



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

Date Prepared/Updated: 04/20/2023 | Report No: ESRSAFA561



BASIC INFORMATION

A. Basic Project Data

Country	Region	Borrower(s)	Implementing Agency(ies)
South Sudan	EASTERN AND SOUTHERN AFRICA		
Project ID	Project Name		
P180785	Enhancing Community Resilience and Local Governance Project Phase II Additional Financing		
Parent Project ID (if any)	Parent Project Name		
P177093	Enhancing Community Resilience and Local Governance Project Phase II		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Urban, Resilience and Land	Investment Project Financing	4/17/2023	5/25/2023

Proposed Development Objective

To improve access to services, strengthen flood resilience, and enhance institutional capacity for local service delivery and integrated disaster risk management at the national and sub-national levels.

Financing (in USD Million)	Amount
Current Financing	120.00
Proposed Additional Financing	30.00
Total Proposed Financing	150.00

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

Yes

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

Public Disclosure



South Sudan is in urgent need of support following another year of devastating floods which affected more than one million people. Since 2019, South Sudan has suffered four consecutive years of severe flooding. The latest seasonal floods (May–November 2022) are considered one of the worst in the last 30 years. As of December 2022, 1.09 million people (8.6 percent of the population) have been verified as affected across 9 states and 39 counties. While these areas are historically prone to flooding, the extent and duration of the latest sequence of flooding is unprecedented and many communities are finding themselves in a state of protracted climate-related crisis which is compounding their lives and livelihoods.

This proposal is an Additional Financing (AF) to the Parent Project titled “Enhancing Community Resilience and Local Governance Project Phase II (ECRP-II)- P177093” which is being prepared in response to the Government of South Sudan’s (GoSS) urgent need of support following another year of devastating floods which affected more than one million people in the country. Since 2019, South Sudan has suffered four consecutive years of severe flooding. The Parent Project/ECRP-II is in its early stages of implementation. It is just nine months into implementation and underwent its second implementation support mission in February 2023.

The ECRP-II AF is consistent with the Country Engagement Note (CEN) for South Sudan FY21–FY23 (158008) which focuses on (a) continuing support for basic public service delivery; and (b) promoting resilience and livelihood opportunities, with a cross-cutting principle of social inclusion, particularly youth and gender. It is also well aligned with the CEN as it proposes to shift closer to a full government-led implementation approach by allowing the GoSS to select and engage implementing partners other than the International Organization for Migration (IOM). Overall, it will support the higher-level objectives of making communities more resilient and improving local governance by (a) improving access to infrastructure for basic services; (b) providing infrastructure that reduces flood risks; (c) strengthening local institutions by training and supporting them in collective; and (d) strengthening the national government’s capacity to oversee local institutions and their development initiatives. It also contributes to advancing the humanitarian-development-peace nexus by filling a critical gap between emergency response and resilient recovery. It does so by addressing immediate service needs in flood-affected areas while strengthening institutions to help make communities more resilient. To this effect, it has the following integrated components.

Component 1: Infrastructure and Services for Community Resilience (US\$113 million equivalent from IDA). Budget allocation for Component 1 will be increased from the existing US\$100 million to US\$113 million to scale up the investments in community-level infrastructure and services in the more flood-affected counties among the twelve ECRP-II target counties. The AF proposes to prioritize counties that have over 10 percent of the county population that is exposed to floods. Eligible investments will continue to be limited to construction or rehabilitation of public goods such as water supply and sanitation facilities, footpaths and community roads, dykes for flood protection, and health and education facilities, among others, to ensure maximum community benefit. This component will continue to be implemented by IOM.

Component 2: Institution Strengthening (US\$10 million equivalent from IDA). Budget allocation for Component 2 will be increased from the existing US\$9.4 million to US\$10 million to provide capacity building on emergency preparedness and response (EP&R) to the communities in flood-affected counties among the twelve ECRP-II counties. The training will help communities better prepare for, manage and respond to recurrent flooding. Activities under this component will continue to be implemented by IOM. This component contributes to GCRF Pillar 3 and 4.



Component 3: Emergency Flood Response (US\$14 million equivalent from IDA). A new component will be added to provide emergency flood response activities in the most heavily affected counties in Northern Bahr-el-Ghazal (NBeG) and Warrap states. The two states have the highest number of flood-affected people (251,763 and 208,133, respectively), accounting for over 42 percent of the total affected population in South Sudan. Activities under the new component, Component 3, are relatively similar to those under Components 1 and 2; thus, new activities are not anticipated under the new component (Component 3) compared to the original project, ECRP-II. The component will support rehabilitation of damaged community infrastructure and services or construction of new infrastructure to reduce flood risks. These are likely to include water supply and sanitation facilities, footpaths and community roads, dykes for flood protection, and health and education facilities, among others. The same “negative list” as the one used for Component 1 will apply. To inject much-needed cash into the flood-affected communities, the community infrastructure will be built to the extent possible in a labor-intensive manner. The physical investments will be coupled with a quick consultative process to identify and validate community priorities, as well as the EP&R training.

Component 4: Project Management and Learning (US\$13 million equivalent from IDA). To cover the Government’s increased project management costs due to emergency flood response, the budget allocation will be increased from the current US\$10.6 million to US\$13 million. This component also contributes to GCRF Pillar 4.

Component 5: Contingent Emergency Response (US\$0). The Contingent Emergency Response Component (CERC) will now be Component 5. The allocation for the CERC will remain US\$0. This will allow for the rapid reallocation of project funds in the event of natural or man-made crisis and major disease outbreaks of public health importance during the implementation of the project, in accordance with the World Bank Investment Project Financing (IPF) Policy, paragraphs 12 (Projects in Situations of Urgent Need of Assistance or Capacity Constraints). Activation of the CERC is triggered by (a) a declaration of a state of emergency by the Government and (b) Government request to the World Bank for activation of the CERC

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 ECRP-II AF, in addition to supporting the ECRP-II implementation areas which continue to target the 12 counties, will expand its geographic footprint to Northern Bahr-el-Ghazal (NBeG) and Warrap States, under the newly added component, Component 3: Emergency Flood Response, to provide emergency flood response activities in the most heavily affected counties. The two states have the highest number of flood-affected people (251,763 and 208,133, respectively), accounting for over 42 percent of the total affected population in South Sudan. The component will support rehabilitation of damaged community infrastructure and services or construction of new infrastructure to reduce flood risks.

The AF proposes to prioritize 5 counties that have: (i) over 10 percent of the county population exposed to floods; (ii) where IOM already has a functional geographic presence to ensure rapid roll-out of activities; and (iii) where there is adequate absorptive capacity at the county level. Based on consultations with the government, these include Leer (Unity state), Fashoda (Jonglei state), Baliet (Upper Nile state) Rubkona (Unity state), and Pibor (Greater Pibor Administrative Area). The ultimate target counties will be determined at the time of implementation based on



accessibility (both due to insecurity and flooding). Within the two newly targeted states of NBeG and Warrap, the AF proposes to target Aweil East, Aweil Center, and Aweil South in NBeG state, along with Gogrial West, Gogrial East, and Tonj East in Warrap state. The ultimate target counties will be determined at the time of implementation in light of accessibility. All payams within the target counties will be eligible for financing but hardest-hit areas will be prioritized. Taken together, the AF will provide flood response support in 11 flood-affected counties.

Given that South Sudan is a landlocked country that falls almost entirely (96 per cent) within the Nile River Basin in East-Central Africa. The country is covered by extensive grasslands, wetlands and tropical forests. Its natural assets include significant agricultural, mineral, timber and energy resources. The climate is mostly hot and dry, with seasonal rains that allow for two or three harvests a year in the country's green belt. Apart from oil, however, its natural resources are largely unexploited and only 4.5 per cent of its potential arable land is cultivated. Livelihoods in the northern dry areas are dominated by seasonal agriculture, pastoralism, fishing and hunting. The conducted social assessment shows different ethnic groups using lands throughout South Sudan with fluid borders between communities of different ethnic groups. As such, the project will adjust to the overlap of social characteristics, including resulting challenges in terms of targeting and social tensions by applying a holistic geographic targeting approach where all communities within a county will be eligible for project funding.

Specifically, the two newly added states (NBeG and Warrap) are highly flood affected (and prone) areas which have faced heavy flooding, impacting the environment, infrastructures, properties and vulnerable peoples, among others. The landscapes of both states are characterized by flat grassland and tropical Savannah; and they also have areas of high-water table (particularly in lowland areas), where swamps and stagnant water make access difficult, particularly in the rainy season. Four main rivers (Tonji, Jur, Kuom, and Lol/Akon) cross the Warrap State while three main rivers (Kuom, Lol/Akon, Kiir) cross the NBeG state. Several seasonal rivers exist in both states as well. The main ethnic group in Warrap State is the Nilotic Dinka (Jieng), and minority tribes include the Luo (Jurchol and Jur Mananger) and Bongo. NBeG state is inhabited mainly by the Dinka people, who make their living through subsistence farming and cattle herding plus Luwo and Fartit tribes.

Both NBeG and Warrap states are predominantly rural areas with a population largely dependent on agriculture, livestock rearing, and natural resources for their livelihoods. The communities in these states have traditional pastoralist and agro-pastoralist livelihood systems, with strong cultural ties to the land and natural resources. The population in these states often includes vulnerable communities, including those who rely on subsistence agriculture and are particularly susceptible to the impacts of floods. These communities may face challenges such as loss of crops, damage to homes, and displacement during floods. Moreover, the security situation in NBeG and Warrap states of South Sudan has been historically volatile due to ongoing intercommunal conflicts over land, resources, and cattle as well as the presence of armed groups, including militias and rebel groups. This insecurity and instability can impact the planning, implementation, and outcomes of the Emergency Flood Response sub-project activities, including its environmental and social risk management.

D. 2. Borrower's Institutional Capacity

At the country's formation in 2011, formal governing institutions were created, but given the years of conflict & the breakdown of former structures, they commenced from a generally low foundation. The new government's capacity to formulate policy & implement programs is still limited but is developing & evolving. Institutional frameworks to accomplish environmental & climate-change commitments are still at the nascent stage due to the low priority in the context of the ongoing situation of conflict, as well as the lack of technical capacity & financial resources.



The ECRP-II AF will be implemented by the Ministry of Finance & Planning (MoFP) in collaboration with the Local Government Board (LGB) on behalf of the Republic of South Sudan in line with the renewed focus on institution building with a gradual shift away from third-party implementation arrangements to government-led implementation. However, due to the scope & complexity of the ECRP-II AF & inherent capacity gaps in government that could impact its implementation, in January 2023, the Output Agreement has been signed between the GoSS (through MoFP & LGB) & IOM, who already has experience in implementing the ECRP & existing geographical footprint in the 10 target counties, to implement the high-risk decentralized components 1 & 2 under the Parent Project. For implementation of the scaled-up activities under Component 1 & 2 under the AF, the existing output agreement between GoSS & IOM will be amended. The PMU has been already established within the MoFP to oversee IOM's activities. The PMU, established under MoFP & the LGB, will continue to coordinate the overall project implementation including supervision of IOM's activities, fiduciary management, environment & social (ES) due diligence, & monitoring & evaluation (M&E). So far, the PMU has been staffed with Project Manager, Financial Management Specialist, & Procurement Specialist; & the recruitment of nine other positions, including Environmental Specialist, Social Development Specialist & Communications Specialist, is expected to be completed by end of April 2023. From the IOM side, it has already hired one Environmental Specialist & one Social Specialist.

For the newly added Component 3: Emergency Flood Response activities, a different implementation arrangement will be adopted to ensure timely implementation. The PMU will engage two NGOs with a pre-existing geographic footprint & technical expertise in the two target states of NBeG & Warrap –one NGO per state to minimize the transaction costs. Such an arrangement will allow for: (i) quick roll-out of activities on the ground in areas outside of the parent project & IOM's existing geographic footprint; (ii) greater autonomy for the GoSS to be able to select implementing partners, facilitating the gradual shift to full government-led implementation of these activities; & (iii) avoiding overstressing IOM from its current work in the ECRP-II's 12 counties. The selection of the NGOs will be based on: (i) geographic footprint; (ii) technical expertise on emergency flood response; (iii) adequate absorptive capacity; & (iv) suitable ES & security risk management mechanisms. NGOs will be hired through procurement process by the PMU once the AF becomes effective. Preparatory work for NGO identification will start as soon as possible & each NGO will be required to be staffed with one Environmental & Social Safeguards Specialist as stated in the updated ESCP for the ECRP-II AF.

The inter-ministerial National Steering Committee (NSC), already established at the national level, will continue to provide oversight & policy guidance to the project. The MoFP serves as the chair. The committee comprises undersecretaries from key government agencies such as the MoFP; LGB; Ministry of Gender, Child, & Social Welfare (MoGCSW); & Relief & Rehabilitation Commission (RRC) under the Ministry of Humanitarian Affairs & Disaster Management (MHADM), Ministry of Water Resources & Irrigation (MoWRI), Ministry of Land, Housing & Infrastructure, Commission for Refugees (CRA) & Ministry of Federal Affairs (MoFA). Given the need for strong coordination, UNHCR (who will advise on refugee-related issues & GIZ (who has been supporting the local governance agenda in South Sudan with LGB) will also be represented. As the project progresses, relevant line ministries such as the Ministries of Health, & Education will be invited to participate in the NSC meetings. The NSC will meet biannually to discuss key policy issues with the World Bank & the Implementing Partner.

A National Technical Working Group (NTWG), with the same agencies as above but represented by the Director General level, has also been established & is actively involved in the parent project oversight. The NTWG will discuss day-to-day project implementation issues.



The PMU, established at the national level within the MoFP & LGB, will continue to ensure effective coordination & oversight of project activities. The PMU will share the FM, procurement, ES risk management, communications & M&E functions with the Bank-financed public Financial Management & Institution Strengthening Project (PFMIS), while ECRP-II designated Project Manager & other technical staff are being recruited. The PMU will be responsible for providing coordination & oversight of day-to-day project activities. The Director of Aid Coordination Unit at MoFP serves as the Program Director & will act as the Secretariat to the NTWG. The Government will second relevant staff to work with the PMU to facilitate capacity building through skills & knowledge transfer. The PMU will be physically located at the LGB & utilize the LGSDP's former PMU office facility.

The ES performance of IOM in managing Environmental, Social, Health & Safety risks has been excellent under ECRP- I & II which were prepared & are being implemented under the ESF. To mitigate the risk arising from Government's weak capacity, the project will support the PMU & offer technical assistance & capacity-building support on key aspects of project implementation. However, the partnership for project implementation, including ES risk management shall include specific commitments for transitional institutional capacity building of the government. Training, capacity building & mentoring on the new ESF, ESSs & the prepared instruments will be undertaken & embedded in the design of the project to enhance the project management team capacity to manage & supervise environmental & social risk & commitments. No training is provided under ECRP-II to date. Will be done starting Q3/Q4 of FY 23. However, it should be noted there are ongoing capacity building training under ECRP-I as "No Cost Project Extension" has been approved until July 31, 2024, mainly due to the delays in the civil works, & to secure adequate Defect Notification Period for all subprojects of ECRP-I. Additional support of independent consultants may be required to support the PMU's & IOM's ES Safeguards Specialists on the implementation of ESF requirements. This will be reflected as part of the institutional assessment to be undertaken as part of the updating of the ESMF for ECRP-II AF.

ES risks & associated mitigation measures have been clearly addressed in the updated ESCP (to be disclosed prior to AF appraisal) & will further be reflected in detail in the ESMF to be updated, consulted up on, cleared & disclosed prior to the AF disbursement. As stated in the ESCP for the AF, trainings as necessary will be integrated into the implementing entities from the national, county & local community level during the ECRP-II AF implementation, since the ESF is new to the MOFP, county government institutions & even the local community level institutions in their role in implementing the project; & the list of the training topics will be updated as required when the ESMF for ECRP-II AF is updated before the AF disbursement. To this end, all Implementing Entities will complete a capacity assessment with a timeline & clear budget requirements to close the capacity gaps & will be reflected in the ESMF accordingly. The requirement for further capacity building for the PMU, implementing partners & other supporting institutions will be carried out during project implementation as required . The PMU together with the implementing partners, including IOM & NGOs, will carry out regular field ES monitoring visits to selected sites & compliment this using geo-spatially enabled remote monitoring system. The PMU contracts a Third-Party Monitoring Agent (TPMA) to help undertake independent ES monitoring of the parent project & ECRP-II AF performance against the agreed ES instruments & tools. Terms of references (ToR) for a TPMA has clear roles & deliverables for its engagement as per Project Operations Manual (POM), including compliance with the ESCP by all Implementing Partners. The parent project's overall environmental & social (ES) risk management performance is Satisfactory, as the project so far focused on finalizing preparatory actions to commence field activities; thus, there are no ES implementation risks identified at this stage. Environmental & social performance of the parent project & its AF will be evaluated through



the Bank’s implementation support missions , & based on the evaluation results, measures for enhancement will be suggested.

All ES instruments (ESCP; SEP; RPF; & ESMF with detailed annexes including Labor Management Procedures & GBV/SEA Action Plan) for the parent project required prior to appraisal or project effectiveness have been prepared, cleared, & disclosed by both the Client & the Bank. Also, Security Risk Assessment including Security Management Plan for the parent project has been prepared as per the ESCP. Regarding the current proposal, the ESCP & SEP will be updated & disclosed prior to AF appraisal while the remaining instruments will be updated & disclosed prior to the AF disbursement.

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

A. Environmental and Social Risk Classification (ESRC)

High

Environmental Risk Rating

High

The AF will support similar activities to the ongoing ECRP II, except expansion of the geographic footprint of the AF implementation in two states under the new component. The AF’s geographic scope of the flood response activities, which are similar to Components 1 & 2, will be expanded to Northern Bahr-el-Ghazal & Warrap states to provide emergency flood response activities in the most heavily affected counties. The AF will finance scaled up investments including refurbishment/rehabilitation &/or construction of community infrastructure (such as water supply & sanitation facilities, footpaths & community roads, & health & education facilities, etc.) that will be identified & prioritized by the communities. While subprojects will be involving local community labor to the extent possible, none of the subprojects will be 100% built by the communities. All subprojects under ECRP I & II have necessitated local contractors’ involvement. Under Component 1 & the new Component 3, emergency flood response activities such as provision of trash pumps to pump water from inundated areas or provision of tools for flood risk reduction will also be financed. These community infrastructures are generally associated with low-to-moderate environmental risks with potential adverse environmental impacts that are reversible, temporary in nature & scope, & can be easily & cost-effectively mitigated. However, the flood risk reduction activities being considered (which may range from dykes, levies, embankment strengthening, drainage of small to medium size) will have significant to high risks depending on the selected type of control, their designs & locations. Though the emergency flood response activities of Component 3 and related EHS risks are similar to components 1 and 2, the potential EHS risks are severe, and affect adversely the environment, properties, infrastructures, cultural heritage and people unless proper EHS mitigation measures are implemented. The main reason for this is that the two newly added states (NBeG and Warrap) are located in highly flood affected areas for the last four consecutive years and their landscapes are characterized by flat grassland and tropical Savannah along with swamp areas and crossed by three to four main rivers along with several seasonal rivers. Further there are potential failure of flood reduction structures (if not properly planned, designed, implemented and monitored) which could exacerbate the EHS risks. These ES risks shall be minimized by applying a hierarchy of controls which will range from exclusion & substitution of certain activity types & proposed locations that may be environmentally & socially sensitive based on a predetermined exclusion criteria to be updated in the ECRP II ESMF; review of engineering designs to adopt them to the respective sub-project site ES condition; & subjecting all the proposed activities to an ES screening process to determine the right corresponding ES instruments to be prepared.

Public Disclosure



As the high ERR is related to contextual risk, the fragile country context & low capacity for implementation, subprojects (community infrastructure investments & the flood risk reduction activities) that, due to their location or the works involved, might be classified as high risk will be excluded. It is also important to underline that the low capacity of the national & county government to enforce & supervise environmental compliance including that of local communities to manage natural resources sustainably in the backdrop of pervasive conflict extends to the control of natural resources that are largely undisturbed & undermanaged. Further, the legal & institutional arrangements to manage, supervise & enforce compliance are equally dysfunctional with low capacity in controlling & monitoring environmental performance during implementation. This is a gap that the TPMA is expected to bridge.

Social Risk Rating

High

Generally, the project beneficial features outweigh the adverse risks. The targeting of the poor and vulnerable to reduce shocks, restore social cohesion and integrate excluded groups is likely to have beneficial impacts on parts of South Sudan’s populations. The project will target the most severely affected, such as IDPs, refugees host communities and others. The substantial security issues, fragility, conflict and violence (FCV) and serious challenges regarding GBV, render the social risk to be high. Social risks are above all the result of the country FCV context in the project area. These include risks resulting from (i) weak grievance redress mechanism on targeting, (ii) social exclusion and elite capture; (iii) insufficient community engagement; (iv) intra-communal tensions in regard to implementation issues, (iii) assets becoming targets of violent groups, (iv) and adverse results from construction and labor activities. Violence (political, criminal, ethnic, etc.) sexual harassment and Gender-based violence (SH/SEA/GBV). Further, as the project will engage in physical construction and rehabilitation, involuntary land acquisition is another risk that needs to be properly managed. However, the extent of works and the footprint are unknown at this stage and hence, the extent of involuntary resettlement and construction-related social impacts (including those linked to worker influx, SEA/SH, community health and safety and labor management) cannot be accurately scoped. The potential tension between host and refugee communities which might lead to conflict due to the potential perception by host communities that refugees are receiving advantages that should go to the South Sudanese citizens is another social risk. The newly included Component 3 on Emergency Flood Response, which aims to provide emergency flood response activities in the most heavily affected counties will have similar social benefits including saving lives and reducing the suffering of affected communities, increasing awareness about flood risks, improving emergency preparedness, empowering vulnerable populations, and enhancing disaster response capabilities of local communities, which can contribute to long-term resilience and sustainability, ensuring vulnerable populations access to critical services. However, the potential social risks and impacts associated with Component 3 include coordination and communication challenges among various stakeholders involved in emergency flood response, social conflicts and disputes over access to relief supplies, differences in priority setting, or perceived inequalities in distribution, vulnerability of marginalized groups such as women, children, elderly, and other vulnerable populations, who may have limited access to resources, services, and decision-making processes, and may be disproportionately affected by the floods. Failure to adequately address the specific needs and vulnerabilities of these groups can result in increased social risks, including gender-based violence (GBV), discrimination, and exclusion, which can further compound the impacts of the floods and hinder the overall effectiveness and sustainability of the emergency response. Based on this assessment, the overall social risk level is considered ‘High’. The overall social risk management will be embedded in the project implementation arrangement, informed by the project ES risk management instruments.

Public Disclosure

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:

As stated in Sections C & II A, in addition to expanding the geographic scope of its implementation, the AF will finance similar activities to the parent project (ECRP-II) which implies that the AF has similar potential ESHS risks & impacts. This section, including ESHS risks & impacts, may be updated when the ESMF for the parent project is updated prior to the AF disbursement as required.

The breadth, depth, & type of analysis of the assessment & management of ES risks and impacts associated with community infrastructure depend on their nature, scale, & the proposed locations to be sited. This will range from but not limited to: water supply & sanitation facilities, footpaths & community roads, health & education facilities, among others. Some of these subprojects like construction or repair of health & educational facilities, markets, roads, drainage, water & sanitation facilities could potentially have adverse environmental impacts that may range from: contamination of ground water due to proximity of latrines & waste disposal sites or inappropriate location of pit latrines, use of limited or sensitively located local construction materials such as timber; noise & dust emissions from civil works; generation & dumping of debris; OHS hazards from handling of equipment by workers; loss of vegetative cover causing erosion of loose soils and waste; & health hazards due to poor storage of market goods providing breeding ground for disease carrying rodents and vectors; health hazards due to inadequate cleaning & maintenance of sanitary facilities; safety hazards due to collapsing pit latrines; health hazards due to bacterial contamination of water resources. Further, the flood risk reduction activities like dykes, levies, embankment strengthening, & drainage present additional significant ES risks such as potential environmental destruction, loss of community assets & livelihoods & occupational and community health and safety risk to the project host communities downstream; loss of flood plains & potential change of the natural ecosystems including natural water flows; & potential for habitat fragmentation where the proposed infrastructure transverses natural ecosystems, among others. The potential EHS risks of the emergency flood response activities of component 3 are much more severe when compared relatively with components 2 and 3, as the two newly added states are located in highly flood affected & prone areas & their landscapes are characterized by flat grassland and tropical Savannah along with swamp areas and crossed by three to four main rivers along with several seasonal rivers. It's however important to note that no high environmental (and social) risk subprojects like dams or water diversion channels of any nature are being considered under these investments. Further, proper EHS risk management of component 3 will be addressed through proper stakeholder engagement, selection, siting, planning, design, construction/rehabilitation and implementation of subprojects, among others.

In the event of an eligible crisis or emergency following: (a) a formal declaration of a national emergency by the government, or (b) Government formal request to the World Bank for activation of the CERC, the CERC will be triggered allowing the flow of funds from other project components to be reallocated to finance the emergency response(s). Given that it's not possible to know the kind of emergency response interventions that may be sought, the project ESMF will provide guidance & procedures consistent with the Bank's safeguards requirements for the CERCs, to be considered in the Emergency Operations Manual that will be prepared if a CERC is triggered.

Social impacts may occur due to the need for land acquisition for infrastructure development; impacts on access to natural resources in relation to water infrastructure; insufficient community and stakeholder engagement due to capacity limitation, community conflicts over beneficiaries and location of subprojects, hence security concerns for the project host communities & project workers (during work on site, travel to site, and accommodation, where



relevant; creation of physical targets for violent groups; labor influx risks such as such as transmission of diseases including HIV/AIDS, Covid-19, etc. & increased social tensions; SEA/SH risks by project & sub/contractor staff; & protection of labor providing inputs to the project. These risks and impacts may differentially affect vulnerable groups including women, youth people living with disabilities as well as communities that met the criteria of ESS7.

In addition, the implementation of Component 3 on emergency flood response can pose various ESHS risks, including risks related to GBV. The potential adverse risks may include: (i) Environmental risks: negative impacts on the environment, such as damage to ecosystems, water contamination, pollution, and destruction of infrastructure which can exacerbate the vulnerabilities of affected populations, including women, girls, & marginalized genders; (ii) Social risks: Conflict-affected contexts such as South Sudan often have existing social vulnerabilities; (iii) Health & safety risks including waterborne diseases, vector-borne diseases, food contamination, weakened health and safety systems, compromised health infrastructure, & lack of adequate safety measures & protocols that may result in accidents & injuries, including GBV or SEA/SH incidents, particularly for women, and girls.

To manage the anticipated risks & impacts of the ECRP-II AF, the client will prepare/update and implement appropriate ES instruments proportionate to the corresponding ES risks. From the ES instruments, the ESCP & the SEP have been updated and will be disclosed prior to appraisal while the remaining instruments including (a) the ESMF, including, as annexes, LMP, Social Assessment, & GBV/SEA/SH Action Plan); (b) the Security Risk Assessment (SRA) & the Security Management Plan (SMP); & (c) the RPF prepared under ECRP-II will be updated, consulted & disclosed prior to the AF disbursement. The updated SEP for ECRP II AF will be further revised, consulted upon & disclosed with in-depth consultation results prior to the commencement of any activities under component 3. Issues to be included/updated in the ES instruments (such as ESMF including its annexes; RPF; & SRA/SMP) will focus on the following: baseline information (in the new AF implementation areas), policy & legal frameworks (prepared/updated since the ECRP-II instruments completed), WGB General EHS Guidelines, ESHS risks with mitigation & monitoring measures, security risks, institutional implementation arrangement, ES capacity building training, community consultations, occupational & community health & safety, among others, associated with the scaled up activities, newly added component (component 3), & expanded geographic scope of its implementation. The ESMF for for ECRP-II AF is being updated to include appropriate processes for screening addressing (a) the proposed community infrastructure investments and, (b) the flood risk reduction investments. The separation of the detailed screening processes will not only ensure the right, but also proportionate, & subsequent ES assessments and tools (e.g., ESAs, ESMFs, RAPs, VLD) are prepared, consulted & disclosed. Activities that present a “high” ES risk including physical displacement associated with the flood risk reduction activities including dams; and substantial to high ES risks associated with community infrastructure subprojects shall be screened out & considered non-eligible & detailed in a negative list of activities in the ESMF & other instruments. Also, subsequent ES tools to be prepared will ensure that all proposed sub-project designs, operations & maintenance regimes are designed & reviewed by qualified engineers, and adopt & implement GIIP safety measures to ensure proposed flood risk reduction activities are compliant & safe. They also include measures to ensure risk & impacts of potential failure of the proposed flood risk reduction structures to downstream communities & their assets are well assessed & mitigated. To address potential land acquisition risks, the RPF for ECRP II will be updated & disclosed before the AF disbursement. The RPF provides a guideline for voluntary land donation.

Two screening checklists (for the community infrastructure investments, and for the flood reduction activities prepared for the ECRP II) are being revised in the updated draft ESMF for ECRP II AF, together with the negative list of



subprojects to be avoided because of their known inherent and residual ES risks. The output of the respective ES assessments and studies (ESIAs, ESMPs, etc.), alongside the ESHS specifications, shall be part of the bidding documents and executed contracts. Contractors will be expected to prepare site specific C-ESMPs for the individual sub-projects informed by the outcome and recommendations of the respective ES assessments & studies conducted. Where the subprojects are implemented directly by the local community, IOM will be responsible for ensuring the required ES assessments are prepared, consulted on, & implemented with the help of their team of ES specialists in respective counties where activities are being implemented. The project team will ensure adequate budget is allocated for the AF ESMF implementation to (i) adequately resource the needed ESHS arrangements for supervision and implementation, and (ii) operationalize the designed mitigation measures over & beyond the internal monitoring and supervision of the project EHS compliance during implementation with an aim to have lasting impacts after the project closure. The PMU will also continue to engage a TPMA to help undertake independent ESHS monitoring of the project performance against the prepared ES instruments/tools. The WB will also carry out regular implementation support missions.

ESS10 Stakeholder Engagement and Information Disclosure

Fostering local conflict management and inter-communal social cohesion as one of the project objectives moves stakeholder engagement to the core of this project. Stakeholders in the local context encompass multiple actors, drawing from the implementing experience of predecessor project. Among others, different households and communities, women/men, elderly/youth/children, refugees/internally displaced persons (IDPs)/returnees and host communities, different ethnic groups, vulnerable groups, government institutions, international non-governmental organizations, and CSOs. Some of the potential risks associated with the implementation of Emergency Flood Response activities include privacy concerns, security breaches, miscommunication and misinformation due to lack of clear and accurate communication protocols, social and cultural sensitivities, failure to adequately manage stakeholder expectations which may result in dissatisfaction, and resource constraints that can hinder the ability to engage stakeholders effectively or disclose information in a timely manner.

The project under the ECRP-I has developed a Stakeholder engagement Plan. Hence, the client will update the SEP for ECRP-II. The updated SEP will outline the characteristics and interests of stakeholders, timing and methods of engagement throughout the life of the project, appropriate to the different population groups, vulnerable and disadvantaged groups, consistent with the requirements of ESS7. The SEP encompasses a wider stakeholder mapping exercise, which will be refined during preparation of subprojects. It also outlines how stakeholders will be engaged during preparation and implementation of sub-projects. Finally, this process will need to be adapted regularly, also given the fast-changing nature of the project's FCV context.

While it is possible to build on activities under ECRP-I and ECRP-II, it will be necessary to take contextual developments into consideration. Work on the SEP will be complementary and interlinked with the social assessment to allow a detailed stakeholder identification and analysis from a country-wide perspective, which allows a simple, template-type assessment for local sites. While due to the long-lasting conflict and wide-spread poverty vulnerability is difficult to distinguish, as it was in ECRP-I project design, the AF give special emphasis on the inclusion of women, refugees, IDPs, returnees, elderly, disabled and youth. The project will ensure respect of human rights, dignity, aspirations, identity, culture and livelihoods of SSAHUTLC and avoid adverse impacts on them or, when avoidance is



not possible, minimize, mitigate or compensate for such impacts. Further, the project will ensure that such communities are appropriately informed and can share the benefits of the project in an inclusive and culturally appropriate manner.

The project will ensure that information is meaningful, timely, and accessible to all affected stakeholders, including usage of different languages, addressing cultural sensitivities, as well as challenges deriving from illiteracy or disabilities. The project will ensure that all process of information disclosure and consultation area inclusive as possible to ensure that all sections of the affected communities will benefit from the project, and women, youth, refugees, IDPs, and other vulnerable groups are not excluded. The project will further ensure that information disclosure takes place in an on-going and satisfactory manner and in a culturally appropriate manner. The SEP prepared for ECRP II has been updated and will be disclosed before appraisal. The updated SEP for ECRP II AF will be further revised, consulted upon and disclosed with in-depth consultation results in 3 months after effectiveness.

The updated SEP includes a robust GRM with provisions for IP/SSAHUTLC, refugees/returnees, and survivors of SEA/SH. Specific assessments of a feasible approach on SEA/SH shall be developed as part of the Gender and SEA/SH assessment.

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

Like the ECRP I and II, the AF will be implemented in accordance with the applicable requirements of ESS 2, in a manner acceptable to the Association, including through, inter alia, implementing adequate occupational health and safety measures (including emergency preparedness and response measures), and setting out grievance arrangements for different categories of workers.

Project workers engaged or employed will include direct workers (workers hired by IOM, NGOs and the TPMA for the project work); contracted workers (for example, skilled and non-skilled construction workers engaged by contractors of each subproject); community workers; and primary supply workers (for example, workers engaged for essential construction materials to be purchased on an ongoing basis, as defined in ESS2). It should be highlighted that provided labor, including by community workers, will be compensated in compliance with ESS2 and agreements and documentation will be established in line with detailed planning provisions in the Labor Management Procedure (LMP) to be updated (including, among others, occupational health and safety aspects associated with the expanded geographic scope of component 3 implementation) as an annex in the updated draft ESMF for ECRP II AF. Although most of the labor is expected to be local, there may be some labor influx for larger and/or more complex subprojects. It is imperative that the implementing entities must clearly define and communicate the arrangements for engaging workers from the community in the project, ensure transparency, implement safeguards against child and forced labor, prioritize occupational health and safety, and monitor and evaluate the implementation of voluntary community engagement arrangements.



Potential risks related to labor and working conditions, include; labor influx (see also ESS1), child labor, forced labor, non-discriminatory hiring practices with a focus on the risk of related ethnicity-based grievances, work-related discrimination and OHS risks associated with the expansion of flood risk reduction activities in the two added states, as well as SEA/SH risks, have been identified and will be addressed through the LMP, and SEA/SH action plan to be updated (as annexes in the ESMF) and implemented accordingly and will be further detailed in the C-ESMPs by contractors. This includes assessment of safety and security risks for project workers and respective risk management provisions adequate to the context (see above). Specifically, the implementation of Component 3: Emergency Flood Response Activities can pose potential risks to labor and working conditions, including exposure to health and safety hazards, such as contaminated floodwater, debris, hazardous materials, and unstable structures, which can result in injuries, illnesses, or even fatalities if proper safety measures are not in place; inadequate labor protections, leading to issues such as lack of fair wages, insufficient rest periods, and inadequate access to personal protective equipment (PPE). Workers may also face challenges of discrimination, exploitation, and abuse, challenges in exercising their labor rights, such as the right to organize, and challenges in rebuilding their livelihoods and accessing decent work, due to the emergency nature of the situation.

To address occupational health and safety risks that may be associated with the subproject activities to community workers including the project host communities, specific ESMPs for subprojects, alongside the ESHS specifications, will be part of the bidding documents and the contracts to be executed. Based on site specific ES instruments for AF subprojects, contractors are required to prepare site specific C-ESMPs for the individual subprojects. Implementing partners/IOM and contractors including their sub-contractors will ensure all workers are inducted on site OHS hazards and safe working procedures including providing safe hand tools and PPEs . Where the subprojects are implemented directly by the local community, Implementing partners/ IOM will be responsible for ensuring the subproject specific ESMP is adopted and complied to. Environmental Social Health and Safety (ESHS) codes of conduct consistent with the Bank standards and guidelines will also be prepared and all workers will be inducted on those requirements. The codes of conduct will extend to cover requirements for responsible environmental management; appropriate social conduct and interactions between workers and surrounding project host communities; and the general community and worker occupational health and safety, including prevention and reduction of communicable diseases and SEA/SH. Due to the limited scope of the physical construction the project is not expected to bring large scale of workers outside the community and hence, labor influx will not be an issue. Besides, Workers' camp will not be needed. The project will decide on a minimum wage on market rates and other humanitarian agencies' rates. For unskilled labor/labor-intensive public works, however, the social protection cluster is trying to harmonize a daily rate nationally, so ECRP-II will follow that to the extent possible and implement it throughout the project and cascade it down to contractors. The minimum age of eighteen for workers will be enforced in recruitment and in daily staff team talks by contractors. Addressing the risk of forced labor, contractors' obligations will be spelled out in their respective contracts. The PMU will monitor to ensure full compliance with World Bank ESSs. The project will ensure that workers can articulate violations of their rights and receive redress through rigorous workers' grievance mechanisms. The approach to which will be detailed in the LMP. The AF as part of the ESMF update will update, consult upon and disclose the LMP prior to AF disbursement. While responding to the challenges of COVID 19, the project will further ensure the ECRP I and II COVID 19 safe working procedures is updated and continue to be implemented in all project activities under ECRP II AF.



ESS3 Resource Efficiency and Pollution Prevention and Management

This standard is relevant as there are potential issues related to both resource efficiency and pollution. The project will have relevance in contributing to resource efficiency related to construction and/or rehabilitation of community infrastructure and emergency flood response subprojects, through appropriate and efficient use of construction/rehabilitation materials (such as sands/gravels/timbers, etc.) and water, among others. However, there are also potential pollution issues arising from subprojects such as rehabilitation/construction spoil material, rubble, and various wastes. This will range from construction and operation waste including construction/ rehabilitation rubble, asbestos containing materials (ACM), dust and air emissions from vehicles and equipment, hospital medical waste, boreholes solar panel electronic waste, etc. Safe waste management including safe disposal will be addressed in the AF ESMF which is being updated, accommodating ES risks (associated with ESS3) in the existing ECRP-II implementation areas (up-scaled investments which will be financed by the AF as well) and in newly expanded geographic scope of AF implementation areas (NBeG and Warrap states) and will be detailed in site-specific ES instruments (such as ESIA/ESMPs) for AF subprojects which will be prepared, implemented and monitored as per the ESMF. Site specific ES instruments (ESMPs/ESIAs) will be the basis for C-ESMPs preparation. The implementing partners will require civil works contractors for construction and/or rehabilitation of subprojects to prepare C-ESMPs satisfactory to the GoSS, the WB, and the implementing partners and enforce their implementation accordingly. Construction materials will be sourced from legally approved sites, through measures specified in Good International Industry Practices (GIIPs) including WBG General EHS Guidelines for Construction Materials, with an aim to resource use efficiency and minimize pollution, as per the ESMF and site specific ES tools.

ESS4 Community Health and Safety

As discussed under ESS1 above, the subproject will present varied levels of OHS risks and hazards to both the project host communities and project workers. To begin with, the flood risk reduction activities which will be limited to small dykes, levies, embankment strengthening, drainage etc. No high environmental risk investments including dam, dykes, or water diversion channels are being considered. These have the potential to cause large scale destruction of properties, multiple injuries and even fatalities should they breach; the presence of pooled water proximal to the community settlement may also become a drowning hazard to children; These pools of water could also act as breeding sites for diseases and illnesses causing vectors like mosquitos. Trip hazards resulting from deep excavations and borrow/quarry sites for extraction of construction/rehabilitation materials;; traffic and road safety risks, sexually transmitted diseases, GBV/SHE risks from project workers; noise/vibration from construction/rehabilitation equipment/machinery/vehicles, air and dust pollution, and solid and liquid wastes and related contamination could adversely affect community and health safety. To effectively manage these hazards and risks, the AF ESMF which is being updated will prescribe detailed environmental assessment which will inform subsequent contractor to prepare community health and safety management plans and emergency preparedness and response plans as part of the CESMPs based on site specific ES&S tools (such as ESMPs/ESIAs, etc. as required) for subprojects to be prepared, implemented and monitored. The implementing partners will require civil works contractors for construction and/or rehabilitation of subprojects to prepare C-ESMPs satisfactory to the GoSS, the WB, and the implementing partners and enforce their implementation accordingly. The C-ESMPs shall also include emergency preparedness and response plan for the respective flood control activities to allow for an organized way of responding in the event of an emergency. For the community infrastructure subprojects, direct community health and safety impacts will range from: i) physical hazards on sites where the community has access; ii) traffic and road safety hazards associated with



the operation of project vehicles (i.e., IPs, government, contractors, suppliers) on public roads and at construction sites; iii) health issues including water-borne, and vector-borne diseases which may result from poor site management (e.g., stagnant water, poor solid waste management), and communicable diseases such as HIV/AIDs associated with labor influx (refer ESS2); iv) potential exacerbation of the spread of COVID-19; (vii) security incidents related to communal and political violence as well as crime; v) SEA/SH; and vi) hazardous materials such as asbestos containing materials (ACM) and hospital medical waste during operation are a potential risk to not only workers but also the project host communities. Medical waste ranging from syringes, needles, tins etc. could be collected by children and other and could result into health implications. Other infectious, hazardous and general waste too if not properly disposed could also result into environmental (water, soil, air) pollution and consequently impact the community's health and well being. Asbestos containing waste from renovation activities could be reused by the community members if poorly disposed. To address all these risks, the ESMF ESMP will provide general guidance and mitigation measures on how these risk will be managed and more specific responsive mitigation measures will be detailed in the subsequent environmental assessment tools. These tools will also ensure that all design, operation and maintenance regime are designed and reviewed by qualified engineers and adopt and implement GIIP safety measure. This include measure to ensure risk and impacts of potential failure of such structures to communities and their assets downstream are well considered and mitigated. Sample ToR for these assessments will be developed, reviewed and cleared by the World Bank as part of the ESMF for ECRP II AF.

To address potential risks associated with the security personnel to be hired by contractors, the ESMF includes mitigation measures in compliance with ESS1 and ESS4. Pervasive incidence of SEA/SH in South Sudan is a significant contextual challenge. The project will conduct an assessment of project related SEA/SH and a commensurate action plan for the identified potential risks will be developed for the project. Given the context of pervasive SEA/SH, the project will adopt a robust approach to address potential GBV risks; including site-specific assessments of the availability of referral systems and its establishment if insufficient. The ESMF will provide an updated checklist to use for screening of subprojects related with SEA SH related risks. Relevant mitigation measures to address these risks (e.g., integrating Codes of Conduct with SEA/SH related protections into community consultations and mapping activities to identify potential service providers, and establishment of GRM with procedures and channels to enable safe, confidential and ethical reporting of SEA/SH incidents) will be articulated in the SEA/SH action plan as part of the updated ESMF. The project will include capacity building and training of relevant stakeholders including government partners, contractors and project workers; risks will be monitored throughout project implementation through regular re-assessment with the risk screening tool, particularly as new project locations are determined, and through regular monitoring engagement. The project will further identify project related risks during the ECRP II AF ESMF update, and later during the preparation of site specific tools (such as ESIA/ESMP, RAPs) for subprojects. The updated SEP for ECRP II AF will be further revised, consulted upon and disclosed with in-depth consultation results in 3 months after effectiveness; and it will be further updates throughout the project as required.

The security risk assessment and a Security Management Plan prepared for the ECRP II will be updated to capture changes in the AF, including stakeholder consultation and security issues in the newly expanded geographic footprint of the AF implementation in the in Northern Bahr-el-Ghazal (NBeG) and Warrap states. The updated SRM will outline the Project's approach to address the pertinent security risks in the project sites as outlined in the ESCP. This includes approaches to security risk assessments and categorization, security provisions for different types of workers and communities (on a large spectrum from prevention to response), institutional cooperation with security actors in the region (local, national, international, WB), decision making processes, and according documentation. The security



risk assessment and the security management plan will be updated before the AF disbursement as stated in the ESCP for ECRP II AF.

The project will incorporate COVID-19 response needs in the first cohort of subprojects. For example, the project can provide funds to construct handwashing facilities at the community level, including markets, places of worship, public transportation hubs, communal water points, women and girls friendly spaces, and any other densely populated spots. Safety provisions will be included in the site-specific OHS plans.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

While most of the activities are community infrastructure investments and will not require significant land acquisition, the flood protection activities might result in land acquisition. The project for the community infrastructure subprojects will continue doing extensive consultations via a CDD approach which will aim to ensure that sub-projects will be implemented on public lands free of individual or collective land users and property right owners, or non-government use. Land acquisition is required for component 1 activities such as construction or rehabilitation of public goods such as water supply and sanitation facilities, footpaths and community roads, dykes for flood protection, and health and education facilities as well as the newly added component 3 that will support rehabilitation of damaged community infrastructure and services or construction of new infrastructure to reduce flood risks which likely include water supply and sanitation facilities, footpaths and community roads, dykes for flood protection, and health and education facilities, among others. Land donated voluntarily for the project will follow due process according to Voluntary Land Donation Guidelines has been outlined in the RPF. However, for the flood protection activities which might require some of the activities may result in private or communal land acquisition, the client will prepare a Resettlement Action Plan and fully implement it prior to commencement of physical construction as per ESS5. As the specific footprint of the sub projects is not known at this time, the scope and magnitude of the required land acquisition will be determined during project implementation. Hence, the Borrower will update the ESCR-II RPF in line with the proposed project activities and will provide guidance on the appropriate site-specific ES instruments such as Resettlement Plans (RPs) prior to the AF disbursement. The RPF will provides the overall principles and objectives of ESS5. It will provides resettlement principles and procedures including for setting eligibility criteria for resettlement entitlements, organizational arrangements, and the establishment of project-level Grievance Redress Mechanism (GRM) to be used during the preparation of site-specific instruments to address potential land acquisition issues. Hence, for any land acquisition, the project will prepare proportionate Resettlement Plans (RPs), and all compensation arrangements including in-kind compensation will be made prior to any land-disturbance. Further, the RPF will provide a complete Voluntary Land Donation (VLD) protocol in accordance with ESS5, including key principles such as informed decision making, the right to reject, the strict avoidance of significant impacts on livelihoods, and clear documentation.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

While most of the community infrastructure subprojects will be undertaken on already existing and disturbed sites and bomas/payams, others will be on green fields especially the flood risk reduction investments that are linear in nature thus presenting inherent environmental sensitivities relevant to ESS6; As such, it's imminent that these



infrastructure will traverse sensitive environmental receptors like swamps, bogs, thick vegetation cover etc. Consequently there is going to be loss of vegetation cover, disruption of habitat, potential for habitat fragmentation, risk of introduction of invasive species among others. The stated risks may be exacerbated in the newly expanded geographic footprint of the AF implementation in the in Northern Bahr-el-Ghazal (NBeG) and Warrap states which will be incorporated in the AF ESMF which is being updated and finalized prior to the AF disbursement. The AF ESMF will update the two separate screening process for both the community infrastructure investments and the flood control investments considering the new geographic footprint of the AF implementation areas and related baseline information along with stakeholder consultations, among others. These processes will help exclude such sensitive areas like national parks, game reserves, forests, water bodies, recognized Ramsar sites etc. The ESMF will also update specific mitigation and monitoring measures to avoid or minimize negative impacts on critical or protected areas if the subproject screening process does not otherwise exclude these areas. These measures shall be detailed in the corresponding site specific ES risk management tools for subprojects (i.e., ESIA, ESMPs and C-ESMPs as applicable). The implementing partners will require civil works contractors for construction and/or rehabilitation of subprojects to prepare C-ESMPs satisfactory to the GoSS, the WB, and the implementing partners and enforce their implementation accordingly.

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

South Sudan is characterized by a large number of distinct social and cultural groups for which it is essential that project interventions are accessible, culturally appropriate and inclusive. Analysis by World Bank and other experts confirm that the overwhelming majority of people in the country meet the requirements of ESS7 including the majority of the ethnic groups in South Sudan as well as in the project area, and excluding only recent immigrants from other countries. The project design and implementation process of the proposed project therefore embed its basic principles. The elements of Indigenous People's Plan (IPP) will be included in the overall project design and updated ESMF as well; and hence, a separate IPP is not required. Respective planning elements have been included in the overall project design. Key identified risks include social ills, SEA/SH, land conflicts, equity issues/targeting as well as elite capture, ethnicity of project staff, exclusion of pastoralists, inter-communal conflicts, violent attacks, and grievances of non-beneficiaries especially pertaining to exclusion of IDPs/returnees. Mitigation measures encompass, among others, awareness campaigns, transparent disclosure of project activities, analysis of risks throughout the project lifecycle, meaningful consultations and participatory approach towards project activities on the ground including site selection, Codes of Conduct, integration of women into committees, transparent procedures on benefit sharing, and ensuring availability of a functional GRM. The Project will build in an iterative social/conflict monitoring throughout the project period to see how the project activities interact with the local dynamics, so that the project activities/approach can be adjusted in real-time. The project is a community infrastructure investments and the sub projects will be selected by communities. However the flood protection activity may involve larger scale infrastructure which may not be managed by the community and requires land acquisition which requires FPIC. Nevertheless, as the exact location and level of impact is not known at this time, it is not possible to determine the risks and impacts require FPIC. Hence, the project during implementation and once the exact location of the sub projects is identified will assess the risks and determine whether FIPC is required or not. Besides, the project during implementation will develop a detailed subproject implementation plan based on the context analysis for each community/county, including how different interest groups will safely be included in decision making fora.



ESS8 Cultural Heritage

Physical activities of ECRP II AF subprojects will be implemented in both rural, peri-urban and urban environment. The possibility of chancing on any physical objects of archeological or cultural importance or these physical activities having material impacts on the intangible cultural heritage is eminent. Therefore, the subproject screening process in the ESMF for ECRP II AF will exclude activities located in known, or in the vicinity of, a recognized cultural heritage site and includes specific mitigation measures to avoid negative impacts if the subproject screening process does not otherwise exclude these areas. Further, the ESMF for ECRP II AF will include chance find procedures that will be followed if previously unknown cultural heritage is encountered during project activities. This procedure will apply to all activities and contracts relating to construction of the project, including excavations, demolition, movement of earth, flooding or other changes in the physical environment.

ESS9 Financial Intermediaries

It is not currently relevant to the project as it will not involve any financial intermediaries in any of its components.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways	Yes
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:

Not applicable

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VI. APPROVAL

Task Team Leader(s):	Makiko Watanabe
Practice Manager (ENR/Social)	Iain G. Shuker Cleared on 19-Apr-2023 at 18:57:24 EDT
Safeguards Advisor ESSA	Martin Henry Lenihan (SAESSA) Concurred on 20-Apr-2023 at 10:21:6 EDT