



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

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I. BASIC INFORMATION

A. Basic Project Data

Country	Region	Borrower(s)	Implementing Agency(ies)
Burundi	EASTERN AND SOUTHERN AFRICA		
Project ID	Project Name		
P180987	Digital Burundi Additional Financing - Modernization Of Public Financial Management		
Parent Project ID (if any)	Parent Project Name		
P176396	Burundi Digital Foundations Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Digital Development	Investment Project Financing	9/18/2023	10/13/2023
Estimated Decision Review Date	Total Project Cost		
9/5/2023	40,000,000		

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Proposed Development Objective

To increase broadband internet access, especially to underserved communities, and improve government’s capacity to manage resources more effectively and deliver public services digitally.

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 Activities

The parent project is designed to increase high-speed internet access and to improve government capacity to provide and deliver digital public services, which will help lay the foundations for accelerated development of Burundi’s digital economy. The proposed additional financing adds to this objective the aim to manage public resources more effectively. The project is composed of three main components:



Component 1: Digital Access and Inclusion will focus on creating digitally enabled citizens and expanding the existing consumer base for digital services. This component will support wider access to broadband, as well as the adoption of data-enabled services. It will do so by financing activities that help strengthen the enabling environment for broadband market development, catalytic investments to expand local access networks, and schemes that support digital access enablers that help grow demand among groups that face barriers to access and usage. The design of this component is shaped by MFD and PCM principles. Sub-components will be implemented sequentially to ensure that upstream reforms improve the downstream investment climate. Activities under this component ultimately aim to connect more users to broadband and to create a growing user-base for digital services in Burundi. Proposed sub-components include: (1.1) Enabling environment for broadband and e-services access, (1.2) Local connectivity access, (1.3) Access and digital inclusion enablers.

Component 2: Digital Public Service Delivery Enablers will focus on creating a digitally enabled government, by strengthening adoption of digital tools by government and introducing the basic building blocks for incrementally scaling more secure and sophisticated digital service delivery. This component will finance cross-cutting digital government foundations that can boost capacity for secure digital public service delivery and use of digital tools and systems by Burundi's public administration. It will adopt a whole-of-government approach to developing the GoB's "digital stack" for e-services. It will predominately focus on transversal, government back-end systems, including reusable and shared digital infrastructure, platforms, and legal and governance frameworks to improve and expand government's capacity for digital public services delivery, reducing existing fragmentation and supporting incremental digital transformation of government, as well as greater resources efficiency (e.g., by reducing infrastructure duplication). By enhancing the digital capabilities of public administration, through digital tools and systems, and digital skills for civil servants using, managing, and maintaining the shared infrastructure and services deployed, the project will expand the GoB's capacity to provide e-services, increasing resilience to shocks by enabling remote service delivery. Proposed sub-components include: (2.1) Institutional, legal, governance and technology frameworks for e-services; (2.2) Shared digital government infrastructure and platforms; (2.3) Digitalization of select services and flagship use-cases.

The additional financing proposed adds to Component 2 the objective to boost capacity for efficient and transparent use of public resources. To do this, the proposed new Sub-component 2.4, Modernization of Public Financial Management (PFM) processes, would enhance the efficiency and transparency of key PFM areas through process reengineering supported by digital technologies. The AF will support six key PFM processes: (i) budget preparation, execution, accounting, and reporting, (ii) treasury management, (iii) tax administration; (iv) public investment management and reform coordination; (v) public procurement; and (vi) human resources and payroll management. In the selection of activities priority is given to areas with the largest impact on expansion of fiscal space and enhancement of transparency. Process enhancements would include the development of the institutional and organizational frameworks needed for an efficient and transparent use of government resources as well as the use of new or upgraded digital tools when needed and the trainings and change management required to adopt lasting changes.

Component 3: Institutional Coordination and Project Management will finance project management and coordination, including procurement, financial management (FM), monitoring and evaluation (M&E), as well as environmental and social (E&S) safeguards management. The additional financing would also reinforce the project implementation unit with additional recruitments and rehabilitation of a dedicated site for the project.



D. Environmental and Social Overview

D.1 Overview of Environmental and Social Project Settings

The proposed operation and AF shall cover both rural and urban areas in government offices to boost country-wide digital transformation focusing on digital enablers but shall have a strong focus on supporting greater access to broadband and digital services in rural areas, among underserved groups and low-income households. Based on the findings and recommendations of the Burundi DE4A diagnostics conducted, project activities seek to expand digital adoption, by spearheading a series of innovative digital access and inclusion initiatives. The project shall also enhance the Government's digital service capabilities, equipping GoB with the ability to harness the power of big data and scale e-services based on shared digital standards, platforms, and infrastructure. Finally, the project shall increase Burundi's capacity to support digitally enabled innovation, by strengthening the local entrepreneurship ecosystem, supporting tech firms to move from startups to growth, and developing Burundi's digital talent base. The AF activities shall cover the modernization of Public Financial Management (PFM) and Human Resources Management (HRM) processes which would be incorporated and are intended to "finance cross-cutting digital government foundations that can boost capacity for secure digital public service delivery and use of digital tools and systems by Burundi's public administration". The digitalization of core PFM systems would directly boost capacity in the use of digital tools in public administration. The component 3 shall cover the rehabilitation of the existing buildings allocated to PAFEN. These existing buildings are in the residential area of the Kinindo quarter; in MUHA Commune. Those buildings belong to the Government and were exploited by the UN agency until they left them more than 10 years ago. The rehabilitation activities of the buildings shall mainly consist of the rehabilitation of walls, frames, roofs, water and electricity networks, access roads to the various offices, etc. The main E&S impacts shall be the generation of debris from these rehabilitation activities and their transport to the known dumps which shall be determined in the Bidding Documents for the companies awarded the rehabilitation contract. Note that the E&S clauses shall be extracted from the ESIA/ESMP document which shall be prepared before the start of the rehabilitation activities. The company awarded the contract must also define an ESMP Site before the beginning of the rehabilitation works.

Briefly, the key features relevant to the operation's environmental and social risks and opportunities for the parent project and the AF will be e-waste, noise, and dust during the installation of broadband and digital services to existing buildings in both rural and urban areas, rehabilitation of PAFEN Site.

The proposed AF shall cover both rural and urban areas in Burundi, an FCV context and it is not expected to involve associated facilities or impact high-biodiversity settings.

At this stage, some specific sites for critical project interventions are not yet identified. Those site-specific details shall be identified during the project implementation, and detailed descriptions and environmental and social assessments of those project/subproject activity locations shall be provided as part of site-specific ESMPs when those details become available. These ESMPs will be disclosed on the Borrower's website.

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

The Ministry of Communication, Information Technology, and Media (MINCOTIM) is mandated to lead ICT sector development and flagship digital initiatives and shall therefore lead the overall implementation of the project activities including ESF aspects. MINCOTIM does have prior experience with World Bank-financed projects from the implementation of the Regional Communication Infrastructure Program – Phase 2 (RCIP-2, P094103) Burundi project



that closed in 2015 under legacy safeguard policies. The PIU team of the parent project has been established including E&S specialists and has been implementing the parent project including E&S activities. This team including E&S specialists shall continue to implement E&S's AF activities which are in line with the same institutional arrangements as the parent project. ESF training has already been done as well as ongoing direct support which shall continue to be provided to the client to ensure ESF requirements are satisfied and met.

The PIU of the parent project has been established within SETIC, which will serve as the main implementing agency for the parent and AF project as it implemented RCIP-2 and it currently oversees the implementation and coordination of all ICT-related projects and programs that support the Government's existing National ICT Policy. Given its mandate, it is therefore well-placed to implement the parent and AF project activities. MINCOTIM will continue to chair the project Steering Committee throughout the parent and AF project implementation.

The PIU team including E&S specialists has already been recruited to support effective environment and social risk management of the parent project and shall continue to support AF activities. If other government agencies or stakeholders will support the implementation of some of the project's sub-components, the environment and social risk management of those institutions shall be assessed during project preparation, as necessary. This may, for example, include the Central Bank of Burundi, in relation to the implementation of digital payments. The staff of those institutions shall also be strengthened and trained on ESF requirements and related instruments, as needed. The Country does not yet have specific e-waste regulations in place like other countries but has waste management regulations that entail hazardous and non-hazardous waste. Until now there are no reputable hazardous waste management operators in Burundi. The government will be advised to consider the potential generation of e-waste in the area of deployment, operation, and maintenance of last-mile digital infrastructure, and to make provision for the establishment of an adequate e-waste management strategy.

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

A. Environmental and Social Risk Classification (ESRC) Moderate

A.1 Environmental Risk Rating Moderate

The project's environmental risk rating for both (parent project and AF activities) is considered to remain Moderate. These risks and impacts are linked to parent and AF project activities to be funded under Component 1, including the deployment, operation, and maintenance of last-mile digital infrastructure at scale and access to smart devices through innovative financing, and under Component 2, which will involve retrofitting parent and AF project activities in existing buildings to connect local government offices including Ministry of public services(AF) to broadband through the expansion of the ComGov network. Key anticipated environmental risks and impacts for parent and AF project may include occupational health and safety hazards for the workforce; environmental pollution from management and disposal of electronic waste (E-waste) as a result of the decommission of hardware and digital devices; generation of solid waste from residual construction materials; soil erosion and vegetation clearance for the construction of the new cell towers, effects of electromagnetic waves on communities from close multiple towers and



for the deployment of fiber optic cables to be followed closely; the risks to the community and workers during installation and maintenance related to health and safety disruptions to access to properties and businesses. Road safety and pedestrian safety risks for the parent and AF project during transportation of digital infrastructure and hardware, and construction activities are also expected. Meanwhile, Components 1 and 2 shall include technical assistance activities (integrated digital economy strategy and roadmap, development of a broadband policy and plan, development of shared governance, strategic, regulatory and legal frameworks, etc.), which will result in increased private sector investment in infrastructure and services expansion. Their potential downstream risks and impacts shall be addressed, and the sustainability of the system strengthened by ensuring that private sectors are adequately regulated by the current environmental policy and institutional framework. The proposed AF activities for Component 3 include also the rehabilitation of the PAFEN site. The main E&S impacts shall be the generation of debris from these rehabilitation activities and their transport to the known dumps which shall be determined in the Bidding Documents for the companies awarded the rehabilitation contract. E&S risks and impacts shall be addressed through the ESIA/ESMP report which will be carried out and propose appropriate mitigation measures before the beginning of the rehabilitation activities. The borrower capacity to manage environmental risks and impacts is a factor in consideration of environmental risks, as it has no experience in preparing and implementing ESF instruments. The implementing agency shall require capacity building to adequately manage potential environmental risks and impacts in a manner that is consistent with the ESSs and satisfactory to the Bank. Therefore, the specific capacity-building areas along with the budget and staff required for ESSs and related aspects of implementation have been assessed during the project preparation. Detailed environmental and social assessments that are proportionate to the potential risks and impacts of the project shall be carried out during the parent and AF project implementation. MINCOTIM does have prior ESF experience with World Bank-financed projects from the implementation of the Regional Communication Infrastructure Program – Phase 2 (RCIP-2, P094103) Burundi project that closed in 2015 under legacy safeguard policies. The PIU team of the parent project has been established including skilled and qualified ESF specialists and has been implementing the parent project. This team including skilled E&S specialists shall continue to implement E&S’s AF activities which are in line with the same institutional arrangements as the parent project. ESF tr

A.2 Social Risk Rating

Moderate

Project activities under the AF are not expected to materially change the moderate Social risk rating of the parent project. Indeed, social risks and impacts are likely to be low in magnitude and easily mitigated in a predictable manner. Social risks and impacts identified are primarily linked to the following activities and aspects of the project: (i) possible temporary or permanent physical and economic displacement in connection with the deployment of digital infrastructure (sub-component 1.2, local connectivity access). However, it is worth noting that temporary and economic displacement is mostly anticipated to be minimal as part of last-mile connectivity infrastructure deployment. While the project seeks to actively address digital inclusion and widen access to broadband, digital tools, and public services, there is (ii) a lingering risk of social exclusion of vulnerable or marginalized populations that will need to be actively addressed as part of the targeting, especially in relation to access to networks (sub-component 1.2, local connectivity access), and the modernization of PFM and HRM processes (sub-component 2.4- i.e. biometric identification) and the various digital skills and device access schemes envisioned (under sub-component 1.3, Access and digital inclusion enablers) to ensure that related populations also gain access to local content supported and key public services that are digitized (under Component 2.3, Digitalization of select services and flagship use-cases). Furthermore, (iii) worker influx to rural areas could be anticipated in connection with infrastructure deployment; (iv) use of hazardous materials and waste from e-waste handling and disposal from smart devices’ access increase (sub-component 1.3); (v) occupational health and safety related to working with electric magnetic fields, optical fiber, and power lines (sub-component 1.2 and component 3); (vi) community health and safety from exposure to construction



vehicles and transports (sub-components 1.2,2.2 and 3); (vii) risks related to the management and securing of data privacy such as privacy theft or unintended profiling of individuals (sub-components 2.1,2.3 and 2.4); (viii) access to internet can also lead to young children and adolescents have access to inappropriate content and can lead to increase in gender-based violence and sexual-exploitation and sexual harassment and/or to fall prey to human traffickers, particularly considering that social media is currently unregulated and there is limited capacity to monitor digital activities and (ix) risk of exposure of workers and vulnerable communities to sexual harassment or exploitation. Further social risks related to the potential impacts of HRM and PFM modernization processes on the labor force and payroll shall be evaluated in a Social Evaluation to be carried out before the beginning of AF activities. The project design integrates proportionate social risk management measures to avoid similar issues under this new operation.

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

B.1 Relevance of Environmental and Social Standards

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Relevant

ESS1 is relevant to the parent and AF project due to the environmental and social risks and impacts identified in relation to the proposed investment and TA activities under components 1, 2, and 3 of the parent and AF project. Investments and TA activities that are anticipated to result in direct and indirect environmental and social risks and impacts include the installation, operation, and maintenance of terrestrial and mobile internet infrastructure (fiber cable, satellite towers and dishes, small equipment sheds, and boxes), and also to the technical advisory such as developing an integrated digital economy strategy and roadmap, development of a Broadband Policy and plan, development of shared governance, strategic, regulatory and legal frameworks. The AF activities shall mainly cover the digitalization of public financial Management Human resources management, and rehabilitation of existing buildings for PAFEN and are anticipated to result in indirect and direct E&S risks and impacts as the parent project. These TA activities could have potential downstream risks such as the digital divide widening, exclusion and inequality, job displacement skills gap, and privacy erosion. They will all be taken care of in the social assessment.

Key environmental issues for parent and AF activities are related to the installation, operation, and maintenance of terrestrial and mobile internet infrastructure, and retrofitting activities in existing buildings to connect local government offices to broadband, are expected to be: waste management and disposal (e-waste and waste from residual construction materials; health and safety risks for communities and workers during installation and maintenance related to health and safety disruptions to access to properties and businesses; soil erosion and vegetation clearance; and road safety and traffic interruptions. Noise and air emissions (mainly dust) may likely be generated from the use of construction machinery and vehicle movement depending on the scale and scope of project activities and this may cause disturbance to nearby businesses and homes. Though some of the project activities may lead to environmental risks and impacts, these can be effectively addressed with mitigation measures which will be outlined in the updated ESMF document due to AF activities.

Potential positive E&S impacts related to climate change mitigation are identified such as reduction of GHG emissions by enabling e-meetings and access to core business services online and reducing the need for local travel as described more in ESS 3.

The assessment of cumulative impacts(through ESMPs for subprojects during the implementation) will take into account the size of the small innovation fund, the Smart Device Access Scheme, and the simplification and

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digitalization of selected services, including the digitization of government-to-person (G2P), which is expected to have a positive impact by moving gradually to paperless and environmentally friend operations.

Based on the scope of the parent Project and AF’s activities, which includes policy development, technical assistance, capacity building, and infrastructure interventions for which exact locations and extent of the work are not yet known, the Borrower shall update and disclose prior to appraisal stage for AF an updated Environmental and Social Management (ESMF) in line with the World Bank’s Environmental and Social Standards(ESSs) and the World Bank Group Environment, Health and Safety (EHS) Guidelines. The updated ESMF will include an LMP, a SEA/SH Action Plan, and screening criteria for the subprojects based on their level of E&S risk. In addition, a Resettlement Policy Framework (RPF), an Indigenous Peoples Planning Framework (IPPF), a Stakeholder Engagement Plan (SEP), and Labor Management Procedures(LMP), a GRM sensitive to SEA/SH aspects shall be updated and disclosed prior to appraisal stage of the AF. ESIA/ESMP report for the rehabilitation work (mentioned under A.1 of this ESRS) shall be prepared for the rehabilitation work planned under the AF Activities on component 3 during AF project implementation. The mitigation measures put in place under the parent project shall be applied to the AF activities. These E&S instruments shall be updated to take into consideration potential risks and impacts, as well as other mitigation measures necessary under the AF activities. The screening process for financing any known subproject shall be undertaken to determine whether an E&S instrument is required or not to be elaborated before its implementation. New consultations shall be carried out to inform stakeholders of the AF activities, to gather their feedback, and to update the instruments. A Social Evaluation will also be carried out to (i) identify the potential social impacts of AF activities, including those resulting from the proposed changes to human resources management, labor force, and payroll; (ii) establish how vulnerable groups will have equitable access and not be adversely affected by the project's activities; (iii) analyze the risks of project activities on GBV, including SEA/SH and how the project could create or exacerbate contextual risks. Based on the results of the Social Evaluation, appropriate measures shall be incorporated into the respective E&S instruments in the first 6 months of project effectiveness. A manual of operations for the GRM, sensitive to SEA/SH risks, must also be developed prior to the beginning of the bidding processes. If needed, a retrenchment/mitigation plan will be created and disclosed prior to starting the implementation of such activities. The Borrower shall prepare prior to appraisal of AF an updated draft Environmental and Social Commitment Plan (ESCP) which covers all material measures and actions needed to ensure compliance with the ESF requirements and the whole parent and AF Project’s environmental and social instruments as well as implementation details, monitoring and reporting activities.

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ESS2 Labor and Working Conditions

Relevant

ESS2 is considered relevant to the project. Direct workers and indirect workers including contracted workers are anticipated to be hired under parent project activities and AF. Anticipated labor risks and impacts are mainly expected in relation to planned digital infrastructure deployment and maintenance works associated with the expansion of the access network that builds on Burundi’s high fiber density and robust backbone network to expand coverage in remote rural communities and connect education institutions and all related activities (sub-component 1.2. local connectivity access) and government offices (sub-component 2.2. Shared digital infrastructure and public administration capabilities) and AF activities (rehabilitation activities/component 3). Impacts of the labor force on the activities of the AF will be assessed in the social assessment. This shall need to be assessed further to estimate the



nature and the scale of works expected. The LMP prepared for the parent project shall be used for the activities of the AF until the updated version of the LMP is disclosed and adopted.

Among skilled workers targeted by the project, the majority of those involved will be existing government civil servants. As such, these employees shall remain subject to the terms and conditions of their existing public-sector employment, unless there is an effective legal transfer of their employment or engagement to the project. Meanwhile, a majority of the unskilled workers employed through project-financed direct and indirect contracts will be sourced from targeted project sites but are also likely to require some skilled workers from outside of the project area. Due to the nature of these activities, the influx of labor is anticipated albeit at a smaller scale. These individuals will, however, be subject to the requirement of ESS2 in relation to labor and working conditions, including occupational health and safety (OHS) and grievance mechanisms. Likewise, any technical consultants contracted by the project will also need to adhere to such standards. The LMP includes dispositions for community workers if applicable and provisions to prevent child and forced labor among project workers.

ESS2 requirements shall be mandated through the project-updated ESMF and site-specific instruments, bid documents, contracts, and in the PPP agreement, and supervised by the PIU. Some key OHS risks and aspects related to the parent and AF Project to be included in the LMP are: (i) construction activities that may lead to falls and injuries; (ii) handling of heavy loads; (iii) electric shocks; (iv) failure to use proper protective equipment during construction; (v) procedures for safety measures in relation to physical and chemical hazards in the workplace; (vi) emergency preparedness and response procedures; (vii) pieces of training and incident monitoring; and (viii) references to measures to address any potential risks and impacts that may arise from the interaction between (parent and AF) project workers and local communities. OHS risks were further assessed during the preparation of the labor-management procedures (LMP), updated ESMF, and subsequent instruments (such as ESMPs during the implementation). To ensure the health and safety of workers during the operational phase of the project, the Borrower shall develop and implement a Health, Safety, and Environmental (HSE) plan that will be included in the site-specific instruments (C-ESMP), in line with World Bank Group Environment, Health, and Safety Guidelines (EHSGs) for rehabilitation works, including contractual provisions specific to address SEAH risks (Code of Conduct).

There will need to be regular pieces of training on SEA/SH for all the workers involved in the project. The Parent Project has developed a Code of Conduct (CoC) addressing SEA/SH as part of the LMP, including sanctions for related perpetrators. The signing of CoCs will be a condition for employment for all workers. The LMP shall be updated by the Borrower to identify the main labor requirements and risks associated with the project AF activities. The project will also include a GRM sensitive to SEA/SH complaints (GRM-SEA/SH) for labor disputes of project workers. The PIU shall ensure that the ESS2 requirements are incorporated in (a) the contracts between the PIU and the Contractor and any entity supervising the project's civil works; and (b) the contracts between the Contractor and any sub-contractors. All project staff will be provided with information and documentation that clearly presents their terms and conditions of employment.

ESS3 Resource Efficiency and Pollution Prevention and Management

Relevant

ESS3 is considered relevant to the (Parent and AF) projects. This ESS is relevant given risks related to pollution prevention and management, including the safe disposal of used batteries from smartphones, and other hardware that



may contain hazardous e-waste. The operation of certain types of switching and transmitting equipment may require the use of backup power systems, consisting of a combination of batteries (typically lead-acid batteries) and diesel-fueled backup generators for electricity. Operational and maintenance (parent and AF) activities envisioned may also result in the generation of electronic wastes (e.g., old cell phones, nickel-cadmium batteries, and printed circuit boards from computers and other electronic equipment as well as backup power batteries and solar panels. Transformer equipment may potentially contain Polychlorinated Biphenyls (PCBs), while cooling equipment may contain refrigerants (potential Ozone Depleting Substances [ODSs]). The management of impacts/risks during transportation, installation of fiber optical cabler, disposal of used batteries and tires, and other e-waste shall be included in the updated ES (parent and AF projects) as activities identified to be associated with potential environmental pollution and shall be part of site-specific E&S risk management instruments for relevant sub-projects such as rehabilitation work. Plans shall be put in place within the ESMPs and site-specific E&S instruments to ensure that e-waste is disposed of in an environmentally sound and safe manner. UNDP has actually supported the GoB on e-waste policy and management plan, the project shall leverage/build on that support to avoid any duplication. Related technical assistance on e-waste management(EWM) shall be included in the (parent and AF) project implementation if needed. The (parent and AF)project shall include TA targeting e-waste management, which shall include operational support for rolling out the existing e-waste management strategy, including the development of climate-resilient and energy-efficient infrastructure standards and capacity building for the borrower.

Material needed for the rehabilitation works (sand, stones, timber, etc.) shall be obtained from licensed quarries and certified timber suppliers.

Water and energy efficiency measures such as efficient water fixtures, efficient lighting, cooling and heating systems, and other water and energy-related efficiency equipment are a factor in this Project. The updated ESMF shall include specific measures related to water and energy use efficiency during the construction phase of all civil works as well as, during the operational phase and the retrofitted buildings.

The (parent and AF) projects are expected to yield a reduction of CO2 emissions. Based on the nature of both anticipated project activities, these may result in multiple small and diverse sources of emissions, yet individual emissions are not likely to be significant. However, this will be offset by the overall impact expected. By expanding digital access and inclusion adoption and last-mile connectivity (under component 1) and supporting the expansion of end-to-end digital public service delivery enablers (under component 2 and component 3 for AF), the parent and AF projects shall reduce the need for physical presence and associated travel of civil servants (e.g., by car or motorbike), subsequently reducing CO2 emissions. These shall also consolidate the use of existing digital systems and technology used by various government agencies, which is expected to yield significant efficiency gains based on the re-use of shared infrastructure and thus minimize climate impact. Based on the nature and scale of the proposed activities, the preparation of the parent and AF project concluded that the emissions generated by proposed activities are not likely to be significant, and the GHG calculations are not necessary for both projects.

ESS4 Community Health and Safety

Relevant

ESS4 is considered relevant for both the (parent and AF) projects. As noted above, a majority of the unskilled workers employed through project-financed direct and indirect contracts will be sourced from targeted project sites including rehabilitation work sites. However, some skilled workers from outside of the (parent and AF)project areas shall also be required. Due to the nature of these activities, the influx of labor is anticipated albeit at a smaller scale. These activities may have negative risks and effects on the health and safety of the communities surrounding project-related work sites. Anticipated risks and impacts include community health and safety risks associated with construction and/or



rehabilitation works, traffic safety, community exposure to diseases (HIV/AIDS, etc.), risks related to SEA/SH, and hazardous materials. The other potential community health risk relates to the potential for the spread of communicable diseases due to the influx of people in search of work in the project sites.

Also, civil works (even minor) may cause some inconvenience to the local communities as access (particularly road and foot traffic) could be interrupted temporarily. In addition, community health and safety issues for parent and AF projects are expected to include road safety and pedestrian safety during the digging of small trenches and backfilling operations. Thus, as part of the updated ESMF and site-specific instruments, traffic management measures may be developed as necessary to address these inconveniences mainly for AF activities (rehabilitation work). In addition, the Borrower will be required to ensure public safety through appropriate signage and barriers for both projects. The telecom regulator (ARCT- Agence de Regulations des Communications et des Telecommunications) has put in place Guidelines for telecoms infrastructure deployment which include setting up "Exclusion zones" with minimum acceptable physical barriers and appropriate tower fencing facilities to prevent intrusion. The updated ESMF shall take into consideration potential risks and impacts related to the AF activities specifically in rehabilitation work.

The (parent and AF) projects do not anticipate any use of security personnel, but these will follow closely the situation where service providers want to protect their sites during construction and/or rehabilitation and both projects shall recommend unarmed security personnel as per the ESS4 requirements.

The management of community health and safety issues is described in the Parent and AF Project's ESMF and will be integrated into site-specific instruments. Contractors will be required in their C-ESMP to install a safety system (fences and safety guards) around the project sites, as well as place the construction equipment in secured storage during the construction period. The borrower will prepare site-specific E&S risk management instruments, based on the updated ESMF, that include standard operating procedures and good construction management practices, including those proposed in WB EHSGs, and will likewise include a SEA/SH action plan to address SEA/SH risk management as well as response to SEA/SH-related claims. The ESMP will also include mitigation measures for these risks and claims, SEA/SH measures based on the SEA/SH action plan, as well as other potential community health and safety issues to be identified during project implementation. Except for the above risks and impacts (which will be managed through preparing and implementing site-specific instruments), the project is generally expected to result in positive community health impacts, specifically for rural communities and schools that will benefit from internet connectivity, access to smart devices, digital skills, and new digital services.

Possible negative social impacts (subcomponent 1.3) may include typical threats resulting from the exposure to the internet and social media of communities that historically had limited or no access, such as cyber-bullies and online predators. Mitigation measures to be incorporated in project design includes reinforcing consumer protection regulation, educational programs for beneficiaries on cyber safety, sensitization programs on responsible and respectful use of the internet and digital services

A Social Evaluation shall be carried out to assess the potential social risks and impacts of the HRM and PFM reforms on the labor force within 6 months of Project effectiveness. The E&S instruments shall be updated to include specific measures to mitigate the risks and impacts identified in the Social Evaluation within the first 9 months after project effectiveness; Additionally, data privacy and data protection risks and impacts shall be mitigated through (i) establishment of a Data Protection Office and related IT systems; (ii) strengthening of national and sector-level



(financial, telecoms) Computer Security Incident Response Teams (CSIRTs) to enhance threat intelligence, monitoring, and prevention. All these social risks and impacts will be addressed through Project SA’s instrument for the project.

If needed, the client will develop their own Security Risk Assessment (SRA) and its Security Management Plan (SMP), informed by the Security Due Diligence (SDA) carried out by the Bank, during early implementation and before activities start on the ground. However, security personnel will unlikely be employed in this program.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Relevant

This standard is relevant. The project will involve civil works connected to the deployment of digital infrastructure, particularly in rural areas and underserved communities, to help bridge existing last-mile connectivity gaps on the supply side that exist across the country. Investments are likely to be located in already modified areas, while the deployment of fiber optic cables is expected to take place on existing right-of-way (ROW). The footprint of any new cell towers would be minimal. It is expected that some activities will involve restriction on land use and land acquisition. Resettlement impacts are mainly expected to be temporary and largely economical. The Project prepared a Resettlement Policy Framework (RPF), which will be disclosed before the appraisal, to inform the land acquisition principles, eligibility, and methodology for Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement. The RPF provides guidance on the process for preparing, reviewing, approving, and implementing subsequent Resettlement Action Plans (RAPs), where necessary, and prior to the commencement of any civil works. The RPF also provides guidance on the process required for public consultations and the establishment of a functional GRM for ESS5-related aspects and disclosure requirements.

The ESMF shall also be updated to take into consideration potential risks and impacts related to the AF activities not directly related to ESS5.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

Not Currently Relevant

ESS6 is considered not relevant to the parent and AF project, even though the project activities have a nationwide impact. Also, ESS6 is not relevant to the rehabilitation work planned under the AF activities because this will be applied to the existing building site. For both (parent and AF activities), investments are likely to be located in an already modified area at small-scale civil works in rural and urban settings. At the same time, the deployment of fiber optic cables is expected to take place on existing right of way (ROW) to expand rural last-mile connectivity. The footprint of any new cell towers would be minimal. AF activities for rehabilitation component 3 will generate E&S impacts on site(existing buildings) which shall be addressed by mitigation measures contained in ESIA/ESMP to be elaborated for this subproject.

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

Relevant

ESS7 is considered relevant to the project at this stage. Batwa communities are present across the territory of Burundi and are considered vulnerable. Project activities will not disproportionately impact IP negatively. An IPPF has been updated with AF elements for disclosure prior to project appraisal to provide guidelines on how to avoid adverse

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impacts of the project on Batwa communities and ensure their access to services and potential participation in the different works and other project benefits. Project activities are not anticipated to cause relocation or impact the resources or cultural heritage of Batwa groups. The IPPF and the SEP include provisions for culturally appropriate consultation with Batwa communities.

The social evaluation shall assess if the AF activities (i.e. HRM and PFM modernization, biometric identification) shall incur potential specific social risks and impacts on Batwa employees such as discrimination, exclusion from project benefits, etc. E&S instruments shall be updated to incorporate the necessary mitigation measures. The social evaluation to be carried out will also further analyze whether the proposed AF activities may have potential risks and impacts on Batwa and may include additional recommendations related to ESS7 communities.

ESS8 Cultural Heritage

Relevant

ESS8 is considered relevant to the (parent and AF) projects as both project activities are the deployment of fiber optic cables underground, where cultural heritage artifacts can be found. The updated ESMF shall provide guidance regarding chance finds procedures. Clauses on potential discoveries shall be included in all work contracts, even in cases where the probability is very low. The ESIA/ESMPs for the rehabilitation work planned under the AF Activities, component 3 shall include a chance finds procedure in case of accidental discovery of cultural remains, in accordance with national legislation and in compliance with ESS8.

ESS9 Financial Intermediaries

Not Currently Relevant

ESS9 is considered not relevant to the parent and AF projects, but if there are any financial intermediaries to support the parent and AF projects, this ESS9 will be revised accordingly.

ESS10 Stakeholder Engagement and Information Disclosure

Relevant

The Project involves various stakeholders. The Project has incorporated inputs from different stakeholder groups, including those directly affected as well as those who have other interests in the proposed project interventions. The key stakeholders include but are not limited to government authorities, development partners, the private sector, consumer associations, and local communities.

The SEP developed for the parent project, available at <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/099245003042239706/stakeholder0en0ns0project000p176396>, shall be updated and disclosed before appraisal with specific provisions for the different AF project components. New consultations are being carried out to inform stakeholders of the AF activities, gather their feedback, and update the E&S risk management instruments. No new stakeholders were identified. The updated SEP shall be complemented by an addendum with the results from the consultations and will be simplified, retaining only the most relevant information. The project will ensure that the needs and voices of vulnerable people (e.g., female-headed households, elderly, youth, people with disabilities, internally displaced people, etc.) are heard through inclusive consultation and participation to ensure that they can equally participate and benefit from the project. The project also includes consultations with civil society organizations (CSOs) and other relevant parties on improving access to project benefits for people with disabilities. Informed by the consultation process, the project design has mainstreamed respective provisions on gender



equality and the mitigation of gender-based violence in digital businesses to be implemented; to avoid potential adverse impacts and ensure strong participation of women in the development of the country’s digital sector.

A GRM, sensitive to SEA/SH aspects, has been developed as part of the SEP. The GRM of the Parent Project is not yet operational. The project will establish a digitally enabled Grievance Redress Mechanism (GRM), integrated into existing GRM structures in communities targeted and with those already managed by the Client, wherever possible. The GRM will also serve as a platform for continuous feedback from project-affected communities, and other interested stakeholders. The GRM will pay particular attention to confidentiality, and appropriate cultural sensitivities and allow for anonymous complaints. The GRM will be sensitive to SEA/SH incidents and include procedures for treating and resolving SEA/SH complaints in an ethical and confidential manner, with a human-centered approach, as well as a manner that is proportionate to the potential risks and impacts. A manual for the operationalization of the GRM shall be developed prior to the beginning of bidding processes.

B.2 Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

B.3 Other Salient Features

Use of Borrower Framework No

Application of the Borrower’s Framework may not be initially feasible. However, this will be explored further, including through the review of site-specific standards instruments (such as ESIAs/ESMPs) for sub-projects and through the issuance of clearances for their implementation as per the national laws of the Government of Burundi, during project implementation, supplemented with specific provisions from the project’s E&S risk management instruments.

Use of Common Approach No

None

C. Overview of Required Environmental and Social Risk Management Activities

C.1 What Borrower environmental and social analyses, instruments, plans and/or frameworks are planned or required during implementation?

The following documents shall be prepared, disclosed, and adopted by the PIU:

- i. updated ESMF (including a SEA/SH Action Plan), SEP with GRM sensitive to SEA/SH aspects, LMP (with a code of conduct that includes SEA/SH provisions), RPF, IPPF: Updated and disclosed prior to AF Appraisal
 - a. An updated SEP with the results of the consultations on the new AF activities: prior to AF appraisal;

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- ii. Social Evaluation: within the first 6 months of AF project effectiveness;
 - a. Based on the results of the Social Evaluation, appropriate measures shall be incorporated into the respective E&S instruments (if needed, a retrenchment/mitigation plan will be created, depending on the potential negative impacts on the labor force: within the first 9 months of implementation;
- iii. ESMPs for subprojects: during implementation, including SEA/SH measures informed by the SEA/SH Action Plan, to be disclosed prior to the beginning of subproject works.
- iv. Security Risk Assessment and a Security Management Plan: if needed during early implementation and before the beginning of activities, depending on the results of the security due diligence.

III. CONTACT POINTS

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V. APPROVAL

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