



# Appraisal Environmental and Social Review Summary

## Appraisal Stage

### **(ESRS Appraisal Stage)**

Date Prepared/Updated: 09/22/2023 | Report No: ESRSA03002

**I. BASIC INFORMATION****A. Basic Operation Data**

Operation ID	Product	Operation Acronym	Approval Fiscal Year
P178644	Investment Project Financing (IPF)	Connectivity and Urban Infrastructure	2024
Operation Name	Improving Connectivity and Urban Infrastructure in Cabo Verde		
Country/Region Code	Beneficiary country/countries (borrower, recipient)	Region	Practice Area (Lead)
Cabo Verde	Cabo Verde	WESTERN AND CENTRAL AFRICA	Transport
Borrower(s)	Implementing Agency(ies)	Estimated Appraisal Date	Estimated Board Date
Republic of Cabo Verde	Unidade de Gestão de Projectos Especiais, UGPE	11-Sep-2023	30-Oct-2023
Estimated Decision Review Date	Total Project Cost		
05-Sep-2023	35,000,000.00		

**Proposed Development Objective**

To improve access to climate-resilient transport and urban infrastructure for selected communities in Cabo Verde.

**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**

The higher-level objective of the proposed project will be to support improved access to climate-resilient transport and urban infrastructure for selected communities in Cabo Verde. The proposed project will support the quality of life of communities through urban upgrading in selected neighborhoods. It will equally reduce the isolation of communities in rural areas through targeted investment in road rehabilitation or upgrade. The proposed Project would include four components: Component 1: Resilient Urban and Community Infrastructure; Component 2: Enhancing Transport Connectivity and Resilience; Component 3: Technical Assistance; Component 4: Project Management ; and Component 4: Contingency Emergency Response Component (CERC).



## D. Environmental and Social Overview

### D.1 Overview of Environmental and Social Project Settings

Located 500 km off the west coast of Africa, Cabo Verde is a biologically diverse archipelago of ten islands. Only 10% of its territory is classified as arable land, and the country possesses limited mineral resources. The country is highly vulnerable to the impacts of climate change. The lack of arable soil (only 10% of the soil is arable) results in high dependency on imports to meet its food needs (80 – 90%). In addition, the country's coastlines - where approximately 80% of the population resides - are very vulnerable to rising sea levels and erosion.

The project will support activities and interventions which aim to enhance access to climate-resilient transport and urban infrastructure and services in urban areas and surrounding rural communities. Specifically, these include rehabilitating public spaces and upgrading public infrastructure, rehabilitation and upgrading of inter-city and rural roads, capacity building and technical assistance. While some of the investments will be selected from a long list through the use of a prioritization framework consisting of 20 criteria and four dimensions (social impact, territorial impact, economic development impact, and resilience impact), some investments selected for implementation (as "first movers") have already been selected from the list of projects previously envisaged under the 2017-2021 PRRA (Requalification, Rehabilitation and Accessibility Program). The list of "first movers" comprises 11 projects, of which 9 are urban renewal projects (rehabilitation of waterfronts, urban/historic centers, and community infrastructure in vulnerable neighborhoods) and 2 are road rehabilitation projects aimed to improve access to services and markets from rural communities.

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

MIOTH will oversee the overall project implementation, coordination, and reporting. Activities under Component 1 and 2 will be carried out by the Cabo Verde Infrastructure Company "Infraestruturas de Cabo Verde" (ICV) and the Cabo Verde Roads Company "Estradas de Cabo Verde" (ECV) under the supervision of MIOTH. Activities under Component 3 related to State-Owned Enterprise (SOE) assistance will be implemented by the Ministry of Finance through the Special Projects Management Unit "Unidade de Gestão de Projetos Especiais" (UGPE). Component 4 (project management) will be subject to a two-part treatment, in which all project management costs related to MIOTH will be dealt with by MIOTH and all project management costs related to UGPE will be dealt with by UGPE. The UGPE (Unidade de Gestão de Projectos Especiais – Special Projects Management Unit) is under the authority of the Ministry of Finance. It was established in 1999 to promote and implement government reforms that have a significant impact on the country's economy. The UGPE serves as the implementation unit for all World Bank-funded projects in Cabo Verde and therefore has experience with the World Bank's Operational Policies and the Environmental and Social Framework (ESF). For example, most recently in projects such as: Cabo Verde: COVID-19 Emergency Response Project (P173857) and AFs (P174299, P175807, P177181); Digital Cabo Verde Project (P171099); Sustainable, Resilient and Inclusive Growth development program in Cabo Verde (P176981); Cabo Verde Renewable Energy and Improved Utility Performance Project (P170236); and Cabo Verde Human Capital Project (P175828). UGPE Staff have benefited from training on the World Bank Operational Policies and, more recently, on the ESF. MIOTH has prior experience with the Operational Policies with the previous Transport project (P126516).

Overall, UGPE has some good capacity and experience in environmental and social risk management. The environmental and social (E&S) performance of the current projects under UGPE implementation have consistently been rated Satisfactory or Moderately Satisfactory. MIOTH will be staffed with at least two suitably qualified and



experienced specialists - one Environmental Specialist and one Social Specialist - to cover the ESF aspects of the first two project components. However, at UGPE there are currently only two full-time dedicated environmental specialists (with qualifications and prior experience in environmental management) and they have been covering both environmental and social aspects. To date, they have adequately covered the environmental aspects but in order to ensure high quality support for social risk management including consultations, GM implementation and screening of social risks, a dedicated, full-time and well qualified Social Specialist will need to be recruited prior to effectiveness. UGPE will be required to provide technical support to MIOTH as it builds capacity for E&S risk management in future project phases; in order to do this successfully, UGPE will need to maintain and expand its capacity (e.g., through the recruitment of a much-needed Social Specialist – as noted above).

It should be noted that this project is taking advantage of the lessons learned from a previous Transport project (P126516 – under OPs/ Safeguards). The Environmental and Social Management Framework (ESMF), four Environmental and Social Impacts Assessments (ESIAs) and four Environmental and Social Management Plans (ESMP) that were prepared for Santiago, Santo Antão, Brava, and Fogo islands cover similar E&S risks and impacts and have been used to inform the preparation of the relevant instruments for this project.

## II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

### A. Environmental and Social Risk Classification (ESRC)

Substantial

#### A.1 Environmental Risk Rating

Substantial

The Project's risks and impacts can be easily mitigated in a predictable manner. Civil works related to road rehabilitation will take place in areas already modified to accommodate agriculture and much of the land along the roads has been converted temporary plantations used by the local population. There is a preliminary list of activities that have already been identified and the potential risks and impacts are expected to be temporary and/or reversible, moderate in magnitude, site-specific, and without likelihood of impacts beyond the actual footprint of the project. During implementation, the potential risks and impacts for the other sub-projects will be screened and mitigation measures proposed per the ESMF and RPF. At Appraisal, the negative impacts identified are likely to be related to civil works to install the new sewer and water connections, install or improve the drainage systems and paving of existing streets in urban areas (Component 1) and road reconstruction and rehabilitation (Component 2). Although these activities are not likely to have significant adverse risk or impacts on human populations and/or the environment, the following risks have been identified: i) temporary nuisance related to : the generation of dust, noise, vibration and gas emissions due to the operation and movement of construction vehicles and machinery during construction phase; temporary exposure, during the construction phase, to chemicals and pathogens/contaminants associated with the connections to water and sewage systems; traffic congestion and emission during the excavation and installation of the pipe network and the new road surface; Off-site activities include quarry and asphalt plant operations, which if not managed properly, may also cause localized adverse impacts ii) improper disposal of construction waste (including asphalt, oils, fuel) and asbestos (if present, as asbestos has been used for a long time in Cape Verde and in many infrastructures, especially asbestos-cement roofs) or operational or accidental spills of fuel and lubricants from the construction machinery; iii) occupational health and safety (OHS) and community health and safety risks, including accidents, and injuries; and iv) loss of vegetation cover, land degradation, brief disturbance to biotope, and soil erosion at the project site due to physical disturbance associated with site clearing, and earth and road construction works. Component 1 will finance, inter alia, water and sewage connections and these are expected to



generate risks and impacts during both construction and operation. During operation, these risks and impacts may include: i) pollution and health risks due to inadequate management of grey water and sludge in case of increased water supply in urban areas; ii) Nauseating odor and pests and iii) urban flooding from solid waste blocking the sewerage system. Resource efficiency (water and raw materials like tar) will also need to be considered and developed in the feasibility studies and ESF site-specific instruments, particularly for Component 2, as road rehabilitation involves pavement reconstruction due to severe road deterioration.

## A.2 Social Risk Rating

Substantial

The Social risk rating of the project is considered Substantial. The proposed project activities are expected to result in positive socio-economic impacts for the beneficiary communities but they also might generate some temporary and/or permanent risks and impacts. At Appraisal, key risks and impacts are mostly related to the civil works that will be financed under Components 1 and 2 and these include, inter alia, some limited physical or economic displacement impacts (both temporary during construction and long term/permanent), social exclusion and some limited risks relating to possible labor influx including sexual exploitation and abuse/sexual harassment (SEA/SH). While the scale and scope of each of the subprojects is expected to be relatively small, the cumulative impact of the large number, dispersed nature and many varied locations may be significant and adequate screening and mitigation of these impacts will be challenging. Risks and impacts relating to labor influx may be relevant for more isolated communities where an external workforce (i.e., workers from other islands and/or larger communities) may be required for civil works. This may include SEA/SH risks as well as other social impacts including intracommunity conflict, price inflation, and changes in housing demand. Such impacts will be managed per the requirements of ESS1, ESS2, and ESS4 and specific measures will be outlined in the Environmental and Social Management Framework and the Labor Management Procedures (ESMF/LMP).

## 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

Overall, the project is expected to have positive environmental and social impacts in terms of improved and upgraded urban infrastructure and road rehabilitation, improvement and maintenance. Under Component 1, the E&S impacts are expected to be directly related to the various stages of construction, operation and maintenance. The environmental risks and impacts at construction stage are likely to involve management of traffic and movement/operation of heavy equipment, digging and installing pipe network, drainage systems and street paving that may generate dust, noise and daily traffic congestion and disturbances. However, these impacts are temporary and site specific. OHS and community health and safety is an area of concern, but would be managed through strict adherence to OHS requirements including wearing PPE, safety training to workers and community awareness raising. Under Component 2, the project will support road improvement and maintenance which may including overlaying, improving small bridges and drainage, etc. At this stage, roads passing through biodiversity areas (modified habitat mostly) are not formally excluded from project design, but the selected roads will pass a robust prioritization and environmental and social impacts screening to ensure the project activities will not cause environmental or social impacts. While detailed scope and locations of the project activities is not known for most of the project activities, potential environmental risks and impacts are expected to be temporary and reversible, moderate in magnitude, and site specific, and without likelihood of impacts beyond the actual footprint of the project. These impacts most



commonly include possible disturbance to biotope, temporary disruption of current traffic circulation, traffic safety, damage to access roads, dust nuisance, and gaseous emissions, potential pollution of soil and water resources, and momentary interference to neighboring settlements through various operation activities. Off-site activities include quarry and asphalt plant operations, which if not managed properly, may cause localized adverse impacts. In most cases, such impacts can be mitigated by good construction practices, environmental permitting process and through implementation of site-specific environmental due diligence instruments. Some road rehabilitation and urban regeneration activities may involve land acquisition or temporary restrictions in land use, thus resulting in temporary or permanent displacement impacts (physical or economic displacement) – although resettlement will be avoided or minimized via adjustments in the design and scheduling of civil works. Given that the location of all project activities is not known prior to Appraisal, the PIU prepared an Environmental and Social Management Framework (ESMF) which builds on other framework documents prepared for projects in Cabo Verde. The ESMF will facilitate screening, assessment, and management of environmental and social risks and Impacts of activities / sub-projects during project implementation. The ESMF provides guidance for the preparation of various instruments to be used for specific sub-projects. The instruments to be prepared when the sub-project locations are fully identified and defined may include site-specific Environmental and Social Impact Assessments and Management Plans (ESIAs/ESMPs) and Environmental and Social Management Plan Checklists (ESMP Checklists). The E&S screening criteria for sub projects is defined in the ESMF. It is expected that ESMP checklist will be used for less risky sub-projects that usually only involve change of asphalt or drainage on exiting road or the installation of sinks, while site specific ESMPs would be used in more complex rehabilitation when locations of segments are more sensitive (e.g. widening of the road, passing near a house, , construction of drainage systems, etc.) or involve works on existing structures (bridge rehabilitation, improvement of cultural heritage properties, etc.). Risks and impacts relating to labor, including labor influx, issues of discrimination in recruitment, working conditions, sexual and other forms of harassment in the workplace, prevention of child labor and forced labor, and workers' access to grievance redress, are addressed in Labor Management Procedures (LMP). Interventions relating to regeneration of historic centers will require the implementation of chance find procedures and a Cultural Heritage Management Plan (CHMP) (e.g., Cidade Velha or other historic town centers with heritage designation). As the project will provide support to road maintenance, guidelines on environmental best practices for road maintenance activities will be developed during implementation. An Environmental and Social Commitment Plan (ESCP), prepared and agreed upon with the Borrower, sets out the substantive measures and actions that will be required for the project to meet environmental and social requirements during implementation. These measures will be implemented within specified timeframe and the status of implementation will be reviewed as part of project monitoring and reporting. These site-specific documents will constitute an integral part of bidding documents for contractors. ESMF and site-specific environmental and social assessment documents (ESMPs and ESMP checklists) will be timely and appropriately disclosed and discussed with the public.

#### ESS10 - Stakeholder Engagement and Information Disclosure

Relevant

ESS10 is relevant as meaningful consultation and engagement of intended project beneficiaries, affected communities, and other stakeholders will be necessary to ensure that community level interventions reflect community priorities and that E&S risks and impacts are adequately managed. To ensure a participatory approach throughout the Project's life cycle, the Borrower has prepared and consulted a Stakeholder Engagement Plan (SEP) in accordance with ESS10 requirements. The SEP contains identification and analysis of various project stakeholders including government and civil society organizations, as well as affected communities and presents the relevant project risks and issues identified by project stakeholders during the various consultations undertaken during preparation as well as provisions for the management of concerns or grievances during project implementation.



Consultations during preparation comprised community consultation meetings in several islands where project interventions are planned as well as bilateral meetings with a range of institutional stakeholders. All communication, information-disclosure and engagement activities will be adapted for each distinct phase of the project cycle. A particular focus on ensuring the inclusion and participation of vulnerable households and individuals will be undertaken during the subproject selection process. The SEP also includes a detailed outline of a grievance mechanism (GM) to address grievances regarding project impacts that might arise during project implementation. It includes multiple grievance uptake channels including specific channels and procedures to address risks relating to sexual exploitation and abuse/sexual harassment (SEA/SH). The SEP will be disclosed at Appraisal and implemented and updated as needed throughout the project cycle.

### **ESS2 - Labor and Working Conditions**

Relevant

The Project will involve government staff assigned to the UGPE (including consultants) as well as primary supply workers. It is not expected that community workers will be involved although this will need to be confirmed during subproject site selection when the final subproject design and availability of local labor has been identified. While Cabo Verde has a Labor Code that is consistent with international standards, an LMP that outlines relevant OHS standards and working conditions, provisions for a workers' grievance mechanism (GM) and a specific prohibition on the use of child or forced labor has been prepared and disclosed. It also contains measures to prevent and address sexual exploitation and abuse/sexual harassment (SEA/SH) risks. The LMP is an annex in the ESMF and will be disclosed by Appraisal.

### **ESS3 - Resource Efficiency and Pollution Prevention and Management**

Relevant

As the project activities involve improvements/maintenance of existing roads, road widening, improvement of urban infrastructure and water and sewer connection activities, the borrower will consider measures that are technically and financially feasible to reduce the negative impact on surrounding communities, environment and other ecosystem services. Also complying with ESS3, a resource management in and around the proposed activities will be developed as part of sub-project project feasibility studies and update of ESF instruments would be done if needed. Furthermore, the borrower will also ensure that the resource efficiency is improved and are being implemented throughout the project period. Nevertheless, the project is not expected to consume large amount of energy and raw materials, nor use or procure pesticides. These activities will require earthworks and the consumption of diesel for heavy machinery and generators. There will be a generation of waste such as packing materials; minor air pollution and fugitive dust; noise and vibration, management of fuel and oil spills at the construction sites will also be generated during construction rehabilitation and construction activities. A screening will be conducted in consultation with the Climate Change Group of the Bank to determine the significance of the GHG emissions from the project activities, if the GHG emissions are significant, the client will be required to further estimate GHG gross emissions using the Bank's approved methodologies. The ESIA/ESMP will identify mitigation measures for efficient use of these resources where technically and practically feasible as well as to prevent use of resources from unlicensed sources. Typical pollutions generated from road and urban improvement activities include: (i) dust and other forms of air pollution from construction site, transportation and auxiliary facilities; (ii) noise and vibration; (iii) solid waste (domestic waste and construction waste including used oil and lubricant); and (iv) wastewater from workers camps. These impacts are temporary, site-specific and can be managed through a set of mitigation measures to be include in the ESMF and ESIA/ESMP. Road improvement may require clearance of vegetation or fauna habitats and may lead to soil loss and erosion. This could lead to substantial impacts in the areas with steep slope and vulnerable to disaster or climate





variation or sensitive habitats. Soil erosion can lead to blockage of drainage or change of surface water flow or sedimentation. Off-site activities include quarry and asphalt plant operations, which if not managed properly, may cause localized adverse impacts. In most cases such impacts can be mitigated readily through good construction practice, environmental permitting process and through implementation of site-specific environmental due diligence instruments. The ESMF and ESIA/ESMP will provide guidance to screen and assess impacts and provide mitigation measures including application of good practice and close supervision of works to: (i) ensure that cutting of trees and vegetation is limited to a minimum and justified by technical requirements and that relevant national legislation is followed, and replacement where vegetation clearance is unavoidable; and (ii) soil loss and erosion is minimize/protected. The potential risks and adverse impacts related to excavation, storage, and transportation of materials, and generation of non-hazardous and hazardous wastes is addressed in the ESMF and the site specific ESIA/ESMPs later, taking into account the national standards and the requirements of the World Bank Group Environment, Health, and Safety Guidelines (WBG EHSG). Use of construction materials that are hazardous to human health (for example, asbestos and asbestos-containing materials (ACM) will not be permitted. ACM waste (from the upgrading of public spaces and cultural heritage assets) will be collected, transported, and finally disposed of by applying protective measures following hazardous waste handling standards or national regulation on hazardous waste management. Potential risks to potential resource efficiency shall further be investigated during environmental and social assessments and should therefore be included in the ESMF and ESIA/ESMPs. The construction contractor/s will develop a C-ESMP with various site-specific management plans for air quality management, waste and hazardous materials management, water management, soil management, and management plan for campsite and OHS for workers in line with Bank's ESHS requirements.

#### ESS4 - Community Health and Safety

Relevant

This project is likely to improve the environmental, social, and health conditions in the selected communities. However, some project activities such as the small scale civil works may also generate some moderate risks/impacts . Under Components 1 & 2, possible risks and impacts on the health and safety of communities during construction may include temporary nuisance as a result of civil works such as noise, dust, air, odor from waste water, possible accidents from transport of construction materials, restrictions on access to home/business, exposure to hazardous risks including asphalt, oils, fuel, asbestos (if present). To address road safety risks during construction and operation phases, the ESIA/ESMP for each section financed will include a road traffic safety assessment that will be integrated into the final design of the improved roads. This assessment will be undertaken by an independent road safety expert including requirements for the post construction road safety audit and integrating inputs from the local communities. It will also take into account potential indirect and cumulative environmental and social impacts caused by the improvement and maintenance of the roads: traffic growth, higher speeds, more trucks, etc. The project will be screened for short- and long-term climate change and disaster risks using the Bank's screening tool. Contractor management and preparation of contractor requirements particularly for the community health and safety aspects through the operations manual and more specifically through qualifications, bidding criteria and contracts will be considered given that the project will likely involve a number of contractors. Limited labor influx may occur in communities where the local labor force is not sufficient to meet the needs of contractors for the civil works. Notwithstanding any measures that may be developed to maximize employment of local workers for the activities financed by the project, inter-island movement of workers does occur where contractors need to mobilize workers with relevant qualifications or experience from other project sites. The ESMP and LMP include measures to address these community impacts including labor influx and an Action Plan to address SEA/SH risks.





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

Relevant

The activities that will be financed under Components 1 and 2 are likely to require some small scale temporary or permanent land acquisition, physical and/or economic displacement. As the extent of such impacts is not yet known, it is likely that urban renewal activities may require both physical displacement (e.g., relocation of dwellings) and economic displacement (e.g., loss of access to livelihood activities or to markets) and civil works relating to road rehabilitation may require temporary access restrictions for economic/agricultural activities and some limited physical displacement. While all efforts will be made to avoid any permanent land acquisition and to minimize economic displacement and adverse impacts, these impacts are not expected to be significant although some impact on subsistence agriculture is likely. A Resettlement Planning Framework (RPF) has been prepared and will be disclosed by Appraisal. Once the physical footprint of specific investments/interventions are confirmed, mitigation and compensation measures for the above-mentioned impacts should be outlined in site-specific Resettlement Action Plans (RAPs) or Abbreviated Resettlement Action Plans (ARAPs) or other management plans. Furthermore, the inclusive and timely stakeholder engagement and consultation process that was initiated during project design will continue during implementation in order to ensure that appropriate mitigation and compensation measures are put in place when displacement impacts cannot be avoided via project design (meaningful participation by affected communities including vulnerable groups in project design may result in the development of measures to mitigate economic displacement impacts and even improve conditions – for example, via the creation of safe and commercially viable spaces for informal vendors).

**ESS6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources**

Relevant

ESS6 is relevant. The medium scale construction and maintenance works are likely to include: i) site clearance for construction purposes; ii) use of quarry and material laydown area; and iii) earth works consisting of excavations and trenching for transit management and signage systems which may lead to direct and indirect habitat degradation and soil disturbance leading to the introduction of alien and invasive plant species. The rehabilitation of infrastructure under component 1 is less likely to have an impact on any sensitive biodiversity as it will take in urban areas, but it is expected to include some degree of earthworks and therefore the site clearance and soil disturbance including detrimental impacts on water quality at water crossings. If project activities result in restrictions on the use of existing land or natural resource that could impact livelihood, or that could restrict local communities' access to provisioning ecosystem services, these will be identified during the screening and adequate mitigation and management measures will be included in the sub-level project specific ESMPs. The ESMF includes a list of areas that project activities should be excluded and avoided, example: protected environmental areas, or areas considered important due to its ecosystem. Moreover, the ESMF includes protection, management and mitigation measures while proposing measures to be considered during design to avoid long-term changes to water courses. Additionally, indirect and cumulative impacts related with (i) urban expansion into agricultural areas; (ii) increased migration, which can lead to increased pressure on ecosystems (iii) Interference with migratory routes or wildlife movement; (iv) wildlife population reduction caused by increased road kills, and forestry operations will be also considered. The ESMF specifically includes criteria and procedures to ensure that sub-project investments are designed and implemented in ways that avoid damage to protected areas or critical habitats (excluded from financing) in accordance with the mitigation hierarchy and GIIP and apply adaptive management practices in which the implementation of mitigation and management measures are responsive to changing conditions and the results of project monitoring. Such measures will be applicable for any associated facilities to the extent that the Borrower has control or influence over



them. Furthermore, the cumulative impact assessment (CIA), included in the ESMF, further assesses the potential impacts and risks of the project and ancillary facilities (quarries, waste disposal sites) in all its phases, in the context of the potential effects of other developments and natural environmental and social external drivers on a selected Valued Environmental and Social Component (VECs) and determine whether the project is incrementally responsible for an adverse impact on an ecosystem component. Corporate requirements regarding climate change will be fully considered during project preparation as more information is known on the specific investments to be financed under the proposed operation. The assessment will provide an indication of potential climate risks (current and future) and areas where further work may be required to understand better the climate and geophysical risks to the project. Specific climate resilience-enhancing measures will be identified and will be further detailed during project preparation, through consultation with the Government and when the technical designs for the main infrastructure are prepared and approved.

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

Not Currently Relevant

ESS7 is not relevant, as IP/SSAHUTLCs are not present in Cabo Verde.

**ESS8 - Cultural Heritage**

Relevant

ESS8 is relevant. Project interventions in urban historic districts may have an impact on tangible or intangible cultural heritage resources. The ESMF includes provisions to conduct screenings and assessment of potential cultural heritage resources and guidance regarding the preparation of relevant management plans including, for example, a Cultural Heritage Management Plan (CHMP). Chance-find procedures consistent with ESS8 will be integrated in sub-project specific ESMPs, where relevant, and will be used to identify and protect previously unknown cultural heritage resources that might be encountered during project activities.

**ESS9 - Financial Intermediaries**

Not Currently Relevant

At this stage no financial intermediaries are expected to be involved in the project.

**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

At this stage, the Borrower's E&S Framework is not proposed to be relied on for this project, in whole or in part. The national framework will not likely address the environmental and social risks and impacts of the project in a manner to achieve objectives materially consistent with the ESF. However, as relevant and consistent, national legal framework and legislation can be referred to and recognized.



**Use of Common Approach**

No

N/A

**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?**

The instruments to be prepared when the sub-project locations are fully identified and defined may include site-specific Environmental and Social Impact Assessments and Management Plans (ESIAs/ESMPs) and Environmental and Social Management Plan Checklists (ESMP Checklists). The E&S screening criteria for sub projects is defined in the ESMF. It is expected that ESMP checklist will be used for less risky sub-projects that usually only involve change of asphalt or drainage on exiting road or the installation of sinks, while site specific ESMPs would be used in more complex rehabilitation when locations of segments are more sensitive (e.g. widening of the road, passing near a house, construction of drainage systems, etc.) or involve works on existing structures (bridge rehabilitation, improvement of cultural heritage properties, etc.). Risks and impacts relating to labor, including labor influx, issues of discrimination in recruitment, working conditions, sexual and other forms of harassment in the workplace, prevention of child labor and forced labor, and workers' access to grievance redress, are addressed in Labor Management Procedures (LMP). Interventions relating to regeneration of historic centers will require the implementation of chance find procedures and a Cultural Heritage Management Plan (CHMP) (e.g., Cidade Velha or other historic town centers with heritage designation). These site-specific documents will constitute an integral part of bidding documents for contractors. ESMF and site-specific environmental and social assessment documents (ESMPs and ESMP checklists) will be timely and appropriately disclosed and discussed with the public.

**III. CONTACT POINT**

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## V. APPROVAL

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