



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 04/10/2024 | Report No: ESRSA03421



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)	26-Mar-2024	14-May-2024
Estimated Decision Review Date	Total Project Cost		
19-Mar-2024	5,000,000.00		

Proposed Development Objective

To enhance the financial and environmental performance of solid waste management 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 PAD 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: Strengthening operations and increasing disposal capacity at Providence landfill , will include improved infrastructure, design, and management of the Providence landfill, 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: Institutional strengthening to improve solid waste management and to promote circularity, will include 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 10,000]

The Republic of Seychelles is an archipelagic state in the Indian ocean, consisting of 155 islands, vulnerable to climate change. The land area of Mahé is 155km², consists of steep granite mountains surrounded by narrow plains. The plains are relatively small, covering only 5% of the total area. In Mahé, almost 75% of the land is forest and protected areas, with residential areas accounting for 20% and increasing with urban development. Seychelles has an extremely rich biodiversity, both marine and terrestrial, making it part of one of the Conservation International’s designated conservation areas of interest. The island is highly vulnerable to rising sea levels, coastal erosion, storm surges, heavy downpours and flooding which may pose a risk to infrastructure in certain areas. The proposed project will be implemented on the main Islands of the Seychelles called Mahe at an existing landfill site. The Providence is located in an industrial area on reclaimed land in the southeast of Victoria. According to a desktop screening using iBAT, there are no biodiversity sensitive sites of concern within close proximity of the landfill. Areas of potential biodiversity sensitivity is the Cerf Channel and associated reef and Ste Anne Marine National Park which are located approximately 2km and 5km from the nearest point of the existing landfill site. Providence I site was constructed in 1996 and operated by a private waste company and closed in 2016. A new landfill site (Providence II) was constructed adjacent to Providence I with the support from the European Union. Providence II was closed in 2022 due to a fire outbreak. The international airport of Seychelles is located on the island of Mahé within close proximity (approx 1.3km) from the land fill site. An average of 90,000 tons of municipal waste is generated per year in Seychelles, of which only 1 percent of waste produced is diverted from the landfills at this stage. It is anticipated that waste will increase by 5 to 15% annually over the next 12 years due to population and tourism growth. 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 10,000]



The Project will be managed by a project implementation unit (PIU). The Project Development and Coordination Section (PDCS) under the Ministry of Agriculture, Climate Change, and Environment (MACCE) will be the implementing agency, with involvement from the Landscape and Waste Management Agency (LWMA). The MACCE is the ministry responsible for environmental risks and impact management, including compliance monitoring and has proven record with the management and monitoring of Environmental and Social impacts, and is familiar with Bank safeguard policies, but no experience with the ESF standards. MACCE is responsible for putting in place and oversee the implementation of the Waste Management Policy, solid waste Master Plan and other contractual documents with any projects under the Basel and Rotterdam convention. Seychelles has legislation in place for screening environmental risks and impacts associated with proposed projects, including the preparation of environmental impact assessments based on the outcome of the screening and scoping assessments. Solid waste management in Seychelles is regulated primarily under the Environment Protection Act (1996, updated 2016), an umbrella legislation covering a broad range of environmental protection measures. While the Act itself has little detail related to solid waste management, associated regulations provide more specific guidance, including the Impact Assessment Regulations (1996) that govern dumping sites, treatment plants, and collection equipment, and Standards Regulations that provide standards for discharge of effluents. There are several regulations in place which address aspects of waste management and pollution, however there are responsibility of implementation which overlaps with various organizations/units/departments which weakens coordination and implementation. A technical assistance support under Component 2 will assist to identify and draft legislation to strengthen solid waste management including extended producer responsibility, waste minimization, and establishment of fees and taxes. The PDCS currently do not have internal capacity to manage environmental risks and will need to be established. An environmental and social specialist will be recruited as part of the PIU team as stipulated within the Environmental and Social Commitment Plan (ESCP). LWMA 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 will be ultimately responsible for overseeing the implementation and monitoring of environmental, health and safety impacts and risks by the appointed landfill operators during the operational phase of the project. LWMA has a Health and Safety Policy in place but limited capacity with managing and monitoring EHS impacts and risks. The Environmental and Social Audit (ESA) will identify the capacity building needs within LWMA and will set out an action plan for organizational strengthening to ensure E&S risks and impacts are appropriately managed during the operational phase as set out in the ESCP.

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) 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 4,000]

The environmental risk rating is considered to be Moderate as activities supported are considered medium 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 the optimization of the existing landfill site and installation of environmental monitoring systems, the physical activities are considered medium scale and will take place within the footprint of the existing Providence landfill site. Component 2 will support technical assistance studies to support



financial sustainability of waste sector, circular economy in fisheries and tourism industries to reduce waste sent to landfill and capacity building initiatives for government and LWMA and strengthening of waste management legislation. Impacts associated with the physical activities and operations under Component 1 include (i) air emissions associated with release of methane gasses and waste burning, (ii) poor leachate control leading to ground and surface water pollution and potential impacts on marine ecosystems, (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 poor waste management practices including to exposure to potential harmful substances and diseases. The risks and impact associated with the technical studies supported under Component 2, is considered limited with low environmental risks and impacts, and likely to contribute to strengthening the environmental performance of waste management in Seychelles. All anticipated impacts and risks associated with the physical interventions can be managed through the preparation of environmental and social management plans, including leachate management, waste management, occupational and community health and safety plans and pest and wildlife management plans among other. Infrastructure will be constructed taking into consideration climate resilience. The MACCE has experience environmental risk management and the World Bank safeguards but no experience with ESF as this will be the first project prepared under the environmental and social framework. There is a legislative framework in place for identification and management of environmental risks however aspects regarding waste risks management needs further strengthening and alignment to improve coordination of enforcement. LWMA who will be responsible for overseeing operations of the landfill sites have limited capacity and experience with E&S risks management, and will be strengthened under Component 3 of the project.

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 4,000]

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, 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 and that these community are informed about E&S risks. 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 8,000]



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

B.1 Relevance of Environmental and Social Standards

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

Relevant

[Explanation - Max. character limit 10,000]

Various sources of information were reviewed as part of the environmental due diligence process, this included a review of the Environmental Impact Assessment that was prepared in 2006 for the Providence II site support by the European Union, documentation shared by LWMA, site visits to the existing operations and information on legislative frameworks and procedures obtained from MACCE. The activities supported under component 1 and 2 have particular relevance to the ESS 1, 2, 3, 4, 6 and 8 as it is likely to pose an environmental and health and safety risks to workers and communities within the immediate surrounding areas. The existing landfill site is situated close to the shore line, therefore poor management of leachate and windblown waste could potentially impact on the marine environment (ESS6). The proposed infrastructure could be vulnerable to sea level rise and other aspects of climate change which will need to be considered as part of the redesign (ESS4). There are an existing airport located near the landfill site, therefore poor wildlife management (birds) could pose a safety risks to aircrafts. The redesign of the landfill site, installation of the environmental monitoring systems and establishment of an environmental monitoring program are likely to have an overall positive environmental impact in that it will eliminate and reduce the current pollution impacts and risks (ESS3). An Environmental and Social Audit (ESA) (ESS1) will be conducted on the current operations to determine the areas which require further strengthening within the existing management systems as key focus areas during the preparation of the Environmental and Social Impact Assessment (ESIA) and associated Environmental and Social Management Plans (ESMPs) for the landfill site (ESS1). The ToR for the ESA was shared with the Bank for review and no-objection on November 15, 2023. The ESA will further identify capacity needs within LWMA to assist with strengthen the current environmental, health and safety monitoring and supervision. The ESA study will be completed within 30 days from the effective date. An ESIA and ESMPs will be prepared as part of the redesign of the landfill site. The redesign will be part of the feasibility study that will be implemented after project approval. The ESMP will address aspects such 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. An Operational Environmental and Social Management Plan (O-ESMP) will be prepared for the operational phase within the timeframe stipulated in the ESCP. The O-ESMP will consist of several sub-management plans to deal with specific aspects such a pollution control including leachate management (ESS3), occupational health and safety plan (ESS2) emergency response and prevention (ESS4), surface emission and methane gas monitoring and collection, pest control (ESS3), wildlife management (ESS6), among other. 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. The Terms of References for the technical studies supported under Component 2 will include environmental considerations, were relevant, in particular in activities to improve circular economy in fisheries and tourism.

ESS10 - Stakeholder Engagement and Information Disclosure

Relevant

[Explanation - Max. character limit 10,000]

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A SEP has been developed, setting out the consultation processes, including frequency, and format of stakeholder engagement throughout project implementation. The SEP requires that Stakeholder mapping is 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. The SEP includes a summary of the consultations that have been carried out during project preparation and sets the guidance on how these consultations are to be carried out through Project Implementation to inform project design and the development of E&S risk management instruments and to ensure that all consultations are inclusive and accessible. It includes a Grievance Redress Mechanism. The ESIA/ ESMP, to be developed for the Landfill, will include a SEP for this particular subproject and will follow the general guidance of the Project SEP.

ESS2 - Labor and Working Conditions

Relevant

[Explanation - Max. character limit 10,000]

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 disclosed, consulted on, and adopted within 60 days of effective date, outlining working conditions including measures to prevent child and forced labor, workers’ GRM, and OHS requirements. Both local labor laws and ESS2 requirements will apply. The ESMPs that will be prepared for the project will include a Labor Management Plan. LWMA has a health and safety policy in place which applies to all workers including contractors under LWMA’s control. The policy sets out requirements for health and safety procedures to be prepared to address aspects of emergency fire response, medical fitness of workers and use of personal protective equipment. The policy is not clear on reporting and recording of health and safety incidents and follows what is required under applicable national legislation. An incident reporting procedure for LWMA will be put in place through the preparation of the Occupational health and safety (OHS) plan. The implementation and monitoring of the health and safety policy within LWMA requires further strengthening to ensure risks and impacts are adequately identified for all aspects of its operations, and that the necessary procedures as set out in the policy are prepared. The ESA will identify further areas of improvements and the gaps will be filled through the preparation of the occupational health and safety plan (OHS) for LWMA. The OHS plan will be prepared in line with ESS 2 while taking into consideration the requirements set out in applicable national regulations and the WBG EHS Guidelines and sector specific guidelines for Waste Management Facilities. The OHSP will include procedures on incident investigation and reporting, emergency preparedness and response procedures and worker training/awareness. Potential historical pollution at the poorly managed landfill sites may pose a health risks to workers and communities. The potential health risks to workers that will be undertaking work on the existing landfill site, will be assessed through a health and safety risk assessment, as part of the ESIA and ESMP that will be prepared under Component 1. 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. SEA/ SH prevention and response measures will be in place for each site as part of the ESMPs to manage any increased SEA/SH risk.

ESS3 - Resource Efficiency and Pollution Prevention and Management

Relevant

[Explanation - Max. character limit 10,000]

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

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degradation if not done adequately which are relevant to ESS3. The project is not likely to have a significant impact on the utilization of natural resources. The redesign of the landfill site under Component 1 will further support the optimization of leachate capturing and treatment in an effort to prevent environmental degradation. The ESIA prepared in 2006 for the Providence II landfill site set out specific monitoring requirements that had to be undertaken which will be elaborated during the preparation of the ESIA and ESMP during implementation. Currently there are limited monitoring data available. Baseline assessments of surface and groundwater quality including a monitoring plan will be established during the preparation of the ESIA and ESMP for the redesign of the landfill site while also taking into consideration the requirements in the WBG ESHG. As part of the activities under Component 1, new groundwater monitoring wells will be installed and a groundwater monitoring plan will be developed. Waste management and pollution related risks associated with the construction activities and operations of the landfill site will be addressed through the implementation of mitigation measures in the ESMPs. The landfill site is not anticipated to contribute to significant levels of greenhouse emissions. The project will support investigations for climate-smart options to address methane release to reduce Greenhouse gases released. The project will further support strengthening of waste legislation and circular economy with an effort to reduce waste sent to landfill site and strengthen management of the different types of waste (non-hazardous and hazardous) under Component 2. The TA studies supported under Component 2 will take into considerations aspects relevant to resource efficiency and pollution prevention and management.

ESS4 - Community Health and Safety

Relevant

[Explanation - Max. character limit 10,000]

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. There is a potential risks for both workers and community (waste pickers) to be exposed to hazardous substances and conditions on the existing landfill site. A health and safety risk assessment will be prepared as part of the ESIA under Component 1. 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, SEA/SH SEA/ SH prevention and response measures will be prepared as Part of the ESMP and will cover community related risks. The movement of vehicle traffic during the construction and operational phase of the landfill site may pose a traffic safety risk to communities. A Community Health and Safety (CHS) plan will be developed and traffic management measures will be included as part of the OHS Plan that will be developed for construction and operational phases of the project. The CHS plan will consider community health and safety measures set out in the WBG EHS general guidelines. The redesign of the landfill site and associated facilities will take into consideration aspects of climate risks such as sea level rise, landslides and flooding. Currently the landfill site is largely unaffected by the affects of climate change according to a report that was prepared by the Bank

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

Relevant

[Explanation - Max. character limit 10,000]

The waste management facilities are located on government land. Physical displacement is not expected as project activities will not require land acquisition. The land will still require to be screened for squatters or any other land

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use. If informal occupants were to be identified, their treatment will need to follow ESS5 provisions. 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). The Terms of reference for the LRP was shared with the Bank for review and no-objection on December 15, 2023. This LRP will assess the number of waste pickers, their livelihood dependency on the site, the impacts the project will have on their livelihoods, and the necessary restoration measures. The livelihood restoration Plan will be designed with the active participation of the waste pickers and other key stakeholders. It will contain a budget for it's implementation as well as a calendar of implementation, and a GRM.

ESS6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources

Relevant

[Explanation - Max. character limit 10,000]

According to the environmental assessment that was prepared for Providence II in 2006, there is a potential that leachates from the landfill site may impact on the nearby lagoon ecosystems. According to iBat, there are no areas of biodiversity concern within close proximity of the landfill site. The Cerf Channel and Ste Anne Marine National Park are located approximately 2km and 5km, respectively from the landfill site, and therefore not likely to be significantly impacted by the landfill. Measures will be put in place as part of the environmental monitoring framework to determine any potential impacts on the marine ecosystems, associated with the landfill site. The redesign of the landfill site will take place within the existing footprint. The impact associated with the redesign of the landfill site on biodiversity and ecosystems will only be known during implementation once the designs have been finalized and the impacts further investigated as part of the ESIA. Since the redesign will be within the existing footprint, it is not anticipated that there will be a significant change or impact. Additionally, according to the study, Cattle Egret and Common Mynah birds are attracted to the landfill site. Both these species of birds are considered of Least Concern according to the IUCN Red data list. It is anticipated that improve management of the landfill site, such as frequency of coverages of waste, will reduce the number of birds attracted to the landfill site. A wildlife management plan will be put in place to as part of the operational ESMP to manage impacts associated with safety risks that birds pose to the nearby airport and to manage other wildlife and domestic animals attracted to the landfill. The TA studies supported under Component 2 will take into considerations aspects relevant to biodiversity and sustainable management of living natural resources.

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

Not Currently Relevant

[Explanation - Max. character limit 10,000]

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

[Explanation - Max. character limit 10,000]

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The redesign of the landfill site will entail civil works such as excavations, although limited in scale. Due to the redesign taking place within the existing footprint of the landfill site it is not anticipated that there will be any significant cultural or heritage finds. A “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. The TA studies supported under Component 2 will take into considerations aspects relevant to cultural heritage.

ESS9 - Financial Intermediaries

Not Currently Relevant

[Explanation - Max. character limit 10,000]

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

[Explanation including areas where “Use of Borrower Framework” is being considered - Max. character limit 10,000]

The use of Borrower Framework is not being considered for this project.

Use of Common Approach

No

[Explanation including list of possible financing partners – Max. character limit 4,000]

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 Appraisal Stage PID and PAD – Max. character limit 10,000]

The environmental and social risk rating is considered Moderate as the impacts associated with the activities that will be supported are not anticipated to lead to any significant long-term, adverse or irreversible environmental risks or impacts.

The environmental and social risks and impacts associated with the project are considered to be site specific and predictable, at this stage, and will be further assessed during project implementation. It is anticipated that the

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environmental and social risk management at the landfill site is likely to be enhanced through the interventions proposed under Component 1. An Environmental Impact Assessment (EIA) for the Providence landfill site 2 was prepared with support from the European Union in 2006 and was reviewed as part of the due diligence. The EIA highlighted key impacts and risks which are still considered relevant to this project. The key environmental and social impacts and risks include (a) air emissions, (b) ground and surface water pollution, (c) potential impacts on marine ecosystems (d) spread of pests and disease-carrying vectors, (e) noise and vibrations, and (f) occupational and community health and safety due to historically poor waste management practices including periodic fires (g) potential adverse impacts on the livelihoods of informal recyclers (waste pickers) and (h) 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. 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. A draft Stakeholder Engagement Plan (SEP), draft Environmental and Social Commitments Plan (ESCP) and the terms of references for an Environmental and Social Audit (ESA) of the existing operations and preparation of a livelihood restoration plan (LRP) have been prepared and shared by the Bank for no-objection on November 15 and December 15, 2023, respectively. The draft SEP and draft ESCP were disclosed in-country and by the Bank on April 10, 2024. MACCE will carry out stakeholder engagement activities as well, in accordance with the provisions of the SEP.

The Environmental and Social Audit (ESA) will be available within 30 days from the effective date. The ESA will assess the existing operations to identify key gaps to strengthen the current operations and organizational capacity within the LWMA as well as to inform key aspects which need to be considered during the preparation of the Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP). The ESIA and ESMP will be prepared as part of the feasibility and engineering for the redesign of the landfill site under Component 1, which will only be available after project approval. The ESIA and ESMP will be prepared within the timeframe stipulated in the Environmental and Social Commitments Plan (ESCP), prior to commencement of works.

MACCE is the ministry responsible for environmental risks and impact management, including compliance monitoring and has proven record with the management and monitoring of Environmental and Social impacts, but is not familiar with Bank safeguard policies and the ESF standards. The PDCS under MACCE will be responsible for the implementation of the project, through a Project Implementation Unit (PIU) staffed with environmental and social specialist. Currently, PDCS does not have the internal capacity to manage environmental and social risks and no experience with implementation of World Bank supported projects. Capacity building support to the PIU will be provided under Component 3 and through support from the MACCE.

To manage the Project's environmental and social risks, the PIU under the PDCS will prepare a series of environmental and social risk management instruments during project implementation. A ESMP will be prepared as part of the ESIA for Component 1 which will include aspects such as an occupational and community health and safety plans, waste management plans, pollution prevention and chance finds procedure, Livelihoods Restoration Plan, Labor Management Procedures and Sexual Exploitation and Abuse/Sexual Harassments Action Plan. For operational aspects of the landfill



site, an operational environmental and social management plan (O-ESMP) will be prepared consisting of several sub-management plans for management of occupational and community health and safety, wildlife management and ground and surface water monitoring plan, among other, the timeframe for the preparation of the O-ESMPs is stipulated in the 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 implementation?

[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 10,000]

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

An Environmental and Social Audit (ESA) will be prepared for current operations to identify key areas that may need further assessment during the preparation of the site specific Environmental and Social Impact Assessment (ESIA) and associated Environmental and Social Management Plan (ESMP), identification of gaps to strengthen the current operations and organizational capacity within LWMA. The ESA will be completed within 30 days from project effective date.

An ESIA and ESMP will be prepared as part of the feasibility for the redesign of the landfill site under Component 1. The ESIA will assess potential risks associated with the redesign and installation of the monitoring equipment, it will further update the baseline information for the establishment of a new monitoring program. The ESIA and ESMP will be prepared taking into consideration the requirements of the ESF and WB EHSOs (General and Sector). The feasibility study and designs will only be available after project approval, therefore the ESIA will only be prepared after project approval within the timeframe stipulated in the Environmental and Social Commitments Plan (ESCP).

An Operational ESMP and procedures for the landfill site will be prepared during implementation taking into consideration the requirements of the ESIA and ESMP including the World Bank Group Environmental, Health and Safety Guidelines (General and Waste sector). The O-ESMP will consist of a set of sub management plans as set out in the ESCP to manage specific environmental aspects

A draft of Stakeholder Engagement Plan (SEP) has been prepared by MACCE consistent with the requirements of ESS10 and disclosed on April 10, 2024. This SEP includes a detailed schedule of planned engagement activities for the various stakeholders during the project cycle, and the information of the consultations already carried out to date. The SEP ensures that all consultations are inclusive and accessible and includes a Grievance Redress Mechanism.

A ToR for the Livelihoods Restoration Plan (LRP) has been shared with the Bank for no-objection on December 15, 2023. The 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. The LRP will be finalized



before the launching of bidding documents for purchase of equipment and construction. 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 MACCE within 60 days from project effective date, 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.

III. CONTACT POINT

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V. APPROVAL

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