Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 11/04/2022 | Report No: ESRSA02287

BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Brazil	LATIN AMERICA AND CARIBBEAN	P178993	
Project Name	Mato Grosso Resilient, Inclusive, and Sustainable Learning Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	11/17/2022	2/14/2023
Borrower(s)	Implementing Agency(ies)		
STATE OF MATO GROSSO	SEDUC - Secretaria de Estado de Educação, SECRETARIAT OF EDUCATION - MATO GROSSO		

Proposed Development Objective

The objective of the project is to support the state of Mato Grosso to improve teaching practices, and schools' digital readiness and learning environments.

Financing (in USD Million)	Amount
Total Project Cost	100.00

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

No

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

The proposed Project would be financed through a proposed IBRD loan in the amount of US$100 million, using an Investment Project Financing (IPF) with Performance-Based Conditions (PBCs) lending instrument. The objective of the project is to support the state of Mato Grosso to improve teaching practices, and schools' digital readiness and learning environments. The Project aims at supporting system-wide activities to tackle the recovery of the learning

loss because of the Covid-19 negative impact. The Project also intends to support a more conducive learning environment and to narrow the digital divide to foster inclusion. The scope of the Project is general education (covering preschool throughout secondary education), but each component would focus on different levels of education to achieve the development objectives.
The project will be structured into four Components. Component 1 will support pedagogical and school management interventions to address students' learning recovery and acceleration. Component 2 will improve the digital conditions for teaching and learning through better digital infrastructure of state schools and SEDUC and Component 3 will support the rehabilitation of school infrastructure and complementary strategies to promote safer, inclusive, greener, and more resilient learning environments. 58. Component 4 will support Project coordination, capacity building of SEDUC, and the implementation of Monitoring and Evaluation (M&E) activities.

D. Environmental and Social Overview

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

The operation will have statewide relevance and will focus on the state schools network. All Project activities will take place in existing school buildings and proprieties of the Secretariat of Education - Mato Grosso (MT) and will not be located in existing protected areas under IUCN categories I, II, III and IV.
Located in the West-Central region of Brazil, MT has a territorial extension of 903,207.05 km² and a population of 3,526,220 inhabitants – 81.8% living in urban areas. Demographic density is low (3.4 inhabitants/km²) and state HDI equals 0.725. MT occupies a prominent position on the national scene due to the natural wealth of three important Brazilian biomes: 53% of its territory is located in the Amazon biome, 40% in the Cerrado and 7% in the Pantanal. The climate – high degree of insolation, regularity of rainfall and high rainfall index – and the topographical relief – not very rugged – favor the development of agribusiness. The extensive environmental capital and the future profitability of the agriculture sector are threatened by growing deforestation, large forest fires and other phenomena related to climate change.
The average nominal monthly household per capita income (2020) is the 8th highest among Brazilian states (BRL1,401). However, in November 2021, about 30.5% of its population were making less than half the minimum wage (approximately US$110/month or 3.67/day) and were registered in the Federal Unified Registry for Social Programs (CadÚnico). Extreme poverty increased 21.3% under the pandemic, reaching nearly 140,000 families (398,000 people) or 18.3% of the population. More 72.500 families live under poverty. The state population includes 43 groups of Indigenous Peoples, including one identified Isolated or Recently Contacted group (the Tupi Kawahiv) and seven under identification. The IP population in the state totals 42,538 people (13.7% living in urban areas) counting for 1.3% of MT population.
Education achievements in MT are stagnant. Among the municipalities, 49% did not reach their defined goals for the initial years of elementary education and 78% did not reach the expected goals for the final years. Small advance was reached in secondary education, but far below the state's target of 4.2 in 2019. In 2020, as a result of COVID-19, there is a significant evasion and even more significant losses in learning, especially for students from low-income families, without access to ICT. The public school network enrolls 86.2% of the 880,884 the students in basic education. The state network offers 44%, which greater participation in secondary education (86.7%) and in the final years of

elementary education (63.3%). To meet this demand in 2019, MT had 2,708 elementary schools (759 state schools) and 660 secondary schools (77.6% state schools). The distribution of state schools in the territory is concentrated in urban areas (72.2%). Only 28.7% of rural schools have internet access. The state network includes 83 Indigenous, 5 quilombola and 175 countryside schools (with 12.2, 20.4 and 17.6 students/class, respectively), which follow the specific guidelines and curricula set by federal and state policies.

MT has the worse index of secondary school failure rate in the country (29.9%). Learning problems start in early years of school education when more than half of children do not obtain reading and numbering skills at the appropriate age and cannot read and understand a simple text. The inefficiency of the public school network hurts the most disadvantaged and vulnerable social groups. Data shows that learning achievements of students enrolled in public schools in both the elementary and secondary education increase as their socioeconomic level grows.

Schools – and, especially, Indigenous and Quilombola schools – lack resilience and require investments in physical and social infrastructure:

- A significant share of schools in MT also lacks appropriate adaptations to ensure equal access to all students and teachers. In 2019, 25 percent of the public schools did not have any accessibility resource (accessible toilets, ramps, or lifts). Ensuring safety is an additional challenge for these schools.
- Between 1995 and 2019, the material damage to public school infrastructure in MT was R$10.4 million, with R$25.6 million in losses due to climate induced and natural disasters. These disasters frequently disrupted or closed transport routes for prolonged periods, affecting student and teacher attendance as well as the school calendar. Their adverse impacts were particularly felt by countryside, Indigenous Peoples, and Quilombola communities' schools, which are supported by the state and federal governments, but do not have adequate maintenance systems that assure the quality of the school environment. Hence, based on community consultations, SEDUC considers that 30 (out of 216) Indigenous Peoples and Quilombola communities' schools need significant rehabilitation works to promote effective learning environments.
- Violence is rampant in these schools, disproportionally hampering the education opportunities for girls. The rate of threats of physical violence against teachers and principals in the state's public schools is among the highest in the country. In 2019, 11 percent of the students did not attend school due to lack of safety within the schools or on the route between home and schools. Episodes of students carrying a weapon and drug dealing in school were reported in in 26 and 17 percent of the state schools. Violence, bullying and cyberbullying were common among students aged 13 to 17 years old, particularly among girls in the capital city of Cuiabá. The state lacks structured actions to prevent school violence and SEDUC's guidance for mitigating violence in schools were implemented in only 34 percent of the schools.

D. 2. Borrower's Institutional Capacity

Project implementation will be led by Mato Grosso's Secretariat of Education (Secretaria de Estado de Educação, SEDUC). A Project Management Unit (PMU) will be established under Component 4 to carry out Project coordination and will be in charge of project management, procurement, financial management, M&E, and environmental and social risk and impact management. The PMU will be established within the State Education Secretariat (SEDUC) to execute this operation in SEDUC's Cabinet Office - NGER (Núcleo Estratégico de Captação de Recursos e Avaliação de Projetos).

Other Sub-secretariats will implement and monitor specific components and subcomponents, reporting back to NGER/SEDUC. They are: (i) the Sub-Secretariat for Educational Management (SAGE, Secretaria Adjunta de Gestão Educacional) will oversee all Pedagogical Development related activities, (ii) the Sub-Secretariat of Regional Management (SAGR, Secretaria Adjunta de Gestão Regional) will be responsible for the regional management and monitoring the implementation of activities at the level of Regional Directorates, (iii) the Sub-secretariat for Systemic

Administration (SAAS, Secretaria Adjunta de Administração Sistêmica) will execute all fiduciary aspects of the operation (financial management and procurement), (iv) the Sub-Secretariat of Infrastructure and Property (SAIP, Secretaria Adjunta de Infraestrutura e Patrimônio) will coordinate and execute all construction works and the Information Technology (IT) activities, and (v) the Sub-Secretariat for People Management (SAGP, Secretaria Adjunta de Gestão de Pessoas) will coordinate and execute capacity building activities.

Considering its attributions, the Diversity Superintendency under the Educational Management Deputy Secretariat will be instrumental for the development of activities related with Indigenous Peoples, as required under ESS 7, and other disadvantaged and vulnerable social groups (quilombola communities, students with disabilities, etc.) as per ESS1 and the Bank Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups.

SEDUC's downstream monitoring of the Project's implementation will be supported by the 15 recently created Regional Directorates of Education (Diretorias Regionais de Educação, DREs), each of one comprises six coordination offices (coordenadorias).

The existing national and state legal and institutional framework for managing environmental and social risks and impacts are found adequate, but implementation, monitoring and enforcement is weak and highly challenged due to under staffing and resource constraints. Furthermore, SEDUC has no previous experience working with the World Bank's Environmental and Social Standards. The Government of Mato Grosso – as a whole – has only a limited experience with these standards, which has been progressively enhanced throughout the preparation of the Progestão Mato Grosso: Public Sector Management Efficiency (P178339).

An assessment of the institutional capacity for social and environmental risk management of the PMU was carried out by the Bank's team, which concluded that significant efforts are required to ensure the capacity of the PMU to address the project's Environmental and Social risks in a manner consistent with the principles and requirements of the ESSs during project implementation. The assessment states the needs of hiring qualified professionals, training the civil servants and increasing the structure for on-site monitoring of activities, including the provision of equipment, transport and other materials and technologies to support socio-environmental supervision – especially in remote areas.

In consequence and as stated in the Project's Environmental and Social Commitment Plan (ESCP), the PMU will put together a core team composed of a senior environmental specialist and a senior social specialist – who will have the role and responsibility of ensuring the management of environmental and social standards requirements - plus a communications specialist, who will ensure the implementation of the Stakeholder Engagement Plan (SEP).

Furthermore, SEDUC will assign a focal point within its structure to each of the sub-secretariats and other participating agencies to enable close coordination and monitoring of results and activities. External consultants will be hired, as required, to guarantee essential support to the PMU.

The ESCP also calls for the provision of training in the ESSs PMU team to strengthen the capacities to manage project environmental and social risks and impacts in the Project. This training will be provided by the World Bank assigned environmental and social development specialists.

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

A. Environmental and Social Risk Classification (ESRC)	Moderate
Environmental Risk Rating	Moderate

The proposed project is expected to increase the Borrower's capacity on environmental management within the state schools network. It will improve access to water supply and waste management systems, sanitary and hygienic infrastructure (WASH), and will foster energy-efficient solutions, contributing to climate change mitigation. It is also expected to have a positive impact on the environment through the development and implementation of natural resources consumption, including reductions in paper consumption through the digitalization of public administration services, consumables, energy consumption and school commuting times by using improved geospatial database and electronic tools for monitoring consumption of energy, water, as well as other natural resources. Technical assistance activities proposed under Component 1 will be carried out to promote cooperation with municipal networks to implement a learning recovery strategy for all primary and secondary public schools in the state. Their environmental impact is negligible. The technology and information systems proposed under Component 2 are well-established and understood and are expected to favor energy-efficient equipment. There is no indication that quantities of electronic waste (or e-waste) will experience an increase due to these activities. There is a potential for environmental gain and climate co-benefits arising from lower consumption of paper and energy benefits. Component 3 will support the development of a framework for scaling up infrastructure interventions in the medium to long-term through school infrastructure plans. Energy efficiency and sufficient Water, Sanitation, and Hygiene (WASH) considerations will be informed through a technical assessment that will help identify sustainable and scalable energy efficiency solutions, following international best practices adequate to the local context to improve the quality of learning environment for children. These activities will target state schools in the most vulnerable and fragile areas, which will be selected based on technical assessments and in consultation with beneficiary communities. Despite the expected reduction of the pressures over living natural resources and the positive climate co-benefits foreseen, investments in the rehabilitation of school buildings under Component 3 can potentially have adverse environmental impacts. As the schools to be rehabilitated have not been identified yet, SEDUC assessed these environmental and social impacts through the preparation of an Environmental and Social Management Framework (ESMF), which found that these interventions will not have large-scale, significant, and irreversible adverse direct impacts and/or downstream implications on society and the environment. On the contrary, their negative environmental impacts will be limited, mostly site-specific and temporary. They will be implemented in changed habitats and their environmental footprint will be restricted to brownfields and are not expected to endanger living natural resources. They are not expected to (i) pose a risk of environmental pollution and degradation of natural resources (air, soil, water), (ii) affect (positively or negatively, directly or indirectly) biodiversity, or (iii) depend upon biodiversity for its success. They can be prevented or mitigated through the implementation of standard construction environmental mitigation measures.

Social Risk Rating Moderate

The social risk is rated Moderate. The anticipated social risks are mostly related to small-scale and site specific community health and safety issues that can be adequately managed/mitigated through well-known measures. All civil works (schools' construction and rehabilitation) will be carried in lands already owned by the state and the Project is not expected to bring adverse impacts related with land acquisition, restrictions on land use and involuntary resettlement. These civil works are not expected to involve a large number of workers from outside of the beneficiary communities and generate risks ordinarily associated with labor influx as they will mostly rely on the local labor force. They do not need to employ heavy machinery and are not expected to increase potential traffic and road safety risks to local communities. However, due to the size of the state of Mato Grosso, some of the schools to be supported by the Project may be located in far away rural communities and, consequently, some rehabilitation works may be hard to supervise. The Project is not expected to bring adverse impacts to Indigenous Peoples and other disadvantaged and vulnerable social groups. On the contrary, these social groups are expected to benefit from the prioritization of construction and rehabilitation of schools dedicated to Indigenous Peoples, Quilombola and countryside education

and from culturally appropriate strategies for learning recovery. Attention shall be paid to culturally appropriate manners to engage and promote the participation of Indigenous Peoples in the planning and implementation of these interventions and the Borrower has prepared an Indigenous Peoples Plan (please refer to the section on ESS 7). Eventually, built heritage may be affected and previously unknown cultural heritage may be encountered during the construction and rehabilitation of school buildings planned under Component 3. Two context-related risk have been factored in. They refer to high levels of physical violence within schools and cyber-bulling. Subcomponent 3.2 has been incorporated in the Project to address them in order to increase students' enrollment and retention.
Stakeholder engagement is a key risk as the activities provided for in all components will require the engagement with a large number of stakeholders – principals, teachers and all other members of the school staff; students, parents and relatives; beneficiaries from rural and urban settings; Indigenous Peoples and Quilombola communities; members of state and municipal councils with consultative and deliberative roles; state and municipal technical staff – and the building of support around the views, objectives and targets of the Project. Meanwhile, it is worth to highlight that project-supported activities are part of the State Education Plan (Plano Estadual de Educação, PEE 2020-2024). This Plan has been widely debated and have been validated by the State Education Council (CEE/MT) and the Indigenous Peoples School Education Council (CEEI/MT) – as required by the regulatory framework of the education sector in Brazil that enforces the principles of non-discrimination, respect for cultural diversity and participatory governance. These councils are composed by representatives from civil society, key stakeholder, the government and the private sector. Additional strategies for information disclosure, communication and engagement with stakeholders have been proposed under the Project's Stakeholder Engagement Plan (SEP) prepared by the Borrower.
Project activities are clearly associated with a social inclusion agenda, prioritizing disadvantaged and vulnerable social groups (such as rural students, Indigenous Peoples and Quilombola Communities), incorporating proper processes of meaningful consultations with the key stakeholders of the school communities, addressing issues related with universal accessibility and the digital gap faced by low income /remotely located schools, and confronting

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

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The proposed project is expected to generate positive social and environmental effects. The Project aims to improve the school environment and strenghten the local capacity to deal with the underlying causes of school drop-out (gender, economic status, and exposure to natural disasters). The Borrower has estimated that the Project will support large rehabilitation and retrofitting works (such as improvement of WASH facilities, including connection to public water supply and wastewater pipelines to avoid water-borne and infectious diseases) in up to 60 schools and small rehabilitation works (such as upgrading of roofs and walls deteriorated by high humidity) in up to 180 schools. These interventions shall prioritize the most vulnerable and fragile schools, but the selection of these schools will be completed only during the early stage of project implementation, when the works to be carried out will also be defined in consultation with the school communities.
Given this circumstance, the Borrower has prepared an Environmental and Social Management Framework (ESMF), which assesses the potential environmental and social impacts of the project (finding out that it does not entail any potential large scale, significant and/or irreversible negative impacts), evaluates the institutional capacity of the

Borrower and sets specific measures and procedures to reduce and mitigate adverse risks and impacts, budgetary provisions and institutional responsibilities.

The ESMF pays special attention to assess the main risks and impacts identified - namely:

(i) social factors that may hamper access to school education and may be related with gender, ethnicity, race, geographic location and customary cultural norms and patterns of social behavior;

(ii) potential risks and impacts on the occupational health, safety of project-workers and community health and safety, including of project-beneficiary communities and aspects related with SEA/SH and GBV and management of hazardous materials;

(iii) potential risks related with labor and working conditions, such as child labor, forced labor and terms and conditions of employment;

(iv) potential risks related with access to communication technologies and digital exclusion of remotely located beneficiary communities; and

(v) potential impact of construction and rehabilitation works on tangible and intangible cultural heritage.

The ESMF also sets measures to be taken to address these risks and highlights that these measures are mostly embedded in project design itself.

Thus, the ESMF highlights that the Project is designed to address challenges in the education sector related to discrimination and social exclusion and reduced education opportunities for children from vulnerable social groups (including children with disabilities and children from ethnic minority groups) and points out that the Project will prioritize Indigenous and Quilombola schools, apply the principle of universa access in school buildings and develop an early warning system able to identify causes of drop-out related to difficulties in transport and the risk of abuse or neglect for children with disabilities. Project's investments on connectivity and digital skills, on the promotion of violence prevention and inclusion of students with disabilities, and on the rehabilitation of Indigenous Peoples and Quilombolas schools will directly address the risks related with the "digital divide".

The ESMF also considers how project design addresses the education challenges posed by gender-based norms and context-factors such as SEA/SH and violence on girls' school enrollment and retention, highlighting that a) it includes activities focusing on the prevention of School-related Gender-based Violence (SRGBV), psychological violence, bullying, and cyberbullying and b) its progress on reducing gender gaps in dropout rates will be tracked through an intermediary results indicator – namely: "gender gap in school dropout rates in grade 10 in schools of state network".

Considering all these features of project design, the social assessment developed as part of the ESMF finds out that the Project will benefit the most the students of the state school network (and, particularly, those from schools located in more remote areas), which are mostly recruited from the lowest income groups (poor urban families, small rural landholdings, Indigenous Peoples, Quilombola and other traditional communities, etc).

Furthermore and considering potential risks related with SEA/SH in the workplace, the ESMF points out that: a) the pool of school teachers and other staff is mostly female; b) Brazil has rules related to the recruitment of teachers and school staff (as well as public servants in general) that take into account that they do not have legal or police records/well-founded allegations that would indicate that they have used SEA/SH for either peers or students; c) Brazil also has rules on prohibition against SEA/SH in the workplace (the Administrative Misconduct Law) and its Penal Code defines SEA/SH as felonies with harsh penalties of imprisonment; d) there are several networks providing referral services to victims of GBV and SEA/SH in the country, which are operated by the executive and judiciary branches of both national and subnational governments; and e) the State of Mato Grosso's House of Representatives approved Bill No. 121/2020 that institutes, within the scope of public administration, the permanent training program to prevent and combat sexual harassment, aimed at public servants (including effective or commissioned servants, outsourced workers, interns and other interested parties). The potential SEA/SH risk is low.

The ESMF emphasizes that construction or rehabilitation works will be designed to consider the influence of natural disasters and extreme events (floods, droughts, tropical storms, and landslides) that are exacerbated by climate change on the rate of school dropout and will incorporate international knowledge in the field of disaster risk management, climate change adaptation, energy efficiency, health and sanitation in the design of school buildings. It points out that these works will be site-specific and will take place within already owned school buildings and properties. Thus, their impacts are expected to be minor, site specific and mostly limited to construction stage. It shall also be mentioned that, although some of the schools to be supported by the Project may be located in far away rural communities, the institutional arrangements for project implementation reduce the potential risk that construction works could be hard to supervise, because the DREs will be involved in their supervision.
Nevertheless, the ESMF provides guidance on how to screen for potential risks and on managing unavoidable environmental and social impacts and on what measures need to be considered on the future preparation of Environmental and Social Management Plans (ESMPs) – to be implemented by the contractors (as necessary). It also sets measures to be taken during the execution of construction and rehabilitation works to ensure, including:
(i) the proper management of the working sites, the protection and the occupational health and safety of the work force – to be further detailed under the Project's Labor Management Procedures (LMP) – and community health and safety (as required under ESS 2 and ESS 4);
(ii) the incorporation of design features aiming to improve efficient consumption of energy, water and raw materials (as required under ESS 3) and to enhance sanitary and hygienic infrastructure (WASH);
(iii) the proper management of wastes, avoiding the generation of e-waste and/or promoting the reuse, recycle and recover waste in a manner that is safe for human health and the environment (as required under ESS 3); and
(iv) the application of the concept of universal access (as required under ESS 4).
Based on the findings of the ESMF, an Environmental and Social Commitment Plan (ESCP) has been agreed and it requires – inter alia – that all construction works will be subject to specific environmental and social impact assessment that are proportionate to the risks they entail – as required under ESS 1. Hence, the key elements of the relevant Environmental and Social Standards will be included the bidding documents. Contractors will be required to prepare and implement ESMPs consistent with the requirements of the relevant ESSs. Relevant measures against discrimination, SEA/SH and gender-based-violence will be reflected in the Project's LMP and bidding documents. The relevant requirements of the Environmental Health and Safety Guidelines (EHSGs) shall be put in place. The PMU will monitor the environmental and social performance of the contractors throughout the period of construction and descommissioning of the works. To avoid adverse impacts, the ESCP includes requirement to screen out schools which construction would require land acquisition, restrictions on land use and involuntary resettlement.The ESCP also states that the Terms of Reference of all technical assistance activities supported under the Project shall be consistent with the requirements of the ESSs.
The draft ESMF and the ESCP will be disclosed prior to Appraisal through a dedicated official website. Key stakeholders will be invited to comment on the ESMF, which final version will be disclosed in the same website within 30 days of Project's Effectiveness.

ESS10 Stakeholder Engagement and Information Disclosure

This standard is relevant. The Project's main stakeholders are the students,teaching professionals and administrative staff of the state school public network and school communities. These stakeholders include an array of specific social

groups that may be more vulnerable and more limited in their ability to participate, express their views and concerns and take advantage of Project benefits than others. These may include the school communities located in more remote rural areas, the IPs and Quilombola school communities, and the students with disabilities. Other interested parties would comprise representative organizations of educational workers, students, people with disabilities, Indigenous Peoples, Quilombola and other traditional communities; municipal secretariats of education; the State Council of Education (CEE) and the State Council of Indigenous School Education (CEEI/MT).

It is worth noticing that democratic governance is one of the guiding principles of the regulatory framework on public education in Brazil (Federal Constitution of 1988,art. 206, VI; Law of Guidelines and Bases of Education (LDB - Law 9,394/1996, art. 3, item VIII, and art. 14). The Project will take advantage of these well-established consultative and participatory instances during Project preparation and implementation and it is worth to highlight that it answers demands raised in these fora.

Thus, in addition to the consultations previously held for the validation of PEE 2020-2024 – the encompassing policy framework in which the Project is inserted), Between November and December 2021, SEDUC carried an online evaluation of the State Policy for Basic Education. Furthermore, SEDUC has debated learning recovery interventions (envisaged under Component 1) with key stakeholders and held two meetings with the State Education Council, and 500 school teachers, coordinators and principals (November 2021 and May 2022). During project preparation two meetings were held with members of the Indigenous Peoples School Education Council (CEEI/MT) to present the Project and discuss actions related with Indigenous School Education (August 4th and September 5th, 2022). CEEI/MT holds the attribution of guaranteeing the execution of a specific educational policy for indigenous peoples and composed by 35 members; 25 of which representing the 44 ethnic groups found in the state and 10 representatives from civil society and governmental agencies – including a representative of the Indigenist National Foundation (FUNAI).

The Borrower has prepared a draft Stakeholder Engagement Plan (SEP). As required by ESS 10, this draft SEP comprises an identification of different stakeholders, with particular attention to those who may be disadvantaged or vulnerable, more likely to be adversely affected by the project impacts, more limited than others in their ability to take advantage of Project benefits or more likely to be excluded from or unable to participate in the Project's consultation processes. It proposes the range, the timing and the methods for information disclosure and engagement with stakeholders (according to their needs) throughout the project life cycle, including suggestions for two-way feedback communication strategies and for removing obstacles to participation of the most disadvantaged and vulnerable social groups throughout the preparation and implementation of the Project. Finally, it describes the grievance mechanism to be implemented to receive and facilitate resolution of concerns and grievances related to the environmental and social performance of the Project in a timely manner.

Aiming to avoid the unsustainable duplication of structures, the draft SEP proposes that the Borrower may rely on existing engagement structures and grievance mechanism (GM) within its system for carrying out meaningful consultations with stakeholders, engaging on a continued basis with stakeholders and responding to concerns and grievances raised by stakeholders. For stakeholder engagement at the state level, the Project will rely on the State Education Council (CEE/MT) and CEEI/MT, which have been evaluated on their key features and functionalities during Project Preparation and this assessment found out that they provide an adequate basis for achieving the objectives set in ESS 10. These are collegiate bodies with consultative and deliberative roles in matters related with the education sector and the indigenous school education policies and programs, respectively. CEE/MT is made up of 24 councilors and their alternates, who comprise representatives of the Basic Public Education Workers Union, the Municipal Secretariats of Education, the entities of students and parents and the State Council for the Promotion of Racial Equality (CEPIR/MT). Taking into consideration a meeting with CEEEI/MT, the draft SEP requires the

implementation of a platform for the dissemination and exchange of good practices of pedagogical experiences with Indigenous Peoples (with different subtitles/dubbing in different indigenous languages).
Finally, with regards to grievance redressing, the Project will rely on SEDUC's Sectoral Ombudsman Office, which is part of the State Ombudsman Network and is responsible for ensuring efficiency and effectiveness in meeting the demands of the citizenry. Based on the assessment of the institutional capacity of this Office, the draft SEP concludes it holds the functionalities required under ESS 10 and requires only the adoption of additional filters for screening, separating and tracking the grievances directly-related with the Project (and its environmental and social impacts) from the total set of grievances it receives, so to allow adequate reporting to the Bank.
The draft SEP will be publicly disclosed prior to Appraisal, which will occur after the electoral period that has imposed some restrictions to the use of official government websites and the carrying out of public consultations. The disclosure of the draft SEP – through a dedicated Project website of SEDUC – will call for feedback on the document. This online consultation will be open for two months and SEDUC will also sent invitations to key stakeholders to review the draft SEP, providing the link to the website. The feedback received will be evaluated and incorporated (as appropriate) in the final version of the SEP. The final version of the SEP will be publicly disclosed in the same dedicated Project website of SEDUC as well as in hard copies (where appropriate) within 30 days of Project effectiveness.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

This standard is relevant.
Project implementation will rely on direct workers (including civil servants from the implementing agencies) and contracted workers. All government civil servants – including teaching professionals at state and municipal schools – directly engaged to perform works related to the core functions of the project will remain subject to the terms and conditions of their existing public sector employment agreements. The Project would not involve primary supply workers and community workers.
The ESMF evaluated the main risks regarding ESS 2 and included requirements and good practices for labor management.
The Borrower will prepare Labor Management Procedures (LMP), which will address aspects related with: terms and conditions of employment, fair treatment, non-discrimination and equal opportunity; minimum working age and measures to prevent the use of all forms of child labor and forced labor; and worker's organizations. The LMP will be publicly disclosed in a dedicated Project website of SEDUC as well as in hard copies where appropriate within 30 days of Project effectiveness
The LMP will also assess the potential risks faced by different groups of project workers (direct and contracted workers) and propose occupational health and safety measures.
The LMP will state the need to establish a standalone grievance redressing mechanism to raise workplace concerns and would define the features of this mechanism in line with the requirements of ESS 2. The workers grievance mechanism may utilize existing grievance mechanisms – providing that they are properly designed and implemented, address concerns promptly, and are readily accessible to such project workers – and would be put in place within 30 days of Project effectiveness and operated thereafter.

The LMP (and Workers Code of Conduct) will also include measures to prevent SEA/SH in the workplaces and in the relationships between project workers and beneficiary community populations.
The LMP will address potential risks related with labor influx and set a Workers' Code of Conduct to which all project workers will abide in their relationships with the beneficiary community populations. Contractors and subcontractors will be requested to expressly abide to the Code of Conduct.
The Project may need to retain direct or contracted workers to provide security to safeguard its personnel and property. This need was confirmed in the ESMF and the LMP will define the measures to be adopted to ensure that this security personnel acts in a manner that is guided by applicable law and the GIIP (such as those provided in the ESF's "Good Practice Note for Assessing and Managing the Risks and Impacts of the Use of Security Personnel" - https://documents1.worldbank.org/curated/en/692931540325377520/Environment-and-Social-Framework-ESF-Good-Practice-Note-on-Security-Personnel-English.pdf and IFC's Good Practice Handbook: Use of Security Forces – Assessing and Managing Risks and Impacts and the Voluntary Principles on Security and Human Rights) in matters related with the hiring, training, equipping, monitoring and rules of conduct and without sanctioning any use of force, except when used for preventive and defensive purposes in proportion to the nature and extent of the threat (as considered under paragraphs 26 and 27 of ESS 4).

ESS3 Resource Efficiency and Pollution Prevention and Management

This standard is relevant.
The Component 1 will include the implementation of activities focusing on changing the behavior of students and teachers and making schools green and resilient to mitigate climate change, and inclusive and safer to protect vulnerable students. Green environment will be achieved by supporting the construction of energy-efficient solutions, access to water supply and waste management systems and, improvement of sanitary and hygienic infrastructure (WASH). In addition, the Project will support interventions for reducing the vulnerability of school facilities against floods, droughts, and wildfire hazards.
The project will also focus on identifying schools exposed to different natural hazards and integrating disaster risk mitigation solutions as part of the construction works to be conducted under this project. The Global Program for Safer Schools (GPSS) will provide guidance and technical support to identify scalable solutions that will increase the resilience of the school infrastructure at risk, based on global experience by supporting countries with similar contexts in strategically addressing challenges in school infrastructure at scale.
Energy efficiency and water, sanitation and hygiene considerations will be informed through a technical assessment providing the basis to identify sustainable and scalable energy efficiency solutions, following international best practices adequate to the local context to improve the quality of learning environment for children.
On the other hand, it is not expected that the activities supported by the proposed operation will pose a risk of environmental pollution and/or degradation of natural resources (air, soil, water), or generation of significant volumes of waste, including e-waste.
There will be some activities related to the procurement of some ICT software and hardware to increase the existing performance of the SEDUC services system. Still, it is not expected to generate significantly more e-waste than would be the case in the absence of the project.
During project preparation, the State Government will set detailed measures to promote efficient use of energy as well as avoid the generation of e-waste, including a focus, where relevant, on reuse, recycling, and recovering of e-waste in a manner that is safe for human health and the environment.

The project will consider the National Policy on Solid Waste established by Federal Law No. 12,305/2010 establishes that solid waste management (including e-waste) must be carried out in a sustainable manner that considers environmental and social dimensions involved in solid waste management at the national level. The designations under Federal Law No. 12,305/2010 are expanded within the scope of the federal decree no. 9,373 of May 11, 2018, which provides further instructions for the appropriate collection, transportation, recycling, and treatment of solid waste in the context of national and sub-national public administration. Further provisions on the handling of e-waste are made through Federal Decree No. 10.240 of Feb 12, 2020, which requires sub-national governments to apply the principle of "reverse logistics" to promote the management of e-waste by putting in place processes that enable planning, implementation and controlling of the backward flow of e-waste and raw materials to manufacturing and distributing companies. At the national level, the Brazilian Ministry of Environment (MMA) is responsible for monitoring the implementation of the National Policy on Solid Waste, and information on progress and compliance on implementation is available publicly through the National Information System on Solid Waste Management (SINIR).
The Project will also consider that, in November 2017, the Brazilian Supreme Court banned the extraction, industrialization and commercialization of chrysotile asbestos all over Brazil, and will be implemented in accordance to the National Council of Environment (CONAMA) regulation on the disposal of products containing asbestos. According to CONAMA, products containing asbestos must be allocated to landfills licensed for this purpose according to specific technical requirements, ensuring non-dispersion of asbestos fiber.
The ESMF has considered opportunities related with the efficient and sustainable use of resources (energy, water and raw materials) in the design of the new school buildings and poluttion prevention measures during the civil works. The ESCP includes principles of sustainability as energy efficiency, reuse, recycle and recovery of e-waste, waste management, and transparency that are compliant with this ESS.

ESS4 Community Health and Safety

This standard is relevant. Infrastructure rehabilitation works envisaged under Component 3 may bring temporary adverse health and safety risks to beneficiary local communities during the construction stage.
These risks are related with: i) the use of heavy vehicles and machineries potentially leading to traffic and road safety risks; and ii) the influx of laborers that can potentially lead to adverse impacts associated with fraternization, SEA/SH, community exposure to communicable diseases, social conflicts between workers and local people. The ESMF addressed these potential risks and proposed mitigating measures to be taken during the implementation of the Project to eliminate or reduce adverse environmental and social impacts to acceptable levels. In addition, the Borrower will be required to include enhanced language on adequate conduct in the procurement contracts.
These works are not expected to have direct impact on ecosystem services that may result in adverse health and safety risks to and impacts on community health. This risk was assessed in the Project's ESMF and it was confirmed that they are low – because the works will be site-specific and carried out within already modified habitats and built areas - and mitigable through well-know procedures related with the proper management of the working sites.
Project activities are not expected to expose communities to hazardous materials or substances and they will not rely on the performance of existing dams or dams under construction.
The design of the school buildings will incorporate all measures that are technically and financially feasible to ensure that the rehabilitation works apply the concept of universal access and, indeed, the Project has the core objective of

promoting inclusive environments and learning opportunities for students with disabilities. Additionally, the construction and rehabilitation projects will be designed and constructed by competent professionals, and certified or approved by competent authorities or professionals, and shall include life and fire safety measures.
The ESMF assessed the need of retaining direct or contracted workers to provide security to safeguard project workers and school buildings and equipment as well as the risks posed by these security arrangements to the population of the beneficiary communities. As previously mentioned, the LMP will include the measures to be adopted to ensure that this security personnel acts in a manner that is guided by applicable law and the GIIP (such as those provided in the ESF's "Good Practice Note for Assessing and Managing the Risks and Impacts of the Use of Security Personnel" - https://documents1.worldbank.org/curated/en/692931540325377520/Environment-and-Social-Framework-ESF-Good-Practice-Note-on-Security-Personnel-English.pdf and IFC's Good Practice Handbook: Use of Security Forces – Assessing and Managing Risks and Impacts and the Voluntary Principles on Security and Human Rights) in matters related with the hiring, training, equipping, monitoring and rules of conduct and the Borrower will not sanction any use of force, except when used for preventive and defensive purposes in proportion to the nature and extent of the threat.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

This standard is not relevant.
The construction and rehabilitation of schools with the support of the proposed Project would be carried out only on land plots in which the school buildings are already located and there will be no need for involuntary resettlement (including physical and economic displacement of informal users), land acquisition or restrictions on land uses. The ESCP includes these criteria in the negative list of Project explicitly stating that no Project investment will be eligible under the Loan where ESS5 impacts occur.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

This standard is relevant.
The IPF operation will not potentially affect living natural resources including native or non-native species, either positively or negatively, directly or indirectly, or depend upon biodiversity for its success. The project does not intend to invest in the forest sector, will not support any forest related activities, or purchasing natural resources commodities, including food, timber, and fiber that are known to originate from areas where there is a risk of significant conversion or significant degradation of natural or critical habitats. Project activities will not take place in protected areas and are not expected to significantly modify or degrade natural habitats.
The expected establishment of digital government systems and a comprehensive procurement system by the Borrower would help reduce paper consumption.
On the other hand, the project aims to establish a framework for scaling up infrastructure interventions in the medium-long term through school infrastructure. Activities under Subcomponent 1.1 would include: (i) development of a School Infrastructure Maintenance Management System (MMS) to strengthen State's school infrastructure operation and maintenance (O&M) capacity, (ii) architectural and engineering designs and civil works for the rehabilitation of existing schools and construction of new ones in line with green, resilient, and inclusive principles;

(ii) acquisition of equipment such as power stations, solar panels, and air conditioning equipment to improve energy efficiency in selected school facilities; (iii) civil works to improve WASH facilities, including connection to public water supply and wastewater pipelines. The design of schools' architectural projects would promote a resilient environment to address: (i) natural disaster events, such as floods, droughts and fires, (ii) the needs of students with disabilities, (iii) the improvement of WASH conditions to cope with the hygiene protocols posed by the Covid-19 pandemic. These activities would bring positive results on the sustainable management of living natural resources. The ESMF proposes screening criteria to ensure that any potential habitat impacts are identified and mitigated during the project implementation. The Borrower will adopt a precautionary approach and apply adaptive management practices in which the implementation of mitigation and management measures are responsive to changing conditions and the results of project monitoring. These requirements are incorporated in the Project's ESCP.

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

This standard is relevant. There are 44 Indigenous Peoples in the State of Mato Grosso, including one Isolated or Recently Contacted Indigenous Peoples (the Tupi Kawahiv) already identified and seven under identification. The IPs population reaches 42,538 people (13.7% living in urban areas). According to the Brazilian Indigenous Peoples Encyclopedia, they comprise the Apiaká, Apurinã, Arara do Rio Branco, Aweti, Bakairi, Bororo, Chiquitano, Cinta Larga, Enawenê-nawê, GuatóIkpeng, Iny Karajá, Iranxe Manoki, Kalapalo, Kamaiurá, Kawaiwete, Kisêdjê, Krenak, Kuikuro, Matipu, Mebêngôkre Kayapó, Mehinako, Menky Manoki, Nahukuá, Nambikwara, Naruvotu, Panará, Paresí, Rikbaktsa, Surui Paiter, Tapayuna, Tapirapé, Terena, Trumai, Umutina, Wauja, Xavante and Yawalapiti Peoples. According to FUNAI (the federal government indigenist agency that has the attribution of protecting and promoting the rights of Indigenous Peoples) in Brazil, there are 78 Indigenous lands in the state territory, holding an area of 20.2 million hectares. Most of these lands (56) are regularized, two have their boundaries ratified, 6 have obtained the authorization for demarcation, 4 have their studies concluded and published and are under analysis by the Ministry of Justice and 9 are in the preliminary stage of anthropological, historical, land, cartographic and environmental studies that support the delimitation of Indigenous Lands. They are found in 55 of the 141 municipalities of the state. IPs in the state are organized, since 2017, in the Federation of Indigenous Peoples and Organizations of Mato Grosso (FEPOIMT).

To enhance IPs School Education (ISE) is a priority objective of the Project as evidenced by the inclusion of two indicators – Number of IPs and Quilombolas school teachers trained on culturally appropriate materials for learning recovery and Percentage of IPs and Quilombolas schools rehabilitated and/or retrofitted based on communities consultation – as of one of the Performance Based Conditions (PBC - Development and implementation of the School Maintenance Management System (MMS) in state schools) for reimbursement of eligible expenditures. The assessments made by the Borrower and the Bank to define the scope and design of the project highlights: a) the lack of resilience – i.e., the exposure to material damages due to climate induced events and natural disasters - of IPs and Quilombola schools; b) the proposal of an intercultural approach to respond to the needs of indigenous schools with regards to the activities to prevent violence and promote inclusion; c) the carrying out of consultations with IPs and Quilombolas communities to integrate cultural components in both the acquisition of teaching and learning materials and in the rehabilitation of schools; and d) the need to recover from the learning losses caused by the COVID-19 pandemic, especially among vulnerable groups, which include IPs and Quilombola communities.

It is worth mentioning that ISE is a special modality of education governed by specific national curriculum guidelines. They aim to ensure that: (i) the respect of IPs right to differentiated school education, (ii) the respect for the

principles of diversity, bilingualism or multilingualism, community organization and interculturality and (iii) the sociocultural and economic practices of the respective communities, as well as their forms of knowledge production, their own teaching and learning processes are considered in the organization and management model of IPs schools. ISE guidelines also aim to provide Indigenous peoples and communities with the recovery of their historical memories, the reaffirmation of their ethnic identities, the appreciation of their languages and sciences, while guaranteeing access to information, technical and scientific knowledge of the national society and other indigenous and non-Indian societies. Finally, ISE guidelines intend to implement the provisions contained in ILO's Convention 169 with regard to education and media as well as the mechanisms for free, prior and informed consultation.

ISE is organized around ethno-educational territories (EET) – i.e., geographically distinct habitats traditionally occupied by different IPs, who have linguistic affiliation, share cultural values and practices and historically built social, political and economic trade networks regardless of the political-administrative division of the country. EETs are defined in consultation with IPs, who participate in the decision of public policies aimed at them, regarding the budget and definition of institutional roles in the management. This organization was a demand and historical conquest of the Indigenous Peoples of Brazil. Five out of 40 ethno-educational territories already organized in the country are in the State of Mato Grosso: the Xavante, Cinta Larga, Tupi Monde, Xingu and Araguaia ethno-educational territories.

The national coordination of the ISE policy is the responsibility of the Ministry of Education (MEC) and its execution is carried out by the States and Municipalities. In Mato Grosso, IPs school education is under the IPs School Education Coordination of the State Secretariat of Education. The mission of the Coordination is to strengthen the IPs school education policy in line with educational policies as well as to monitor and evaluate the Pedagogical Policy and Curriculum Guidelines for Indigenous School Education. In 2019 (the last date official census data from the Ministry of Education is available), Indigenous school education counted with 189 schools (71 state schools and 118 municipal) within IPs Lands spread over 26 municipalities in Mato Grosso. Pre-school education is available in 104 IPs schools, elementary education and secondary education are offered in 184 and 62 IPs schools respectively. State data from 2020 refer to 83 state schools offering IPs education, offering 1,070 classes and serving 13,226 students (3.55% of the enrollments in state schools).

The Project aims to support the construction and rehabilitation of IPs Schools selected in consultation with IPs and the Borrower has prepared an Indigenous Peoples Plan (IPP) following the requirements of this Standard, which includes: (i) the description of activities aimed at benefiting IPs; (ii) the assessment of their potential effects on IPs; (iii) the description of the process of engagement and participation of IPs in the design of the Project and to ensure the free, prior and informed consultation of the communities that will actually benefit from Project's interventions, including the evidences of their support to the activities; (iv) a description of the institutional arrangements (roles and responsibilities), commitment of funding for evaluating their effects on IPs, consulting them in a culturally appropriate manner, and addressing any grievances; (v) monitoring and reporting arrangements; and (vi) the dissemination of the IPP and assessment of its implementation.

To reduce risks of negative impacts related to IPs, the IPP states that each beneficiary IPs community shall evidence their broad support to the set of activities to be locally carried out – works and/or pedagogical and school management interventions for the recovery and acceleration of student learning – prior they begin. It also sets a Protocol for hiring and executing construction works within IPs Lands, including: the necessary consultations with IPs representative leaderships before the beginning of works and throughout their implementation, the necessary community and institutional authorizations, the respect of the calendar of cerimonial and cultural events as well as everyday life, and the preference for (i) culturally appropriate architectural designs and constructive materials and (ii) the hiring and training local labor workers.

The draft IPP was prepared in a participatory manner with consultations in a culturally appropriate manner with the IPs representatives in CEEI/MT. CEEEI/MT was created by Decree No. 265/1995, in accordance with Inter-ministerial Ordinance No. 559/1991 and ILO Convention 169. It aims to guarantee the execution of a specific educational policy for indigenous peoples. CEEI/MT is an advisory, deliberative and technical advisory council composed by 35 members; 25 of which representing the 44 ethnic groups from across the state, in addition to another 10 representatives from civil society and governmental agencies – including representatives of the Federal University of Mato Grosso and National Foundation of Indio (Funai). As a result of these consultations, the project design was improved to respond in a culturally and legally appropriate way to the provision of indigenous education, including the provision of preparation of pedagogical materials for culturally appropriate learning recovery and in the different languages of the indigenous peoples existing in the MT. Furthermore, the technical criteria for the selection of the Indigenous Schools to be rehabilitated was agreed and these schools have been selected. The selection criteria and the list of selected schools are presented in the IPP.

The draft IPP will be publicly disclosed prior to Appraisal. The disclosure of the draft IPP – through a dedicated Project website of SEDUC – will call for feedback on the document. This online consultation will be open for one month and SEDUC will also sent invitations to key stakeholders (including CEEI/MT) to review the draft IPP, providing the link to the website. The feedback received will be evaluated and incorporated (as appropriate) in the final version of the IPP, which will be be publicly disclosed in the same dedicated Project website of SEDUC as well as in hard copies (where appropriate) within 30 days of Project effectiveness. The IPP will be updated (as needed) – in a manner acceptable to the Bank – based on learnings during implementation and feedback from IP groups.

ESS8 Cultural Heritage

This standard is relevant. As the school buildings to be rehabilitated under Component 3 have not been selected yet, there is a small chance project works may be carried out within historical buildings. The PMU will identify public schools buildings of cultural and historical value. Following this screening, the Government of Mato Grosso will implement documentation and protection of these historical and architectural assets in compliance with the requirements of this standard and in compliance with the guidelines defined by the National Institute for Historical and Cultural Heritage (IPHAN), which are consistent with this ESS.

As the construction works may require excavation, there is also a very slight chance they may encounter previously unknown cultural heritage. The potential for chance finds is minimal as the construction works would take place on sites where old, deteriorated and unrecoverable structures would be dismantled. Nevertheless, the Borrower has defined as part of the ESMF a chance finds procedure. This procedure will also be included in all contracts for construction works leading to changes in the physical environment, setting out how chance finds associated with the project shall be managed and including a requirement to: (i) notify relevant authorities of found objects or sites by cultural heritage experts; (ii) fence-off the area of finds or sites to avoid further disturbance; (iii) conduct an assessment of found objects or sites by cultural heritage experts; (iv) identify and implement actions consistent with the requirements of this ESS and national law; and (v) train project personnel and project workers on the chance finds procedure.

The works to be carried out in indigenous and quilombola schools as well as the support for pedagogical and management interventions are not expected to significantly impact cultural heritage that is material to the identity and cultural, ceremonial or spiritual aspects of the traditional communities and will not use their cultural heritage for commercial purposes. However, the ESMF identifies potential impact of activities on tangible and intangible cultural heritage in a manner to allow the Project to recognize and incorporate adaptations on schools and on tailored

pedagogical material that could lead to a significant improvement on the learning processes for these communities moving forward.

ESS9 Financial Intermediaries

The standard is not currently relevant.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways	No
OP 7.60 Projects in Disputed Areas	No

B.3. Reliance on Borrower's policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework?	No

Areas where "Use of Borrower Framework" is being considered:

The use of the Borrower Framework is not being considered in replacement of the principles and requirements of any of the relevant Environmental and Social Standards.

IV. CONTACT POINTS

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Borrower/Client/Recipient

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Implementing Agency(ies)

Implementing Agency: SEDUC - Secretaria de Estado de Educação

Implementing Agency: SECRETARIAT OF EDUCATION - MATO GROSSO

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VI. APPROVAL

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