



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 10/25/2023 | Report No: ESRSC03882



I. BASIC INFORMATION

A. Basic Operation Data

Operation ID	Product	Operation Acronym	Approval Fiscal Year
P181243	Investment Project Financing (IPF)	Seychelles SWM Project	2024
Operation Name	Seychelles Solid Waste Management Project		
Country/Region Code	Beneficiary country/countries (borrower, recipient)	Region	Practice Area (Lead)
Seychelles	Seychelles	EASTERN AND SOUTHERN AFRICA	Urban, Resilience and Land
Borrower(s)	Implementing Agency(ies)	Estimated Appraisal Date	Estimated Board Date
Ministry of Finance, National Planning, and Trade	Ministry of Agriculture, Climate Change, and Environment (MACCE)	04-Mar-2024	28-Mar-2024
Estimated Concept Review Date	Total Project Cost		
17-Oct-2023	5,000,000.00		

Proposed Development Objective

To promote sustainable solid waste management and circularity in Seychelles.

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]

The project aims to support the government in strengthening its capacity to manage solid waste as well as to improve circularity, thereby decreasing the amount of waste generated in Seychelles. Activities expected under each component includes: Component 1: Improving the Solid Waste Management (SWM) system, will include improved design and management of the Providence and La Digue landfills, acquisition of equipment, construction of central collection facility for recyclables waste, piloting waste segregation in selected areas, capacity building/institutional strengthening



including development of operational plans, data collection, and improving financial sustainability. Component 2: Improving Circularity, will include composting pilots as well as capacity building on composting for the relevant stakeholders. Capacity building and development of business plan on the financial sustainability of the sector will be provided to Small and Medium Enterprises (SMEs) across Seychelles. Including, promoting waste reduction initiatives from the fisheries sector and community engagement and outreach and the review and update of Waste Management relevant legislation at a nationwide level. Component 3: Project Management, will include support for the incremental operating costs for the Project Implementation Unit (PIU) and project management consultants, including measures to strengthen the capacity of the PIU to manage the E&S risks of the project activities in accordance with the ESF.

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 Republic of Seychelles is an archipelagic state in the Indian ocean, consisting of 155 islands, vulnerable to climate change. There are three main Islands in the Seychelles: Mahe, Praslin and La Digue each with an existing landfill site. An average 90,000 tons of waste per year are produced by Seychelles, which is not recycled. 1 percent of waste produced is diverted from the landfills. Waste is expected to increase by 5 to 15% annually over the next 12 years due to population and tourism growth. The Project will finance activities to optimize waste management practices at two existing landfill sites (Providence and La Digue Landfill), located on the Islands of Mahe and La Digue. A third existing landfill site, located on Praslin island, is under consideration but not confirmed. Providence is located in an industrial area on reclaimed land in the southeast of Victoria and is surrounded on three sides by seawater. There are no biodiversity sensitive sites near the landfill according to iBat. La Digue is a sanitary landfill site with semi-functional leachate control. Majority of the coastal areas in La Digue is considered important bird and biodiversity areas. Praslin landfill is located inland near the airport with no environmental sensitivities nearby. Several educational campaigns are led by Government and civil society to engage communities and private sector in waste minimization efforts. Landfill site are often not fenced, located near communities and used by waste pickers to collect recyclable materials.

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]

The Project will be managed by a project implementation unit (PIU). The Ministry of Agriculture, Climate Change, and Environment (MACCE) will be the implementing agency, through the Landscape and Waste Management Agency (LWMA). The Agency is responsible for the administration of waste management contracts for waste collection and landfill management. As well as the monitoring of the different contractors for waste collection, landfill management, beach and road cleaning in the Seychelles. The Agency has experience in the management and monitoring of Environmental and Social impacts but is not familiar with Bank safeguard policies and the ESF standards. As part of its due diligence during project preparation, the Bank will conduct capacity assessment and analysis of existing environmental and social management systems that maybe in place, to determine the needs of the Implementing Agency to strengthen its capacity in terms of E&S Management. This assessment will inform the E&S capacity building



measures needed to manage the project’s risks in accordance with the ESF, which will be reflected in the project’s Environmental and Social Commitment Plan (ESCP).

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Moderate

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]

The environmental risk rating is considered to be Moderate at concept stage as activities supported are considered medium to small in scale, located at existing landfill site and not anticipated to lead to significant long-term, adverse or irreversible environmental risks or impacts. LWMA has no experience with the ESF, but experience with environmental and social risk management in general. Borrower capacity and environmental impacts and risk will be further assess as part of project preparation. Component 1 support installation of environmental monitoring systems, medium to small scale physical activities (compaction) to improve waste management practices at the existing landfill site and construction of a central collection and recycling facility, piloting of waste segregation at source in selected areas and capacity building, while Component 2 will support studies to reduce waste sent to landfill, pilot compositing at landfill sites, involving Small and Medium Enterprises (SMEs) in waste management initiatives and improve legislative framework. Impacts associated with the physical activities, pilot studies and operations under Component 1 and 2 include (i) air emissions associated with release of gasses and waste burning, (ii) poor leachate control leading to ground and surface water pollution, (iii) spread of pests and disease-carrying vectors, (iv) wind-blow litter waste, (v) generation of construction waste (vi) noise pollution from heavy equipment, (vii) occupational and community health and safety risks due to historical poor waste management practices including to exposure to potential harmful substances and diseases. Anticipated impacts can be managed through the preparation of environmental and social management plans, including waste management, occupational and community health and safety plans. Infrastructure will be constructed taking into consideration climate resilience.

A.2 Social 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]

The Social Risk is assessed as Moderate. While no long term, widespread or irreversible social impacts have been identified as a result of the project, Components 1 and 2 entail activities involving: (i) community health and safety risks, particularly as a result of the construction of a central collection facility, increased traffic, movement of machinery and materials, monitoring equipment, and operation of heavy equipment, which could pose a threat to the surrounding population; (ii) potential adverse impacts on the livelihoods of informal recyclers, also known as waste pickers, in addition to the potentially increased risks for their health and safety after project changes are introduced; and (iii) other social risks, which will be further explored during the project preparation process, including the risk of child labor, and the Sexual Exploitation and Abuse/Sexual Harassments (SEA/SH) risks associated with project activities. At this stage, it is not expected that the Project will need to acquire land to build a waste recovery facility, as there is available space at the landfill and this space is owned by the land authority. Nevertheless, the land will be screened to confirm its status, including the potential presence of informal occupants. Effective Stakeholder consultations are required to ensure that waste management solutions are developed and implemented with the



support and knowledge of local communities. The capacity of the LWMA is not optimal as the agency is not experienced with implementing the ESF and Bank’s E&S Policies. However, the country has E&S firms and consultants with good capacity. The Project will articulate a thorough capacity Building program on the ESF at the level of the LWMA.

[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]

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]

Physical interventions under component 1 and 2 may pose a worker and community health and safety risks, generate construction waste and impact water and air quality, therefore require preparation of site specific Environmental and Social Management Plans (ESMPs) (ESS1), including environmental, health and safety risks assessments for activities at the landfill sites due to exposure to potential harmful substances (ESS3), occupational and community health and safety plan (ESS2 & 4), and waste management plan (ESS3) for both construction an operations. Activities will be screened using screening and exclusion lists in Environmental and Social Management Framework (ESMF), which will set out the principles for the preparation and implementation of site specific E&S assessments/EMSPs. The project will also prepare a Livelihoods Restoration Plan (LRP) to manage the impacts on waste pickers. E&S include waste strengthening, capacity initiatives and climate resilience.

ESS10 - Stakeholder Engagement and Information Disclosure Relevant

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

A SEP will be developed, setting out the consultation processes, including frequency, and format of stakeholder engagement throughout the life cycle of the project. Stakeholder mapping will be conducted to identify stakeholders and to their influence on project design, implementation and project impacts on them. Attention will be given to inclusion of women, migrant workers, waste pickers, and other interested groups. Consultations will be carried early on during project preparation to inform project design and the development of E&S risk management instruments The SEP will ensure all consultations are inclusive and accessible. It will include a GRM. The SEP will be prepared and disclosed prior to project appraisal, and will report on the consultations carried out until then.

ESS2 - Labor and Working Conditions Relevant

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

The project involve direct, contracted and primary supply workers. A small number of workers is expected to be employed by the project. Labor Management Procedures (LMP) will be prepared by appraisal outlining working conditions including measures to prevent child and forced labor, workers’ GRM, and OHS requirements.. Both local

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labor laws and ESS2 requirements will apply. Contractor's ESMPs will include the LMP. An Occupational health and safety plan (OHSP) as part of the ESMPs will be prepared for construction and operations, following the WBG EHS Guidelines and r Guidelines for Waste Management Facilities. The OHSP will include procedures on incident investigation and reporting, emergency preparedness and response procedures and worker training/awareness. Training activities for workers and SMEs subcontracted by the LWMA will entail the risk of SEA/SH and codes of conduct with SEA/SH provisions. A GBV Action Plan will be in place for each site to manage any increased SEA/SH risk.

ESS3 - Resource Efficiency and Pollution Prevention and Management

Relevant

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

The project by nature aim to reduce waste to landfill and improve waste management practices. Activities supported may lead to air, soil, surface and groundwater pollution, waste generation and littering and environmental degradation if not done adequately which are relevant to ESS3. Potential historical pollution at poorly managed landfill sites may pose a health risks to workers and communities and requires preparation of a health and safety risk assessment as part of the site specific ESIA/ESMP. Pollution related risks will be addressed through the implementation of mitigation measures in the ESMF and site-specific ESMPs. Waste and pollution prevention measures will form part of the construction and operational ESMPs. The project will support investigations for climate-smart options to address methane release to reduce Greenhouse gases released.

ESS4 - Community Health and Safety

Relevant

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

The Landfills are not fenced and in close vicinity to community settlements which can lead to negative impacts on the H&S of the community. The landfill is used by waste pickers who collect recyclable material. Small scale construction, may lead to increase in communities health and safety risks due to community located close to the landfill. Although the GBV risk was assessed as not particularly significant, as civil works are small in scale and will not require a significant amount of workers, a SEA/SH Assessment and Action Plan will be prepared and will cover community related risks. The installation of monitoring materials and vehicle traffic during implementation will expose communities to greater H&S risks from increased traffic during construction. A CHS plan and traffic management measures will form part of the ESMPs to reduce traffic related risks. The CHS plan will consider community health and safety measures set out in the WBG EHS general guidelines.

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

Relevant

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

The waste management facilities are located on government land. Physical displacement is not expected as project activities should not require land acquisition. The land will still require to be screened for squatters or any other land use. If informal occupants were to be identified, their treatment will need to follow ESS5 provisions. The ESMF will need to include procedures so that screening can be undertaken before the facility is built. However, because the safety of waste pickers could be at risk and their access may be temporarily restricted in some areas of the landfill site, this may lead to loss of livelihoods that the waste pickers gather. Because of this potential disruption, the project will prepare a Livelihoods Restoration Plan (LRP). This LRP will assess the number of waste pickers, their livelihood

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dependency on the site, the impacts the project will have on their livelihoods, and the necessary restoration measures.

ESS6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources

Relevant

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

Impact on biodiversity is not anticipated, however Providence is located in reclaimed land and is surrounded by ocean on three sides, and La Digue coastal areas are considered Key Bird and Biodiversity Areas as per iBat screening. No biodiversity sensitivities noted near for Praslin landfill according to iBat screening. Activities will generally take place within the footprint of existing landfill sites with potential existing impacts on adjacent marine and terrestrial ecosystems due to poorly managed leachate, wind-blow litter etc. Mitigations to reduce impacts will be incorporated in the operational plans, monitoring systems, waste management strengthening initiatives supported under Component 1 and 2. The ESMF will be used to screen for potential impacts on biodiversity sensitivities, including exclusion criteria and provision for mitigation measures in line with ESS6 to form part of the site specific ESIA/ESMPs to be prepared.

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

Not Currently Relevant

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

This ESS7 is not relevant as there are no communities nor peoples who meet the World Bank criteria for Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in Seychelles.

ESS8 - Cultural Heritage

Relevant

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

ESS8 is assessed as relevant. Civil works with excavations, although limited in scale, will occur in already exploited Landfills. An assessment will be conducted as part of the ESIA and/or ESMP and the mitigation hierarchy will be applied on the management of the project's potential risks and impacts. "Chance Find Procedures" will be included in the ESMP and chance find clause will be included in works contracts requiring contractors to stop construction if cultural heritage are encountered during construction and to notify and closely coordinate with relevant mandated Government authority for the salvaging and restoration of such cultural heritage.

ESS9 - Financial Intermediaries

Not Currently Relevant

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

The project does not involve Financial Intermediaries.

B.2 Legal Operational Policies that Apply



OP 7.50 Operations on International Waterways

No

OP 7.60 Operations in Disputed Areas

No

B.3 Other Salient Features

Use of Borrower Framework

No

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

Use of Borrower Framework is not being considered.

Use of Common Approach

No

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

No other financing partners are currently considered

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 environmental risk rating is considered Moderate at concept stage as activities supported are considered medium to small in scale, located at existing landfill site and not anticipated to lead to significant long-term, adverse or irreversible environmental risks or impacts. Component 1 support installation of environmental monitoring systems, minor physical activities (compaction) to improve waste management practices at the existing landfill sites and construction of a central collection and recycling facility, piloting of waste segregation at source in selected areas and capacity building, while Component 2 will support studies to reduce waste sent to landfill, pilot compositing at landfill sites, SME waste initiatives and strengthening of legislative framework. Impacts associated with activities supported under Component 1 and 2 include (i) air emissions associated with release of gasses and waste burning, (ii) poor leachate control leading to ground and surface water pollution, (iii) spread of pests and disease-carrying vectors, (iv) wind-blow litter waste, (v) generation of construction waste (vi) noise pollution from heavy equipment, (vii) occupational and community health and safety due to historical poor waste management practices including to exposure to potential harmful substances and diseases and (viii) traffic safety risks due to increase traffic and movement of heavy equipment. Infrastructure and activities supported under the project will be constructed and undertaken, taking into consideration climate risks and resilience.

The Social Risk of the Project is assessed as Moderate. While no long term, widespread or irreversible social impacts have been identified as a result of the project, Components 1 and 2 entail activities involving (i) community health and safety risks, particularly as a result of the construction of a central collection facility, installation of increased traffic, movement of machinery and materials, monitoring equipment, and operation of heavy equipment, which could pose a threat to the surrounding communities; (ii) potential adverse impacts on the livelihoods of informal recyclers, also known as waste pickers, in addition to the increased risks for their health and safety after the project changes are introduced; and. (iii) other social risks, which will be further explored during the project preparation process, including the risk of child labor SEA/SH risks associated with project activities. At this stage it is not expected that the Project will need to acquire land to build waste recovery facility as there is available space at the Landfill and this space is owned by the Land authority.

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Nevertheless, the Land will be screened to confirm its status, including the potential presence of informal occupants. Effective Stakeholder consultations are required to ensure that waste management solutions are developed and implemented with the support and knowledge of local communities.

To manage the Project's environmental and social risks, the implementing agent (MACCE) under the LWMA will prepare a series of environmental and social risk management instruments, which include an Environmental and Social Management Framework to screen project activities, a Stakeholder Engagement Plan with a grievance mechanism, an a Livelihoods Restoration Plan, Labor Management Procedures, Sexual Exploitation and Abuse/Sexual Harassments Action Plan. Site specific ESMPs which include occupational and community health and safety plans, waste management plans, and an environmental, health and safety risk assessment, among other, will be prepared during project implementation. The MACCE will carry out stakeholder engagement activities as well, in accordance with the provisions of the SEP. These commitments will be reflected in the Project's Environmental and Social Commitment Plan (ESCP).

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 LWMA and project implementing agency MACCE will be responsible for preparing and overseeing the implementation of the E&S instruments through the lifecycle of project and within the agreed timeframes.

A draft Environmental and Social Management Framework (ESMF) will be prepared for interventions which the location is not confirmed. The ESMF will sets out principles for preparation and implementation of site-specific E&S assessments/EMSPs, including a SEA/SH assessment and action plan and exclusion list for activities which will have a potential adverse impact on biodiversity. The ESMF will be prepared by the LWMA and disclosed as prior to appraisal.

A draft of Stakeholder Engagement Plan (SEP) will be prepared by LWMA consistent with the requirements of ESS10 and disclosed prior to the project appraisal. This SEP will include a detailed schedule of planned engagement activities for the various stakeholders during the project cycle, and will include the information of the consultations already carried out until then. The SEP will ensure all consultations are inclusive and accessible. It will include a Grievance Redress Mechanism.

A draft Livelihoods Restoration Plan (LRP) will be prepared due to the potential disruption in waste pickers activities. The LRP will assess the number of waste pickers and their livelihood dependency on the site, impacts, and mitigation measures. While the LRP will assess waste pickers impacts by appraisal, either as a standalone instrument or as part of the ESMF, the LRP's restoration measures will be finalized before the launching of bidding documents for purchase of equipment and construction of the collection facility for recyclables waste. The implementation of the LRP will need to be finalized before the beginning of works and operation of equipment acquired by the project.



Labor Management Procedures (LMP) will be prepared by LWMA by Appraisal as part of the ESMF, to provide measures to address the terms and conditions of works. These procedures will outline the Borrower’s responsibilities for enforcing ESS2 requirements, applicable to the program.

A draft Environmental and Social Commitment Plan (ESCP) which sets out the Borrowers commitments to implement measures and actions required for the project to achieve compliance with the applicable ESSs within the agreed timeframes. The ESCP will be prepared and disclosed prior to appraisal.

Site specific Environmental and Social Management plans (ESMPs) will be prepared by the contractors responsible for the small scale physical interventions. The ESMPs will make provision for measures to address occupational health and safety, community health and safety, waste management and chance finds procedures which will be prepared prior to undertaking the physical activities.

III. CONTACT POINT

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V. APPROVAL

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