



Additional Financing Appraisal Environmental and
Social Review Summary
Appraisal Stage
(AF ESRS Appraisal Stage)

Date Prepared/Updated: 03/22/2021 | Report No: ESRSAFA076



BASIC INFORMATION

A. Basic Project Data

Country	Region	Borrower(s)	Implementing Agency(ies)
Djibouti	MIDDLE EAST AND NORTH AFRICA	Republic of Djibouti	Ministry of Education and Vocational Training
Project ID	Project Name		
P175464	Expanding Opportunities for Learning Additional Financing (GPE)		
Parent Project ID (if any)	Parent Project Name		
P166059	Expanding Opportunities for Learning		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	4/14/2021	6/8/2021

Proposed Development Objective

The project development objective is to increase equitable access to basic education, improve teaching practices, and strengthen MENFOP's management capacity.

Financing (in USD Million)	Amount
Current Financing	0.00
Proposed Additional Financing	0.00
Total Proposed Financing	0.00

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 project aims to address the following key sectoral challenges: (a) Early childhood education (ECE) provision is limited and, where available, at a nascent stage of development. It is constrained by a lack of classroom space and



dedicated or qualified preschool teachers. Therefore, the project proposes to support the regulatory and quality aspects of ECE provision, teacher professional development and materials provision and establishment of dedicated pre-school classrooms (through construction or repurposing of existing spaces); (b) access and retention: the shortage of infrastructure in urban areas results in the curtailing of enrollments at the beginning of each school year, large class sizes and double shifting. Out-of-school rates are much higher in rural areas than in Djibouti-ville due in part to insufficient numbers of schools. Distance from school, poverty, and opportunity costs deter young children from attending, especially for girls wanting to attend lower secondary education. As a result, the project proposes to construct new or expand existing schools in strategic locations and explore innovative ways to provide educational services to rural areas, with a particular focus on girls' access to education opportunities; (c) learning and assessing: The quality of education is a central concern as shortages of key quality inputs (learning materials, teacher guides, and development opportunities) impede education quality and teachers need to develop more appropriate pedagogical practices but also receive sufficient professional in-school support. Also, the introduction of Information and Communication Technologies (ICT) into the classroom requires guidance. Another challenge is the lack of data especially related to student performance and teacher pedagogical and content knowledge skills that would allow providing targeted corrective measures. The project aims to improve teacher professional development and build on the government's current system of centralized training to a decentralized and continued support/mentoring approach. It will also explore ways to strengthen the existing assessments (year 2 and 5 national exams – OTI) and provide capacity building for ministry staff from central to school levels to be able to interpret data and act on it.

D. Environmental and Social Overview

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

Djibouti's public education system is free and mandatory at the primary and secondary levels and is managed by the Ministry of Education and Professional Training (MENFOP is its acronym in French). According to data from MENFOP, there are a total of 54 public preschools, 150 public primary schools and public 39 public secondary schools in the country, benefitting roughly 1,000 preschool children, 60,000 primary school children and 40,000 secondary school children, respectively. There are a total of 60 preschool teachers, 1,125 primary school teachers and 1,112 secondary school teachers in the public sector. At the national level, the student-teacher ration is 1:39. This varies between urban and rural areas, with the highest rates in Djibouti-ville (1:44). To address this high ratio, around 43 percent of schools operate in a hybrid system, where some students go in the morning and the others in the afternoon.

There are important inequalities in access to education by regions, gender, income levels and other characteristics. Vulnerable student populations are defined by MENFOP as out of schools primary-school aged children, students in remote areas, refugees children and children with special needs.

The gender gaps in education remain a challenge. According to the preliminary findings of the 2018 household survey, enrollment rates in primary education is 74 percent, with 46 percent for girls. Enrollment rate in lower-secondary school is 63 percent, with 46 percent for girls. The Out of School Survey conducted by MENFOP in 2019 (OOSC 2019) reveals that 18 percent of girls are not attending secondary school (compared to 13 percent for boys). The rate goes up to 47 percent in rural areas (compared to 31 percent for boys). Among the barriers to girls' attendance are the limited sanitary facilities in school buildings and a lack of encouragement especially from parents living in rural areas.



According to the United Nations High Commission for Refugees (UNHCR) records, in February 2019 the country hosted 29,214 refugees and asylum seekers as well as a significant population of economic migrants and pastoral nomads (for which population estimates vary). There are four groups of refugees: Somalis (43 percent), Yemenis (16 percent), Ethiopians (36 percent) and Eritreans (3 percent). There are refugee camps (called villages) that host 80 percent of the refugee population: two for Somalis in the south of the country and one in the north for Yemenis. In 2017, the National Refugee Law came into force and decrees were enacted that ensure the integration of refugees into national systems such as health, education and the labor market. MENFOP coordinates the provision of educational services in appropriate languages to around 3500 refugee children through three preschools, three primary schools and five professional centers. The OOSC 2019 estimates that only 42 percent of refugees between the ages of 6-10 years and 38.7 percent of refugees between the ages of 11-14 attend school at the national level.

Ensuring that children with special needs benefit from the education system is another challenge for MENFOP. The Ministry has set up a special needs office and developed a basic strategy, as well as curricula and manuals for students with visual and hearing impairments at the primary level. It has not been possible to obtain data from MENFOP on the number of special needs children benefitting from these improvements.

In the face of challenges resulting from the COVID-19 pandemic and associated school closure between March and September 2020, MENFOP developed several programs adapted to its various student populations: a distance learning program for all grades and subject matters that was broadcast through national television and another designed for schools in remote areas that is imparted via the radio; the development of an e-Learning platform for all grades that became operational in April 2020; printed curricula for students of remote rural schools and refugee students to be imparted by local trainers; and a virtual learning platform to train teachers. MENFOP also conducted communication campaigns on public health measures to prevent the spread of COVID-19. The Ministry also facilitated the end of year high school certification for all high-school students, including refugee students. MENFOP has developed a COVID-19 sanitary protocol, and schools have been reopened since September 2020.

The World Bank supports MENFOP through three projects in Djibouti: (i) the parent project “Expanding Opportunities for Learning Project - PRODA” (P166059), approved in September 2019 for US\$28.05 millions, which activities are described below; (ii) the “Education COVID-19 Emergency Project” (P174128), approved in December 2020 through a grant of US\$3.5 million designed to accelerate funding for COVID-19 to build MENFOP’s capacity for remote learning and support safe school reopening; and (iii) PRODA’s US\$2.3 million additional financing (P175464), which is under preparation.

PRODA (P166059) is the Parent Project of this additional financing and it supports activities designed to 1) improve the quality of and access to pre-school education; 2) expand access to and improve retention in primary and lower secondary education with a special focus on vulnerable groups; 3) build the capacity to support teaching and learning and; 4) strengthen MENFOP’s management capacity and data systems.

Through its components 1 and 2, PRODA finances civil works, such as the construction of around 25-30 new primary schools, the construction of 41 new preschool classes, the rehabilitation of 150 primary school classes, the construction and rehabilitation of water and sanitation facilities in existing primary schools, as well as the rehabilitation of 20 school cafeterias. PRODA includes activities designed to improve the curricula for special needs students, such as the design of curriculum in braille or sign language and the training of teachers to impart that curriculum. Moreover, PRODA finances free meal programs designed to encourage low-income students to attend



school and outreach activities for out of school children. Finally, PRODA will have a particular focus on vulnerable children, aiming at enrolling 35,000 out-of-school primary school level children with a particular focus on girls, refugee children, and children living in remote areas.

PRODA started its effective implementation in February 2020. At the time of writing, MENFOP had launched the civil works in around 50 sites in rural areas across the country, with each at a different level of execution. These include the construction of new classrooms in 24 sites, the construction of cafeterias in 13 sites, the rehabilitation of 14 primary schools, and the construction of additional latrines for girls in 6 schools. To date, no civil works associated with the construction of new school have initiated. The environmental and social performance of the Parent Project is further detailed under ESS1.

The Additional Financing (P175464) will finance IT equipment and furniture, individual national consultants and technical assistance from consulting firms (international). The project will also finance minor civil works for the rehabilitation of two offices located in the city of Djibouti: the National Education Center for Research, Information and the Production of Material (acronym CIPREN in French) and the National Training Center for School Teachers (acronym CFEEF in French). The AF is partially financed by the Global Partnership in Education (GPE).

Key project beneficiaires are expected to be around 100,000 public primary and secondary school students and around 2,230 public preschool, primary and secondary school teachers and as well 50 inspectors.

D. 2. Borrower’s Institutional Capacity

MENFOP is responsible for the overall project preparation and implementation. It has formed a management team across relevant departments and strengthened the capacity of its Direction Générale de l’Administration (DGA) and Project Service Unit (PSU or service de la gestion des projets) to implement projects financed by the World Bank, namely PRODA (P166059), its Additional Financing (P175464) and the “Education Emergency Response to Covid-19 Project” (P174128) with financing from the World Bank.

MENFOP’s capacity to manage E&S risks and impacts at the regional level remains limited and the E&S performance under the ongoing project PRODA (P166059) is moderately unsatisfactory (more information is provided under the ESS1 description). Although MENFOP’s capacity to implement the ESF instruments was strengthened by the recruitment of a part-time E&S expert in August 2020, there is a need to further strengthen MENFOP’s capacity through a combination of trainings and additional human resources.

It is proposed under the AF to recruit a social development consultant on a part-time basis to support the implementation of the Stakeholder Engagement Plan (SEP), the grievance mechanism as well MENFOP’s commitment to address all forms of violence in school settings. Moreover, given that the project’s outreach spans across all primary school buildings in all regions, it is proposed to nominate E&S focal points among MENFOP’s regional inspection teams (there are 5 regions) as well as within each beneficiary schools (there are about 150 beneficiary primary schools). Given that the AF plans rehabilitation works at the offices of CIPREN and CFEEF, it is proposed to nominate a focal point in each of these centers too.

The focal points will play an important role in supporting the implementation of the ESF instruments, including carrying stakeholder engagement activities in the field, supervising the site-specific ESMPs, ensuring compliance with MENFOP’s COVID-19 protocol, operating the site-specific grievance mechanism as well as operationalize the implementation of the new protocol against all forms of violence in school settings.



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

A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Moderate

The key environmental risks/impacts of the project are temporary, of low magnitude and site-specific thus rated as moderate. The project activities will involve small rehabilitation/construction civil works interventions within the facilities of existing offices of CIPREN and CFEEF, and could result in dust, noise, vibrations and the generation of solid waste and occupational health and safety issues. The project will also generate small quantities of electronic waste related to the procurement of IT equipment as well as exposure to COVID-19. The project is classified as "moderate" as the potential adverse risks and impacts on human populations and/or the environment are not likely to be significant and can be easily mitigated in a predictable manner. It is anticipated that the project will have very limited negative effects on the environment. During the implementation of the parent project implementation, the PIU has demonstrated a low capacity to manage these risks/impacts.

Social Risk Rating

Moderate

The social risk is rated as moderate. A key social risk is failure of the project to reach poor and vulnerable students, such as those living in rural areas (in particular rural girls), children from refugee families, children with disabilities and out of school children. This risk is to a great extent mitigated by the design of the Parent Project that emphasizes improving access to education opportunities to vulnerable children, through supporting the enrollment of 35,000 out-of-school children, as well as the development of regional plans that aim to address area-specific bottlenecks to ensuring all children have access to quality education, as well as awareness campaigns to boost girls' participation in schooling. The AF will only finance minor rehabilitation civil works that are expected to be implemented by a couple local contractors (for a total of 5-15 employees), and will not generate labor influx. The sexual exploitation and abuse (SEA) screening tool was applied to the project and the risk is rated as moderate. The risk of propagation of or exposure to COVID-19 as a result of project activities has been identified as a transversal risk.

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:

The project is expected to lead to positive social impacts by improving MENFOP's capacity to provide continuous education through remote learning, improve the quality of teaching through reforms of the curriculum, the professional development of teachers and the capacity of school inspectors, outreach to vulnerable students and improving services to special needs students.

The project entails moderate environmental and social risks and impacts associated with minor rehabilitation/construction civil works, such as noise, vibration and solid waste. Other risks are associated with project benefit distribution, electronic waste generation, potential for sexual abuse, and exposure to and propagation of COVID-19. To a large extent, some of these risks are addressed through the project design. Overall, the

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environmental and social risks are rated as moderate, as they are site-specific, predictable, and can be mitigated with the appropriate measures.

The Environmental and Social Management Framework (ESMF), the Labor Management Procedures (LMP) and the Stakeholder Engagement Plan (SEP) were prepared under PRODA (P166059) and approved and disclosed by the Bank and MENFOP in April 2019. An E&S consultant was recruited by MENFOP in August 2020.

To date, the E&S performance of the Parent Project needs to be significantly improved. The documentation attesting for the implementation of environmental and social mitigation measures associated with civil works is only partially documented and the screening sheets are not systematically applied. While the proper E&S measures were integrated to the civil works contracts and some of these measures are being implemented, such as notably, the securing the perimeters of the civil works to avoid the circulation of children and school personnel in the area, it is unclear to what extent other mitigation measures are followed through (e.g. waste management, application of COVID-19 public health measures, measures to minimize disturbances, including noise and vibration during school hours).

None of the measures associated with the prevention and management of sexual harassment and abuse have been implemented to date. In addition, while there is a phone number and email address for the reception of grievances associated with the project, no grievances nor request for information have been received to date. Also, there is no evidence that it is unclear whether information about the existence of this mechanism has been disseminated or even posted on the sites for civil works. Finally, there is a need to better raise awareness among all actors of the contents of the ESF instruments and requirements for implementation and supervision.

To address the shortfalls outlined above MENFOP and the Bank have agreed on implementing a corrective action plan, which has been outlined as one of the commitments of the environmental and social commitment plan (ESCP). The CAP includes: (i) the verification that all E&S mitigation measures are corrected on all sites with ongoing civil works; (ii) that an E&S due diligence is conducted for all ongoing and completed civil works sites, even if this is to be done ex-post; (iii) that no future civil works is allowed to start prior to the submission of screening sheets and environmental, social, health and safety (ESHS) plan to the World Bank; (iv) that MENFOP develops a ESHS supervision checklist to monitor performance and that this supervision is added to the updated ESMF (see below); (v) that the grievance mechanism is widely disseminated at each site; (vi) that a COVID-19 protocol for contractors and school settings is developed and implemented – and is part of the updated ESMF; (vii) that a protocol to raise awareness and sanctions sexual, physical and moral abuse and harassment in school settings is developed and implemented and added to the updated ESMF; (viii) that a strong training program on E&S mitigation measures for PIU members, and E&S focal points at central and regional level and other ministry personnel involved in project activities implementation will be prepared and implemented. To closely follow-up on the CAP, the production of E&S reporting will be requested quarterly.

Given the assessment above and in light of the fact that this is the first time that MENFOP is implementing a project under the ESF, the ESF instruments developed for the Parent Project have been simplified and updated to include the activities of the Additional Financing as well as those of the Education Emergency Response to COVID-19 Project (P174128) in order for MENFOP to have one single set of instruments to implement. All these instruments will be disclosed prior to appraisal.



In terms of managing the E&S risks associated with the activities under the additional financing, the updated ESMF includes an electronic waste management plan, MENFOP's protocols to prevent the spread of COVID-19, such as the wearing of masks, physical distancing and the proper aeration of school premises. MENFOP has agreed to adopt a protocol that outlines a code of conduct for all teachers, school directors, pedagogical advisors, inspectors and MENFOP employees that sanctions sexual harassment in the workplace and moral, physical and sexual abuse against students. There will be sensitization training for all MENFOP staff (teaching and non-teaching) on this new protocol in a gradual manner in the course of the project implementation. In addition, the ESMF enhances the existing project grievance mechanism to account for the sensitivity of sexual abuse and account for a clear dissemination plan. Finally, the updated ESMF also includes a capacity-building plan with a clear timeline and budget.

The updated ESMF was the subject of consultations that took place virtually on March 2, 2021, with the participation of around 50 representatives from five regions. Participants included representatives from school administrations, local government administration (prefecture, regional councils), representatives of parent associations, the Ministry of Environment, the National Institute of Public Health (INSPD in French). The key findings and conclusions of these consultations are summarized in the section on ESS10 below.

ESS10 Stakeholder Engagement and Information Disclosure

Key project stakeholders include beneficiary students and their parents, MENFOP officials, teachers, school administrative and teacher support personnel, as well as the contractors and primary suppliers hired under the project. Vulnerable stakeholders include the refugee student population, female students, particularly in rural areas, students who are at risk of dropping out, and students with special needs. Other affected parties include representatives from civil society, the public at large and other ministries, such as the Ministry of Health.

A Stakeholder Engagement Plan (SEP) under the Parent Project PRODA (P166059) was disclosed on MENFOP's and the World Bank's websites in May 2019. An exhaustive consultation process took place between August-October 2020 in the three communes of Djibouti-ville and in each capitals of all five regions. The consultations included the participation of the Mayor of Djibouti, the presidents of regional councils, the Prefects and their Deputies, the presidents of the communes, local elected officials, representatives of the neighborhood council, representatives of the parent associations and school directors. The main objectives were to (i) inform key stakeholders and the general public about the measures undertaken by MENFOP to ensure distance learning and other measures for rural areas in case of school closure; (ii) inform stakeholders of new health protocols in school settings to combat COVID-19 pandemic and (iii) inform stakeholders of new curriculum and testing advances promoted under PRODA.

Moreover, MENFOP conducted a COVID-19 campaign and a campaign to reach out to out-of-school children and parents, but it was not possible to obtain from MENFOP detailed information on the activities, locations and the audiences reached. These two campaigns will be regularly implemented and will be part of the updated SEP (see below). Moreover, while there is a phone number and email address for the reception of grievances associated with the project, no grievances nor request for information have been received to date. This suggests that the existence of this mechanism has not been widely disseminated or is not even posted on the sites for civil works.



Consultations on the AF and the updated ESF instruments were conducted on March 2, 2021, with the presence of around 50 stakeholders representing local governments, parent associations, school administration and teachers' representatives. Given the context of the COVID-19, the participants joined virtually from the capitals of each of Djibouti's five regions. The consultations highlighted the need to expand MENFOP's support in preschool services. The representative from the national institute of health of Djibouti (INSPD) highlighted the need to continue awareness-raising on public health measures related to COVID-19 but also on simple hygiene measures that would diminish the impacts of viruses. Representatives from the regions indicated that many rural areas still lack the most basic infrastructures in the school settings (i.e. access to water and electricity, latrines, etc.). MENFOP responded that the selection of schools that will benefit from these infrastructure improvement was based on a series of indicators that identified the schools that were most in need. Finally, some stakeholders highlighted the need for additional security measures for students who are residing in dormitories. MENFOP responded that they are planning to mainstream a model for the operation of dormitories based on a pilot in Obock, which would include more security measures to prevent instances of harassment and abuse in such settings.

MENFOP has updated the SEP to account for the activities of the additional financing as well as the Education COVID-19 Emergency Project (P174128). In addition to disseminating and engaging stakeholders about the environmental and social risks associated with the project, the consolidated and updated SEP includes activities under the COVID-19 public health campaign for parents and students, activities under the back-to-school campaign, the various awareness-raising and training activities that will be undertaken during project implementation (i.e. training of education structure E&S focal points, training of contractors on E&S management for activities under the Parent and Emergency projects, awareness raising on soon to be adopted sexual harassment and abuse prevention protocol, etc....). Finally, the updated SEP includes the dissemination of the existence of the grievance mechanism and an enhanced channel to address sensitive grievances, such as those associated with sexual harassment or abuse. The updated SEP will be disclosed prior to appraisal and implemented throughout the three projects' life cycles. As part of the environmental and social commitment plan (ESCP), it was also requested that MENFOP hired a part-time social development consultant to support the implementation of the violence prevention protocol outlined above and the updated SEP.

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

Project workers include around 20 direct workers who are civil servants who form the project's management team across relevant MENFOP departments, in particular the Direction Générale de l'Administration (DGA) and the Project Service Unit. Other workers include contracted workers, estimated 5-7 individual consultants (mostly nationals) and employees of consulting firms that may be hired to provide technical assistance. Other contracted workers include about 10 employees under one or two national contractors that will be hired to conduct the rehabilitation works. Labor influx is not expected under the additional financing as all civil works and most technical assistance assignments will take place in Djibouti ville. In terms of primary suppliers, the project will include internet providers such as Djibouti Telecom, as well as IT hardware and software suppliers and furniture suppliers.



Occupational health and safety (OHS) risks are expected to be moderate and mostly limited to construction activities such as exposure to dust and noise and the risks of physical hazards (falls, injuries through moving equipment, etc...). The main risk remains exposure to and the propagation of COVID-19 as a result of project activities. This will require careful mitigation measures, especially for activities in remote rural areas with limited health facilities.

MENFOP has already prepared labor management procedures (LMP) for the ongoing PRODA (P166059). The LMP sets out the way project workers will be managed in accordance with the requirements of national laws and ESS2. The existing LMP includes requirements for: working conditions and terms of employment; nondiscrimination and equal opportunity; worker's organizations; prohibition of child labor, minimum age and forced labor; grievance mechanisms; maintenance of training records; documentation and reporting of occupational accidents, diseases and incidents; and emergency prevention and remedies for injuries, disability and disease.

This LMP has been updated to include the categories of workers associated with the activities of the additional financing. In addition to the existing measures, it will include public health measures to prevent the spread of COVID-19. MENFOP will incorporate the requirements of the updated LMP into technical assistance and individual contracts and suppliers, together with appropriate noncompliance remedies. The updated LMP will also include incident/fatalities notification procedures.

ESS3 Resource Efficiency and Pollution Prevention and Management

The Project will generate solid and electronic waste during both the construction and operational phases, as well as dust emission, noise and vibrations during rehabilitation activities. The updated ESMF includes a generic environmental and social management plan (ESMP) and e-waste management procedures.

ESS4 Community Health and Safety

Community health and safety risks associated with this project are expected to be moderate. The risks associated with sexual harassment and abuse have been assessed and rated as moderate. These behaviors, which could potentially be perpetrated by project workers or beneficiaries, such as school personnel and teachers, could have significant impacts, but are not resulting from labor influx associated with the project and could occur independently of its activities. While MENFOP's performance on addressing potential risks of sexual harassment has been poor in the context of the Parent Project, it has committed to address this risk through the adoption and implementation of a protocol against all forms of violence in school settings that is applicable to all MENFOP personnel as well education staff. The protocol is included in Annex 14 of the updated ESMF "Protocole Relatif a la Prevention et la Protection des Violences". It strictly sanctions all forms of physical, moral, psychological and sexual violence, plans for the establishment of committees in all school settings to conduct awareness raising, and document and manage associated complaints.

Another key risk associated with community health and safety is the risk of exposing community members and project beneficiaries to COVID-19 and is transversal to all project activities. The updated ESMF includes in Annex 6 the COVID-19 prevention and management protocol developed by MENFOP (Protocole sanitaire pour la capitale et les



regions pour la rentrée scolaire 2020/2021), which highlights all sanitary public health measures to be implemented such as physical distancing, wearing masks, handwashing, communication requirements, etc...).

The risks associated with the use of security personnel is not relevant for the project, as no private or public security force will participate in its implementation.

The updated ESMF includes all the additional risks and mitigation measures highlighted above. The revised instrument also describes how the Project will serve vulnerable and disadvantaged beneficiaries, such as students with disabilities, refugee students, female rural students and children who are susceptible to dropping out.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

While ESS5 is applicable to the Parent Project, this ESS is not relevant to the activities of the additional financing. Civil works will be limited to rehabilitation works within two MENFOP offices in Djibouti ville.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

This ESS is not relevant to the activities of the additional financing.

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

This ESS is not relevant as there are no groups or individuals in Djibouti meeting the definition of indigenous communities.

ESS8 Cultural Heritage

This ESS is not relevant to the activities of the additional financing as the civil works are limited to rehabilitation works in-situ.

ESS9 Financial Intermediaries

This ESS is not relevant to the activities of the additional financing.

B.3 Other Relevant Project Risks

The main relevant risk is linked to the project PIU capacity to manage E&S risks during construction/rehabilitation works. this capacity need to be improved and the periodicity follow up increased to quarterly.

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:

The Borrower framework is not being considered

IV. CONTACT POINTS

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Borrower: Republic of Djibouti

Implementing Agency(ies)

Implementing Agency: Ministry of Education and Vocational Training

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VI. APPROVAL

Task Team Leader(s):	Bridget Sabine Crumpton
Practice Manager (ENR/Social)	Pia Peeters Cleared on 22-Mar-2021 at 08:31:55 GMT-04:00

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