



# Appraisal Environmental and Social Review Summary

## Appraisal Stage

### **(ESRS Appraisal Stage)**

Date Prepared/Updated: 01/30/2020 | Report No: ESRSA00325



**BASIC INFORMATION**

**A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
Cambodia	EAST ASIA AND PACIFIC	P171063	
Project Name	Community-based Childcare for Garment Factory Workers Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Social	Investment Project Financing		2/28/2020
Borrower(s)	Implementing Agency(ies)		
Planète Enfants & Développement	Planète Enfants & Développement		

Proposed Development Objective(s)

To establish quality, sustainable community-based childcare services for garment factory workers that improve employment and labor outcomes, reduce unpaid household childcare, and improve child development.

Financing (in USD Million)	Amount
<b>Total Project Cost</b>	<b>3.25</b>

**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 project will establish community-based childcare centers (CBCCs) for garment workers in partnership with local government, employers and garment worker families. While the project will finance the capital costs of construction new buildings, properly outfitting them, hiring and training qualified childcare workers, the ongoing costs of CBCC services will be co-financed by the families of the children and the employers. This pilot initiative is intended to provide public-private partnership model that can be adopted and scaled up over time.

**D. Environmental and Social Overview**



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

Twenty two Community-based Childcare Centers (CBCCs) are expected to be established. Childcare centers will be established in selected communes in Kampong Speu Province and potentially other provinces in Cambodia, which have a high concentration of factory workers from factories that are participating in the project. No sites have been identified. Specific locations are to be determined through a consultation process with the factories and local government. Centers will be on donated land or renovated from existing facilities. Each center will support around 30 children, with the centers dispersed across a wide geographical area within the province/Capital.

The project will target 625 children of garment workers during project implementation: 110 children aged 3-17 months, 440 children aged 18-36 months, and 75 children aged 37-60 months. Seventeen of the CBCCs will serve ages 3 – 36 months, while 5 CBCCs will serve children 37-60 months. So, the number of children will be higher for the CBCCs with older children.

Garment factories in Cambodia provide jobs to nearly 700,000 people, approximately 90% of whom are women. Many garment workers travel long distances back-and-forth to work each day and some are migrant workers, moving from their villages to often urban areas near factories, including factory dormitories. Providing childcare options will have overall benefits to the households in terms of increased incomes, due to family members (mothers, fathers, grandparents, aunts/uncles) being able to stay employed and enjoy the benefits of career progression and development. Fathers and grandparents will no longer have to give up income earning activities to care for young children, as is often the case in Cambodia. There will be a reduced burden on grandparent/family caregivers and their time use can be redirected from unpaid care to paid work. While there will be benefits for families and for early childhood development, in particular, the quality of the care in the facilities is an important risk factor. CBCC facility design, operational standards, caregiver certification and operational monitoring and quality assurance arrangements will need to be designed so as to ensure child safety and the application of good practices in childhood development.

Cambodia urbanization rate reached 30% in 2015 based on the 2011 urban reclassification (ADB, Cambodia urbanization study). The development of industrial centers and Special Economic Zones (SEZs) is primarily focused in the Phnom Penh Capital and has spilled over to neighboring provinces including Kandi and Kampong Speu. The urban expansion does not seem to be controlled, but is sprawling all over the place. Kampong Speu, where most of the CBCCs will be constructed/renovated, has the advantage of sitting between the capital and the rapidly growing coastal city of Sihanoukville which is the Government designated logistic hub in the country. Some parts of Kampong Speu province consist of natural water streams, mountains, forest covers, etc. the activities located within or near the sensitive natural critical habitats. However, the project will not finance the activities located within or near the sensitive natural critical habitats. The proposed project locations would be clearly separate from such natural settings. The national park and protected area (Kirirom-Bokor) is approximately 90km from Phnom Penh, or around 50km from Kampong Speu center. Some minor environmental impacts would be expected from the project, largely during and after construction of the centers. But these are site specific, short term, and reversible.

D. 2. Borrower's Institutional Capacity

Planète Enfants & Développement (PE&D) is a French non-governmental organisation (NGO), created in 1984 to support child victims of the civil war in Cambodia. Today, PE&D is working in 4 countries: Cambodia, Vietnam, Burkina Faso and Nepal. PE&D has a mission to work comprehensively and holistically for vulnerable children by creating conditions conducive to their well-being and development by means of health, education, and family support services.



PE&D is currently implementing a 3-year Enterprise Based Social Service (EBSS) project with an objective to contribute to the improvement of the legal framework for enterprise-based health and early childhood services in Cambodia. The EBSS project approach is to target the specific needs of female garment workers in piloting reproductive and maternal health and childcare services. As part of its work on early childhood development in Cambodia, PE&D is currently constructing community pre-schools, and therefore has had experience not only in service delivery areas highly relevant for the proposed project, but also in the civil works that are a part of the design and which would raise some of the more significant social and environmental risks.

As part of the organisational structure, PE&D is putting in place staff, ESF focal persons for project preparation and implementation, consultants and needed resources to assess, monitor and manage risks and impacts. The Construction Guidelines, developed by the PE&D, build on the experience and capacity they have gained from other similar projects financed by multilateral donors/organizations. Recently, with the support of Japanese embassy, PE&D built 10 community preschools in Kampot Province, and 1 health care center and 4 maternity waiting rooms in Kampong Speu. PE&D have gained vast experience including on social and children risk management. Considering the fact that the scale of the civil works, entailed in this project, are minor and manageable, PE&D would be capable of monitoring and managing the risks and impacts throughout the project life cycle and beyond. However, to ensure that impacts are properly managed during the construction phase and beyond, training and capacity development is also planned for raising awareness of risk as well as the measures in place for managing those risks (during construction phase and operation) including through the operationalisation of the grievance procedures.

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

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

**Environmental Risk Rating Moderate**

A - type, location, sensitivity and scale of the Project including the physical considerations of the Project: The project will be covering Kampong Speu province, which is around 40km from Phnom Penh Capital, and Phnom Penh capital itself, which have a high concentration of factory workers in and around SEZs and along NR4. Twenty two Community-based Childcare Centers (CBCCs) are expected to be established in/around garment factory zones. Prior to start of civil works, specific locations for the centers are to be determined through a consultation process. The facilities will not be located in sensitive natural critical habitats or protected areas. All of them will be located in either existing buildings or new locations which are in residential or commercial areas near to the homes of the targeted factory workers.

B - nature and magnitude of the potential environmental risks and impacts, the nature of the potential risks and impacts (e.g. whether they are irreversible, unprecedented or complex). The project will invest in small scale, low intensity civil works including rehabilitation of existing buildings, construction of new childcare centers, provision of clean water and latrines, etc. The design of the center which has been incorporated in the Construction Guidelines is a typical one-story (of about 300 m2) building with tile roof. The floor layout consists of a kitchen, kids' learning spaces, resting area during the day, and restrooms. The centers will be protected by fences all around, with a main gate opened to community roads. It is unlikely that the activities would generate, or increase, traffic concern since the distance from CBCC to garment factory workers are walk able. Some temporary, localized, adverse environmental

Public Disclosure



impacts of minor to moderate scale are anticipated partly during the construction phase. These are likely traffic disturbances, disturbances to small shops near the construction site, dust, noise, and construction waste. These adverse impacts could be simply managed by applying good construction practices. CBCC Construction Guidelines was developed and provide standard requirements for building new buildings or significantly rehabilitating existing buildings into CBCCs, covering relevant Environmental and Social Standards (ESSs), environmental screening, chance finds procedure, waste management, occupational health and safety (OHS), and generic Environmental and Social Management Plans (ESMPs) for individual contractors to manage the impacts of civil works. The CBCC Construction Guidelines also covers the commitment to inspect and enforce to ensure the relevant requirements are met and would be accompanied by CBCC Operational Guidelines, to be prepared after 6 months from project effectiveness, which will provide guidance on activities to take place during CBCC operation including the disposal of waste, health and safety for childcare workers and children, and other areas of CBCC operations.

C - capacity and commitment of the Borrower to manage risks and impacts in a manner consistent with the ESSs: Planète Enfants & Développement (PE&D) is involved in early childhood development in Cambodia, and is currently constructing community pre-schools. However, considering the fact that the World Bank’s ESF is new among clients and implementers, the capacity of PE&D has been assessed and confirmed: PE&D would be capable of managing risks and impacts throughout this project and beyond. Capacity development will be provided to engineers and staff as needed. The requirements spelled out in the Construction Guidelines such as ESMP, waste management, OHS, etc. will be made aware to contractors, site engineers, and construction supervision consultants ahead of the civil works. The training will also draw upon lessons learned from Bank-financed school construction projects, including basic good construction practices.

D - other areas of risk that may be relevant: No other risks are relevant.

**Social Risk Rating**

Moderate

The social risk is considered moderate. The centers will be located near factory worker homes on available donated land or through renovation of existing facilities. The key potential risks and impacts relate to the construction, renovation, and the running of the centers. The social risks relate to labour, community health and safety, land and building donation and from potential impacts to any cultural heritage sites located in proximity to the centers. This suggests the adverse social impacts are site specific, are predictable and can be effectively mitigated.

Affordability of services by garment workers is addressed through project design. In case of excess demand, beneficiaries will be chosen randomly to allow fairness and transparency.

To address any risks to children, the ESCP includes implementation of the PE&D Child Protection Policy which has to be signed by any staff, consultant and third party. All workers will be trained in the implementation of the Policy. Caregivers also will need to be certified.

The CBCC Construction Guidelines have in place measures to effectively mitigate identified social risks during site identification process and construction. Monitoring and adaptive management have been built into measures to address risks as they emerge and will inform revisions to the guidelines and any associated procedures. The Project Implementation Manual and CBCC Operational Guidelines will be in place for managing risks and impacts when the centers are up and running. The Environmental and Social Commitment Plan (ESCP), that PE&D have put together,



summarises what is in place and to be put in place, including training and resources, for understanding and managing risks.

## **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:***

Twenty two CBCCs will be established in total, some of which will require construction. Specific locations are to be determined through a consultation process and after the project is approved. Each center will support around 30 children, with the centers dispersed across a wide geographical area. Some centers may be on the same footprint of existing facilities that would be renovated. The project is being designed through a consultative process, including the determination of where the centers are to be located. As part of the proposed activities the project will build capacity and experience to manage and operate childcare centers at a community level in Cambodia. To support the establishment of the physical premises all the legal and institutional arrangements, training material and guidelines have been developed for constructing high quality centers. These construction guidelines have taken into consideration potential environmental and social risks and impacts related to working conditions, waste management, community and worker health and safety, land and building use, cultural heritage. Site selection will look into details the possibility of UXO presence. PE&D will consult with relevant technical institutions/authority to handle UXO clearance before starting the civil works.

Guidelines will also be put in place for operation of the centers and for them to meet defined standards including environmental and social measures. An ESCP has been prepared, which sets out measures and actions that are in place and will be implemented and monitored and measures that still need to be developed, including timelines for these.

##### **Potential key environmental risks:**

The likely risks from the civil work activity are dust, noise, waste from construction activities and during operation, disturbance to traffics and daily businesses, etc. These are minor and localized. During operation, it is expected that solid waste (mostly municipal solid waste from kitchen) will be generated from the centers. Some negative impacts would be possible if proper waste storage and collection services are not effectively implemented. Because of the locations of the proposed centers are so dispersed it is unlikely that waste will be accumulated. Waste management plan will be developed to manage impacts in a long-run. . The other potential risks would be the safety to children including, but not limited to, electrical and fire hazards, children falling off, traffic accidents due to lack of proper prevention, etc. The risk of poor treatment of wastewater from the facilities requires the design to be well considered regarding the treatment system and discharge. These matters were incorporated in the ESCP and standard design specifications of the Construction Guidelines. These Guidelines adopted from the MoEYS's school building design for community pre-school. The CBCC Construction Guidelines was reviewed by ESF specialist, finalized, translated and publicly disclosed . Where needed, a site specific contractor ESMP would be developed by the contractor(s) , using a template to be included in the CBCC Construction Guidelines.



Potential key social risks relate to: labour; community and worker health and safety in the construction of centers and renovation of donated facilities and once they are operational; poor implementation of protocols for voluntary land donation; and impacts to cultural heritage or restriction of access through conversion of land for construction of new centers or renovation of donated facilities. To address potential adverse social risks, PE&D have put measures in place as part of the Construction Guidelines. These ensure that the centers meet national requirements and Good International Industry Practice (GIIP), including World Bank requirements, in all design, construction. PE&D will similarly put in place measures for the safe running of the centers as part of the Project Implementation Manual and CBCC Operational Guidelines. These measures are captured in the Environmental and Social Commitment Plan (ESCP).

The project is being designed through a consultative process both as part of preparation as well as in implementation, including the determination of where the centers are to be located and the services to be offered. The design, construction and running of the centers also requires engagement of stakeholder groups including representation of the users on multi-stakeholder advisory committees (i.e. parents, village leaders and local government officials) which will be established for each CBCC. The ESCP and the construction guidelines together capture the approach to stakeholder engagement including on risks. The ESCP was disclosed on November 29, 2019 and the Construction Guidelines on December 12, 2019.

Beyond providing safe and affordable childcare for garment workers, the benefits of the project also include: better health and economic outcomes for children and their families; improved cognitive development for the children; and, increased retention (reduced turnover) of female workers. Children will be actively cared for and not left to manage while traditional family caregivers (including siblings) focus on their other required daily activities. A curriculum will be developed to contribute towards enhanced family and child learning that will have benefits to overall child development, including cognitive growth, motor skills, social skills and early learning. The CBCCs will provide healthy meals and monitor health standards, resulting in better nutrition and health outcomes of children. Benefits will be measured by health records maintained in the childcare centers, documenting the child's development that include milestones reached, basic health quality measures and cognitive development.

### **ESS10 Stakeholder Engagement and Information Disclosure**

Interested and affected stakeholder groups include: government agencies at various levels covering health, education, labour and other relevant departments; factories, brands/buyers, civil society organisations (CSOs), development partners interested in child-care provision, communities where the centers are based, caregivers, garment workers and their families. The children of the garment workers who will receive the child-care, the garment workers and their families will be those most directly affected.

Consultations and advisory committees form key part of the project design to both inform establishing and functioning of the centers. The caregivers and users will be key stakeholders in these consultations and committees.

Engagement to inform design and construction, for understanding and managing environmental and social risks and impacts, are embedded in project design and the CBCC Construction Guidelines. The project team has already



conducted several rounds of consultation with national and local authorities and garment factory workers and their families. The Guidelines and ESCP have been disclosed at PE&D offices in Phnom Penh and Kampong Speu.

Throughout construction, the Executive Summary, the Construction Guidelines and a register will be available at the Commune Hall for anyone who would like to share comments about any aspect of the project. The Executive Summary will be available in Khmer and English. Additionally the project documentation will be posted in each center.

Once the centers are operational, PE&D will apply mechanisms developed as part of the Bank-supported Cambodia Social Accountability Framework (SAF) which includes community scorecards for community members and CBCC staff themselves to assess the quality of service delivery against service standards and agree on actions to improve the quality of services. As per the SAF approach, the results of community scorecard assessments (including grievances and recommendations for improvement of service quality) are channeled into Action Plans to commit the CBCC and other stakeholders to address the specific feedback that is shared, and to do so on a specific timetable.

Implementation of Actions Plans will be monitored by the CBCC Advisory Committees which will be comprised of multiple stakeholder representatives.

The ESCP summarizes the stakeholder engagement requirements for design, construction and operation of the centers including on the development, communication and operationalisation of a grievance procedure. A separate engagement plan is not required for the project.

## **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**

Twenty two CBCCs will be established in total, some of which will require new construction and/or facility renovation. Workers will include direct, and contract workers. The requirements for labour management procedures including worker grievance procedure are captured in the ESCP. The Construction Guidelines have also been informed to take into account the needs of workers including occupational health and safety considerations. These guidelines will be revised following a review of policies and procedures currently in place for the different categories of workers. Any gaps will be addressed where relevant by developing new and/or revising existing procedures. The review and gap analysis will also inform the Operations Guidelines to ensure compliance with Government of Cambodia and World Bank requirements in relation to working conditions, including occupational health and safety, and pay and benefits for workers in the operation and safe running of the centers.

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

The project (the civil works) will not generate pollution to air, water and land and consume finite resources that may threaten people, ecosystem services and the environment even at local level. The activities will generate minor quantities of waste (solid waste and waste-water) which requires systematic waste management procedures and resources. These matters are spelled out in the ESCP. Besides the Construction Guidelines, the standalone Waste



Management Plan will be developed to provide more details on how to address this aspect in a sustainable manner, i.e. during and after construction. Once Asbestos materials involved, Bank's practice note (2009) will be applied. In the case of risk of asbestos materials the Bank's practice note (2009) will be applied.

#### **ESS4 Community Health and Safety**

There are risks to community health and safety as a result of the construction and renovation of centers. Once constructed and renovated, risks could also arise for the workers and users of the centers. The CBCC Construction Guidelines captures requirements for managing health and safety risks as part of the design and also construction of the centers, including the requirement to inspect and enforce the health and safety standards of the childcare centers for children and staff. Child safeguarding measures will also be in place with training provided to all staff. The ESCP captures measures to be in place as part of the Project Implementation Manual and CBCC Operational Guidelines for the safe running of the constructed/renovated centers.

The CBCC design will ensure a safe, healthy, stimulating and warming environment to welcome young children. Security provisions will include security fences, smoke detectors, safe storage of hazardous materials, and door locks. Health and hygiene assurance standards will include providing fans in all rooms, unlimited drinking water, first aid kits, and adult- and child-accessible toilets, sinks, and soap for handwashing. Lands will be selected after a systematic Social & Environmental Assessment, to ensure that the location will be safe from any environmental risks or hazards (e.g. flooding, pollution, dangerous flora and fauna, neighboring construction, and unguarded water bodies).

#### **ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

No specific sites for centers have been identified. The site-selection will be undertaken during implementation and following a defined planning procedure. Land needed for each center is about 300m<sup>2</sup>. The assets will be owned by the respective commune authorities upon conclusion of their agreements with PE&D.

Any centers to be constructed are expected to be on land which is publicly owned and donated by local government, particularly Commune Councils. District and Commune officials expressed a willingness to donate public land during stakeholders consultation meetings, and this is seen as an important strategy for reducing project cost and offering more affordable services to target beneficiaries. Where land is donated, procedures are included as part of the CBCC Construction Guidelines, to ensure that the donor is fully informed and the donation of land does not result in any displacement. Any facilities that are donated will have to be screened for any legacy issues with respect to prior land acquisition.

The ownership of the land will not be transferred but an agreement for long duration use will be signed. The Construction Guidelines contain Land or Building Use Protocol and template Agreement. The Agreement will be signed by PE&D and Commune Council and will the roles and responsibilities in relation to the planning, implementation, and operation of the center and its related community activities.



**ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

The project will not finance the improvement or construction or activities that could provide access to or deplete critical natural habitats, wildlife sanctuary, protected areas and/or scarce resources. The construction of the centers and renovation of existing buildings will only take place in residential or commercial areas that are already developed. However, it is expected that, because some areas may be prone to flood, some childcare centers/locations may require leveling up (backfilling) with aggregates or construction debris as the primary source of backfilling materials that are available in the market . Contractors are not permitted to access to or use materials from or nearby biodiversity conservation or protected areas that serves as ecosystem services for the living natural resources unless from licensed suppliers. These concerns were incorporated in CBCC Construction Guidelines and the contractor-specific ESMP(s) would be developed if such issues are arisen.

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

Indigenous peoples are not expected to be adversely impacted, and they do not reside in the targeted project area. Most garment workers are women some of whom are migrant workers. All workers, and their children, who have access to the centers, will benefit regardless of their ethnicity. The design of project is such that it takes into consideration the needs of various stakeholders (government, employers, garment workers and their families) through consultations. Furthermore, CBCC Advisory Committees will be established for each CBCC which will include representation from the parents as well as other stakeholders as deemed necessary. Any specific requirements for ensuring access and inclusion, to ensure benefits for all, and that the project takes into consideration the needs of all groups, will be mainstreamed into project design and in the operational guidelines for running the centers.

**ESS8 Cultural Heritage**

Centers will be constructed on donated land or renovated if existing facilities are donated for renovation and use as CBCCs. There is potential for risks to tangible cultural heritage that may be on the land or in close proximity as a result of conversion, construction or renovation. A provision of chance-finds procedure was incorporated in the construction Guidelines. Screening form for possible PCR in the proposed locations was also developed is available in the guidelines.

**ESS9 Financial Intermediaries**

The project is not expected to use financial intermediaries.

**B.3 Other Relevant Project Risks**

All risks and impacts have been presented against the standards.

**C. Legal Operational Policies that Apply**

**OP 7.50 Projects on International Waterways**

No

Public Disclosure



**OP 7.60 Projects in Disputed Areas**

No

The project will not be located in an area under legal or international dispute nor competing territorial claims.

**III. BORROWER’S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)**

DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED	TIMELINE
<b>ESS 1 Assessment and Management of Environmental and Social Risks and Impacts</b>	
REGULAR REPORTING: PE&D will prepare regular (6-monthly) monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities, feedback response and grievance mechanisms.	09/2020
INCIDENTS AND ACCIDENTS: PE&D will develop and implement an Incident Reporting Mechanism and will cover concerns of any workers and any affected communities. The measures will be captured in the PIM. Training will be provided as part of the implementation of the mechanism. Should an incident occur the Bank will be informed in a timely manner as per the mechanism.	04/2020
ORGANIZATIONAL STRUCTURE: PE&D will establish and maintain an organizational structure with qualified staff and resources to support strong management of E&S risks including oversight from: Country Representative; Project Manager; Construction Supervision Consultant; and the CBCC Coordinator.	03/2020
MANAGEMENT TOOLS AND INSTRUMENTS: PE&D will implement the Construction Guidelines and this ESCP, develop operational guidelines and revise and review its existing policies and instruments, including the guidelines, related to all aspects of the ESCP and update to ensure alignment with the relevant standards of the ESF where necessary.	04/2020
MANAGEMENT OF CONTRACTORS: PE&D will incorporate the relevant aspects of the ESCP and Construction Guidelines into the ESHS specifications of the procurement documents with contractors. Thereafter PE&D will monitor and report on compliance.	05/2020
CAPACITY BUILDING: Training will be provided to consultants, PE&D staff and NGO sub-grantees on environment and social risk management throughout the life of the project including (but is not limited to): Child Protection Policy for project consultants and caregivers; Community health and safety for CBCC caregivers; Grievance Mechanism; Worker Grievance Mechanism for all direct and indirect workers; and incident reporting mechanism.	04/2020
<b>ESS 10 Stakeholder Engagement and Information Disclosure</b>	
STAKEHOLDER ENGAGEMENT: PE&D will undertake, record and report on consultations with interested and affected stakeholders as per the approach presented in the construction guidelines, and as yet to be set out in the operation guidelines and PIM.	04/2020

Public Disclosure



PROJECT GRIEVANCE MECHANISM: PE&D will develop, raise awareness, and operationalize a feedback response and grievance mechanisms, including monitoring and reporting on any grievances.	04/2020
<b>ESS 2 Labor and Working Conditions</b>	
LABOUR MANAGEMENT PROCEDURES: PE&D will ensure the labour and working conditions are in line with the requirements of the World Bank and the Government of Cambodia for all categories of workers.	10/2020
GRIEVANCE MECHANISM FOR PROJECT WORKERS: PE&D will implement, monitor, and report the workers' grievance procedures as laid out in the internal terms and conditions of employment. PE&D will also review, operate and extend the grievance mechanism.	10/2020
OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES: PE&D will implement, monitor, and report the occupational health and safety (OHS) measures provided by the organization for its workers as contained in the employment terms and conditions.	10/2020
<b>ESS 3 Resource Efficiency and Pollution Prevention and Management</b>	
WASTE MANAGEMENT PLAN: PE&D will avoid or minimize the generation of hazardous waste, reduce non-hazardous waste, and treat and destroy waste in a environmentally sound and safe manner.	10/2020
RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: The PE&D will not involve the use of scare resources or impact the natural environment. It will not invest in the use of scarce resources depleting the existing ecosystem in project areas.	10/2020
<b>ESS 4 Community Health and Safety</b>	
COMMUNITY HEALTH AND SAFETY: PE&D will implement, monitor and report on the risks and measures related to community health and safety as specified in the construction guidelines, and as yet to be specified in the operational guidelines.	10/2020
CHILD PROTECTION MEASURES PE&D will implement and train staff on its child protection policy which contains risks assessment, code of conduct, mechanism of reporting in case of child abuse and information about workers training in child protection.	04/2020
SECURITY PERSONNEL: PE&D and their contractors will not be using Security Personnel for protecting their assets. If the circumstances change, the Bank will be notified, and a Security Management Plan will be developed and implemented.	10/2020
<b>ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</b>	
AGREEMENT FOR LAND AND/OR BUILDING USE: PE&D will implement the Land and/or Building Use Protocol and ensure that the land use agreement for each center is completed and recorded, including undertaking and recording any engagement.	04/2020

Public Disclosure



<b>ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>	
BIODIVERSITY RISKS AND IMPACTS: The CBCCs will not be built in areas that could provide access to or deplete natural critical habitats, wildlife sanctuary, protected areas and/or scarce resources.	10/2020
<b>ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities</b>	
<b>ESS 8 Cultural Heritage</b>	
CHANCE FINDS: PE&D will implement, monitor, and report the implementation of measures regarding “protection on historic and cultural resources on land site” as contained in the Construction Guidelines.	10/2020
<b>ESS 9 Financial Intermediaries</b>	

**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:**

There are no areas where the Borrower’s E&S Framework will be used.

Public Disclosure

**IV. CONTACT POINTS**

**World Bank**

Contact:	Erik Caldwell Johnson	Title:	Senior Social Development Specialist
Telephone No:	5721+1314 /	Email:	ejohnson1@worldbank.org

**Borrower/Client/Recipient**

Borrower: Planète Enfants & Développement

**Implementing Agency(ies)**

Implementing Agency: Planète Enfants & Développement

**V. FOR MORE INFORMATION CONTACT**



The World Bank  
1818 H Street, NW  
Washington, D.C. 20433  
Telephone: (202) 473-1000  
Web: <http://www.worldbank.org/projects>

## **VI. APPROVAL**

Task Team Leader(s):	Erik Caldwell Johnson
Practice Manager (ENR/Social)	Christophe Crepin Cleared on 30-Jan-2020 at 19:46:41 EST