



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)
Tonga	EAST ASIA AND PACIFIC		
Project ID	Project Name		
P181090	Second Additional Financing For Tonga Safe And Resilient Schools Project		
Parent Project ID (if any)	Parent Project Name		
P174434	Tonga Safe and Resilient Schools Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Urban, Resilience and Land	Investment Project Financing	7/2/2024	9/30/2024
Estimated Decision Review Date	Total Project Cost		
5/8/2024	28,250,000		

Proposed Development Objective

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

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 project will include four components:

Component 1: Component 1. Improving Safety and Resilience of Education Facilities

This Component will improve the safety and resilience of selected education facilities in Tonga and con-tribute to the reduction of to reduce disaster and climate vulnerabilities from more frequent adverse weather events. This



Component will finance the design, supervision and works contracts to enhance the safety and resilience of selected education facilities throughout Tonga through structural strengthening, functional im-provements, and the in-situ replacement of existing facilities. Additionally, this Component will support improved operation and maintenance of education facilities and multi-year investment planning to lay the foundation for future scaling of investments, and the long-term resilience of the sector. These objectives will be achieved through two sub-components:

- (a) Resilient Infrastructure Investments; and
- (b) Strengthening Education Infrastructure Planning and Maintenance

Component 2. Improving Learning and Teaching Conditions in Early Childhood, Primary and Secondary Education

This component will strengthen data management systems within the education system in Tonga and improve the quality of teaching. These objectives will be achieved through four sub-components:

- (a) Establish a comprehensive Education Management Information System (EMIS); and
- (b) Upgrading curricula and assessments.
- (c) Supporting Quality Primary and Secondary Education, and Promoting Early Childhood Education
- (d) Improving Learning and Teaching Conditions

Component 3: Contingent Emergency Response Component (CERC)

This component is designed to provide an immediate response in an event of an "Eligible Crisis or Emer-gency," (as defined in the legal agreement), by enabling Tonga to request the World Bank to re-allocate project funds to support emergency response and reconstruction.

Component 4. Project Management

The objective of this component is to provide efficient and effective implementation support for the proposed project. A designated Project Management Unit (PMU), will be created specifically to support MET in the areas of Project management, coordination, implementation and supervision. Individual consultants will be recruited to the PMU to support procurement and contracts management, financial management, environmental and social risk management, monitoring and evaluation, reporting, and citizen engagement and communications activities under the Project; all through the provision of technical assistance, Training, and Operating Costs.

D. Environmental and Social Overview

D.1 Overview of Environmental and Social Project Settings

The Kingdom of Tonga consists of 169 Islands, 36 of which are inhabited, and a total population of around 104,400. The country lies in the South Pacific and covers a total land area of 748 square kilometers. Around three quarters of the population are based on the main island of Tongatapu, while other major islands and island groupings include 'Eua, Ha'apai, Vava'u and the Niuas. The population is primarily Polynesian, with a literacy rate close to 99 per cent and a relatively low incidence of extreme poverty (approximately 1% of the population). Tongans are a homogenous



and family/church-oriented society with their location making it one of the most geographically remote nations from major centers of economic activity in the world.

Tonga is particularly vulnerable to climate change and natural hazards. Catastrophic risk modeling by the World Bank indicates that Tonga is expected to incur, on average, US\$15.5 million per year in losses due to earthquakes and tropical cyclones and losses of up to 14% of GDP in years affected by specific disasters. According to the World Risk Report 2012, Tonga is the second most at risk country from disasters out of 173 countries surveyed. Tropical Cyclone (TC) Gita, classified as a Category 4 storm, made landfall in Tonga on February 12, 2018. Its impact on the country's gross domestic product (GDP) was estimated to be around 38 percent. The landfall of Tropical Cyclone Harold on April 9, 2020, caused substantial destruction and financial setbacks amounting to 12 percent of the country's gross domestic product. A more recent catastrophe that profoundly affected the nation was the Hunga Tonga – Hunga Ha'apai (HT-HH) volcanic eruption of January 15, 2022, which was followed by ashfall and tsunami waves. The tsunami inflicted extensive destruction upon various sectors, including infrastructure, schools, buildings, roads, electricity and water supply networks, tourism facilities, livestock, and fisheries.

Schools in Tonga are exposed to a range of geophysical and hydrometeorological hazards including earthquakes, tropical storms (strong wind), tsunami, flooding (both coastal and inundation), liquefaction, landslide (both slope collapse and debris impact), volcanic events (both pyroclastic flow and ash fall) and extreme heat. The impact of the HT-HH eruption and tsunami and TC Gita in 2018 highlighted the vulnerability of school infrastructure in Tonga to climate and disaster hazards, and the need to improve the resilience of building stock in Tonga to avoid similar impacts to education facilities in the future. The GoT has committed significant resources to reconstruct and strengthen Tonga's school building portfolio, however significantly more investment is needed to enhance the safety, structural adequacy and basic sanitary requirements in accordance with the Tonga National Building Code and associated Australian and New Zealand Standards.

The parent project, the Tonga Safe and Resilient Schools Project (the Parent Project) was approved on December 9 2021 and is comprised of four components:

(i) Improving Safety and Resilience of Education Facilities;

(ii) Establishment of an Education Management Information System ("EMIS") and improved quality of curricula and assessments;

- (iii) Contingent Emergency Response; and
- (iv) Project Management.

The Ministry of Education and Training (MET) is responsible for the overall implementation of the project, and is the implementing agency for Components 1, 2 and 4. The Ministry of Finance (MoF) is the implementing agency responsible for Component 3. Early implementation of activities were originally negatively impacted by the HT-HH eruptions and tsunami, and Tonga's first COVID 19 outbreak, all of which occurred within the first six months of approval of the Parent Project. The Project Management Unit (PMU) is now fully staffed and key progress has been made across project components.



There remains an urgent need to invest in safer, climate change and disaster resilient, and inclusive school infrastructure in Tonga. Tonga has a high proportion of school buildings that fail to meet the safety, accessibility, structural adequacy and basic sanitary requirements of the Tonga National Building Code and associated Australian and New Zealand Standards, which pose a substantial risk to lives, buildings and education continuity in the context of a future cyclone or earthquake, and as the climate warms. Recent risk modelling developed as part of the World Bank Resilient Public Facilities in Pacific Island Countries Technical Assistance (P152037) indicate that natural disasters will cost the Tonga education sector and estimated US\$7.38 million in Annual Average Losses driven primarily by strong winds, earthquakes and floods. The modelling indicates a minimum works budget of US\$ 96 million is needed to reduce these losses and strengthen the safety and resilience of school facilities in Tonga. There is also a high need to support the improvement of learning and teaching conditions that could ultimately contribute to better education quality. Tongan students struggle to acquire the foundational skills that are paramount for proper and continued learning, as well as future success in the labor market. The results of assessments highlight the need to improve learning and teaching conditions in Tonga. Assessment findings point to a gap in foundational skills that need to be strengthened to support continued learning and future success of Tongan students in the labor market.

The proposed Additional Financing (AF) will support the scale up of Component 1 and Component 2 activities of the Parent Project to enhance its development impact through: i) for Component 1, the scale up of resilient investments in the broader education infrastructure portfolio and the pilot maintenance program to reduce disaster and climate vulnerabilities from future hazards and more frequent adverse weather events; and ii) for Component 2, improvement of the conditions for teaching and learning in early childhood, primary and secondary education, as well as to promote early childhood education. Under Component 4 on Project Management, the AF will finance the additional Project Management costs associated with the scale up of activities under Component 1 and Component 2.

Under the AF, activities under sub-component 1.1 on resilient infrastructure investment include the carrying out of a program of civil works to:

(i) construct new Approved Education Facilities;

(ii) retrofit and strengthen existing Approved Education Facilities; and

(iii) undertake minor repair and maintenance works.

Support may also be provided for the operations of the Approved Education Facilities including through, inter alia, the purchase and distribution of teaching and learning materials, equipment, and furniture. The subcomponent will also finance assessments and studies, and including the monitoring of the contractors' environmental and social management plans (CESMPs). Component 2 will include two additional sub-components. Activities under sub-components 2.3 include curriculum revision, professional development of teachers, student counselling, student campaigns. Under sub-component 2.4, activities relate to the improvement of teaching conditions in middle and high schools including establishment of science corners and science laboratories, financing of ICT equipment and air conditioning units, as well as purchase and distribution of outdoor playground equipment and indoor play zones.

The Parent Project and first and second AF (collectively referred to herein as 'the Project') aim to enhance the safety and disaster resilience of selected school facilities across Tonga. The Project Development Objective (PDO) will be unchanged under the AF, which is to:



(i) enhance the safety and resilience of selected education facilities;

(ii) improve the quality of data-driven education management, curricula and assessments in the selected educational programs; and

(iii) in case of an Eligible Crisis or Emergency, respond promptly and effectively to it.

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

MET is the implementing agency for the parent project and this implementation arrangement will continue under the AF. A PMU has been established within MET under the parent project to effectively support the management and implementation of key project-related tasks for the Project. MET chairs a Project Steering Committee, which provides strategic oversight and coordination of the project, and this will continue under the AF. The Steering Committee comprises of representatives from relevant line ministries, for example, Ministry of Finance (MOF), Ministry of Infrastructure (MOI), Ministry of Meteorology, Energy, Information, Disaster Management, Environment, Climate Change and Communications (MEIDECC) and Ministry of Lands and Natural Resources (MLNR).

MET has prior experience working on World Bank-funded projects and management of E&S risks under the Operational Policies through their role on Tonga Skills and Employment for Tongans (SET) project, as well as experience in implementing the World Bank Environmental and Social Framework (ESF) under the parent project. The PMU includes an E&S officer who has been in place since April 2022. The E&S officer is responsible for day-to-day E&S risk management during implementation. The officer has adequately managed risks to date during implementation with E&S performance currently rated as Satisfactory for all relevant ESSs. The PMU E&S officer will continue to be supported by two dedicated E&S resources established within the Central Services Unit (CSU). The CSU, based in the Ministry of Finance (MoF), is experienced in the preparation and implementation of World Bank-funded projects and with the ESF. The CSU will also continue to provide additional capacity building during implementation.

The experience of the PMU E&S officer in implementing the WB E&S requirements, together with oversight and support from the CSU Safeguards Team, will provide sufficient capacity to effectively manage the E&S risks and impacts under the AF.

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

A. Environmental and Social Risk Classification (ESRC)

A.1 Environmental Risk Rating

The Environmental Risk for both the Parent Project and the AF is considered Moderate given risks and impacts are not likely to be significant, large or complex and are expected to be predictable, temporary and reversible. Risks are expected to be site specific with low probability of serious adverse effects to human health or the environment and easily mitigated in a predictable manner. The AF will fund a scale up of works under the Parent Project. Under component 1 the AF will fund construction of new approved education facilities, retrofitting of existing facilities and minor repair and maintenance work. Given the AF provides funding for a greater number of schools to be included rather than new scope under component 1, environmental risks are unchanged from the parent project and will be

Moderate

Moderate



managed via the same risk management approaches. Under component 2 scale up activities related to improvement of teaching conditions include procurement of science equipment, ICT equipment, air conditioning units and outdoor play equipment which will require end-of life waste management and may generate safety risks relating to equipment installation/assembly. An Environmental and Social Management Plan (ESMP) was prepared, disclosed and adopted under the Parent Project and has been updated to assess minor additional environmental risks associated with component 2 activity scale up. The ESMP notes that key risks for civil works under component 1 include hazardous materials management (including potentially asbestos and lead), sourcing of construction materials from unsustainable sources, OHS risk, air quality impacts due to dust, noise impacts, construction waste management, soil and erosion management during construction and loss of vegetation through site clearing. Operational risks associated with the construction/ refurbishment of school facilities include management of operational waste and potentially fire safety risk. The school based operation and maintenance (O&M) training and capacity building program has potential to create OHS risk to community members during hands-on training activities and ongoing maintenance activities with the management of waste potentially required. Technical Advisory (TA) activities proposed for the project under Components 1&2 are designed to strengthen MET's capacity and improve the quality of curricula and assessments in Tongan schools. The risk of downstream impacts is considered low given the nature of TA activities, the positive outcomes and the long-term engagement between the World Bank and MET. The above risks remain the same for the AF. Procurement of science equipment and ICT equipment, air conditioning units and outdoor play equipment under component 2 has potential to generate health and safety risks for workers, students and teachers and to generate downstream waste including e-waste.

A.2 Social Risk Rating

Moderate

Social Risk for both the Parent Project and the AF is Moderate, given that risks and impacts are not likely to be significant, large or complex and are expected to be predictable, temporary and reversible. Risks are expected to be easily mitigated in a predictable manner. No closure of schools, nor relocation of students is expected during building and upgrade activities, and the works are not expected to impact educational services. Minor temporary relocations may occur to other buildings/facilities within the site, however, activities will be staged to minimize impacts to educational services. The overall social impact of the Project is expected be positive with improved access to education, improved education systems and teaching standards, more resilient public sector buildings with potential emergency/ evacuation centers and water and sanitation hygiene (WASH) facilities included in the outcomes. Given that activities through the AF under Component 1 largely involve scale up of existing activities, social risks under Component 1 remain unchanged. Key social risks include: (i) Community health and safety due to interactions with construction workers and construction equipment; (ii) Exposure of workers and building occupants (including school aged children) to potentially hazardous materials such as disturbed asbestos, and dangerous activities, such as machinery, before and during demolition and or construction/rehabilitation activities; (iii) Child safety and impacts to the school community due to the proximity of workers to school children and school staff; (iv) Impacts of construction impacts such as noise, dust or vibration v) Minor impacts to community or livelihoods due to restricted or temporarily reduced access to sites and regular travel routes; vi) Risks to vulnerable groups (poor, disabled, elderly, isolated or ethnic groups) as a result of construction activities and the movement of people; vii) Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) risks during construction; viii) potential impacts to land, or access to land, during construction and operation of works, ix) failure to provide adequate information and involvement in decision-making about the impacts of the activities on students and families. These impacts are considered temporary and will be subject to standard accepted mitigation measures to be implemented by the contractor. The possible need for temporary access to nearby land for lay down and construction facilities will be assessed on a case by case basis. If



temporary land use is required as a result of laydowns or compounds, an MOU or lease agreement will be developed. Procurement of school equipment under sub-components 2.3 and 2.4 have the potential to generate relate to social risks. There are also sporadic instances of corporal punishment in government schools in Tonga by teachers of students, and activities are included under the AF to address risks associated with corporal punishment.

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

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

Physical works under Component 1 include renovation and construction of classrooms, water sanitation and hygiene (WASH) facilitates, teachers' housing, and other facilities for both government and non-government schools. Key E&S risks associated with these works include:

i) risks associated with the management of hazardous materials (including potentially asbestos and lead);

ii) resource efficiency risks associated with sourcing of materials;

iii) OHS risks; iv) air quality impacts via construction dust; v)noise impacts;

vi) Risk of improper construction waste; vii) Soil and water risk due to improper management of erosion and sediment controls; viii)Community health and safety risk, particularly safety risk to school children and communities during construction;

ix) Minor loss of vegetation during site clearing;

x) Minor loss of, or loss of access to assets and land to allow for storage sites to be established in a voluntary and short-term manner;

xi) Limitations in access to the project by vulnerable groups considering those schools which would not be included in the project based on prioritization;

xii) Risks associated with the purchase and supply of school equipment such as science equipment, ICT, and playground equipment;

xiii) risks to beneficiaries due to the issue of corporal punishment in Tongan schools; and

xii) SEA/SH risks associated with interactions between project workers and host communities.

These risks are expected to be temporary, readily managed, site specific, predictable and mitigation is readily available. The overarching ESMP which was adopted for the parent project has been updated, disclosed and adopted for the AF. The ESMP already addressed E&S risks for component 1 works and has been updated to address risks and impacts associated with the supply and installation of equipment under Component 2 including waste management requirements, safe storage requirements for science equipment and requirement to install equipment in line with manufacturer's requirements.



The ESMP provides high level E&S impact assessment for expected activities. The criteria for school selection for both government and non-government schools are documented in the Project Operations Manual. The ESMP requires that proposed physical works are screened via a site assessment checklist included as an annex to the ESMP. The site assessment checklist requires assessment of specific construction and operational risks for each site (including site specific risks, e.g. flood risk) and the selection of relevant mitigation measures guided by a provided list of generic mitigation measures. Generic mitigation measures include construction stage environmental, social and OHS mitigations relevant to proposed infrastructure typologies, including materials sourcing and hazardous materials management measures. The ESMP also includes mitigation measures for the operation of facilities such as fire safety and operational waste management measures. The ESMP requires that aggregate (particularly sand) be sourced from permitted quarries and suppliers only and prohibits the use of illegally mined sand.

The site assessment checklist screens the requirement for contractors to prepare a CESMP or more limited environmental and social code of practice (ESCOP) based on the works to be completed at each site and the E&S risks identified, with a CESMP required for higher risk activities. The ESMP includes a template and guidelines for an CESMP and ESCOP and includes the management of OHS risk in accordance with environment, health and safety (EHS) guidelines and good international industry practice (GIIP). Where required, CESMPs will include elements such as appropriate fencing to reduce the risk to community members and school children, prior to the commencement of construction works. The Environmental and social commitment plan (ESCP) requires the preparation of the site assessment checklist for all physical works prior to bid preparation. The Project includes the construction of ramps and pathways which are essential to improve the accessibility of school facilities. Universal access will be considered in designs.

The school community-led O&M program to be supported under Component 1 may result in OHS risk to the community. With the support of World Bank technical assistance, an Operation and Maintenance Technical Manual and Training of Trainers (ToT) Manuals have been developed for a range of common structural typologies in Tonga. The AF includes the scale up of technical assistance and support to implement the Operation and Maintenance program and improved asset management practices in an increased number of schools. The parent project and AF will continue to deliver OHS training to contractors and school community members involved in maintenance activities. The templates also address the management of maintenance waste.

Downstream impacts of TA activities under the Project are anticipated to remain largely positive. To manage the minimal risk for TA activities, the ESCP requires that Terms of Reference (ToRs) for technical studies, advisory services and the recruitment of staff consultants be screened for potential E&S risks and to ensure that advisory services comply with the objectives of the ESF and GIIP. MET is currently collecting and storing student data, with the EMIS expected to strengthen this process whilst considering privacy and data storage risks.

Similar to the parent project, the AF may give rise to SEA/SH risks and impacts, particularly in relation to the presence of workers in a school setting. SEA/SH risks have been assessed as low and will continued to be managed using standard measures provided in E&S instruments, including orientation to workers on SEA/SH and requirement to sign a workers code of conduct prior to commencing works.

ESS2 Labor and Working Conditions

Relevant



ESS2 is relevant as the Project will involve both direct workers and contracted workers. It is not expected that community workers will be engaged. The Project may involve the use of some primary supply workers such as workers at quarries supplying materials. Workers would be engaged in compliance with all relevant Tongan legislation and requirements under ESS2. A small number of workers will be required for each school works. It is expected that workers will generally be from Tonga though it is possible that the workers will not be from the same community or island where work take place. Adequate mitigation will be identified to manage risks associated with workers being on a school site and have been included in the ESMP.

A Labor management procedure (LMP) has been prepared under the parent project and will applied to AF to protect workers and manage labor and working conditions. The risks associated with labor and working conditions have been assessed within the LMP. The LMP addresses worker conditions and relationships, non-discrimination and equal opportunity, and workers organisations. The LMP also includes reference to the worker GRM which is the responsibility of the Tonga Public Service Commission and sits within the Office of the Prime Minister.

The CSU and World Bank E&S specialists will assist with reviews of TOR for contractors and will ensure adequate provision for E&S mitigation management including OHS management is included in TOR. Construction OHS risks are expected to be managed through the implementation of appropriate management measures, including a requirement for OHS induction training for all contractors.

ESS3 Resource Efficiency and Pollution Prevention and Management

Relevant

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

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

Construction pollution risks will continue to be managed via the implementation of the project ESMP with site specific mitigation to be included in a site assessment checklist to be completed prior to procurement. The site assessment checklist also determines the need for contractors to a Contractor CESMP or ESCOP based on the works to be completed at each site and the E&S risks identified. The ESCP includes the requirement for asbestos surveys to be completing during design to confirm the presence or absence of asbestos. No asbestos has been identified at schools so far during the implementation of the project.

The school community-led O&M program may involve activities which could result in pollution risk (for example use of hazardous materials during maintenance activities). The ESCP require MET to develop an ESCOP for the program include



management of any hazardous materials which are expected to be required during maintenance activities in accordance with EHS guidelines and GIIP.

There would also be some operational risks associated with the infrastructure component of the project such as the management of sewage, greywater and wastewater. Designs for WASH facilities include appropriate controls to prevent release sewage, greywater and wastewater to the environment.

The AF will fund procurement of ICT equipment, science and playground equipment. The ESMP has been updated to require consideration of end-of-life waste management for these items at the time of purchase.

ESS4 Community Health and Safety

Relevant

ESS4 is relevant to the Parent Project and AF activities as it will include physical works which could pose a health and safety risk to community members. Community health and safety risks are typically associated with construction works including noise, dust and vibration and proximity to work sites for students and the school community. The parent project ESMP includes generic mitigation and management measures which can be drawn on by contractors to develop site specific CESMPs or ESCOPs as appropriate to the type of works being completed at each site. No additional risks under Component 1 have been identified for the AF, however the ESMP has been updated to include measures to mitigate against risks associated with the installation of science equipment and outdoor playground equipment under sub-components 2.3 and 2.4. The need for a CESMP or ESCOP will be determined based on a site assessment checklist which will be completed for each site prior to preparation of bidding documents using the template in the ESMP. Where required, CESMPs will include requirements such as appropriate fencing, signage, pedestrian/vehicle safety, waste management, dusty and noise controls and management practices to reduce the risk to community members and school users, prior to the commencement of construction works. The CESMP will also include traffic management measures which consider access requirements and possible traffic impacts to local neighbors, school children and the community accessing schools or surrounding sites, construction working hours and noise types/levels. To separate workers from children, a fenced off work area will be agreed as part of the CESMP. The CESMP will also consider scheduling of works in order to minimize impacts to school users such as scheduling works during school holidays where possible. Other measures such as unique safety vest colorings and identification badges should also be considered during development of the CESMP. Adequate temporary WASH facilities for contractors should be established prior to start of works and should be separate from those used by student/staff with all land tenure clearly established and acceptable prior to selection of schools. Project designs will adhere to universal access principles and siting of construction ancillary facilities will take these principles into consideration.

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

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



SEA/SH risks for the parent project and the AF have been assessed as Low and will be addressed and mitigated through standard measures outlined in E&S instruments including the ESCP, ESMP and SEP. The Grievance Redress Mechanism (GRM) will include referral pathways for grievances related to SEA/SH. The project will continue to engage with the Women and Children Crisis Centre (WCCC), a key GBV service provider in Tonga, for the management of project-specific SEA/SH risks. MET has committed in the ESCP to the implementation of a workers Code of Conduct (CoC) for the parent project and AF which includes provisions for SEA/SH prevention. The CoC, SEA/SH training and provision of a GRM with referral pathways for SEA/SH-related grievances are as mitigation measures in the ESMP and LMP.

Both the Parent Project and AF (collectively referred to as 'the Project') aim to enhance the safety and disaster resilience of selected school facilities across Tonga. The project will undertake detailed building-level structural condition assessments, geotechnical and other site investigations, feasibility design studies, and investment planning for activities. Engineering designs will incorporate multi-hazard resilience measures as appropriate to site-specific exposures.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

ESS5 is relevant to the project as both the parent project and AF may require voluntary land donation or land-leasing. It is expected that all land use will be on public or government-owned land. No involuntary resettlement impacts are anticipated as a result of this project, as all civil works are expected to be carried out within existing school footprints and/or publicly owned land. If temporary land use is required as a result of laydowns or compounds, an MOU or lease agreement will be developed. Criteria for voluntary land donation and land-leasing has been included in the ESMP. Under the AF, the process followed under the parent project will continue to be followed for confirming land tenure including land use arrangements. Land tenure including existing leases and land use arrangements will need to be confirmed before the commencement of civil works.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Relevant Resources

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

The Parent Project and AF will fund construction and renovation of small-scale infrastructure which may require clearing of small amounts of vegetation. Vegetation impacted by the works is located within the existing footprint of brownfield sites and is not significant, nevertheless impacts will continue to be managed through the implementation of standard environmental management measures as identified in the ESMP including screening via a site assessment checklist for each site and including mitigation measures as necessary in a Contractor CESMP or ESCOP.

There is a risk to sustainable management of living resources due to the potential to source construction materials from unsustainable sources, for example the procurement of sand which has been mined from beaches. The ESMP for the

Relevant



project includes conditions for materials sourcing (requirement to source materials from licensed quarries only) and prohibits procurement of illegally mined sand.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Not Currently Relevant Local Communities

ESS7 is not relevant for Tonga. There are no known distinct IP groups that meet the criteria in ESS7 as the vast majority of people are Tongan. Cultural needs of this group will be managed through culturally appropriate stakeholder engagement informing project design and implementation.

ESS8 Cultural Heritage

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

ESS9 Financial Intermediaries

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

ESS10 Stakeholder Engagement and Information Disclosure

ESS10 is relevant to the Parent Project and AF. Stakeholder consultations have been undertaken during implementation of the parent project and have been used to inform the AF. Key stakeholders include core governmental agencies such as MET, MEIDECC, MOI, and MLNR, as well as the Ministry of Internal Affairs, principals, teachers, students, parents (including representatives of the Parents and Teachers Association), District officers and all affected parties, vulnerable groups including isolated communities or minorities and other interested parties. The Stakeholder Engagement Plan (SEP) prepared under the parent project will be used for the AF and no significant changes to stakeholders or project activities requiring revision to the SEP have been identified. The SEP includes the identification of key stakeholders, describes the process and modalities for sharing information on the project activities and seeking and incorporating stakeholder feedback into project design and implementation, and outlines strategies for information disclosure and information dissemination.

The parent project and AF is largely well supported with positive community benefit expected to improve education, access and infrastructure sustainability. There is a risk of failure to provide adequate information and involve the local community and families regarding the staged construction programming aimed at providing a continuous education service. This risk is minimal and unlikely if the PMU ensures the involvement and continued engagement of the school community and administration in project planning. A grievance redress mechanism (GRM), established for the uptake and resolution of project-related grievances and included in the SEP, will continue to be operational under the AF.

B.2 Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

No

Not Currently Relevant

Not Currently Relevant

Relevant



OP 7.60 Projects in Disputed Areas

B.3 Other Salient Features

Use of Borrower Framework

Use of borrower framework was not considered for the Parent Project and this approach will be followed for the AF.

Use of Common Approach

N/A

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 instruments have been prepared under the Parent Project and will apply to implementation under the AF:

- Environmental and Social Commitment Plan (ESCP)
- Stakeholder Engagement (SEP)
- Environmental and Social Management Plan (ESMP)
- Labor Management Procedures (LMP)

The ESMP prepared under the Parent Project has been updated under the AF to address potential E&S risks and impacts arising in relation to additional activities under sub-components 2.3 and 2.4 including the procurement of science equipment, ICT, and outdoor playground equipment, and to highlight measures to address the issue of corporal punishment which give rise to risks to beneficiaries under the project.

The ESCP includes measures and actions to comply with the ESSs including: retaining a full-time local E&S officer in the PMU; regular reporting; notification of incidents and accidents; carrying out E&S screening reports/assessments prior to the start of works for which a CESMP or ESCOP is required in accordance with the ESMP; inclusion of the ESMP, ESHS measures and requirements into procurement documents; requirement for final CESMPs before commencement of civil works; WB E&S Specialist review of ToR and TA activities to ensure compliance with ESF and GIIP requirements.

III. CONTACT POINTS

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No

No



IV. FOR MORE INFORMATION CONTACT

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V. APPROVAL

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