Additional Financing Appraisal Environmental and Social Review Summary

Appraisal Stage

(AF ESRS Appraisal Stage)

Date Prepared/Updated: 04/13/2022 | Report No: ESRSAFA370

BASIC INFORMATION

A. Basic Project Data

Country	Region	Borrower(s)	Implementing Agency(ies)
Tonga	EAST ASIA AND PACIFIC	Kingdom of Tonga	Ministry of Education and Training

Project ID	Project Name
P178849	Additional Financing to the Tonga Safe and Resilient Schools Project

Parent Project ID (if any)	Parent Project Name
P174434	Tonga Safe and Resilient Schools Project

Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Urban, Resilience and Land	Investment Project Financing	5/9/2022	6/23/2022

Proposed Development Objective

i) to enhance the safety and resilience of selected education facilities; and (ii) to improve the quality of data-driven education management, curricula and assessments in the selected educational programs.

Financing (in USD Million)	Amount
Current Financing	15.00
Proposed Additional Financing	15.00
Total Proposed Financing	30.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The Parent Project is financed by and IDA Grant (D927-TO) of SDR10.60 million (US$15 million equivalent). It was approved in November 2021 and declared effective on March 8, 2022. The PDO's are to: (i) to enhance the safety and

resilience of selected education facilities; and (ii) to improve the quality of data-driven education management, curricula and assessments in the selected educational programs. The TSRSP has four components: (i) Improving Safety and Resilience of Education Facilities; (ii) Establishment of Education Management Information System ("EMIS") and improved quality of curricula and assessments; (iii) Contingent Emergency Response; and (iv) Project Management.

The Ministry of Education and Training (MET) is responsible for the overall implementation of the project, and is the implementing agency for Components 1, 2 and 4. The Ministry of Finance (MoF) is the implementing agency responsible for Components 1, 2 and 4. The Ministry of Finance (MoF) is the implementing agency responsible for Component 3.

The Additional Finance (AF) will scale up of investments under Component 1 to support the Government of Tonga (GoT) in responding to the Hunga-Tonga-Hunga-Ha'apai (HT-HH) volcanic eruption and tsunami on January 15, 2022. The AF will enhance development impact of the Parent Project through: (i) the climate and disaster resilient recovery of school facilities impacted by the HT-HH eruption and tsunami; and (ii) resilient investments in the broader education infrastructure portfolio to reduce disaster and climate vulnerabilities from future hazards and more frequent adverse weather events.to build future resilience to climate and disaster hazards of school infrastructure in Tonga. No changes to the Project Development Objectives of the Parent Project are required.

The proposed AF is aligned with the World Bank's framework for supporting green, resilient, and inclusive development (GRID) in IDA and IBRD countries, and supports the three pillars of GRID as follows: (i) Green Development: the proposed Project will support sustainable infrastructure through the investment in education facilities; (ii) Resilient Development: the proposed Project will support risk identification, reduction and residual management of risk, along with supporting vulnerable groups (children); and (iii) Inclusive Development: through the boosting of human capital through investments in gender and accessibility to sensitive water, sanitation and hygiene (WASH) facilities

The Additional Financing is consistent with the World Bank's Pacific Islands Regional Partnership Framework (FY17-FY23) covering nine Pacific Island countries: Kiribati, the Republic of the Marshall Islands (RMI), Federated States of Micronesia (FSM), Republic of Nauru, Republic of Palau, Independent State of Samoa, Kingdom of Tonga, Tuvalu, and Vanuatu. It is in line with Focus Areas 3 of the Regional Partnership Framework: Focus Area 3: Protecting incomes and livelihoods, through its contribution to the achievement of Objective 3.1: Strengthened resilience to natural disasters and climate change. The project also aims to ensure strong liaison with other development partners, thus avoiding duplication of ongoing efforts and collaborating where possible.

D. Environmental and Social Overview

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

The Kingdom of Tonga consists of 169 Islands, 36 of which are inhabited, and a total population of around 104,400. The country lies in the South Pacific and covers a total land area of 748 square kilometers. Around three quarters of

the population are based on the main island of Tongatapu, while other major islands and island groupings include 'Eua, Ha'apai, Vava'u and the Niuas. The population is primarily Polynesian, with a literacy rate close to 99 per cent and a relatively low incidence of extreme poverty (approximately 1% of the population). Tongans are a homogenous and family/church-oriented society with their location making it one of the most geographically remote nations from major centers of economic activity in the world.

Tonga is particularly vulnerable to climate change and natural hazards. Catastrophic risk modeling by the World Bank indicates that Tonga is expected to incur, on average, US$15.5 million per year in losses due to earthquakes and tropical cyclones and losses of up to 14% of GDP in years affected by specific disasters. According to the World Risk Report 2012, Tonga is the second most at risk country from disasters out of 173 countries surveyed. Financial resilience through a suite of tools, including disaster insurance, will be imperative to mitigate disaster risks for Tonga.

The Tonga Safe and Resilient Schools Project (the Parent Project) was approved on December 10 2021. On January 15 2022, the Hunga-Tonga-Hunga-Ha'apai (HT-HH) volcanic eruption and tsunami damaged infrastructure across coastal areas of Tonga. The disaster is estimated to have caused physical damages and economic losses of at least US$182m (36.4 percent of GDP). It is estimated that over 600 buildings were damaged or destroyed with the Tonga Cable System which connects Tonga to Southern Cross's trans-Pacific cable in Fiji sustaining damage impacting the countries communications. The cable was largely repaired in late February 2022 although further faults have been recorded. Clouds of ash caused significant damage to waterways, crops and air quality with three fatalities and a large number of injuries recorded. Subsequent to this disaster Tonga experienced its first COVID-19 outbreak and is currently in lockdown as of March 2022.

The proposed Additional Finance (AF) will support the Government of Tonga (GoT) in responding to the HT-HH volcanic eruption and tsunami and scale up investments already planned to build the future resilience to climate and disaster hazards of school infrastructure in Tonga and for the repair and reconstruction of school facilities impacted by the HT-HH disaster. Both the Parent Project and AF (collectively referred to as 'the Project') aim to enhance the safety and disaster resilience of selected school facilities across Tonga.

A high proportion of Tongan school buildings fail to meet the safety, structural adequacy and sanitary requirements of the Tonga National Building Code and associated Australian and New Zealand Standards which pose a substantial risk to lives, building resilience and education continuity in the context of future cyclone or earthquake, in the current COVID-19 pandemic, and as the climate warms. There is also a shortage of quality, accessible and code compliant WASH facilities. Approximately 92% of Government Primary School buildings are at a high risk to one or more hazards and require immediate intervention to reduce risk and improve the safety and resilience of the assets.

The proposed AF will scale up Component 1 activities which are to be initiated under the Parent Project, with no new activities proposed. To date, the Parent Project has recruited staff to the PMU, established working spaces and support mechanism and is undertaking its first mission. No changes to the Project Development Objectives of the Parent Project are required. Grant contribution from the Papua New Guinea and Pacific Islands Umbrella Facility (PPIUF) Multi-Donor Trust Fund(MDTF) will be provided to co-finance infrastructure investments under the scaled-up project. Formal approval by the Board of Executive Directors for the use of CRW funding is requested.

D. 2. Borrower's Institutional Capacity

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MET will be the implementing agency for the Parent Project and AF. A PMU has been established within MET to effectively support the management and implementation of key project-related tasks for the Parent Project and AF, including environmental and social (E&S) risk management throughout the project implementation period. MET will chair a project steering committee, which will provide strategic oversight and coordination of the project. The Steering Committee comprises of representatives from relevant line ministries (for example, Tonga Ministry of finance (MOF), Tonga Ministry of Infrastructure (MOI), Tonga Ministry of Meteorology, Energy, Information, Disaster Management, Environment, Climate Change and Communications (MEIDECC) and Tonga Ministry of Lands and Natural Resources (MLNR).

MET has some prior experience working on World Bank funded projects project and management of E&S risks under the Operational Policies through their role on Tonga SET. More recently the ministry has undertaken ESF training, and managed the development of approvals documentation which has improved their understanding of the framework and expectations. Although the experience with the ESF is through the parent project, there is good capacity and experience that exists within existing MET staff. A PMU has been established, with an E&S officer recently appointed due to start on the 11 April 2022. The E&S resource will be responsible for day-to-day E&S risk management during implementation. They will be supported by the Central Services Unit (CSU) E&S specialist based in the Ministry of Finance and National Planning (MFNP) who has experience with WB project preparation and will provide additional capacity building during implementation.

Several valuable lessons have been learned from the recent experience of school reconstruction and retrofitting under Pacific Resilience Project (PREP) Tonga and are being carried forward to enhance project implementation., specifically: (i) the timely development of land access agreements; (ii)improving the approach to consultations and stakeholder engagement by considering the impacts of the entire works program and establishing a process for school communities to provide input into design, E&S impacts and mitigation strategies; (iii) reducing impacts to project timelines by improving the implementation of environmental management strategies (including permits) and streamlining processes such as utilization of document templates (iv) clearly articulating roles and responsibilities between the CSU, project PMU and Design/Supervision firms early in the project; (v) ensure the project PMU understands procurement processes & expectations early; and (vi) provide support and training for contractors earlier in regards to implementation expectations, occupational health and safety (OHS) and reporting (vii) improving the design and installation of WASH facilities. The PREP project encountered challenges with the capacity of local contractors to implement OHS controls on site, highlighting the need to consider the OHS capacity of contractors during procurement and the need for training in this area. OHS training for contractors was provided under PREP Tonga prior to tendering for school rehabilitation works, and there is the opportunity to build on this training through the delivery of OHS training to contractors and school community members. The impact of Covid-19 has already been identified as a risk to the project's implementation. Current COVID-19 travel restrictions, in response to an outbreak in January 2022 have also limited monitoring capacity and oversight for both E&S and design aspects.

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

A. Environmental and Social Risk Classification (ESRC) Moderate

Environmental Risk Rating Moderate

The Environmental Risk for both the Parent Project and the AF is considered Moderate given risks and impacts are not likely to be significant, large or complex and are expected to be predictable, temporary and reversible. Risks are expected to be site specific with low probability of serious adverse effects to human health or the environment and easily mitigated in a predictable manner. The AF will not fund new activities but will involve a scale up of works under the Parent Project, with additional schools to be selected for upgrade. Given the AF provides funding for a greater number of schools to be included rather than new scope, it is proposed that environmental risks are unchanged from the parent project and will be managed via the same risk management approaches as described below considering lessons learnt from the PREP which had a similar scope of works. Lessons learnt included a new process for the design of septic tanks to ensure the tanks are left to dry cure for an extended period of time prior to filling. Works under Component 1 will involve the retrofitting, renovation and construction of school facilities and early child education centers at selected schools across Tonga to improve building performance levels and reduce damage from natural hazards. Physical works will include renovation and construction of classrooms, water sanitation and hygiene (WASH) facilitates, teachers' housing, temporary emergency shelter and other facilities (such as halls, dormitories, laboratories, libraries, administration) that are essential to a school's function. Where appropriate, a multi-hazard intervention approach for the facility/campus (e.g. site drainage to reduce localized flooding) as well as access, energy efficiency and non-structural improvements may also be considered. An Environmental and Social Management Plan (ESMP) has been prepared, disclosed and adopted to assess potential environmental risks for these works and found that key risks include hazardous materials management (including potentially asbestos and lead), sourcing of construction materials from unsustainable sources, OHS risk, air quality impacts due to dust, noise impacts, construction waste management, soil and erosion management during construction and loss of vegetation through site clearing. Operational risks associated with the construction/ refurbishment of school facilities include management of operational waste and potentially fire safety risk. To support the ongoing operation and maintenance (O&M) of facilities renovated or constructed by the project, Component 1 includes implementation of a school community-based O&M training and capacity building program. The School O&M program is expected to include practical, hands-on training, citizen engagement and small-scale investments in maintenance, minor works and risk reduction interventions for select building typologies by the school community under the supervision of skilled labour/ tradespersons. There is the potential for this program to create OHS risk to community members during hands-on training activities and ongoing maintenance activities with the management of waste potentially required. The project may consider development of additional standard designs (with known costs) for new classrooms, WASH facilities and staff housing. The use of these designs on future projects could result in E&S benefits through improved standards and consideration of E&S issues. While impacts are limited in terms of preparing designs there is potential for impacts to be experienced when facilities are constructed. Technical Advisory (TA) activities proposed for the project under Components 1&2 are designed to strengthen MET's capacity and improve the quality of curricula and assessments in Tongan schools. The risk of downstream impacts is considered low given the nature of TA activities, the positive outcomes and the long-term engagement between the World Bank and MET.

Social Risk Rating Moderate

Social Risk for the AF is considered the same as for the Parent Project and is Moderate given risks and impacts are not likely to be significant, large or complex and are expected to be predictable, temporary and reversible. Risks are

expected to be easily mitigated in a predictable manner and the AF is expected to be largely positive. No closure of schools, nor relocation of students is expected during building and upgrade activities, and the works are not expected to impact educational services. Minor temporary relocations may occur to other buildings/facilities within the site, however, the parent project and AF will be staged to minimize impacts to educational services as was done during the PREP project. During screening, the TA will identify any other activities such as small business or community services occurring on school sites with mitigation measures to be considered in construction programming. Experience from the PREP project suggests that such risks are unlikely and minimal. The overall social impact of the project is expected be positive with improved access to education, improved education systems and teaching standards, more resilient public sector buildings with potential emergency/ evacuation centers and water and sanitation hygiene (WASH) facilities included in the outcomes. The key social risks and impacts associated with the parent project and AF are expected to include: (i) Community health and safety due to interactions with construction workers and construction equipment; (ii) Exposure of workers and building occupants (including school aged children) to potentially hazardous materials (such as disturbed asbestos) and dangerous activities (such as machinery) before and during demolition and or construction/rehabilitation activities; (iii) Child safety and impacts to the school community due to the proximity of workers to school children and school staff; (iv) Impacts of construction impacts such as noise, dust or vibration v) Minor impacts to community or livelihoods due to restricted or temporarily reduced access to sites and regular travel routes; vi) Risks to vulnerable groups (poor, disabled, elderly, isolated or ethnic groups) and gender-based violence as a result of construction activities and the movement of people; vii) Gender based violence (GBV), Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) risks during construction; (viii) The risk of COVID-19 to workers and the school community if community transmission become apparent ix) potential impacts to land, or access to land, during construction and operation of works x) failure to provide adequate information and involvement in decision-making about the impacts of the activities on students and families. These impacts are considered temporary and will be subject to standard accepted mitigation measures to be implemented by the contractor. The possible need for temporary access to nearby land for lay down and construction facilities will be assessed on a case by case basis. If temporary land use is required as a result of laydowns or compounds, an MOU or lease agreement will be developed. Lessons learnt from PREP Tonga have indicated that adequate temporary WASH facilities for contractors should be established prior to start of works and should be separate from those used by student/staff with all land tenure clearly established and acceptable prior to selection of schools. The risk of Component 3 CERC activities are unknown as are based on emergency events. E&S risk for CERC activities will be screened using the CERC ESMF which will include a list of 'positive' activities which are eligible for funding under the project (such as procurement of equipment to respond to natural disasters and infrastructure repairs).

Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Risk Rating Low

SEA/SH risks have been assessed as low and will be addressed during implementation through the ESCP including screening and implementation of measures to prevent and mitigate the SEA/SH risks. The project involves minor civil works which are not expected to increase the risk of SEA/SH risk within the community. To support the works, and to reduce the risk, a community GRM has been established and GBV, SEA/SH training will be undertaken with contractors. A code of conduct which is agreed with both contractors and workers will also be part of procurement processes.

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

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

Both the Parent Project and AF are expected to have long-term positive impacts, delivering improved infrastructure, information and teaching systems to schools, strengthening the resilience of school facilities, providing universal access as well as improving the capacity of schools to respond to emergency situations. Whilst E&S risks and impacts are present for the parent project and AF, they are expected to be temporary, predictable, and readily managed through design and mitigation measures.

Physical works under Component 1 will include renovation and construction of classrooms, water sanitation and hygiene (WASH) facilitates, teachers' housing, and other facilities. Key E&S risks associated with these works include:
i) Risk associated with the management of hazardous materials (including potentially asbestos and lead) ;
ii) Resource efficiency risks associated with sourcing of materials;
iii) OHS risks;
iv) Air quality impacts via construction dust;
v)noise impacts;
vi) Risk of improper construction waste;
vii) Soil and water risk due to improper management of erosion and sediment controls
viii)Community health and safety risk, particularly safety risk to school children and communities during construction;
ix) Minor loss of vegetation during site clearing;
x) Minor loss of, or loss of access to assets and land to allow for storage sites to be established in a voluntary and short-term manner;
xi) Limitations in access to the project by vulnerable groups considering those schools which would not be included in the project based on prioritization;
xii) SEA/SH associated with interactions between project workers and host communities; and
xiii) COVID-19 safety risk to project works and host communities.

These risks are expected to be temporary and readily managed. Whilst the specific locations for all school infrastructure and renovations to be funded are not yet confirmed, risks are site specific, predictable and mitigation is readily available. An overarching ESMP has been prepared, disclosed and adopted, which provides high level assessment for expected activities based on the lessons learnt during the PREP school's construction. The ESMP includes a checklist for site assessment to be completed by the PMU E&S specialist prior to the development of bidding documents. This approach was also used on the PREP Tonga project and will allow for continuity in the risk management process between projects and the implementation of lessons learned such as improvements to the site assessment checklist. Given no new activities are proposed for the AF, there is no need to update the ESMP as E&S risks and impacts can be adequately assessed and managed via the existing ESMP.

This ESMP requires that proposed physical works are screened via a site assessment checklist included as an annex to the ESMP. The site assessment checklist requires assessment of specific construction and operational risks for each site (including site specific risks, e.g. flood risk) and the selection of relevant mitigation measures guided by a provided list of generic mitigation measures. Generic mitigation measures include construction stage environmental, social and OHS mitigations relevant to proposed infrastructure typologies, including materials sourcing and hazardous

materials management measures. The ESMP also includes mitigation measures for the operation of facilities such as fire safety and operational waste management measures. The ESMP requires that aggregate (particularly sand) be sourced from permitted quarries and suppliers only and prohibits the use of illegally mined sand.

The site assessment checklist screens the requirement for contractors to prepare a CESMP or more limited environmental and social code of practice (ESCOP) based on the works to be completed at each site and the E&S risks identified, with a CESMP required for higher risk activities. Where required, CESMPs will include elements such as appropriate fencing to reduce the risk to community members and school children, prior to the commencement of construction works. The Environmental and social commitment plan (ESCP) requires the preparation of the site assessment checklist for all physical works prior to bid preparation.

The project ESMP has considered: i) the role that education plays on the gender dynamics and inequality of employment opportunities and labour force participation in Tonga; ii) the role of gender within operations and maintenance of school infrastructure; iii) the scope of schools as emergency shelters to integrate designs to reduce GBV in an emergency context; and iv) potential gender-based barriers related to teacher training,
The project is expected to include the construction of ramps and pathways which are essential to improve the accessibility of school facilities. Universal access will be considered in designs.

A Labor management procedure (LMP) has been prepared for the parent project, and will applied to AF, to assist protect workers and manage labor and working conditions including non-discrimination. A COVID Safety Protocol has also been prepared to address COVID-19 Safety risk. Construction works will be completed in accordance with the World Bank interim note COVID-19 Considerations in Construction/ Civil Works Projects. A Stakeholder Engagement Plan has been prepared to ensure proactive consultation and engagement of the community and stakeholders and is currently guiding communications and engagement plans including key stakeholder discussions and TOR development.

The school community-led O&M program to be supported under Component 1 may result in OHS risk to the community. With the support of World Bank technical assistance, an Operation and Maintenance Technical Manual and Training of Trainers (ToT) Manuals have been developed for a range of common structural typologies in Tonga. These materials are expected to be piloted in-country and refined over the next six months so that lessons learned can be leveraged by the parent project and AF to develop and formally adopt a comprehensive and scalable training program. The program is expected to be established within the existing school management systems of Tonga, in which Principals, teachers, district officers, parents and the Parent Teachers Association (PTA) play a critical role. The ESCP requires that MET develop an ESCOP for the program including management of OHS risk in accordance with environment health and safety (EHS) guidelines and good international industry practice (GIIP). OHS training for contractors was provided under PREP Tonga prior to tendering for school rehabilitation works being tendered for the project. The parent project and AF will build on this training through the delivery of OHS training to contractors and school community members involved in maintenance activities. The ESCOP also addresses the management of maintenance waste.
Downstream impacts of TA activities under Components 2 are anticipated to be largely positive and include the strengthening of MET's capacity which is anticipated to improve the quality of curricula and assessments in Tonga. To manage the minimal risk for TA activities, the ESCP requires that Terms of Reference (ToRs) for technical studies, advisory services and the recruitment of staff consultants be screened for potential E&S risks and to ensure that

advisory services comply with the objectives of the ESF and GIIP. The World Bank will be required to provide a 'no objection' to all ToRs prior to the engagement of consultants, PMU staff, and technical studies. MET is currently collecting and storing student data, with the EMIS expected to strengthen this process whilst considering privacy and data storage risks.

The parent project and AF may also fund development of additional standard designs for new classrooms, WASH facilities and staff housing. The use of these standard designs on future projects could result in E&S risks associated with small scale infrastructure including air quality impacts due to dust, noise impacts, construction waste management, OHS risk and soil and erosion management during construction. In the case of future investments using these standard designs, ToRs for these designs would be required to comply with ESF requirements and GIIP and to be reviewed by the World Bank E&S specialists who will provide no objection, and inputs on design process to manage E&S risks e.g. locks on doors, including guidance for siting facilities and management of sewage.

Similar to the parent project, the AF may result in SEAH impacts, particularly in relation to the presence of workers in a school setting. SEA/SH risks have been assessed as low in accordance with the World Bank Good Practice Note of SEA/SH in major civil works. Prior to implementation, appropriate mitigation measures will be identified including screening of project activities, identification of SEA/SH training and support service providers and identification of sensitive receivers. CERC activities in Component 3 will be assessed using the screening process outlined in the CERC ESMF.

ESS10 Stakeholder Engagement and Information Disclosure

ESS10 is relevant to the parent project and AF as design development and activities will require stakeholder engagement and information disclosure. Comprehensive stakeholder consultation has taken place in the PREP project which is transferrable to the TSRS project and AF. In addition to the core governmental agencies (MET, MEIDECC, MOI, MLNR) consulted, additional stakeholders are expected to include, but are not limited to the Ministry of Internal Affairs, Principals, Teachers, students, parents (including representatives of the Parents and Teachers Association), District officers and all affected parties, vulnerable groups including isolated communities or minorities and other interested parties. All stakeholders will be proactively consulted and engaged throughout project preparation and implementation which has been described in the Stakeholder Engagement Plan (SEP) which was prepared for the Parent project and will be utilised for the AF as no additional risk or change has been identified. Consultation will be undertaken during Project preparation to clarify risks and impacts and to develop appropriate mitigation measures for both the project and AF.

The parent project and AF is largely well supported with positive community benefit expected to improve education, access and infrastructure sustainability. There is a risk of failure to provide adequate information and involve the local community and families on the staged construction programming aimed at providing a continuous education service. This risk is minimal and unlikely, if the PMU incorporates lessons learnt from the PREP project and ensures the school community and administration is involved in project planning. During preparation, the Borrower will prepare an updated SEP (including Grievance Redress Mechanism (GRM) to identify/confirm existing stakeholders, describe the process for sharing information on project activities, and seeking/incorporating feedback on project design and implementation. These will be implemented throughout the life of the Project. Reporting and disclosure of documents will also be included in the updated SEP.

Principles and approaches to mitigate the risk of COVID-19 including good hygiene and engagement practices have been included in the parent project SEP along with the COVID-19 Safety Protocol to address COVID risk during

stakeholder engagement activities. The SEP also includes COVID risk mitigations for the movement of workers, although it is expected that local labor will be used on all sites. The COVID Safety Protocol has been prepared during preparation to address COVID-19 Safety risks. The GRM which will enable stakeholders to raise project related concerns and grievances has been outlined in the SEP along with a process for managing and addressing these grievances. This includes lodgment channels, governance structures, roles and responsibilities, investigation and feedback processes, social risks and implementing arrangements.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

ESS2 is relevant to the parent project and AF as will require the employment of workers. Amongst other works, the parent project and AF will involve construction and renovation of small-scale infrastructure (one-two story buildings and facilities) within existing schools. Physical construction works require management of OHS risks to ensure the safety of workers. There is also the potential for renovation and retrofitting works to encounter hazardous materials such as asbestos and lead based paints within existing buildings.

Workers on the parent project and AF are expected to be either direct or contracted workers. It is not expected that community workers will be engaged. The project involves the use of some primary supply workers such as workers at quarries supplying materials. Workers would be engaged in compliance with all relevant Tongan legislation.

A small number of workers will also be employed at each school. Based on PREP and given the current COVID-19 travel constraints, it is expected that workers will generally be from Tonga though it is possible that the workers will not be from the same community or island where work take place. Adequate mitigation will be identified to manage risks associated with workers being on a school site and have been included in the parent project ESMP.

The risks associated with labor and working conditions have been assessed within the LMP which addresses worker conditions and relationships, non-discrimination and equal opportunity and workers organisations. No additional risks relating to this AF exist, so the existing LMP will be apply to the AF. The LMP also includes reference to the worker GRM which is the responsibility of the Tonga Public Service Commission and sits within the Office of the Prime Minister.

To reduce the risks associated with the transmission of the COVID-19 virus to project workers and the community, a Project COVID-19 Safety Protocol has been developed in line with current World Health Organisation and Tongan Ministry of Health advice with particular reference to the construction industry.

The PREP project encountered challenges with the capacity of local contractors to implement OHS controls on site, highlighting the need to consider the OHS capacity of contractors during procurement and the need for training in this area. An OHS awareness training program is expected to be delivered to contractors' school community members, utilizing lessons learned from the OHS training program delivered under the PREP Project. The CSU and World Bank E&S specialists will assist with reviews of TOR for contractors and will ensure adequate provision for E&S mitigation management including OHS management is included in TOR.

Construction OHS risks are expected to be managed through the implementation of appropriate management measures, including a requirement for OHS induction training for all contractors. The ESMP requires the preparation of a site assessment checklist using a template provided for all physical works during the design process. The site

assessment checklist included in the ESMP also determines the need for contractors to a Contractor CESMP or ESCOP based on the works to be completed at each site and the E&S risks identified. The Contractor CESMP or ESCOP includes pollution and waste management measures as appropriate to the site location and works to be completed. The ESCP also includes the requirement for asbestos surveys during the design process to confirm the presence or absence of asbestos. Should asbestos be discovered it would be removed safely and deposited at the hazardous waste facility attached to the Nukualofa landfill.

ESS3 Resource Efficiency and Pollution Prevention and Management

Tonga has a well-established regulatory framework that provides measures to protect the environment from pollution and degradation. Key legislation includes the Marine Pollution Prevention Act 2002 and the Environment Management Act 2010.

The Parent Project and AF will involve construction and renovation of small-scale infrastructure within existing schools and in some cases potentially the relocation of (HT-HH) volcanic eruption and tsunami damaged schools (within brownfield, MET owned sites only). Risks associated with the construction of small-scale infrastructure include degradation of receiving environments as a result of improper erosion and sediment controls, improper management of hazardous material, improper waste storage and management including inadequate hazardous waste disposal procedures. There is also the potential for renovation and retrofitting works to encounter hazardous materials such as asbestos within existing buildings and the use of lead-based paints.

Construction pollution risks are expected to be managed through the implementation of appropriate environmental management measures. Generic management measures are included in the project ESMP with site specific mitigation to be included in a site assessment checklist to be completed prior to procurement. The site assessment checklist also determines the need for contractors to a Contractor CESMP or ESCOP based on the works to be completed at each site and the E&S risks identified. The ESCP includes the requirement for asbestos surveys to be completing during design to confirm the presence or absence of asbestos. No asbestos was identified at schools during the works completed under the PREP Tonga Project.

The school community-led O&M program may involve activities which could result in pollution risk (for example use of hazardous materials during maintenance activities). The ESCP require MET to develop an ESCOP for the program include management of any hazardous materials which are expected to be required during maintenance activities in accordance with EHS guidelines and GIIP.

Resource efficiency risks associated with small-scale infrastructure construction include sourcing of materials from unsustainable sources including but not limited to the procurement of sand which has been mined from beaches or procurement of unsustainably sourced timber. The ESMP for the project include a requirement to source sand and aggregate from licensed quarries only and prohibits procurement of illegally mined sand.
There would also be some operational risks associated with the infrastructure component of the project such as the management of sewage, greywater and wastewater. Under the PREP Tonga Project issues were identified with the improper installation of some septic systems which were found to leak during testing and commissioning (with

water). These issues have been rectified and to limit impacts on future projects additional due diligence will be undertaken as part of a design improvement review and during installation by the design and supervision consultant. Designs for WASH facilities will be reviewed by the PMU E&S specialist and by the World Bank E&S specialists to ensure that sewage, greywater and wastewater will be appropriately managed. The ESMP includes operational mitigation and management measures which include management of operational waste.

The project involves retrofitting of existing buildings or construction of new school buildings and facilities and is not anticipated to result in substantial or significant point sources of environmental pollution or emissions. Due to the limited nature of physical works and the very low likelihood of downstream emissions as a result of the works, quantification of gross GHG emissions as a result of the project is not expected to be required.

ESS4 Community Health and Safety

ESS4 is relevant to the parent project and AF activities as it will include physical works which could pose a health and safety risk to community members. Community health and safety risks are typically associated with construction works including noise, dust and vibration and proximity to work sites for students and the school community. Stakeholder engagement will include construction education and communication plans with the ESMP including management and mitigation measures to reduce impacts where possible. The parent project ESMP includes generic mitigation and management measures which can be drawn on by contractors to develop site specific CESMPs or ESCOPs as appropriate to the type of works being completed at each site. No additional risks have been identified fro the AF, so the existing ESMP will apply to the AF. The need for a Contractor CESMP or ESCOP will be determined based on a site assessment checklist which will be completed for each site prior to preparation of bidding documents using the template in the ESMP. Where required, CESMPs will include requirements such as appropriate fencing, signage, pedestrian/vehicle safety, waste management, dusty and noise controls and management practices to reduce the risk to community members and school users, prior to the commencement of construction works. The CESMP will also include traffic management measures which consider access requirements and possible traffic impacts to local neighbours, school children and the community accessing schools or surrounding sites, construction working hours and noise types/levels. To separate workers from children, a fenced off work area will be agreed as part of the CESMP. The CESMP will also consider scheduling of works in order to minimise impacts to school users such as scheduling works during school holidays where possible. Other measures such as unique safety vest colouring and identification badges should also be considered during development of the CESMP. Project designs will adhere to universal access principles and siting of construction ancillary facilities will take these principles into consideration.

There is also the potential for renovation and retrofitting works to encounter hazardous materials such as asbestos and lead based paints within existing buildings. The ESCP includes a list of activities which are ineligible for funding under the project which will include use of asbestos containing materials and use of lead-based paints. The ESCP also includes the requirement asbestos surveys during design to confirm the presence or absence of asbestos.

It is expected that local labor will be used on all sites, and that labour influx is minimal, however, if required, a labor management plan may be developed to limit the impact to rural and remote communities faced with the temporary influx of workers during construction.

SEA/SH risks for the parent project and the AF have been assessed as low in accordance with the World Bank Good Practice Note of SEA/SH in major civil works. During preparation, appropriate mitigation measures will be identified

including screening of project activities, identification of SEA/SH service providers and identification of sensitive receivers in the vicinity of project sites or access.
The MET, in the ESCP has committed to the implementation of a Contractor Code of Conduct for the parent project and AF which includes provisions for SEA/SH prevention (safe, accessible, separate facilities for women, well-lit areas, signage, training and M&E of GBV prevalence). The Contractor Code of Practice, GBV training and provision of a GRM will be included as mitigation or impact reduction mechanisms.
Risks associated with COVID-19 include the movement of workers, community engagement practices and lack of good hygiene resulting in infection or transmission of the virus. A Project COVID-19 Safety Protocol has been developed and will be implemented to protect both the community and project workers: i) for the PMU during project preparations; and ii) for contractors prior to commencement of works.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

ESS5 is relevant to the project as whilst the project aims to use lessons learnt from the PREP in regards to early tenure identification and agreements, both the parent project and AF may require voluntary land donation or land-leasing. It is expected that all land use will be on public or government owned land. No involuntary resettlement impacts are anticipated as a result of this project, as all civil works are expected to be carried out within existing school footprints and/or publicly owned land. If temporary land use is required as a result of laydowns or compounds, an MOU or lease agreement will be developed. Criteria for voluntary land donation and land-leasing has been included in the ESMP.
The impacts to land will be confirmed once design is finalised and site tenure is confirmed. Given that no land will be acquired, a RAP or RPF will not be required. Based on experience from PREP however, where land screening and access arrangements caused some delays, the Project will consider the preparation of voluntary land donation or land-lease procedures. The process will ensure that those donating land will understand that they have an options to say no, and that the criteria will limit the amount of land to be donated so as not to involve a severe impact on those donating land, the process will be duly validated, and witnessed as a voluntary donation. This will be based on engagement with stakeholders and be developed in a manner that is consistent with the objectives of ESS5.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

ESS6 is relevant to the Parent Project and AF as works have the potential to impact on biodiversity and the sustainable management of natural resources. Tonga has an existing regulatory framework relevant to biodiversity conservation and the management of living natural resources. This includes the Bird and Fish Preservation Act 1988, and the Parks and Reserves Act 1988. Funding of works by the project within or adjacent to national parks or reserves under the Parks and Reserves Act 1988 or protected reserves under the Bird and Fish Preservation Act 1988 is prohibited and this is included in the excluded activities list in the ESCP.

The Parent Project and AF will involve construction and renovation of small-scale infrastructure. Given the specific school sites have not been confirmed it is unclear what the impact to biodiversity will be though the ESMP identifies that there is the potential for impacts to biodiversity or natural habitats for example due to poor management of

sediment controls or hazardous materials should construction occur close to watercourses. Construction of new facilities may also require the clearance of small amounts of vegetation within existing brownfield sites. Given these works would occur within existing school grounds (or existing brownfield sites owned by MET) and would be small in scale with impacts limited to within the project boundary the project will not disturb any critical habitat under ESS6. Vegetation impacted by the works would be modified and all works would take place within the existing footprint of brownfield sites.

Construction phase impacts to biodiversity and natural resources are expected to be managed through the implementation of standard environmental management measures as identified in the ESMP. This ESMP requires that any proposed physical works are screened via the site assessment checklist included as an annex to the ESMP. The site assessment checklist included in the ESMP determines the need for contractors to a Contractor CESMP or ESCOP based on the works to be completed at each site and the E&S risks identified. The Contractor CESMP or ESCOP will include biodiversity and natural resource management measures appropriate to the site.

There is a risk to sustainable management of living resources due to the potential to source construction materials from unsustainable sources, for example the procurement of sand which has been mined from beaches. The ESMP for the project includes conditions for materials sourcing (requirement to source materials form licensed quarries only) and prohibits procurement of illegally mined sand.

The school community-based O&M program may occasionally remove vegetation in order to protect the integrity of buildings. The ESCOP requires that MET develop an ESCOP for the program which includes screening criteria for the removal of vegetation and a vegetation replacement policy.

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

This standard is not considered relevant as there are no IPs identified in the parent project or AF sites and the population is majority Polynesian ethnicity. This is consistent with the PIC guidelines.

ESS8 Cultural Heritage

This standard is not considered relevant for this parent project or AF, however chance finds procedures will be adopted. and will be implemented if, during works, tangible or intangible cultural heritage is discovered.

ESS9 Financial Intermediaries

This standard is Not Relevant to the parent project or proposed AF interventions, as no financial intermediaries will be used.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways	No

OP 7.60 Projects in Disputed Areas	No

B.3. Reliance on Borrower's policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework?	No

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

Use of borrower framework is not being considered

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Kingdom of Tonga

Implementing Agency(ies)

Implementing Agency: Ministry of Education and Training

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VI. APPROVAL

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Practice Manager (ENR/Social)	Susan S. Shen Cleared on 13-Apr-2022 at 17:16:23 GMT-04:00