Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 04/26/2020 | Report No: ESRSC01352
BASIC INFORMATION

A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
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<tbody>
<tr>
<td>Mozambique</td>
<td>AFRICA</td>
<td>P172657</td>
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</tbody>
</table>

Project Name: Ending Learning Poverty in Mozambique

Practice Area (Lead): Education

Financing Instrument: Investment Project Financing

Estimated Appraisal Date: 11/23/2020

Estimated Board Date: 1/28/2021

Borrower(s): Ministry of Economy and Finance

Implementing Agency(ies): Ministry of Education and Human Development

Proposed Development Objective(s):
Reduce learning poverty in basic education and improve transition of girls to secondary education in Mozambique.

Financing (in USD Million):

<table>
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<th>Amount</th>
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<tbody>
<tr>
<td>Total Project Cost</td>
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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]
This project will contribute to reducing learning poverty in Mozambique for girls and boys and improving girls’ education at the basic level to boost retention in schools and increase transition to secondary school.

To improve learning in early grades and help keep girls in school requires an integrated approach with multiple interventions at different moments in the education cycle. This project will include a multisectoral approach, in collaboration with other sectors such as health and nutrition, and social protection.

Key results that this project aims to achieve include:
- Increase girls’ graduation rates from primary and transition to lower secondary education
- Improve girls’ and boys’ reading skills in grades 1, 2 and 3
- Increase the number of female teachers in the system, especially in upper primary and lower secondary education
- Improve monitoring mechanisms and community involvement to prevent GBV in schools

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]

The project will focus on three components. Component 1 - Improving learning of girls and boys in primary education: aims at improving learning outcomes for girls in the first three grades of primary education; Component 2 - Increasing access and retention of girls in upper primary and lower secondary education: seeks to retain girls in the last years of primary education and in lower secondary education; Component 3 - Strengthening governance to improve efficiency and monitoring of girls’ education progress: aims at improving efficiency in the system by strengthening of education statistics and national assessment and implement performance-based school and district grants programs to support girls’ attendance and retention in schools.

The project has a national scope with focus on primary and lower secondary schools, both in rural and urban context. The project will likely target schools that have similar characteristics: poor water, sanitation and hygiene conditions. Schools, particularly those in rural areas, often completely lack drinking-water and sanitation and hand-washing facilities; alternatively, where such facilities do exist, they are often inadequate in both quality and quantity. Schools with poor water, sanitation and hygiene conditions, and intense levels of person-to-person contact, are high-risk environments for children and staff, and exacerbate children’s susceptibility to environmental health hazards. Moreover, some schools have poor infrastructures, including crowded classrooms, inadequate ventilation and lighting, lack of waste management facilities and inappropriate disposal practices and the design doesn’t consider children with disabilities. Project civil works envisage construction (preschools) and rehabilitation/expansion of schools (primary/secondary education schools).

D. 2. Borrower’s Institutional Capacity

Ministry of Education and Human Development (MINEDH) through the Directorate of School Infrastructure and Equipment (DIEE) - which hosts the environmental and socials specialist’s unit - will be responsible for the management of environmental and social (including Gender, Gender Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) risks and impacts of the proposed project. The unit has past (P124615) and current (P166437, P156559, P125127) experience with World Bank funded operations with a considerable improved safeguard monitoring performance capacity. Through this experience, DIEE has acquired considerable knowledge and practice in working with World Bank safeguards policies and it is, therefore, familiar with implementation and supervision requirements for such projects. While existing staff at MINEDH had ESF training during the roll-out phase, they had never been exposed to ESF operations either in preparation or implementation. Nonetheless, continued capacity building will be necessary to enhance overall MINEDH capacity to manage environmental and social risks and impacts tailored to the sector and in consistency with the World Bank Environmental and Social Standards. The team is considering strengthening implementation at all levels of the system, from MINEDH to school clusters and school levels. The project will make use of the existing structure (e.g. gender department at MINEDH, safeguards specialist at the infrastructures department) to support training and empowerment of the staff at decentralized level, including schools. Moreover, the project will most likely use the same approach as of current WB funded operations under the
Ministry of Education and hire firms for the supervision of works and use the reports for management of contracts with contractors to ensure environmental and social compliance.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Environmental Risk Rating

The project Environmental Risk rating is classified as Moderate based on a combined analysis of the project type, location, sensitivity, scale, nature and magnitude of environmental risks and impacts and borrower capacity and commitment.

The scale of the project is national, although the exactly geographical areas of intervention are not yet known. The project type is mostly capacity building activities, learning and education, however with significant involvement of some construction, expansion, improvement and/or re-qualification of school’s infrastructures. Moreover, there will be Technical Assistance focusing on policies and teacher’s training.

The project is expected to result in positive benefits to the target schools through improving hygiene and sanitation, however activities are also anticipated to generate adverse risks and impacts to the health and safety of workers and communities related to proposed infrastructure.

Risks and impacts related to civil works, including the construction and maintenance of schools, as well as school infrastructure improvements (e.g. functioning toilet facilities and latrines) are anticipated to be moderate and short-lived and will mainly emanated from earthworks for classroom improvements, excavation during rehabilitation works, use of heavy machinery that could lead to dust generation and vibration as well as traffic safety concerns, including occupational health and safety concerns related with works at heights and use of construction equipment and machinery.

Social Risk Rating

The project Social Risk rating is classified as Substantial after considering, in an integrated manner, the Sexual Harassment (SH), GBV/SEA risks and impacts of the Project, taking into account the capacity of the multisectoral implementing agencies (Education, Health and Social Protection) to manage social, GBV/SEA/SH and Violence Against Children (VAC) risks. MINEDH has no prior experience in implementing ESF projects and has very limited capacity and experience to monitor GBV/SEA/SH/VAC risks and impacts. Other risk is related to selection criteria of project areas and beneficiaries, considering the socio-cultural norms in different regions of the country (i.e. “matrilineal communities” in the northern part of the country). Selection criteria should be well and clearly defined in close collaboration with stakeholders and potential project beneficiaries. Aspects of vulnerability, disability & inclusion and poverty should be considered as critical in the selection process. It is also worth noting that a Gender-Based-Violence (GBV) assessment will be conducted based on planned activities, and the results of the assessment presented as annex to PAD.
The implementation of specific activities such as promoting access to sexual and reproductive health services for adolescents should take into account systemic, knowledge and sociological risks. Systemic risks relate to the health services’ ability to regularly provide medicines and other medical inputs. Since the project will specifically focus in supporting access to services (demand), the risk is on the ability of the service to address the demand. The knowledge risk is linked to persisting low demand for sexual and reproductive health services among adolescents, especially in rural areas. This results from limited awareness about the availability and relevance of these services. The sociological risks are associated to cultural and gender practices that ultimately undermine adolescents’ adherence to services. While major mitigation measures are clearly identified, a more systematic approach to community mobilization and participation is paramount to address risks of service adherence and knowledge. The project will consider the potential adverse social impacts (i.e. early pregnancy, school dropout, sexual exploitation and abuse of girls in schools) of the Project in rural areas, which could result from imbalanced power dynamics between teachers and students at school.

The proposed project activities will require substantial efforts to ensure stakeholder engagement and regular community awareness interventions supported by adequate mitigation measures to address several factors outside the control of the Project with potential significant adverse impacts on the social performance and outcomes of the Project.

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:

While the project activities are expected to improve learning and increase access to education, achieving these outcomes implies a number of environmental and social risks and impacts that will be identified throughout the environmental and social assessment process foreseen under the ESS1. Potential environmental and social risks and impacts relate to civil works especially under Subcomponent 1.1 – Strengthening school readiness - through construction and maintenance of pre-schools and under Component 2 - Increasing access and retention of girls in upper primary and lower secondary education – through improvements of Water, Sanitation and Hygiene infrastructure. These civil works are likely to include the construction, expansion, improvement and/or requalification of classroom, laboratories, sanitary facilities, and maintenance/renovation works for a selected number of schools throughout the country. Therefore the project will have a mix of new constructions and upgrading of schools. In pre-primary, it is anticipated the construction of new facilities, which could be additional classrooms in primary schools or separate pre-primary centers, depending on the model that the government will adopt for the expansion of this services. In secondary education, it being considered the upgrading of primary education schools by adding classrooms, water and sanitation facilities, multipurpose rooms (laboratories and libraries). The exact numbers and location will be defined in discussion with the Ministry of Education during project preparation. The key environmental issues that can be anticipated at this stage are related to: (i) nuisances related to air and noise emissions; (ii) health and safety of, teaching staff and visitors during the construction phase; (iii) disposal and management of construction waste; (iv) traffic safety; (v) occupational health and safety of workers; (vi) community health and safety; (v) erosion from earth works and run-off, and (vii) impacts on water quality and quantity etc. These impacts are expected to be short in duration, limited to existing school compounds, and can be managed through the implementation of cost-effective mitigation measures.
However, to ensure that all risks and impacts related to civil works are adequately managed, the Borrower will prepare and consult upon an Environmental and Social Management Framework (ESMF). Once target schools are known an Environmental and Social Screening will be conducted and if deemed necessary, an Environmental and Social Management Plan (ESMP) will follow to manage site-specific related risks and impacts. The ESMPs will form part of and the Bidding Documents prepared for the subprojects and they will include a Health, Safety and Environmental (HSE) plan in line with World Bank Group Environment, Health and Safety (EHS) Guidelines.

The provision of food/lunch with adequate nutrition supplements in preschools also has some social risks associated with it. This relates to issues of exclusion and sustainability of the activity. The provision of nutrition, should be well handled by the implementing agencies adapted to cultural norms and practices. Consultation on this aspect will equally play a significant role in shaping the course of the activity and mitigate associated risks.

MINEDH E&S Unit has been recently created (including one Environmental specialist and one Social specialist) and therefore their capacity to cover project areas along the country is still limited and is likely to present significant implementing challenges given the nature of the project’s potential risks and impacts in particular those related with GBV/SEA/SH and VAC, considering the fact that no GBV capacity to monitor such risk is currently available at the implementing agencies.

The Environmental and Social Commitment Plan (ESCP) will summarize the material measures and actions for the project to meet the ESSs requirements. The agreed measures and actions between the Borrower and the Bank will be outlined in the ESCP with the timeline for completion and responsible parties, including the finalization of the ESMF and preparation of site specific ESMPs, as needed, and additional risk management documents that may be identified during project preparation or during the elaboration of the ESMF.

Areas where “Use of Borrower Framework” is being considered:

None. The project does not propose to use the Borrower’s ES Framework in whole or in part.

ESS10 Stakeholder Engagement and Information Disclosure

MINEDH will implement the program through its different units or departments. However, in line with the multisectoral approach being proposed for this project, MINEDH will collaborate with the relevant Ministries and institutions according to their mandate in the delivery of education services. Provision of sexual and reproductive health education will be done in collaboration with Ministry of Health. Within MINEDH, as in the current operation, the Planning and Cooperation Department (DIPLAC) will coordinate the project implementation and will ensure internal and external communication on the project.

DIPLAC in coordination with all the relevant implementing entities will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
MINEDH/DIPLAC will engage in meaningful consultation with all stakeholders in particular women, vulnerable groups, children in project area. MINEDH will provide stakeholder with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.

A draft Stakeholder Engagement Plan (SEP) will be prepared prior to appraisal and should include details of types, frequency and approach to consultations, information sharing and Grievance Redress Mechanism (GRM) related procedures. The Borrower will submit the SEP for Bank’s clearance by appraisal and update it regularly during implementation. The process of stakeholder engagement will involve the following: stakeholder identification and analysis; planning how to engage with stakeholders; disclosure of information; consultation with stakeholders and focal groups as appropriate; and effective project level Grievance Redress Mechanism (GRM), addressing and responding to grievances; and reporting to stakeholders.

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

Relevant, as the project comprises various civil works, involving improvements, expansion and construction. Civil works may require one or more speciality contractor in remote locations. Details on how construction and upgrading of schools will take place will be defined during project preparation. The project will use to the extent possible the procedures currently in place for construction financed under the education common fund (FASE). Currently, construction of schools and classrooms are managed at provincial level following standards defined at central level at MINEDH Infrastructure Directorate (DIEE). The provinces procure contractors for construction and consultancy firms for supervision of works. In sum, a considerable workforce will be needed, and the project may face difficulties in promoting sound worker-management relationships and to guarantee safe and healthy working conditions. The related occupational, health and safety (OHS) risks will stem from working near or on machinery (cuts, noise, vibration, crushing) and heights (slips, trips and falls). The situation is aggravated by the gaps in the Mozambique labor, health and safety legislation. Mozambique had important improvements in the labor legislation with the Labor Law, “Lei do Trabalho”, issued in 2007, determining that all workers have the right to healthy conditions and protection equipment, among other measures. The Regulation on Occupational Accidents and Professional Diseases (Decree 62/2013) was another important progress. However, the health and safety regulation dates of 1973, “Diploma Legislativo n.º48/73”, designed mainly for industrial activities and missing specific requirements for the different types of construction works. The environmental, health and safety instruments to be prepared during implementation will need to address, in detail, occupational, health and safety (OHS) requirements, (guides and manuals), applicable to all construction works funded by the project, including the preparation of contractors’ Health and Safety plans.

The Project will need to also ensure that Labor Management Procedures (LMP) are in place and are consistent with the provisions of the World Bank’s ESS2, which identify that all contractors and sub-contractors must ensure that there is no bonded or child labor employed during construction. The LMP will be prepared as part of the ESMF and include provisions to ensure fair wages in line with local legislation and provide contractual hiring of workers (both male and female), adequate payment for overwork and other measures. If a Labor Camp is established for
construction purposes, the facility must follow guidelines established by the Project to ensure safe and hygienic living conditions. Labor Management Procedures and a labor GRM will need to be developed as part of overall safeguards instruments. The LMP will guide the production and implementation of Labor Management Plans for specific sub-projects including specification of responsibilities at sub-project implementation stage by all stakeholders to address labor management requirements.

**ESS3 Resource Efficiency and Pollution Prevention and Management**

ESS3 concepts and objectives are relevant to the project, mainly, due to the potential generation of hazardous and non-hazardous wastes in during civil works (Sub-components 1.1 and Component 2). Civil works (improvements, expansion and construction) will have limited environmental negative impacts, likely arising mainly, during the development phase, which could be caused by the cleaning of vegetation and use of heavy machinery, excavated material disposal, vibration, noise and air pollution, work at heights, etc. Construction works also have the potential to generate significant amount of solid waste at construction and decommissioning sites, including excess fill materials from grading and excavation activities, scrap wood and metals, and small concrete spills. Hazardous solid waste could include contaminated soils, amounts of machinery maintenance materials, such as oily rags, used oil filters, and used oil, as well as spill cleanup materials from oil and fuel spills. Techniques preventing and controlling hazardous and non-hazardous wastes, including availability of licensed treatment and disposal facilities, as well as other potentials risks and impacts will be detailed in the subproject ESMPs.

The project is not anticipated to be a significant user of water or generate significant quantities of GHG emissions.

**ESS4 Community Health and Safety**

Specific measures to protect the community health and safety are relevant, as construction activities may result in an increase in movement of heavy machinery and vehicles for the transport of construction materials and equipment increasing the risk of traffic-related accidents and injuries to workers and local communities. Moreover, improvements and expansion civil works may occur during academic term in existing schools, this will require appropriate signage and restriction to the working area. In fact, the construction works in schools demand special measures to reduce accidents involving students during construction e.g. slips, trips, falls, struck by objects, etc. The problem is aggravated by the large number of students in these schools and given young age and unawareness of risks. Site specific ESMPs will include traffic management measures and the contractors’ Health and Safety plans will address health and safety risks to communities from civil works subprojects after environment and social screening have been conducted. Other measures are expected to include a combination of education and awareness-raising to avoid and minimize risks to students and communities. In addition, to prevent OHS hazards resulting from design layout, material and equipment during operation stage, the standards for resilient construction of both conventional and unconventional infrastructures developed by the education sector will be implemented. These standards have been previously reviewed, found satisfactory and are being used for the Mozambique Disaster Risk Management and Resilience Program (P166437).

The project will ensure that children with disabilities are not denied access to a school education by providing adequate and universal facilities for them including Water and Sanitation for Health (WASH) facilities. The project will work with the school community, including school councils to raise awareness on GBV and support the implementation of regulation and a referral system on GBV. At school level, the entry point will be gender focal
points, who will be trained on GBV issues and provided with tools (contacts of the referral system) to work on this matter. The team will work with GBV specialists during the preparation of the project.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
The project will involve small scale construction, expansion and maintenance of pre-schools (Sub-components 1.1) and improve school infrastructure, e.g. gender separated and functioning toilet facilities and latrines (Component 2). Potential social impacts and risks are expected regarding the physical and economic displacement of Project Affected People (PAP) and temporary or permanent land acquisition.

Since the exact location of schools subject to minor construction or expansion are not known at this stage, the Borrower will prepare, prior to project appraisal a Resettlement Policy Framework (RPF) that examines the project overall risks and impacts and sets out the principles, rules, guidelines and procedures to assess, mitigate and monitor the land acquisition, resettlement related risks and impacts along the project implementation in accordance with the WB Environmental and Social Standards (ESSs). The RPF will be prepared as a preventive measure and will guide the preparation of site specific RAP/ARAPs (if needed) when such locations are identified.

The RPF will include without limitation: guidelines and principles for land acquisition and resettlement, preparation of Resettlement Action Plans (RAP) and Abbreviated Resettlement Action Plans (ARAP) as required.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources
No significant conversion or degradation of natural habitats are expected, and risks and impacts related to ESS6 are expected to be excluded through the screening criteria in the ESMF.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
As per the UN Definition and World Bank ESF there are no Indigenous People (IP) in Mozambique. This ESS is not applicable for the project.

ESS8 Cultural Heritage
The location, nature and scope of reconstruction works have not been defined, yet. It is possible that some works interfere with tangible or intangible cultural heritage. The ESMF must have specific provisions for protecting cultural heritage from the adverse impacts of project activities as well as supporting its preservation, including meaningful consultation with stakeholders regarding cultural heritage. It must also include Chance Find procedures.

ESS9 Financial Intermediaries
The project will not use any Financial Intermediaries, therefore the ESS9 is not relevant for this Project.

B.3 Other Relevant Project Risks
The selection of project area along the country needs to consider the recent unrest in some areas of the country (center and north regions) where there may be significant concerns regarding the activities of security forces. However the project does not consider the use of security personnel and will avoid mapped areas with security issues.

Children with disabilities attend and complete primary and secondary education at lower rates than children without disabilities and this gap may be growing wider. Women and girls with disabilities face disproportionate barriers in their access to education and subsequently to employment. The schooling and early childhood development deficit experienced by children with disabilities can become the most challenging impediment to earning an income and achieving long-term financial autonomy as adults. Reduced earnings caused by lower education levels result in a substantial economic loss from the labor market. When children with disabilities are unable to go to school or have deficient access infrastructure to schools, there is an added economic burden on the household, including possible lost wages of a caregiver who stays at home—who in most cases is a woman.

The Ending Learning Poverty in Mozambique Project will identify several entry points for promoting the inclusion of students with disabilities. The project team will learn more about the gaps and barriers in the education sector and ensure universal access to all children to school infrastructures and equipment, in particular the disabled children.

### C. Legal Operational Policies that Apply

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

### III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

**A. Is a common approach being considered?**

**Financing Partners**

At this stage the project does not consider financing partners.

**B. Proposed Measures, Actions and Timing (Borrower’s commitments)**

**Actions to be completed prior to Bank Board Approval:**

Prior to appraisal:

- Draft Environmental and Social Commitment Plan (ESCP)
- Draft ESMF including Labor Management Procedures and Grievance Redress Mechanism (GRM) for workers
- Draft Resettlement Policy Framework (RPF)
- Draft GBV Action Plan
- Stakeholder Engagement Plan (SEP) including GRM
Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):
Finalize the ESMF including Labor Management Procedures and Grievance Redress Mechanism
Finalize the RPF
Finalize the GBV Action Plan
Prepare Site Specific ESMP including Waste Management Plans and contractors’ H & S Plans.
Prepare Site Specific RAP/ARAPs (if needed)

C. Timing
Tentative target date for preparing the Appraisal Stage ESRS  04-Jun-2020

IV. CONTACT POINTS

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V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s):  Lucia Jose Nhampossa, Marina Bassi
Practice Manager (ENR/Social)  Senait Nigiru Assefa Recommended on 21-Apr-2020 at 12:04:11 EDT
Safeguards Advisor ESSA  Nathalie S. Munzberg (SAESSA) Cleared on 26-Apr-2020 at 20:33:10 EDT