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Environmental and Social Systems Assessment (ESSA)

Swachh Bharat Mission - Gramin

Executive Summary

DRAFT

Prepared by The World Bank

Executive Summary

1.   Government of India (GoI) has recently launched Swachh Bharat Mission-Gramin (SBM-G) campaign and program to accelerate efforts to achieve universal sanitation coverage, improve cleanliness and eliminate open defecation in rural India by 2019. The proposed World Bank support to the program will enable GoI, in collaboration with State governments, to achieve the goals of SBM-G. The project development objective (PDO) is *to reduce open defecation in rural areas and strengthen MDWS's capacity to manage the national program.*

2.   The World Bank support will concentrate on four key result areas that contribute to achievement of the PDO including (i) increased access to safe and functional sanitation facilities; (ii) achieving and sustaining community-wide ODF status; (iii) improved solid and liquid waste management (SLWM) services; and (iv) strengthened capacity of MDWS in program management, advocacy, monitoring and evaluation.

The ESSA Scope and Methodology

3.   An Environmental and Social Systems Assessment (ESSA) of the proposed Operation was undertaken by the World Bank to understand the environmental and social risks, benefits, impacts and opportunities of the existing sanitary policy and practices on the ground. The assessment is also part of the World Bank's preparation in line with the requirements of OP/BP 9.00. The assessments were carried out through a comprehensive review of relevant government policies, legislation, institutional roles, program procedures, assessment study of earlier national programs in five states and an analysis of the extent to which these are consistent with Bank OP/BP 9.00. Further, actions to address gaps to enhance risk mitigation were identified and detailed. The ESSA methodology included analysis of information/data on GoI's Swachh Bharat Mission - Gramin (SBM-G) Program, field reviews, and consultations with all key stakeholders at the level of the five state governments and the national government.

4.   The key findings of this assessment are based on surveys and consultations carried out in the five states of Rajasthan, Madhya Pradesh, Chhattisgarh, West Bengal and Odisha. The status as observed in the States are reflective of the performance of the predecessor programs of SBM-G and many of those gaps have now been addressed by the SBM-G guidelines, as launched in 2015. The current SBM-G guidelines have been taken into account while proposing the action and implementation plan under this Operation.

Environmental Systems

5.   The risk screening suggests that the overall environmental impact of the Project is likely to be positive. Reduction in open defecation will reduce the risk of transmission of disease through the fecal-oral route. Similarly, improved SLWM will also have a positive impact on water quality and human health. Well designed, executed and managed systems and structures will result in overall human and environmental wellbeing and reduce risks of water contamination and environmental degradation.

6.   However, environmental risks could arise in some places during implementation due to improper location, planning, execution and management of schemes, especially in areas subject

to climate vulnerability and disasters like drought, high ground water table, areas prone to cyclones, and proximity to protected natural areas and monuments. The risks likely to arise are: (i) contamination of groundwater supplies due to poorly designed/managed sanitation facilities (ii) incomplete technical and O&M knowledge and guidance to PRIs and GP/village level implementing institutions about the domestic, institutional sanitation facilities and SLWM systems may pose general environmental and health problems, (iii) potential impacts on natural resources, and natural and cultural heritage sites located nearby, (iv) potential occupational and public safety risks for sanitation workers in the villages.

Social Systems

7.   The assessment reviewed the social policies and procedures (both at National and State level) and found them to be adequate. The assessment finds an enabling policy and legal framework that will promote: decentralized planning, implementation and monitoring, active participation and safeguarding the interests of vulnerable sections (women, scheduled caste and scheduled tribe communities) be it through targeting or membership in local governance institutions or in community level groups. However, challenges were observed at the level of implementation though impact of the identified social benefits overweighs the program related social risks. Most of these risks are manageable and can be mitigated through proper implementation, better local oversight and accountability.

Key Findings

Environmental Issues
8.   The key findings of ESSA on environmental systems are:
(a) The national and states governments have a well-developed environment legislations. However, the implementation setup to address environmental challenges of SBM-G Program needs to be strengthened.
(b) IHHL designs for different onsite conditions have been promoted through GoI guidelines. Non-adherence to guidelines during planning and implementation of the IHHLs resulted in significant environmental risks and vulnerability in the past. Therefore, the states need to ensure that designs being implemented are demand responsive and suitable across all socio-economic strata and appropriate for onsite conditions.
(c) The past approach was mainly focused towards toilet construction to improve coverage and access. The SBM-G focuses on usage also. However, post construction management of toilets and black water management needs to be strengthened.
(d) Although, GoI's guidelines include Solid Liquid Waste Management (SLWM) as a part of the Program, the success level of such schemes at village level has been variable due to different geographical size, population density and cultures in villages. Accumulation of grey and black water in low lying areas, burning of solid waste and dumping of solid waste in common land or water bodies creates health risks, contaminates water resources and risks local flooding during rains.
(e) Moreover, inadequate planning and technology selection may affect groundwater quality, Program sustainability and infrastructure usability.
(f) The Program's existing institutional systems needs further strengthening for environmental management along with a framework for environmental monitoring.

Social Issues

9.   The key findings on social systems are:

a) ***Policy:*** The National Acts[1] applicable to developmental work related to sanitation along with the corresponding State Acts articulates the "processes" to be followed for decentralized planning, social inclusion, participation, transparency and accountability. Additionally, right to Fair Compensation and Transparency in Land Acquisition and Rehabilitation and Resettlement Act of 2013 ensure that in case of land diversion/acquisition related matters do not marginalize the vulnerable.

b) ***Institutional mechanisms:*** The five tier institutional structure ensures that institutional structure is available for planning, monitoring, and implementation of SBM at national, state, district, block and GP level[2]. The corresponding key units are assisted, supported and guided by a whole range of other units/institutions like Program Monitoring Unit & Sanitation Support Organization, Capacity and Communication Development Unit, Support Organizations, Technical Support Units/Cells, Resource Groups, Gram Panchayat, Gram Sabha and Ward Sabha. However, there are gaps in staffing on social expertise at some levels in the sample states. Such staffing gaps needs to be addressed to ensure decentralized planning, social inclusion, participation, transparency etc.

c) ***Procedures and Processes:***

- **Capacity:** The key functionaries responsible for implementing SBM have limited perspective on social aspects of SBM. Also there are huge challenges especially at the village level as the coverage and targets are high but staff for social mobilization, decentralized planning, transparency, accountability is extremely limited.

- **Land management:** SBM is not a land intensive program and currently no land related disputes were observed as the focus in on IHHL for which families use their existing land or Panchayat diverts its land for the landless. However, as the progression moves to community complexes, public toilets and village level SLWM, local laws related to ownership/management should be followed if land is needed and documented via the monitoring.

- **Decentralized Planning:** The GP level overall plans of sanitation are supposed to be a consolidation of Gram sabha/ward level plans and are expected to be made through an inclusive participatory process. However, local planning needs to be further strengthened.

- **Social inclusion, participation, transparency and accountability:** In principle, the SBM has macro-level mandate with a community saturation approach, whereby everyone within the village gets coverage. This ensures that the program covers everyone irrespective of a households' vulnerability status (i.e. with respect to caste, gender, disability etc.). However, historical and baseline data shows that despite the past sanitation programs of the government, vulnerable BPL and APL households still lack access to toilet facilities at an alarming rate (47% and 44% respectively). This is seen to be 20 percentage point lower than access rates for non-vulnerable APL households. Therefore, to ensure that SBM's saturation

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[1] 73rd Constitutional Amendment Act of 1993, Panchayat Extension to Scheduled Areas (PESA) Act of 1996, Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act of 2006, Right to Information Act 2005; National Rural Employment Guarantee Act 2005.

[2] The SBM has a 5-tier structure at the National/State/District/Block/Village level- with National Swachh Bharat Mission (G) – NSBM (G) at the centre; the overall planning and implementation is the prerogative of State Water and Sanitation Mission (SWSM), District Water and Sanitation Mission (DWSM), Block Water Mission and Block Sanitation Mission (BSM) and Village Health Water and Sanitation Committee at the respective levels.

approach bridges that gap in practice, sound systems of social accountability and monitoring needs to be developed.

- **Monitoring:** As was observed during the surveys, apart from physical and financial progress, the monthly Progress Report had provisions for tracking SC/ST/BPL beneficiaries. The states also had defined system for social audit for specific centrally sponsored scheme though implementation remained a challenge. Moreover, sanitation programs were not within its ambit.

Most of these concerns have been taken care of by the new SBM-G guidelines. SBM-G has provisions for ODF verification, social audits, overall progress (physical and financial) etc. These provisions can be further strengthened to ensure SBM-G's sound principles are carried out in action during implementation.

- **Grievance redressal:** The existing grievance management system is mostly inaccessible for economically vulnerable and those living in remote areas where access to both mobile and internet services is limited. This is mainly because the system is only available in English and there is lack of awareness. The existing system needs to be strengthened to make it more responsive and approachable for all sections of the population.

- **Operation and maintenance:** The survey and consultations found instances where O&M of IHHL reinforces traditional cultural practices that increases the work load of women. Responsibility for Community assets such as sanitary complexes, SLWM projects and overall cleanliness of the village come under VWSC/panchayat but continues to be seen as job to be done by specific communities. While SBM-G clearly lays out that O&M responsibilities (particularly pertaining to community toilets) are collective responsibility of the community, there remains a need for community sensitization and monitoring of maintenance and usage to ensure that caste or gender based discrimination are not prevailing.

Key Operation Actions

10.   Key actions agreed with GoI to address the environmental and social risks and gaps identified in ESSA, though PforR component of the Operation, mainly encompasses:

Capacity Building: Strengthening capacity for environment and social management, as required
(a) **Environment**: Strengthening of guidelines, procedures and monitoring framework for improved environmental management of the program
(b) **Social**: Strengthen monitoring and grievance redressal systems (including use of ICT and GIS tools, as needed) and track access and usage across social groups, undertake thematic audits to understand progress and gather citizen feedback and undertake staffing, training and sensitization of human resources

11.   *Detailed Environmental Operation Actions:*
(a) *Exclusion of high-risk interventions:* Criteria to exclude certain interventions from the Operation that may impact ecologically sensitive/important/notified wetlands, and protected monuments;
(b) *Strengthening the existing GoI system* for environmental management. The Operation Action Plan focuses on strengthening GoI's procedures and capacity including strengthening/preparing guidelines for technical options for variable socio-economic, onsite conditions and disasters, and integrating environmental management of the Program with these guidelines.

(c) *Building institutional capacity* to address environmental issues for monitoring and due diligence.

12.   The proposed Action Plan under the Operation shall strengthen the existing guidelines with sustainable technological options for onsite sanitation and SLWM, thereby reducing the risk of contamination of water resources and improving the current sanitation conditions in rural areas. Any water extracted from the water sources for construction activities and for maintenance of infrastructure constructed under the Operation is not envisaged to be significant to adversely affect any riparian's possible water use. Therefore, considering the Operation's focus on reduction in open defecation and overall rural village sanitation, it is the Team's assessment that the activities under the proposed Operation shall (i) not adversely change the quality and quantity of water flows to the other riparian, and (ii) not be adversely affected by other riparian's possible water use.

13.   *Detailed Social Operation Actions:*
(a) *Inclusive Planning:* SBM in principle addresses the risk of social exclusion through its tenet of Community Saturation and emphasizes on collective action – thus ensuring coverage to everyone irrespective of vulnerability status. In order to maximize the benefit of this tenet and to ensure that the planning process is demand driven, community participation and ownership needs to be emphasized upon.
(b) *Monitoring:* Analysis of baseline data for 2012 shows that despite the government's past efforts to "target" vulnerable households and provide them access to IHHL, significant gaps still exist. Only 44% and 47% of vulnerable APL and BPL households have access to IHHL respectively. This is in contrast to a 64% (on average) access rate for non-vulnerable APL households. Annexure 3 documents the detailed analysis.
The SBM has adequate scope of addressing the existing gaps via its Community Saturation principle, provided its implementation is effectively tracked. In this context, it is important to enhance the national government's existing monitoring system to ensure that social indicators related to sanitation - like inclusion of the vulnerable in plans and design, usage of toilets by different social groups (based on age, gender, caste); tracking citizen's feedback, grievance management, land management issues covered and documented as required. Monitoring system will also be enabled to track the reduced incidence of open defecation across different vulnerable groups as well as expenditure on inclusion of different social groups.
(c) *Citizen's Feedback:* Thematic Social Audits to be conducted with focus on inclusion, participation, transparency, expenditure tracking and quality control. Role and functioning of VWSCs and local groups not to be surpassed and support to be provided by committees at block, district and state level. Results from the same will be used for mid-term remedial actions if required.
(d) *Grievance Redressal:* Considering the scale and targets of SBM, there is a need for specific, approachable and responsive grievance redressal mechanisms for timely and efficient redressal.

Implementation Support – Environment and Social

14. Successful completion of the key Operation actions pertaining to Environment and Social aspects will be facilitated by the IPF component of the Operation. This will mainly assist all Operation management and capacity building needs.

Implementation Support for Environmental Aspects

15. *Development of implementation support tools:* To support implementation that ensures environmentally appropriate actions, appropriate guidance for Program implementation would need to be developed. This may include an Operation Manual that has checklists, standard operating procedures (SOPs) and other guidance to ensure adherence to good environmental practices and existing environmental legislation.

16. Culturally appropriate demand creation and awareness strategies and material for both onsite sanitation and SLWM is required. Guidelines for strengthening existing IEC/BCC material focusing on improving skills and awareness of beneficiaries and GPs for planning, monitoring and management.

17. *Capacity Building of Implementing Authorities:* MDWS has a capacity building plan into which environmental management may also be added. Capacities need to be created across the institutional setup. MDWS would need to create environmental focal points/nodal persons to ensure Program related environmental actions and impacts are appropriately addressed in the Program. The nodal officers will also ensure Program actions comply with existing environmental regulatory environment. To ensure required capacity is built at the various levels, a suggested list of capacity building actions is given below.

Table 1: Capacity Building for Environmental Aspects

Broad areas	Topics	Building Capacities for
Awareness on guidelines and legislation	Government of India and state environmental guidelines, safeguards and legislation, and project guidelines.	All key project stakeholders, at National, State and district (implementing officials) and other agencies implementing various project components.
Environmental impacts and mitigation	Identification of environmental impacts from construction, location and design issues of onsite sanitation and SLWM actions, possible mitigation actions	Key stakeholders implementing project – including district implementing agency, and environment nodal points
SLWM system development	Identification of SLWM concerns in GP/villages, actions and appropriate options, including technological options for management and disposal	Key stakeholders involved in project design
Construction supervision	Environment issues during construction and material sourcing, construction site management, public and worker safety concerns, disposal of construction waste	Stakeholders involved in construction supervision, including district staff and GP members
Toilet management	Management of toilets to keep clean and use, including disposal of waste once pit cleaned, identification of issues of leakages, breakages etc.	Beneficiaries
Management of	Management of sanitary complex, levying of	Stakeholders identified for system

Broad areas	Topics	Building Capacities for
sanitary complex, SLWM systems	fee, cleaning and waste disposal, SLWM systems cleaning, management and waste disposal	management in GP

18.   *Monitoring and surveillance mechanisms:* Monitoring of environmental impacts from the Project need to be identified. Comprehensively Operation implementation monitoring, to ensure major environmental parameters are addressed under SBM-G needs to be developed. This should include water quality and management of developed systems. This may include monitoring of more water points and systems, sanitary surveys, and convergence with other departments monitoring water quality.

19.   Environmental Audit to ensure compliance of environmental policies and procedures shall be undertaken as part of Annual Sanitary Survey. Results shall be used for mid-term remedial actions, if required.

20.   In order to implement identified actions discussed in this section, implementing actions and a plan has been identified to be implemented by MDWS. This is given in the table below.

Table 2: Implementation Plan for Environment Actions

Sub-action description	Deadline	Completion measurement
Strengthen technical guidelines while incorporating environmental management rules and procedures.	Identification of and plan developed beginning first year	Environment rules and actions identified and formally endorsed by nodal department and implementing agencies. Institutional structure for implementation of environmental action at GP level identified and recognized.
Capacity building for environmental management (*State and district team PRI institutions and other identified implementing partners*)	Starting in first year, ongoing throughout project period.	Detailed training calendar, modules and material developed. Training undertaken as per calendar.
Monitoring plan for environmental management along with indicators	Identification of and plan developed beginning first year	Indicators endorsed by implementing agencies and used to track environmental management of SBM-G

Implementation Support for Social Aspects

21.   *Capacity Building:* MDWS has a capacity building plan into which social management may be integrated. Across the 5 levels of institutional set-up, enhancement of capacity is envisaged. Need based increment of positions and specialists (social) in planning, social mobilization for collective behavioural change towards achieving ODF status is required. A capacity development plan (detailed in the Operation Manual and in the Community Operational Manual) has to be devised for key implementing institutions (PMU, WSSO, Water and Sanitation Units at all three tiers, Technical support units) that regularly updates their skills, perspectives on community led sanitation, gender sensitization, decentralized decision making, transparency, and accountability.

22. The capacity building plan for social aspects will target three broad areas – Perspective level, Skill level and Mobilization and Behaviour change. The perspective level trainings will be catered to administrators, elected officials, representatives of technical and support units and will cover topics of Cultural practices; sensitivity to habits; existing class, caste and gender hierarchies in sanitation practices. Skill training will cater to Staff at district, block and GP level as well as elected representatives and will cover topics on planning, monitoring, targeting, inclusion, participation, grievance redressal. Behavioural trainings will be targeted at Beneficiaries, GP representatives, SHGs, Anganwadis and implementation staff at the village level and will discuss Campaigns and information dissemination.

23. The capacity building component will also be used to train the relevant GoI counterparts on ICT tools and modules that can be seamlessly integrated with GoI's existing monitoring system and used for effective tracking of program implementation progress.

24. *Development and Implementation of Program Manuals, Guidelines:* Assist development of detailed checklists, standard operating procedures, guidelines etc. to ensure adequate social inclusion, fair land diversion (when public land is not available), transparency and accountability pertaining to all identified social aspects of the project.

25. In order to successfully implement the identified programmatic and IPF actions in this section, the following Action Plan has been identified to be implemented by MDWS:

Table 3: Implementation Plan for Social Actions

Sub-action description	Building Capacities for	Completion measurement	Deadline
Implement strengthened social management rules and procedures to enhance the guiding principles - inclusion, participation, transparency, and accountability and grievance management	Enhance perspective and skill levels of administration, elected representatives, technical and support units	Formal endorsement of strengthened social management rules and procedures included in the Operation Manual and Community Operational Manual	Formal endorsement by appraisal; Implementation starting in First Year
Capacities Augmented on Social Management (Creating new and building existing institutional and individual capacities within the program, mainstreaming social issues in IEC/BCC/formal trainings)	Enhance skill levels of administration, elected representatives, technical and support units	Finalization of the Organigram for SBM support and its approval by appropriate sanctioning committee. Formal communication from hiring unit confirming hiring of specialists and support agency to facilitate implementation of social management rules and procedures.	Staffing recruitment by State govt. at the end of the first year; On-going, starting in First Year
Strengthening social component of formal Trainings strategies/plans Impart training to all stakeholders for strengthening institutions to deliver the program that is grounded in the "guiding principles." Enhancement in institutional capacity of key State Training	Enhance skill levels of district, block and GP level administration as well as elected representatives	Training on the basis of a detailed training calendar. Different set of training designs in place for different set of stakeholders; Training modules finalized incorporating social issues; Key STIs/ enlisted institutions have acquired necessary capacities to deliver quality trainings that address social	On-going, starting in First Year

Sub-action description	Building Capacities for	Completion measurement	Deadline
Institutes		management issues.	
Develop and IEC material; and existing BCC/IEC of the program for PRIs and community	Bring about mobilization and behavior change in beneficiaries, GP representatives, SHGs and other implementation staff in a sustainable manner	IEC implemented on the basis of a detailed IEC calendar.	On-going, starting in First Year
Develop Indicators to measure if IEC & communication messages are reaching community & being understood		Developed based on IEC material and key messages	On-going starting in First year
Manuals, resources and experts to be made available for assisting and facilitating the above			

26.   A separate Integrated Safeguards Data Sheet (ISDS) has been prepared for the IPF component. The IPF Component consists primarily of consultancy services, evaluation studies and capacity building to ensure efficient implementation of the identified Environment and Social Action Plans. Therefore no significant, long term or adverse environment or social issues are anticipated from the proposed interventions/activities.

27.   Social safeguard issues, including any significant, long term or adverse impacts or risks are not anticipated due to activities/interventions proposed under this IPF component. OP 4.12 is not triggered as no resettlement is envisaged due to the implementation of the activities under the IPF Component. OP 4.10 is not triggered as no adverse impact on tribal communities are envisaged.

Stakeholder Consultations

28.   Consultations with officials from the sample states (at state HQ, district level and two blocks per district and 4-6 GPs per block) in each of 5 states of Rajasthan, Madhya Pradesh, Chhattisgarh, West Bengal and Odisha were undertaken as part of Environmental and Social Systems Assessment (ESSA). Consultations at national level including MDWS officials, state officials, NGOs, civil societies, etc., will be undertaken after disclosure of draft ESSA and before appraisal of the Operations.

Disclosure

29.   MDWS is required to disclose draft ESSA on their website before stakeholder consultations at the national level. The final ESSA, incorporating comments from stakeholder consultations, shall be disclosed by the MDWS before or after appraisal of the Operation. The World Bank will disclose ESSA in Infoshop after receiving NOC for disclosure from MDWS on both occasions.

Conclusion

30.   Overall, the ESSA shows that the state's Environmental and Social systems are adequate for the Program implementation, with implementation of the identified actions to address the gaps and to enhance performance during implementation.