. A salient issue under the project activity is the identification



of beneficiaries of productive economic inclusion (PEI) measures. It is critical, thus, to ensure that the measures to identify persons with disabilities are effective. Persons with disabilities often live on the fringe of society in Haiti and can be hard to reach. Beneficiaries will be targeted using the social registry SIMAST, which has been entirely updated for the whole population of the Grand' Anse region between November 2021 and June 2022. In addition, the BSEIPH will mobilize the CSODPs from the region to get their support to reach, target, and enroll eligible persons with disabilities. The use of the updated social register and targeting methodology to allow for the inclusion of eligible beneficiaries is considered adequate to reach project beneficiaries. Gender inclusion is included in project design by aiming for 50% of women amongst the beneficiaries of the PEI program.

Key social risks and impacts include: i) security risks to project workers given the country's deteriorating security situation and ii) project workers exposure to COVID-19 and transmission of the virus to local beneficiaries and communities. These risks will be addressed through an update of the ASPIRE ESMF which will comprise a security management protocol and a COVID-19 protocol covering the project activities.

SEA/SH risks are assessed to be Low based on the scope of project activities, which do not comprise any civil works or labor influx. The ASPIRE ESMF includes a Code of Conduct addressing SEA/SH aspects, to be signed by all project workers.

The updated ESMF, LMP and SEP of the ASPIRE to cover activities under this pilot will be drafted, consulted and finalized at the latest 60 days after the Grant Effectiveness Date.

The ESCP will be drafted and disclosed during preparation, finalized at the signing of the Grant Agreement and re-disclosed.

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

None

ESS10 Stakeholder Engagement and Information Disclosure

The COVID-19 pandemic continues to pose a challenge for stakeholder engagement and disclosure of information, as stakeholder engagement and consultation processes cannot always be conducted in person. As long as COVID-19 related restrictions place limitations on traditional forms of stakeholder engagement, the requirements of ESS10 will be met by implementing actions such as (i) avoiding public gatherings (taking into account national restrictions), including public hearings, workshops and community meetings; (ii) conducting consultations in small group sessions, where small-group gatherings, that allow for social distance, are permitted, or make all reasonable efforts to conduct meetings through online channels where gatherings are not permitted; (iii) diversifying means of communication and rely more on social media and online channels where appropriate, including, where possible, the creation of dedicated online platforms and chatgroups appropriate for the purpose, based on the type and category of stakeholders; or (iv) employing traditional channels of communications (TV, newspaper, radio, dedicated phone-lines) when stakeholders do not have access to online channels or do not use them frequently as these can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions. These and other measures based on emerging experiences from other WBG projects in Haiti operating under COVID conditions (e.g. ASPIRE, CHUD, MDUR).



During Project preparation the BSEIPH will carry out stakeholder engagement activities including (i) identifying the Project stakeholders, making a distinction between those directly affected by the project and other interested parties; (ii) carrying out consultations with key stakeholders on project activities prior to appraisal; (iii) broaden the well-functioning ASPIRE Grievance Mechanism to cover activities supported under the JSDF pilot, per the requirements of ESS10, as will be documented in the updated SEP of ASPIRE. The SEP will be updated by the ASPIRE MAST PIU. The separate ASPIRE Workers' Grievance Mechanism will also be adapted to include provisions for grievances from Project workers under ESS2.

During implementation, BSEIPH will hold annual public consultations with stakeholders on the implementation of the project, including management of E&S risks and impacts, and produce and publish an accessible annual report on the progress of the project, including management of E&S risks and impacts. These measures will be included in the updated SEP of ASPIRE.

The ESCP, updated ASPIRE ESMF, LMP and SEP, will be timely disclosed to ensure meaningful and informed engagement with all Project stakeholders. Engagement with stakeholders will continue throughout Project implementation as will be indicated in the updated 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

ESS2 is considered relevant to this Project. The MAST PIU will hold fiduciary and E&S responsibility for the project. The PIU is a hybrid structure composed of civil servants and consultants considered as direct workers. Employees of implementing partners, including NGOs, are considered contracted workers under ESS 2. The ASPIRE LMP will be updated to cover activities under this pilot.

Whilst physical works are not envisaged under the project, the nature of the pandemic requires occupational health and safety (OHS) training in line with international good practice to be considered in all contracts with workers. Training will be delivered on basic workplace Occupational Health and Safety (OHS) practices as well as sanitary-specific precautions in order to limit exposure to communicable diseases, communicate provisions for treatment if exposed, and to avoid transmission to local communities and beneficiary households. While the number of workers cannot be estimated at the current stage, no large-scale labor influx is expected. The ASPIRE LMP includes a specific code of conduct, including SEA/SH provisions, as well as a general code for interacting with beneficiaries, communities and partners. In line with ESS2, the use of forced labor or the use of child labor for any person under the age of 18 in hazardous work situations is prohibited. People under the age of 15 (per Haiti's Labor Code) will not be hired by the project. For any project workers aged 15 to 18 years old, there will be a prohibition on any project-related work that is likely to be hazardous or interfere with their education or health.

The ASPIRE LMP includes a COVID-19 protocol on infection prevention during the pandemic. The Borrower will also ensure a nondiscriminatory, decent work environment; including ensuring that all workers adhere to the World Health Organization (WHO) Code of Ethics and Professional conduct as well as Good Industry Practice and WHO guidance on COVID-19. The measures to ensure compliance with ESS 2 will be embedded in all project contracts and



monitored by the PIU. The MAST PIU for ASPIRE worker GRM will be broadened to cover activities under this project, as we will document in the updated LMP. These measures will be comprised in the ESCP.

ESS3 Resource Efficiency and Pollution Prevention and Management

This ESS is relevant to the Project, however risks and impacts related to resource efficiency and pollution prevention and management as a result of project activities are expected to be minimal. The potential for direct and indirect environmental risks or impacts to Project workers and beneficiaries, especially regarding safe disposal of sanitary material and used PPE, are included in the COVID-19 protocol of the ASPIRE ESMF. The project is not expected to include significant use of water or impacts on water quality. In addition, the project is not expected to produce significant greenhouse gas emissions.

ESS4 Community Health and Safety

ESS4 is considered relevant to the Project. One risk factor is related to COVID-19 where poor community engagement practices or unauthorized mass gatherings of people could raise exposure risk to community workers and beneficiaries, which could lead to further spread of the disease through the project. As mitigation measures, the Borrower will design and implement provisions to prevent or minimize the spread of COVID-19 to the community as detailed in a dedicated COVID-19 protocol ASPIRE ESMF.

The use of security forces is not envisaged under the project, but should they be required, the project will comply with the requirements of ESS4 and will take into account the ESF Good Practice Note on Assessing the Risks and Impacts of Using Security Personnel in project.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Not currently relevant. No land will be either temporarily or permanently acquired for this project. There will be no physical or economic displacement

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

Not currently relevant. The Project will not finance any activities that involve direct, indirect or cumulative risks and impacts related to habitats biodiversity conservation, and sustainable management of living natural resources

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

Not relevant as there are no IP/SSAHUTLCs in Haiti as per standard definition of ESS7.

ESS8 Cultural Heritage

ESS8 is not relevant to the Project for the suggested project interventions.



ESS9 Financial Intermediaries

This standard is not relevant for the suggested project interventions.

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

None currently identified.

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

Actions to be completed prior to Bank Board Approval:

Final ESCP, timely disclosed to ensure meaningful and informed engagement with all Project stakeholders

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

- Designate ASPIRE PIU as having E&S oversight with the support of the ASPIRE E&S specialist
- Require implementing NGOs to designate E&S focal point
- Security management protocol included in ASPIRE ESMF
- COVID-19 protocol included in the ASPIRE ESMF
- Code of Conduct for project workers included in ASPIRE ESMF
- Define requirements for stakeholder engagement and include them to ESCP and updated ASPIRE SEP
- Provide training on Environmental, Social, Health and Safety risks to the project beneficiaries.

IV. CONTACT POINTS

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Public Disclosure



Borrower/Client/Recipient

Borrower: Republic of Haiti, Ministry of Economy and Finance

Implementing Agency(ies)

Implementing Agency: Ministry of Social Affairs and Labor, Agency for Persons with Disabilities BSEIPH

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

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Practice Manager (ENR/Social) Genevieve Connors Recommended on 20-Dec-2022 at 16:28:11 EST