



Review & Update of World Bank's
Environmental & Social Safeguard Policies
Phase 3 Consultation Meetings

Agriculture Investment and Market Development Project



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Jan. 2016

**“Road Testing” the new ESSF--Project Case Studies:
what changes, what does not?**

- 1. What are the new requirements if any?**
- 2. What requirements are dropped, if any?**
- 3. Change in effort or expertise required?**
- 4. Added Value?**

Standard	Building on	Modernizing
ESS1: Assessment and Management of ESS Risks and Impacts	OP/BP4.01(Environmental Assessment)	Non-discrimination, adaptive management, time frame for compliance
ESS2: Labor and working conditions	OP/BP4.01 and EHS Guidelines	Prohibiting child labor and forced labor, focus on OHS, grievance mechanism
ESS3: Resource Efficiency and Pollution Prevention	OP4.09 (Pest Management) and EHS Guidelines	Efficient management of energy, water, and other resources and materials
ESS4: Community Health and Safety	OP/BP4.37 (Safety of Dams) and EHS Guidelines	Focus on risks and impacts on communities through design and safety of infrastructure, equipment, products, services, traffic, and hazardous materials
ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	OP/BP4.12 (Involuntary Resettlement)	Greater clarity on treatment of state land, land titling, access to common resources, voluntary transactions, force evictions
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	OP/BP4.04 (Natural Habitats) and OP/BP4.36 (Forests)	Requirement to assess and mitigate impacts on biodiversity
ESS7: Indigenous Peoples	OP/BP4.10 (Indigenous Peoples)	Clearer definitions, introduction of FPIC in specified circumstances
ESS8: Cultural Heritage	OP/BP4.11 (Physical Cultural Resources)	Adopt chance find procedure, enhanced consultation with affected communities
ESS9: Financial Intermediaries	OP/BP 4.01	Establish E&S procedures commensurate with FI nature, risk level and impact
ESS10: Information Disclosure and Stakeholder Engagement	Consolidates WB engagement provisions	Meaningful consultation, access to information and grievance redress

Project objectives: to support the transformation of low productivity, subsistence-oriented cassava, maize and sorghum sub-sectors into commercially-oriented and competitive value chains in four agro-ecological areas.

Project description:

Component A: Support to Production, Processing and Marketing, including (i) establishing productive partnerships between Producer Organization and agribusiness buyers; (ii) matching grants to Producer Organizations for increased production & for construction/rehabilitation of post harvest storage and processing facilities; (iii) facilitating nutrition enhancing practices; (iv) construction/rehabilitation of basic infrastructure in the project area such as market platforms, 500 km of feeder roads, rural roads and ponds.

Component B: Support to Seed System, Core Public Services and Technology Transfers measures to improve the seed production and distribution system

Component C: Project Coordination and Management including preparation of safeguard instruments and derived implementation measures

From Safeguards to E&S Standards



SAFEGUARDS POLICY		
4.01	ENVIRONMENTAL ASSESSMENT	✓
4.04	NATURAL HABITATS	
4.36	FORESTS	✓
4.09	PEST MANAGEMENT	✓
4.11	PHYSICAL CULTURAL RESOURCES	✓
4.37	SAFETY OF DAMS	
7.50	PROJECTS ON INTERNATIONAL WATERWAYS	
7.60	PROJECTS IN DISPUTED AREAS	
4.12	INVOLUNTARY RESETTLEMENT	✓
4.10	INDIGENOUS PEOPLES	✓

CATEGORY B



**SUBSTANTIAL
(MODERATE?)
RISK**

ESS STANDARD	Specific Applicability to Lom Pangar Hydropower Project
ESS1: Assessment and Management of ESS Risks and Impacts	✓
ESS2: Labor and working conditions	✓
ESS3: Resource Efficiency and Pollution Prevention	✓
ESS4: Community Health and Safety	✓
ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	✓
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	✓
ESS7: Indigenous Peoples	✓
ESS8: Cultural Heritage	✓
ESS9: Financial Intermediaries	
ESS10: Information Disclosure and Stakeholder Engagement	✓

OP 4.01: Implementation of Safeguard Policies (actual)

- Category B
- Project activities (mainly component 1) include construction/rehabilitation of processing facilities, rural and feeder roads, and market infrastructure. OP 4.01 triggered for the civil works, and impacts of agriculture.
- By appraisal ESMF was prepared as precise nature and location of activities was not identified at the time
- Sub-projects that would be rated A are ineligible

OP 4.04: Not triggered. Project will avoid activities with adverse impacts on natural habitats

OP 4.36: Project will avoid financing activities with adverse impacts on forest health or on rights and welfare of people depending on forests. ESMF includes a positive list of areas where agro-forestry and reforestation activities will be undertaken.

OP 4.09: Project activities will likely increase use of chemical pesticides. Issues recognized in ESMF. By appraisal PMP prepared including integrated pest management practices.

OP 4.11: Triggered as precaution. Civil works may include excavations and movement of earth. ESMF includes chance find procedures and guidelines for contractors.

OP 4.10: Triggered due to presence of Indigenous Peoples in project area (Baka in South and East region; Bakola and Bagyeli in South region and Bedzang in Center region). Indigenous Peoples Plan prepared by appraisal.

OP 4.12: policy was triggered for the event that the civil works subprojects should require land acquisition. RPF prepared by appraisal, to guide preparation of RAPs when needed during implementation.

ESS1: Assessment & Management of E & S Risks & Impacts

New Requirements/Approaches?	Actual (under WB Ops)	Changes, additional effort/expense under ESSF	Value?
Use of Borrower's E & S System to the extent possible	No	Borrower may request, WB approve in whole or in part	
E & S Assessment	Integrated environmental and social assessment (including community health and safety)	ESIA include assessment of potential for specific community benefits; Non-quantitative assessment of TPP greenhouse gas emissions (see ESS3)	
E & S Commitment Plan	ESMF completed prior to project Appraisal, includes monitoring of impacts with indicators and budget; capacity building	Time-bound ESCP covering life of project, emphasis on monitoring and adaptive management	
Project Monitoring & Reporting	Requirements throughout life of project	ESCP likely with broader range of monitoring, explicit provisions for adaptive management based on monitoring results	
Stakeholder Engagement & Info Disclosure	Public consultations on Safeguards documents (ESMF, PMP, RPF, and IPP by appraisal– and any ESIA, RAP as and when prepared)	Preparation and implementation of Stakeholder Engagement Plan, Borrower reporting to public and WB throughout life of project	

ESS2: Labor & Working Conditions

New Requirements?	Actual (under WB Ops)	Changes, additional effort/expense under ESSF	Value?
Working Conditions & Management of Worker Relationships	No explicit requirements beyond routine OHS (guidelines for contractors in ESMF)	Explicit requirements and Borrower responsibilities relating to relationship between contractors/subcontractors and workers	
Protecting the Work Force	No explicit requirement	Explicit requirements relating to non-discrimination; child/forced labor	
Grievance Mechanism	No GM for workers	For all aspects of project; separate GM for workers	
Occupational Health & Safety (OHS)	General OHS	Explicit requirements for WBG Environm. Health & Safety Guidelines	
Contracted Workers	General OHS	Expanded requirements in contracts; application to subcontractors; enhanced Borrower responsibility for monitoring	
Workers in Community Labor	No requirement	In CDD projects ascertain whether labor is on voluntary basis as outcome of community agreement	
Primary Supply Workers	No requirement	Depending on level of control over primary suppliers, address risks of child labor and serious safety issues	8

ESS3: Resource Efficiency & Pollution Prevention & Management

New Requirements?	Actual (under WB Ops)	Changes, additional effort/expense under ESSF	Value?
Resource Efficiency	No explicit requirement (ESMF does identify opportunities such as biodigestors)	Explicit consideration of opportunities to enhance energy efficiency	
Pollution Prevention & Management	ESMF: <i>identifies risks and mitigation measures</i> (potential soil degradation, water pollution etc) EHS guidelines apply PMP identifies measures for integrated pest management and safe use of pesticides	GHG emissions estimation?	

ESS4: Community Health & Safety

New Requirements?	Actual (under WB Ops)	Changes, additional effort/expense under ESSF	Value?
Community Health & Safety	ESMF (and PMP): potential impacts and mitigation measures regarding traffic accidents; construction risks; health risks (exposure to chemicals), risk of social conflict (land, resources) and loss of traditional ways	Consideration of other potential impacts, e.g. communicable & non-communicable diseases (?) Emergency plan (?)	
Security Personnel	No requirement		

ESS5: Land Acquisition, Restrictions on Land Use & Involuntary Resettlement

New Requirements?	Actual (under WB Ops)	Changes, additional effort/expense under ESSF	Value?
General	RPF prepared prior to Appraisal (requires preparation and implementation of RAP prior to land acquisition)	ESCP specifies preparation/implementation of RAP prior to land acquisition for project purposes (RPF or RAP still required prior to WB Board approval?)	
Displacement	RPF covers physical & economic; permanent and temporary displacement.	No change	
Collaboration with Other Responsible Agencies or Subnational Jurisdictions	RPF describes responsibilities of PIDMA and sector ministries	ESCP might require more explicit, written agreements among parties involved in land acquisition	
Technical & Financial Assistance	RPF describes measures for capacity strengthening	ESCP might specify time-bound assistance to strengthen Borrower capacity, with costs and monitoring provisions	

ESS6: Biodiversity Conservation & Sustainable Management of Living Natural Resources

New Requirements?	Actual (under WB Ops)	Changes, additional effort/expense under ESSF	Value?
General	ESMF excludes potential activities in and around permanent forest domain (and includes sensitization measures)	<p>ESIA considers potential biodiversity impacts in modified habitat; ecosystem services</p> <p>ESCP to specify adaptive management strategy based on monitoring results; might include preparation of a time-bound Risk Management Plan</p>	
Primary Suppliers	No requirement	Not applicable to project (no sourcing of primary production, no ongoing suppliers)	



ESS7: Indigenous Peoples

New Requirements?	Actual (under WB Ops)	Changes, additional effort/expense under ESSF	Value?
Circumstances Requiring Free, Prior & Informed Consent (FPIC)	FPI-Consultation	FPIC when project impact lands traditionally owned/used/occupied by IP; cause relocation of IP; cause significant impact on IP heritage. FPIC does not equate unanimity	
Protection of IPs in voluntary isolation	Not mentioned	Likely not applicable	
Indigenous Peoples & Broader Development Planning	Not mentioned IPP includes various measures	Borrower or IPs may seek support for this, for ex. for capacity building	

ESS8: Cultural Heritage

New Requirements?	Actual (under WB Ops)	Changes, additional effort/expense under ESSF	Value?
General	No physical cultural heritage plans prepared as no known areas. Movement of earth & risk of chance finds. Addressed via ESMF (and eventual ESIA) and guidelines for contractors	EIA would consider potential for impact on intangible cultural heritage (unlikely to be an issue)	
Stakeholder Consultation & Identification of Cultural Heritage	ESMF	Likely not applicable	
Legally Protected Cultural Heritage Areas	Not applicable		
Provisions for Specific Types of Cultural Heritage		Likely not applicable	
Commercialization of Cultural Heritage		Not applicable	

ESS9: Financial Intermediaries

New Requirements?	Actual (under WB Ops)	Changes, additional effort/expense under ESSF	Value?
FI Environmental & Social Procedures	Not applicable 	Not applicable 	
Stakeholder Engagement			
Reporting to the Bank			

ESS10: Stakeholder Engagement & Information Disclosure

New Requirements?	Actual (under WB Ops)	Changes, additional effort/expense under ESSF	Value?
Engagement during Project Preparation	Public consultations on Safeguards instruments	Preparation of Stakeholder Engagement Plan, covering life or project;	
Engagement during Project Implementation & External Reporting	Operation and disclosure of Grievance Mechanism in relation to land acquisition	Implementation of Stakeholder Engagement Plan; Regular reporting to public and WB on implementation	
Grievance Mechanism	In RPF and IPP	Covering all aspects of project; separate GM for workers	
Organizational Capacity & Commitment	Capacity building elements in ESMF, IPP, PMP and RPF	ESCP to specify detailed, time-bound implementation and associated capacity building plan	

Operational Implications of Proposed Framework:

Borrower: overall low incremental change in scope of work and resources; decreasing marginal costs as capacity increases

Bank: similar low incremental change

Environmental and Social Standard	Prospective Change in Effort/ Resources
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts	Low
ESS 2: Labor and Working Conditions	Moderate to Substantial
ESS 3: Resource Efficiency and Pollution Prevention and Management	Low
ESS 4: Community Health and Safety	Low to Moderate
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	None
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	None
ESS 7: Indigenous Peoples	None
ESS 8: Cultural Heritage	Low to None
ESS 9: Financial Intermediaries	None
ESS 10: Stakeholder Engagement and Information Disclosure	Low to None