

**MINISTRY OF FINANCE AND PLANNING**

**REPUBLIC OF SOUTH SUDAN**

**ENHANCING COMMUNITY RESILIENCE AND LOCAL GOVERNANCE PROJECT PHASE II**

**PROJECT ID- P176761**

**ENVIRONMENTAL & SOCIAL MANAGEMENT PLAN**

REHABILITATION OF LOCAL GOVERNMENT BOARD OFFICE BLOCK IN JUBA

**JANUARY 2023**

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# LIST OF ACRONYMS AND ABBREVIATIONS

|  |  |
| --- | --- |
| CoC | Code of Conduct |
| CRW | Crisis Response Window |
| ECRP II | Enhancing Community Resilience and Local governance Project II |
| E&S | Environmental & Social |
| EIA | Environmental Impact Assessments |
| ESF | Environmental and Social Framework |
| ESMF | Environmental and Social Management Framework |
| ESMP | Environmental and Social Management Plan |
| ESS | Environmental and Social Standard |
| GBV | Gender-Based Violence |
| GIZ | Deutsche Gesellschaft für Internationale Zusammenarbeit |
| GRM | Grievance Redress Mechanisms |
| IDP | Internally Displaced Person |
| IOM | International Organization for Migration |
| LGB | Local Government Board |
| LMP | Labor Management Procedures |
| MOE | Ministry of Environment |
| OHS | Occupational Health and Safety Standards |
| O&M | Operation and Maintenance |
| PAPs | Project Affected Populations |
| PDO | Project Development Objective |
| PMU | Project Management Unit |
| PPE | Personal Protective Equipment |
| PSEA | Prevention of Sexual Exploitation and Abuse |
| SEA | Sexual Exploitation and Abuse |
| SEP | Stakeholder Engagement Plan |
| SH | Sexual Harassment |
| WB | The World Bank |
| WMP | Waste Management Plan |
| WHR | Window for Host Communities and Refugees |

# EXECUTIVE SUMMARY

The Ministry of Finance & Planning with Local Government Board received some funds from the World Bank for implementing the Enhancing Community Resilience and Local Governance Project, Phase II (ECRP II). The project aims to address the immediate needs for basic services and flood risk reduction in selected vulnerable areas of South Sudan, while strengthening community institutions and local governments’ capacity to better manage local development and intercommunal tensions over services and supporting the national government to provide oversight. The project seeks to maximize its impacts and sustainability through a strong focus on O&M of the infrastructure. To ensure flexibility and adaptability to evolving population, political, and conflict dynamics, the project uses a design approach that is built on continuous conflict assessment and possible replacement counties.

The proposed sub-project is the rehabilitation of 2 building to host the Project Management Unit Staff (PMU) at the Compound of Local Government Board (LGB), in Juba Town (South Sudan), west of Bank of South Sudan. The proposed subproject is found at the GPS Coordinates point of 04º51’12.52’’N and 31º36’56.05’’E. The activity of the proposed subproject includes the renovation of two exiting office blocks at the Local Government Board (LGB) for the use by staff of the Project Management Unit (PMU).

This Environmental and Social Management Plan (ESMP) specifies the means through which the adverse environmental and social risks and impacts of the Rehabilitation of the Local Government Board Office Block associated with pre-construction, construction, and operational activities of the Project are either avoided or mitigated.

The anticipated positive and adverse negative Environment and Social impacts and risks associated with the rehabilitation of the two office blocks at LGB has been classified into the renovation and operation phase of the subproject. Proposed mitigation measures for each environmental and social risk and impacts were also identified, including their monitoring responsibilities and indicators, frequency, and the budget line. The ESMP also captures the channels through which project grieved stakeholders can report their grievances. It additionally addresses measures for handling and resolving grievances. Grievances form will be developed and made available at the subproject site and a GRM box will be installed by the project site. An induction on GRM related issues will be provided to all workers before commencement of work at the site. The Project GRM facilitates the subproject to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project based on the Project ESMF.

The Environment and Social Management Plan was developed based on qualitative method using the results obtained from the Environment and Social Screening, information captured from stakeholder consultations based on the procedures included in the Project Environment and Social Management Framework. The ESMP was prepared to specify the means through which the adverse environmental and social risks and impacts of the Rehabilitation of the Local Government Board Office Block associated with renovation and operational activities of the subproject are either avoided or mitigated.

# CHAPTER 1: INTRODUCTION

## Project Background

Enhancing Community Resilience and Local Governance Project Phase II (ECRP II) aims to address immediate needs for basic services and flood risk reduction in selected vulnerable areas of South Sudan, while strengthening community institutions and local governments’ capacity to better manage local development and intercommunal tensions over services and supporting the national government to provide oversight. The project seeks to maximize its impacts and sustainability through a strong focus on O&M of the infrastructure. To ensure flexibility and adaptability to evolving population, political, and conflict dynamics, the project uses a design approach that is built on continuous conflict assessment and possible replacement counties.

**Project Development Objective**

To improve access to services, strengthen flood resilience, and enhance institutional capacity for local service delivery and integrated disaster risk management at the national and sub-national levels.

**Component 1. Infrastructure and Services for Community Resilience (US$ 100 million equivalent)**

This component will be led by IOM to leverage its expertise and experience under ECRP-I. The component will support eligible investments in community-level infrastructure and services as well as physical investments for flood risk reduction. The WHR funds will be used for Subcomponents 1.1 and 1.3 whereas the CRW funds will be used for Subcomponents 1.2 and 1.3.

**Subcomponent 1.1: Community Infrastructure and Services.**

This subcomponent will support eligible investments in community-level infrastructure and services in selected vulnerable areas through a participatory planning process. Eligible investments include construction or rehabilitation of public goods such as water supply and sanitation facilities, footpaths, and community roads, dykes for flood protection, and health and education facilities, among others, to ensure maximum community benefit.[[1]](#footnote-1) Selection will be made from an open menu (subject to a short negative list)[[2]](#footnote-2)from which communities will choose in a participatory manner, based on their needs and priorities. Selected community infrastructure will use renewable energy sources (solar panels) and adopt disaster- and climate-resilient approaches, including risk assessments, to identify safe locations and elevated building structure options to reduce flood and other disaster risks. The participatory planning process will be supported under Component 2. All payams and bomas within the target counties will be eligible for funding.

## Purpose of the ESMP

This Environmental and Social Management Plan (ESMP) specifies the means through which the adverse environmental and social risks and impacts of the Rehabilitation of the Local Government Board Office Block associated with pre-construction, construction, operational and decommissioning activities of the Project are either avoided or mitigated. It further identifies, characterizes, and manages the potential risks and impacts while rehabilitating the current office block. The ESMP lists the project-specific risks and impacts and mitigation measures, lays out institutional arrangements of the implementation and monitoring of the risk mitigation measures, and proposed monitoring indicators for measurement and monitoring of E&S performance.

The Specific objectives of the ESMP are to.

* Ensure compliance with the environmental and social instruments (including the Environmental and Social Management Framework) for ECRP II and the relevant South Sudan legal framework on Social and Environmental Safety and Health.
* Identify potential Environmental and social impacts (including solid waste, air pollution, traffic management, occupational and community health and safety aspects) that may occur during the rehabilitation, operation, and maintenance of the Local Government Board Office Block.
* Develop a detailed specific mitigation measure with relevant cost implications that will need to be achieved during and after the renovation process.
* Specify responsibilities and institutional arrangement that will be put in place to ensure that the mitigation measures are implemented
* Integrate environmental aspects fully into the various activities during the renovation and operation of the facility.
* Monitor the implementation and effectiveness of the proposed Environment and Social risk mitigation measures.
* Contribute towards risk identification, prevention, and management.

## ESMP Methodology

Environment and Social Screening was performed to identify the potential environmental and social impacts and risks posed to the Public and neighboring communities during the construction and operation phases of the subproject.

During the Environment and social screening process, methods like observation, Stakeholder interviews and focused group discussions, photography and checklist were used to identify the environmental and social findings for the proposed project.

The Environment and Social Management Plan was developed based on qualitative methods through analysis of the results obtained from the Environment and Social Screening, documentation reviews and information captured from stakeholder consultations.

# CHAPTER 2: POLICY, LEGAL AND ADMINISTRATIVE FRAMEWORK

## Introduction

This chapter covers the general overview of applicable national policy, international environmental agreement and other legal frameworks which is useful for environmental and social management and conservation during the implementation of the ESMP starting from prerenovation, renovation, and operation phases of the subprojects.

The Government of the Republic of South Sudan adopted a new constitution after attaining its independence in July 2011, as well as policies and legislation related to environmental and social standards. Some legislation from the previous ‘Southern Sudan’ remains in place. At the same time, other laws and regulations are still being drafted, with the aim of enhancing sustainable socio-economic development. The policies and laws provide procedures to be followed in the planning and implementation of activities to utilize resources and execute programs to maximum benefit.

**Transitional Constitution of the Republic of South Sudan of 2011:** The Transitional Constitution of the Republic of South Sudan of 2011 includes numerous provisions that have a bearing on the environment. Article 41 (1) provides that the people of South Sudan shall have a right to a clean and healthy environment and (2) that every person shall be obliged to protect the environment and (3) that future generations shall have the right to inherit an environment protected for the benefit of present and future generations. The constitution promotes the prevention of pollution, ecological degradation, natural resource conservation and securing the application of natural resources in an ecologically sustainable way. It also emphasizes on promoting rational economic and social development to protect the biodiversity of South Sudan. Furthermore, Article 166 (6) expects local governments to involve communities in decision-making in the promotion of a safe and healthy environment.

**South Sudan Draft Environmental and Protection Bill (2013)** was developed to protect the environment and to promote ecologically sustainable development that improves the quality of life for both the present and future generations. Section 18 of the South Sudan Draft Environmental and Protection Bill introduces the requirement for Environmental Impact Assessments. This bill is vital since it requires involvement of communities in decision-making and to anticipate and avoid, minimize, or offset the adverse significant biophysical, social, and other relevant effects of development proposals, among others. This draft bill is critical for the development and implementation of this ESMP.

In addition, Section 32, Cap 5, intends to introduce the requirement for Environmental Audits. An Environmental Audit is defined as the systematic, documented, periodic and objective evaluation of how well environmental organization, management and equipment are performing in conserving the environment and its resources. The main objectives of an Environmental Audit are to: Assess how far project activities and programs conform with the approved environmental management plans as well as with the required environmental quality standards. To provide mechanisms for coherent implementation procedures of a project to mitigate adverse environmental impacts and provide regulatory bodies with a framework for ensuring compliance with, and the performance of an environmental management plan.

Section 20, Cap 5, intends to introduce the requirement for Environmental Monitoring. Which is defined as the continuous determination of actual and potential effects of any activity or phenomenon on the environment, whether short or long term. The bill mandates the line ministries to: Monitor environmental phenomena with a view to assessing possible changes in the environment and their possible impacts. In addition, they must monitor the operations of any industry, project, or activity with a view to determining its immediate and long-term effect on the environment. They need to compel the proponent to carry out a baseline survey to identify basic environmental parameters in the project area before implementation (except where a baseline survey has been carried out) Finally, they must determine the parameters and measurable indicators to be used in monitoring of projects and conduct measurement of environmental changes that have occurred during implementation.

**Environment Policy of South Sudan (2015 – 2025):** The Policy was passed in 2015 and its strategic goal is to ensure the protection, conservation, and sustainable use of the natural resources of South Sudan without compromising the tenets of inter-generational equity. The policy will pursue and archive to develop laws, regulations, and guidelines to ensure sustainable management of the environment as well as the prudent utilization of natural resources. The policy addresses a number of aspects that that include; climate change, management of resources, corporate social and environmental responsibilities and environmental planning, among others. The project will generate hazardous and non-hazardous waste during its respective phases that should be responsibly managed to avoid pollution of environmental media. Moreover, the project will involve provision of support and capacity building to the Project Implementation Unit that will include strengthening the environmental and social safeguard implementation capacity at the Ministry of Finance and Planning as well as other project implementation entities/partners.

**The Land Act of 2009 (State of Southern Sudan):** One of the key objectives of the Land Act is to promote a land management system, which can protect and preserve the environment and ecology for the sustainable development of South Sudan. It also provides for fair and prompt compensation to any person whose right of occupancy, ownership or recognized long-standing occupancy or customary use of land is revoked or otherwise interfered with by the Government.

The Land Act reinforces the Government’s recognition of customary land tenure: ‘Customary land rights including those held in common shall have equal force and effect in law with freehold or leasehold rights.’ Community land can be allocated to investors as long as investment activity ‘reflects an important interest for the community’ and ‘contributes economically and socially to the development of the local community’. It also requires that state authorities approve land acquisitions above 250 feddans (105 hectares) and create a regulated ceiling on land allocations.

The Land Act requires the Government to consult local communities and consider their views in decisions about community land. The Act also gives pastoralists special protection: ‘No person shall without permission to carry out any activity on the communal grazing land which may prevent or restrict the residents of the traditional communities concerned from exercising their grazing rights’.

The Land act is applicable to this project since there is acquisition of land through voluntary donation process for the implementation of project activities.

**The Wildlife Conservation and National Parks Act (section 5**) recognizes that wildlife constitutes an important national natural wealth and is part of the heritage of South Sudan and therefore needs to be conserved, protected, and utilized for the benefit and enjoyment of all its people. Section 6 vests the administration and execution of the policy to the Secretariat headed by the Director General of the Secretariat of Wildlife Conservation, Environment Protection and Tourism. The Secretariat’s objectives and functions are as follows: The conservation, management and administration of parks, controlled areas, and other protected game reserves. The development, in cooperation with other competent authorities, of Tourism (based on the wildlife in South Sudan) and the development of other forms of rational utilization of the wildlife and environment resources. The control of hunting and management and preservation, conservation and the protection of wildlife and environmental resources along with the control of trade in protected animals and trophies. The promotion of education and dissemination of information about wildlife resources in South Sudan (In cooperation with competent authorities). The training of wildlife officers, non-commissioned officers and game scouts and other personnel of the Secretariat. The development and carrying out of research on wildlife and environmental resources with a view to their optimum preservation, conservation, management and protection. The management and administration of zoological gardens. Finally, the administration and enforcement of the provision of this Act and the attainment of its objectives.

**The Public Health (and Sanitation) Act (2008)** emphasizes the prevention of the pollution of air and water and encourages improvement in sanitation. Key provisions include the protection of the sanitation of the environment, and it encompasses the measure to address the pollution of water and air. The following are measures geared towards control of pollution of water: Measures to prevent pollution of water for consumption; Measures destined to prevent pollution of potable water; Anyone who offers the public water to drink or human food, and which includes frozen food should ensure that the water conforms to the portability regulations; Management and disposal of hazardous wastes; and storage of wastes on the premises of waste generators. The Public Health Act (2008) also provides the need for the protection of pollution of water through the enforcement of regulations and measures necessary to combat all elements of pollution and protect the natural level of the environment and public health. As per Section 12 of the Labor Act, the general minimum age for work is 14 (which is in accordance with ILO standards on minimum age where a country’s economy and educational facilities are insufficiently developed) . Section 10 spells out that forced labor is prohibited. Article 12(2) allows children between the ages 14 and 18 to engage in the worst forms of child labor, violating international standards. Compulsory education age (13) is inconsistent with minimum age for work (14).

**The Child Act (Act No. 10 of 2008):** The Child Act regulates the prohibition on child labor, the protection of children and young persons and hazardous child labor. Therefore, the contractors are not allowed to employ child labor during the construction process.

**The South Sudan National Gender Policy (2012):** The goal of achieving gender equality in South Sudan is anchored in the country’s Transitional Constitution and guided by a vision of equality as an inalienable right for all women, men and children, and gender equality as a human right. The goal of this policy is to ensure that gender equality is an integral part of all laws, policies, programs and activities of all South Sudan’s public institutions, the private sector and civil society to achieve equality in the cultural, social, political and economic spheres in South Sudan. Gender related concerns such as Gender Based Violence, sexual harassment, gender discrimination among others that may be associated with the development of the project should be addressed in line with the policy to ensure that the project objectives/desired benefits are attained.

T**he Labour Act (Act No. 64 of 2017):** The Act establishes a legal framework for the minimum conditions of employment, labor relations, labor institutions, dispute resolution and provisions for health and safety in the workplace. It further reinforces the right to equal remuneration for work of equal value as guaranteed by the constitution. Section 6(1) of the Labour Act provides that ‘No person shall discriminate, directly or indirectly, against an employee or job applicant in any work policy or practice’. Section 6(2) also forbids discrimination by any Trade Union, Employers Association or Federation. Section 6(3) defines discrimination as ‘any distinction, exclusion or preference with the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation’ based on a series of grounds including sex and pregnancy or childbirth.

## International Conventions Signed and Ratified by South Sudan.

There are important international conventions signed and ratified by South Sudan. They contribute to the protection of the environment and public health during the implementation of subprojects.

**ILO Convention 138, Minimum Age.** The convention provides for the possibility of initially setting the general minimum age at 14 (12 for light work) where the economy and educational facilities are insufficiently developed. South Sudan has informed the ILO that it has set the general minimum age at 14 years. South Sudan ratified the convention in 2012.

**ILO Convention 100 on Equal Remuneration.** The convention aims at equal remuneration for work of equal remuneration between men and women. South Sudan ratified the convention in 2012.

**ILO Convention 111 on Discrimination.** The convention calls upon states to enable legislation prohibiting all forms of discrimination and exclusion on any basis, including race, sex, religion, etc. South Sudan ratified the convention in 2012.

**Convention on the Elimination of all forms of Discrimination against Women**. CEDAW places explicit obligations on states to protect women and girls from sexual exploitation and abuse, among other issues. South Sudan ratified the CEDAW in 2014. The accession to CEDAW enabled the country to address issues of customary law involving women’s right to inherit and own productive assets, as well as their lack of voice and decision making in family and community matters and the denial of their right of choice to find a family especially in rural settings.

## World Bank Environmental and Social Management Framework and Relevant Standards (ESS)

Nine of the ten Environmental and Social Standards establish the standards that the Borrower and the project will meet through the project life cycle, as follows:

**ESS 1: Assessment and Management of Environmental and Social Risks and Impacts.** ESS1 sets out the Client’s responsibilities for assessing, managing, and monitoring environmental and social risks and impacts associated with each stage of a project supported by the Bank through Investment Project Financing, to achieve environmental and social outcomes consistent with the Environmental and Social Standards (ESSs).

**ESS 2 – Labor and Working Conditions.** ESS2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. ESS2 applies to project workers including full time, part-time, temporary, seasonal, and migrant workers.

**ESS 3 – Recourse and Efficiency, Pollution Prevention and Management.** ESS3 recognizes that economic activity and urbanization often generate pollution of air, water, and land, and consume finite resources that may threaten people, ecosystem services and the environment at the local, regional, and global levels. The current and projected atmospheric concentration of greenhouse gases (GHG) threatens the welfare of current and future generations. At the same time, more efficient and effective resource use, pollution prevention and GHG emission avoidance, and mitigation technologies and practices have become more accessible and achievable. This ESS sets out the requirements to address resource efficiency and pollution prevention and management throughout the project life cycle consistent with GIIP.

**ESS 4 – Community Health and Safety.** ESS4 recognizes that project activities, equipment, and infrastructure can increase community exposure to risks and impacts. In addition, communities that are already subjected to impacts from climate change may also experience an acceleration or intensification of impacts due to project activities.

**ESS 5 – Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement.** ESS5 recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons. Project-related land acquisition or restrictions on land use may cause physical displacement (relocation, loss of residential land or loss of shelter), economic displacement (loss of land, assets, or access to assets, leading to loss of income sources or other means of livelihood), or both. The term “involuntary resettlement” refers to these impacts. Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in displacement.

**ESS 6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources.** ESS6 recognizes that protecting and conserving biodiversity and sustainably managing living natural resources are fundamental to sustainable development. Biodiversity is defined as the variability among living organisms from all sources including, inter alia, terrestrial, marine, and other aquatic ecosystems and the ecological complexes of which they are a part; this includes diversity within species, between species, and of ecosystems. Biodiversity often underpins ecosystem services valued by humans. Impacts on biodiversity can therefore often adversely affect the delivery of ecosystem services.

**ESS 8 – Cultural Heritage.** ESS8 recognizes that cultural heritage provides continuity in tangible and intangible forms between the past, present, and future. People identify with cultural heritage as a reflection and expression of their constantly evolving values, beliefs, knowledge, and traditions. Cultural heritage, in its many manifestations, is important as a source of valuable scientific and historical information, as an economic and social asset for development, and as an integral part of people’s cultural identity and practice. ESS8 sets out measures designed to protect cultural heritage throughout the project life cycle.

**ESS 10 – Stakeholder Engagement and Information Disclosure.** This ESS recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

# CHAPTER 3: BIOPHYSICAL AND SOCIO-CULTURAL ENVIRONMENT

## 3.1. Physical environment

## Geographical location of Proposed Subproject

The office blocks proposed for renovation are located at the Local Government Board (LGB) Office found in Juba, Central Equatoria State, South Sudan. It is situated at the GPS Coordinates point of 04º51’12.52’’N and 31º36’56.05’’E. The LGB office is boarded by the Central Bank of South Sudan, Central Equatoria Revenue Authority and Central Equatoria Medical Commission, a Mosque and Traffic Police.



*Map 1: Showing an aerial map of the Local Government Board Office in Juba, South Sudan. Image Obtained from Google maps. Symbols 1 and 2 represent the buildings to be renovated.*

## Geography and Climate

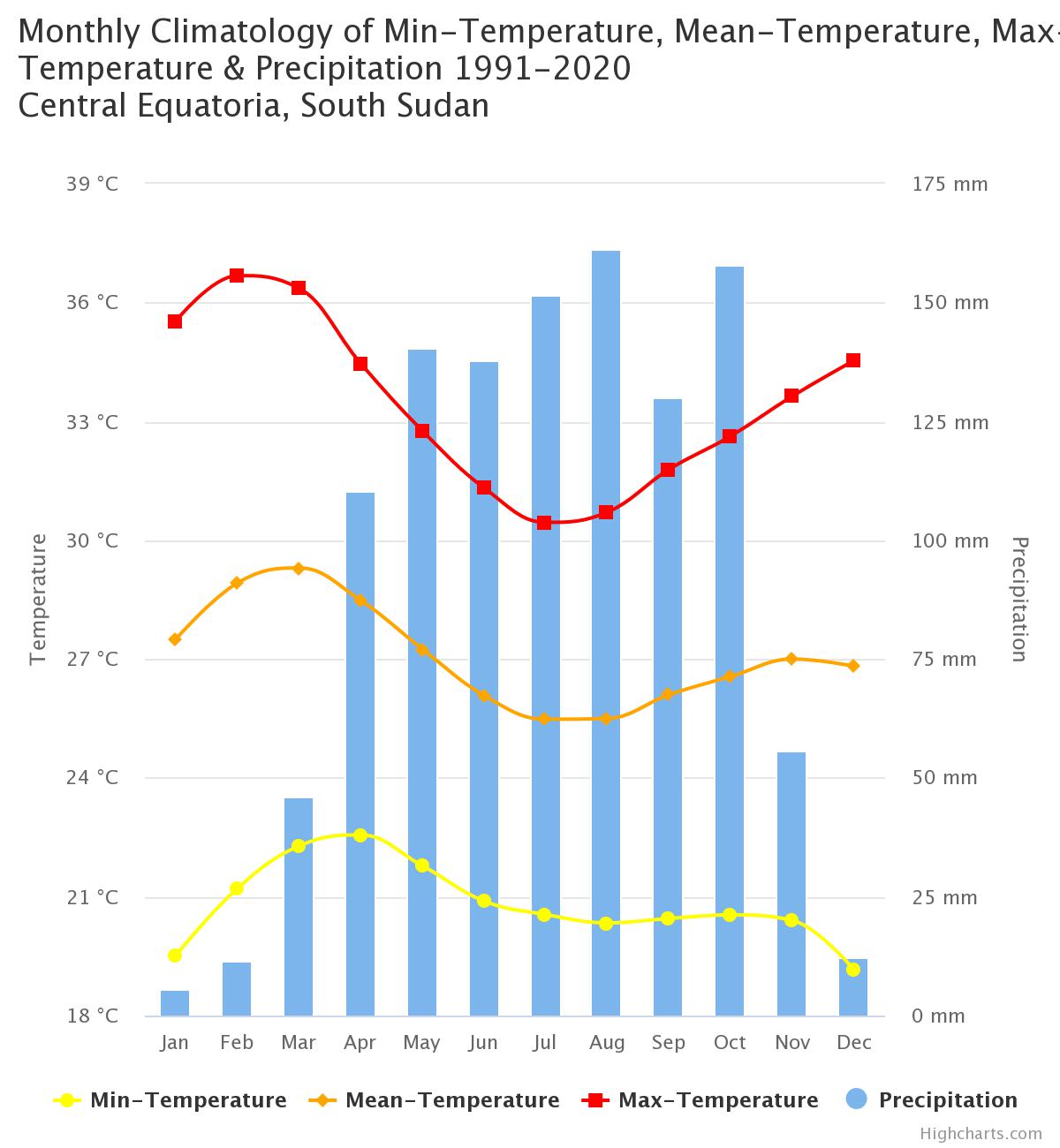
The Proposed subproject is in Juba, the Capital City of South Sudan. Juba County is situated in the center of Central Equatoria State. It borders Terekeka County to the north and Kajo-Keji and Lainya Counties to the south. The counties of Lopa/Lafon, Torit and Magwi in Eastern Equatoria State are to the east, while the counties of Mundri East and Mundri West in Western Equatoria State are to the west. The river Nile flows northwards through the capital city and county (CSRF-South Sudan).

## Rainfall

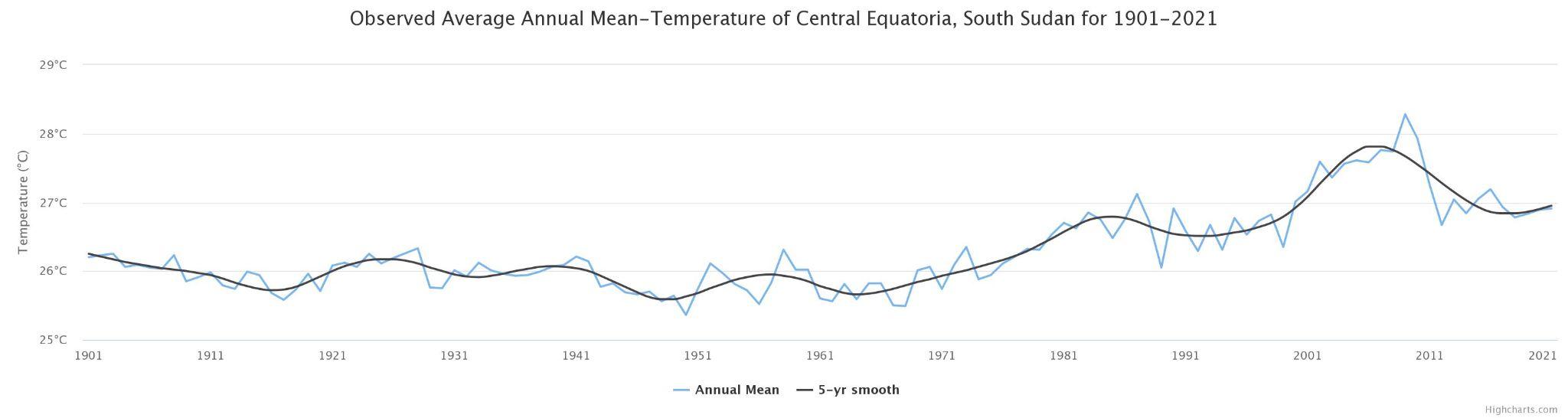
Rainfall data for Juba Town is available for the period 1996 to 2009 but excludes 2001. Features of rainfall are as follows; - Annual rainfall. Rainfall records for the last 10 years for Juba Town, mean annual rainfall averages 1096.1 mm. The wettest year 1996 with 1340 mm while 200 was the driest year when only 884 mm was recorded. Seasonal rainfall: Annual rainfall is delivered in one long wet season lasting 7 months from April to December. Each of the 7 months of the wet season receives on average 41 above 100mm of rainfall. April and October are the wettest months, receiving on average 154.2 and 145mm of rainfall respectively. November to march is the dry season when rainfall on average is below 50mm.

## Temperatures

Juba is basically a hot area where average minimum monthly temperatures (based on the 1998 to 2004 statistics) range from 20 to 24 whereas the average maximum monthly for the same period is in the range 30 to 38.



Graph obtained from <https://climateknowledgeportal.worldbank.org/country/south-sudan/climate-data-historical>



Graph obtained from <https://climateknowledgeportal.worldbank.org/country/south-sudan/climate-data-historical>

## Topography and Geology

The terrain within Juba town is relatively flat but gradually sloppy towards the banks of the Nile River. The subproject area and its surrounding area can be tectonically and geologically divided into two zones that consist of the alluvial deposits and the Undifferentiated Basement Complex. The alluvial deposit, un-conformably overlying the Undifferentiated Basement Complex is extensively distributed in the area. The undifferentiated basement complex consists of metamorphic and intrusive rocks of various grades of metamorphism.

## Landscape

The landscape of the subproject areas is characterized by commercial buildings, residential homes, office buildings and a few trees with some bushes and shrubs in some locations.

3.2. Biological environment

## Fauna, Flora, and Biodiversity

The subproject is located approximately 3.5 km away from the Nile River. The Nile rivers serve as habitat for interrelated and interacting populations of plants and just a few animal species. However, at the proposed project area, Juba town does not support any wildlife due to the existing human settlements and lack of wildlife habitats.

Historically the study area used to be covered by mixed vegetation of savannas and forests.

However, the vegetation cover was lost due to urbanization and human settlement. Therefore, lots of birds and other small wildlife that used to have lived in forests were affected and the great majority of them have disappeared. A trace of forestry vegetation remains along the Nile River and its branch rivers. In these areas, there are mango trees, papaya trees, and other fruit trees, in addition to Neem and other useful trees.

## 3.3. Socio-Economic Environment

## Demographics

According to Information obtained from South Sudan National Bureau of Statistic (SSNBS 2020) the population of juba county stands at 509,958 people.

As host of the country’s capital, Juba County is multi-ethnic. The Bari and Pojulu, Kakwa, Kuku and Mundari are among the main ethnic groups with a smaller number of Dinka and Nuer. English and Juba Arabic are most spoken, alongside other national languages (CSRF-South Sudan).

## Economy and Livelihood

Given the relatively high urbanization in Juba City, residents of the county engage in a diverse range of livelihoods. The presence of national, state, county, and municipal government institutions, as well as the humanitarian and development community in Juba provides significant employment opportunities for South Sudanese. Many South Sudanese in Juba either directly work for the government or humanitarian/development sector or provide ancillary support and business services to support these two sectors. Juba also serves as a transit hub for both travelers and imported goods on their way to other parts of the country. Residents of Juba County also engage in a range of other livelihoods including small business, cultivation, cattle-keeping, and technical vocations. While the parameters of the informal economy in South Sudan are unknown, residents of the county engage with this sector on a regular basis, whether as consumers or vendors (CSRF-South Sudan).

# CHAPTER 4: SUBPROJECT DESCRIPTION

## 4.1. Subproject Activities

The proposed subproject activities will mainly involve renovation of the existing two office blocks at the Local Government Board. Detailed subproject works are included below in the scope of works.

## State of Current Office Blocks to be renovated



*Image 1: Showing the small office block to be renovated. Image taken by Yengi Emmanuel Daro on 11-15-2022*



*Image 3: Showing the Large office Block to be renovated. Image taken by Yengi Emmanuel Daro on 15th Nov 2022*

## 4.2. Scope of Works for the Proposed Rehabilitation Works

The Scope of work during the rehabilitation of the Local Government Board Office Blocks may include the following:

### Small Office Block

* Site clearance, fumigation, relocation
* Fumigation
* Relocation of furniture, fittings, fixtures, and reinstallation, replace
* Replace ceiling, repair
* Repair roof, refinish
* Refinish doors and windows, painting
* Painting (interior and exterior)
* Repair veranda,
* Anti‐termite treatment, construction
* Construction of water tank stand for 3,000 L tank, connection
* Connection of sanitary system, commissioning
* Commissioning of water supply and sanitary system.

### Large Office Block

* Site clearance,
* Fumigation,
* Relocation of furniture, fittings, fixtures, and reinstallation,
* Replace damaged ceiling and roof sections,
* Painting of fascia board and roof eaves,
* Remove floor tiles, spot repair of floor slab, and reinstall new tiles,
* Refinish doors and windows,
* Painting (interior and exterior),)
* Anti‐termite treatment, and
* Repair of plumbing in kitchen and washrooms.

### Generator Room

* Remove the existing 2‐piece roof and install one roof system over the generator room extension and original building.

### Ancillary works

The proposed subproject activities do not include the creation of new quarry sites or borrow pits. However, the subproject activities shall involve the sourcing of materials and resources such as sand, gravel and water from licensed contractors that provide such materials and resources required for the rehabilitation process of the building. The subproject shall require little use of extracted materials such as sand, gravel, and water due to the scale and nature of the proposed scope of work for the rehabilitation of the office blocks.

## List of Materials that may be used during the rehabilitation of Local Government Board rehabilitation project

* Sand, water, aggregate/gravel, cement, bricks, timber, iron sheets, plumbing materials, paints, fumigation chemicals and Termiticide.

## List of Tools, Equipment and Machinery that may be used during the construction process

* Concrete mixer for concrete works
* Tipper trucks for transportation of materials to site
* Drilling machines
* Wheelbarrow, measuring tape, spade, trowel, steel float, wood float for masonry works.
* Scaffolds and access ladders for works at height.
* Hoe, digging bar/pickaxe for demolition works

# CHAPTER 5: STAKEHOLDER ENGAGEMENT AND CONSULTATION

## 5.1. Stakeholder engagement and Meetings

Stakeholder engagement and consultation meetings were conducted from 18th to 21st November 2022 as part of the Environment and Social Screening for the proposed renovation works of the two office blocks at the Local Government Board office premises.

The consultations were held at the subproject location to capture the views and concerns of the stakeholders that may be positively or negatively affected by the proposed works of construction.

The stakeholder engagement and consultations were mainly conducted through group discussion and key informant interviews as a means of incorporating their concerns into project design and implementation. As well as informing them on the anticipated negative environmental and social risks and impacts associated with the project including their proposed mitigation measures.

During the consultation process, staff from Local Government Board, GIZ, South Sudan Land Commission and the neighboring communities were also consulted and informed on the upcoming renovation project and its environment and social risks.

**5.2. Summary of stakeholder views, concerns, and recommendations.**

* Augustino-Director Accounts LGB recommended that the main gate should be used as an access control point for construction Workers.
* Site barricading should be done to prevent unauthorized access.
* Malouny-Director General LGB raised a concern on how the barricading of the site would be done. He also recommended that the contractors need to be inducted on the Environment and Social Risks and Impacts.
* Felix Munda Advisor with GIZ raised a question on how the project shall ensure that their staff are not exposed to dust generated during the demolition process. He was informed that the contractor shall follow SOPs for demolition and adopt wet demolition procedures including use of dust arrest nets.
* Del Rumdit-Ag Chairperson LGB further commented that a certain company that previously did some renovations at the LGB offices left their construction wastes and debris at the office premises and never removed them. So, he proposed that the construction debris that may be generated by the project should be removed and reused for backfilling purposes elsewhere.
* James Loa Director General for South Sudan Land Commission suggested that the contractor to be procured should renovate the outside pit latrines for use for their workers during the period of construction.

During the stakeholder engagement and consultation process, all the engaged stakeholders were informed about anticipated the Environment, Health, Safety, and social risks of the proposed subproject including their mitigation measures for addressing these EHS risks.

# CHAPTER 6: ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS AND MITIGATION MEASURES

This section covers the anticipated positive and adverse impacts associated with the rehabilitation of the Local Government Board Office Blocks. The E&S risks and impacts are associated with the rehabilitation activities of office blocks (see Chapter 4 for details).

## 6.1. Construction Phase

### 6.1.1. Potential Positive Impacts

**Employment opportunity**

Creation of direct and indirect employment during the construction period. The Rehabilitation process will provide short term employment opportunities to skilled, semi-skilled and unskilled workers.

**Income Generation Opportunity**

Procurement of construction materials like sand, gravel, timber, and cement will be required during the renovation process. The purchase of these materials from suppliers within the subproject area will have a positive impact on the local economy.

## 6.1.2. Potential Negative Environmental risks and impacts with Brief Mitigation Measures

**Soil erosion and soil contamination**

* The site clearance activity of the subproject is the main cause for soil erosion. When the soil is exposed to rain and wind, it may cause soil erosion. Soil erosion causes pollution of the water body. On the other hand, soil contamination and loss of soil quality can happen due to the use of termiticide and fumigation chemicals during the construction phase of renovation projects.

**Mitigation measures of soil erosion** a**nd Soil contamination**

* Minimize vegetation clearance and topsoil disturbance.
* To minimize water runoff and soil erosion, contour access roads.
* Use physical means (e.g., diversion culverts) to minimize sheet erosion
* Stockpile topsoil separately from subsoil. We will fill the tower foundation first with subsoil and then evenly spread topsoil over excavated areas following the sequence of their removal.
* Scheduling to avoid heavy rainfall periods (i.e., during the dry season) to the extent practical.
* Minimize the use of pesticides, chemicals, and oils
* Training of workers on the use, handling, storage and disposal of used oils and chemicals
* Excavating/removal of contaminated soil in the event of accidental spill to reduce spread of contamination.

**Air pollution**

The rehabilitation of the Local Government Board Office Blocks subproject generates dust release to the environment and workers due to demolition activities and vehicle movement. A secondary source of emissions may include exhaust from diesel engines of earth moving equipment. Ambient air quality also reduces from the release of gaseous emissions from use of vehicles and motorized equipment.

**Mitigation measures for improving air quality**

* All vehicles entering and leaving the subproject sites should be covered except when they are loading.
* Spraying water on access and internal roads should be practiced in a timely manner.
* Implement the speed limit of trucks and other construction vehicles.
* Vehicles transporting loose soil materials shall be covered
* Stockpiling of excavated materials for a long period should be avoided.
* Stockpiles, i.e., excavated soil wastes, should be covered as much as possible.

**Noise and vibration**

The construction rehabilitation of the Local Government Board Office Blocks project may cause noise and vibration hazard due to pile drivers, earth moving and demolition equipment, drilling machines, concrete mixers, and the transportation of equipment, materials, and people.

**Mitigation measure of noise and vibration**

* Identified high noise project activities and planned to minimize disturbance, using noise control devices, such as temporary noise barriers and deflectors for impact and blasting activities, and exhaust muffling devices for combustion engines.
* Avoiding or minimizing project transportation through community areas.

**Solid Wastes**

The rehabilitation of the Local Government Board Office Blocks project will generate some amount of hazardous and non-hazardous solid wastes during the rehabilitation phase of the subproject, and it can potentially pollute the nearby biophysical and social environment. Materials such as concrete mixes, packing materials, containers for various construction materials, plastics, paints, fumigation chemicals, termiticide spill of oil and used oil, etc. are expected to be generated and disposed indiscriminately within and around the construction sites during project implementation phase. Therefore, there is a need to prevent the potential waste impacts generated from these subproject activities and to control associated environmental and social impacts and risks in compliance with the applicable national and international environmental policies, regulations, and procedures.

**Non-Hazardous Waste Management**

Non-hazardous wastes, like concrete mixes, packing materials, and containers for various construction materials will be generated during the rehabilitation phase.

**Mitigation Measures of Non-Hazardous Waste**

* All non-hazardous wastes are characterized and sorted on site and deposited at designated areas.
* Wastes of any type should be removed on time and on a regular basis.
* Solid waste includes those materials which are no longer used for subproject activities and should be removed to a designated area on time.
* Establish a waste management procedure at the subproject sites by considering domestic solid, liquid wastes and hazardous waste.
* Place different dustbins based on the material species according to the site requirements.
* The construction team should classify the waste and put it into the dustbin after the work is finished every day. The waste material should be treated in a timely manner.
* Disposal of maintenance slash by truck.

**Hazardous Waste Management**

The rehabilitation of the Local Government Board Office Blocks subproject also generates hazardous chemicals and materials like plastics, paints, fumigation chemicals, termiticide, spill of oil and used oil. Liquid petroleum fuels for vehicles and other equipment may also be used and stored at the project area.

**Liquid Petroleum (Fuels) Management**

* Fuels should be stored to prevent or control accidental releases to air, soil, and water resources in area location where:
* Waste is stored in a manner that prevents the commingling or contact between incompatible wastes and allows for inspection between containers to monitor leaks or spills. Examples include sufficient space between incompatibles or physical separation such as walls or containment curbs.
* Store in closed containers away from direct sunlight, wind, and rain.
* Secondary containment systems should be constructed with materials appropriate for the waste being contained and adequate to prevent loss to the environment.
* Secondary containment is included wherever liquid wastes are stored in volumes greater than 220 liters.
* The available volume of secondary containment should be at least 110 percent of the largest storage container, or 25 percent of the total storage capacity (whichever is greater), in that specific location.
* Hazardous waste storage activities should also be subject to special management actions, conducted by employees who have received specific training in handling and storage of hazardous wastes.
* Provide adequate ventilation where volatile wastes are stored.
* Preparing and implementing spill response and emergency plans to address their accidental release.

**General Mitigation Measures for Hazardous Substances**

* Job safety analysis to identify specific potential occupational hazards is implemented, to monitor and verify chemical exposure levels, and compare with applicable occupational exposure standards.
* Hazard communication and training programs are required to be prepared for workers to recognize and respond to project area chemical hazards.
* Maintain a register of hazardous materials used on site and store them in a sealed area at proper distance from construction activities and camps.
* All substances will be clearly labeled and stored and obtain approval for handling and storing.
* Put material safety data sheets in a place at the storage site and its content will be informed for all employees.
* Isolate hazards waste on-site and provide ventilation in the area of storage if needed.
* Prepare temporary on-site waste storage facilities include garbage bin and segregated waste storage plastic bin and trash can.
* Be sure that the conductor is far from the transformer (not nearly into the transformer line).
* Follow proper disposal mechanisms and dispose only in the authorized area.
* On-site and Off-site transportation of waste should be conducted to prevent or minimize spills, releases, and exposures to employees and the public.
* All waste containers designated for off-site shipment should be secured and labeled with the contents and associated hazards, be properly loaded on the transport vehicles before leaving the site and be accompanied by a shipping paper.

**Water pollution**

Excavated piles of soils may be washed into the nearby water body causing sedimentation. The Inappropriate use of chemicals during the rehabilitation phase may also lead to the pollution of the nearby surface water sources.

**Mitigation measures of water pollution**

* Proper handling, use, storage and disposal of hazardous chemicals and fuels
* Excavated earth materials shall be reused for backfilling and leveling of ground
* Avoid the repair of machinery and equipment from site to minimize the risk of oil spills on the site.

**Resource Consumption (water and energy) impact**

The rehabilitation subproject requires additional water and energy demand and creates pressure on local energy requirements. In addition, water will also be required for sanitation and drinking during the operation phase.

**Water and energy utilization Mitigation measures**

* Encourage sustainable practices like switching machines when not in use.
* Minimizing water and energy use by reusing and recycling where possible.
* Monitoring the consumption records for water, energy, and raw materials.

**Traffic Safety Issues**

The activities of the subproject during the rehabilitation of the subproject trigger certain issues about potential traffic accidents. An increased movement of vehicles could lead to potential impacts on the project workers and the communities. Thus, a traffic safety management Plan is useful for avoiding potential traffic accidents during the whole subproject implementation time. It is also important to ensure the health and safety of employees, vendors, and visitors.

**Mitigation measures**

* Use speed control devices to control the speed of vehicles
* Develop a plan for on-site parking for cars.
* Periodic supervision of the management of vehicle movement to access tower foundations should be done.
* Emphasizing safety aspects among drivers.
* Improving driving skills and requiring licensing of drivers.
* Adopting limits for trip duration and arranging driver rosters to avoid overtiredness.
* Avoiding dangerous routes and times of day to reduce the risk of accidents.

**6.1.3. Occupational Health and Safety**

Falling at height, risks of accidents arising from fall from height when working on fragile roofs. Public and staff may be exposed to physical and Chemical hazards on the project site leading to OHS issues.

**Exposure of Hazardous Chemicals**

The risk of accidental spillage and leakage of hazardous chemicals, such as paints, solvents, termiticide and used oils from machinery have acute and chronic health risk. Workers may be exposed to these chemicals due to inappropriate use of them.

**Mitigation measures**

* Obtaining material safety data sheets for all chemicals containing essential information regarding their identity, suppliers’ classification of hazards, safety precautions and emergency procedures are provided and are made available to employees and their representatives
* Keep a record of all hazardous chemicals used at the premises, cross-referenced to the appropriate chemical safety data sheets
* Proper storage of all hazardous chemicals with their proper and appropriate labeling and marking.
* There should be no eating or drinking in areas where chemicals are stored or used
* Training of workers on the use, handling, storage, and disposal of chemicals.

**Falling at height**

Risks of accidents arising from fall from height when working on fragile roofs. In addition, falling hazards can happen during the use of scaffold and ladder. Moreover, partially built, or demolished structures are among the most common cause of fatal or permanent disabling injury at construction sites.

**Mitigation measures**

* Avoid work at height where possible
* Training and use of temporary fall prevention devices, such as rails or other barriers able to support a weight of 200 pounds, when working at heights equal or greater than two meters or at any height if the risk includes falling into operating machinery, into water or other liquid, into hazardous substances, or through an opening in a work surface.
* Training and use of personal fall arrest systems, such as full body harnesses and energy absorbing lanyards able to support 5000 pounds (also described in this section in Working at Heights above), as well as fall rescue procedures to deal with workers whose fall has been successfully arrested. The tie in point of the fall arresting system should also be able to support 5000 pounds.
* Use of control zones and safety monitoring systems to warn workers of their proximity to fall hazard zones, as well as securing, marking, and labeling covers for openings in floors, roofs, or walking surfaces.

**Welding / Hot Work hazards**

Hot work activities during welding of doors and windows in the rehabilitation project would expose both the contractor workers and the public to hazards like noise, electric shock, toxic gasses, metallic fumes. Welding creates an extremely bright and intense light that may seriously injure a worker’s eyesight. In extreme cases, blindness may result. Additionally, welding may produce noxious fumes to which prolonged exposure can cause serious chronic diseases.

**Mitigation measures**

* Provision of proper eye protection such as welder goggles and/or a full-face eye shield for all personnel involved in, or assisting, welding operations. Additional methods may include the use of welding barrier screens around the specific workstation (a solid piece of light metal, canvas, or plywood designed to block welding light from others). Devices to extract and remove noxious fumes at the source may also be required.
* Special hot work and fire prevention precautions and Standard Operating Procedures (SOPs) should be implemented if welding or hot cutting is undertaken outside established welding workstations, including ‘Hot Work Permits, stand-by fire extinguishers, stand-by fire watch, and maintaining the fire watch for up to one hour after welding or hot cutting has terminated. Special procedures are required for hot work on tanks or vessels that have contained flammable materials.

**Mitigation measures of Noise from welding activity**

* Replacement of noisy welding generators with the less noisy ones.
* Redesigning of generators by Installation of noise silencers to reduce the level of noise being generated.
* Installation of soundproof and sound absorbing materials in noisy areas to reduce the level of sound generated to the neighboring offices.
* Provision of personal protective equipment like earmuffs and earplugs to workers and visitors to reduce the level of noise being exposed to.

**Mitigation measures for Metal fumes and toxic gases from welding activity**

* Replacement of hazardous materials with less hazardous ones to reduce exposure to toxic metal fumes
* Rotation of workers according to shifts to limit exposure to metal fumes.
* Introduction of Method statements and safe operating procedures for welding.
* Training of workers on the health risks of welding
* Use of personal protective equipment.

**Mitigation measures for Fire hazards from welding and other activity**

* Good housekeeping practices should be practiced and maintained at the welding site
* Designation of separate storage room for flammable liquids and materials to prevent contact with sparks arising from welding activities.
* Developing and Testing of the effectiveness of the emergency evacuation plan using a fire drill.
* Training of employees on fire safety and use of fire extinguishers.
* Installation of firefighting equipment like Fire extinguishers and fire blankets at the welding site.

**Electrical hazard**

Exposed or faulty electrical devices, such as circuit breakers, panels, cables, cords, and hand tools, can pose a serious risk to workers during renovation building construction implementation. Overhead wires can be struck by metal devices, such as poles or ladders, and by vehicles with metal booms. Vehicles or grounded metal objects brought into proximity with overhead wires can result in arcing between the wires and the object, without actual contact.

**Mitigation measures**

* Marking all energized electrical devices and lines with warning signs.
* Locking out (de-charging and leaving open with a controlled locking device) and tagging-out (warning sign placed on the lock) devices during service or maintenance.
* Checking all electrical cords, cables, and hand power tools for frayed or exposed cords and following manufacturer recommendations for maximum permitted operating voltage of the portable hand tools.
* Double insulating / grounding all electrical equipment used in environments that are, or may become, wet; using equipment with ground fault interrupter (GFI) protected circuits.
* Protecting power cords and extension cords against damage from traffic by shielding or suspending above traffic areas.
* Rubber tired construction or other vehicles that come into direct contact with, or arcing between, high voltage wires may need to be taken out of service for periods of 48 hours and have the tires replaced to prevent catastrophic tire and wheel assembly failure, potentially causing serious injury or death.
* Conducting detailed identification and marking of all buried electrical wiring prior to any excavation work.
* Regular inspection of electrical appliances and wiring to identify defects.
* Training of workers on electrical hazards and safety.
* Use of personal protective equipment like gloves and safety boots when performing welding activities.

**Demolition hazard**

Risk of fall of demolition debris on construction workers, staff and public and falling from tripping on building materials. Workers may be exposed to Injury from falling or flying debris when demolishing existing infrastructure.

**Mitigation measures**

* Barricading of construction site to limit unauthorized access of visitors to the site
* Conduct Job safety analysis and risk assessment prior to the start of demolition activities
* Introduction of permit to work systems to control the risks associated with demolition
* Use of appropriate method statements for performing demolition activities.
* Mandatory use of personal protective equipment at the site.

***Slips and Falls***

Slips and falls on the same elevation associated with poor housekeeping, such as excessive waste debris, loose construction materials, liquid spills, and uncontrolled use of electrical cords and ropes on the ground, are also among the most frequent cause of lost time accidents at construction and decommissioning sites.

***Mitigation measures***

* Implementing good house-keeping practices, such as the sorting and placing loose construction materials or demolition

debris in established areas away from foot paths.

* Cleaning up excessive waste debris and liquid spills regularly.
* Locating electrical cords and ropes in common areas and marked corridors.
* Use of slip retardant footwear.

**6.1.4. Community health and safety impacts**

**i), Communicable disease**

* Exposure of project staff to COVID 19 during interaction with other workers while on site.
* Spread of communicable diseases (Sexually Transmitted Infections, HIV/AIDS, Covid-19 & Ebola etc..) among construction workers and the public.

**ii), Vector disease**

* Project and construction workers may be exposed to vector diseases like malaria caused by mosquitoes.

**Mitigation measures**

* Training of workers and staff on spread and transmission of communicable and vector borne diseases
* Implementation of Ministry of Health Guidelines on prevention of COVID-19 and Ebola
* Introduction of Standard operating procedures for the prevention of communicable and vector borne diseases.

## 6.1.5. Potential Negative Social Risks and Impacts

**Use of child and forced labor**

Children under the age of 14 and 18 might be employed by contractors and primary supplier during the renovation process in works like cleaning activities or fetching of water for use at the renovation site.

**Mitigation measures**

* Inducting of Contractors on the avoidance of use of child labor before the start of construction works
* Physical screening of contractor workers to ensure compliance with South Sudan Law labors and WB guidelines on Labour
* Maintaining registry of all workers on site including their ages.
* induction for potential primary suppliers on the avoidance of use of child labor
* involve community members during hiring of local workers

**Delayed payment of construction workers**

Delay in the payment of the contractor workers’ wages could trigger complaints and conflict among the workers and contractors.

**Mitigation measures**

* Timely payment of contractor payment by ECRP II after the completion of each milestone.
* Contractors to share their workers payment plan, timeline, and payment records with PMU

**Underpayment of contracted workers or supply workers**

Contracted workers or supply workers might be underpaid by either the contractor or the ECRP II project.

**Mitigation measures**

* Provision of payment in accordance with the agreed and approved wages in the South Sudan Laws

**Labor and working conditions of construction** workers may not comply with WB and South Sudan legislation – including occupational health and safety risks.

**Mitigation measures**

* The contractor will implement the Labor management plan prepared for the project
* Contractor to be inducted on the labor and working conditions requirement of the project.
* Contractor to share their site-specific labor management plan prepared based on the project LMP with PMU
* Routine inspection of subproject site to ensure compliance with the requirement of the ESMP.

**Discrimination against women in employment**

Women and girls may not be employed during renovation process of the LGB office blocks.

**Mitigation measures**

* Contractors to be inducted on the importance of women and girl’s empowerment and employment in project activities.
* Some of the employment opportunities shall be reserved for women to promote their participation in construction works.
* Contractor to develop Labour Management Plan that enables fair working conditions and women’s safe and equitable participation.
* Training and Induction of contractors and project staff on GBV/SEA
* List number of workers, indication of origin, gender, and nationality

**Spread of communicable diseases** (Sexually Transmitted Infections, HIV/AIDS, Covid-19 & Ebola etc..) among construction workers and the public.

**Mitigation measures**

* Training of workers and staff on spread and transmission of communicable diseases
* Implementation of Ministry of Health Guidelines on prevention of COVID-19 and Ebola
* Introduction of Standard operating procedures for the prevention of communicable and vector borne diseases.

**Risk of GBV/SEA, including sexual harassment**

* Training and induction of staff and contractor workers on GBV/SEAH
* Mandatory signing of CoC for all staff and contracted workers.

**6.2. Operation Phase**

**6.2.1. positive impacts**

**Strengthening community institution**

The rehabilitation of the local government board office project maximizes the capacity and quality of local institutions.

**Improve access to service**

The rehabilitation of the local government board office project enhances community benefit.

**6.2.2. Potential Negative Environmental risks and impacts with Brief Mitigation Measures**

**Air pollution and greenhouse gas emissions**

The use of the generator for power generation at the Local Government Board office block and use of vehicles to transport staff to and from LGB office would lead to the production of air pollutants and Chlorofluorocarbons (CFCs) by the air conditioning systems and refrigerators.

**Mitigation measures**

* Adoption of clean energy sources for the generation of electricity for the LGB offices.
* Regular maintenance of vehicles and generators to minimize their gaseous emissions and air pollution.
* Turning off generators, vehicles, and Air Conditioning systems when not in use to reduce and limit the generation of greenhouse gases.

**Solid Wastes generation**

The operation phase of the Local Government Board Office Blocks will generate some amount of non-hazardous and hazardous solid wastes. These wastes can potentially pollute the nearby biophysical and social environment. Materials such as packing materials, plastics, batteries, food waste, cleaning detergents and spill of used oil, etc. are expected to be generated and disposed indiscriminately within and around subproject site during the operation phase.

**Non-Hazardous Waste Management**

Non-hazardous wastes, such as packing materials and food wastes will be generated during the operation phase of the subproject.

**Mitigation Measures of Non-Hazardous Waste**

* All non-hazardous wastes are characterized and sorted on site and deposited at designated areas.
* Waste of any type should be removed on time and on a regular basis.
* Solid waste includes those materials which are no longer used for subproject activities and should be removed to a designated area on time.
* Establish a waste management procedure at the subproject sites by considering domestic solid, liquid wastes and hazardous waste.
* Place different dustbins based on the material species according to the site requirements.

**Hazardous Waste Management**

The operation phase of the Local Government Board Office Blocks subproject will also generate hazardous chemicals and materials like construction debris, plastics, oil, fumigation chemicals, cleaning chemicals. Liquid petroleum fuels for vehicles and other equipment may also be used and stored at the subproject area.

**Liquid Petroleum (Fuels) Management**

* Fuels should be stored to prevent or control accidental releases to air, soil, and water resources in area location where:
* Waste is stored in a manner that prevents the commingling or contact between incompatible wastes and allows for inspection between containers to monitor leaks or spills. Examples include sufficient space between incompatibles or physical separation such as walls or containment curbs.
* Store in closed containers away from direct sunlight, wind, and rain.
* Secondary containment systems should be constructed with materials appropriate for the waste being contained and adequate to prevent loss to the environment.
* Secondary containment is included wherever liquid wastes are stored in volumes greater than 220 liters.
* The available volume of secondary containment should be at least 110 percent of the largest storage container, or 25 percent of the total storage capacity (whichever is greater), in that specific location.
* Hazardous waste storage activities should also be subject to special management actions, conducted by employees who have received specific training in handling and storage of hazardous wastes.
* Provide adequate ventilation where volatile wastes are stored.
* Preparing and implementing spill response and emergency plans to address their accidental release.

**General Mitigation Measures for Hazardous Substances**

* Job safety analysis to identify specific potential occupational hazards is implemented, to monitor and verify chemical exposure levels, and compare with applicable occupational exposure standards.
* Hazard communication and training programs are required to be prepared for workers to recognize and respond to project area chemical hazards.
* Maintain a register of hazardous materials used on site and store them in a sealed area at proper distance from construction activities and camps.
* All substances will be clearly labeled and stored and obtain approval for handling and storing.
* Put material safety data sheets in a place at the storage site and its content will be informed for all employees.
* Isolate hazards waste on-site and provide ventilation in the area of storage if needed.
* Prepare temporary on-site waste storage facilities include garbage bin and segregated waste storage plastic bin and trash can
* Be sure that the conductor is far from the transformer (not nearly into the transformer line).
* Follow proper disposal mechanisms and dispose only in the authorized area.
* On-site and Off-site transportation of waste should be conducted to prevent or minimize spills, releases, and exposures to employees and the public.
* All waste containers designated for off-site shipment should be secured and labeled with the contents and associated hazards, be properly loaded on the transport vehicles before leaving the site and be accompanied by shipping paper.

**6.2.3. Occupational Health and Safety**

The operation phase of this subproject shall expose the staff of LGB to occupational health and safety hazards and risks like slips due to wet floors in the office during cleaning process, tripping of staff over loose electrical cables in the office, and electrical hazards posing the risk to electrical shock, exposure to cleaning chemicals, and fire outbreak in the office and explosion might occur, ergonomic and psychological hazards leading muso-skeletal disorders and stress.

**Mitigation measures**

* Practice and maintenance of good housekeeping practices in the office
* Installation of firefighting equipment in the office at fire hotspots.
* Designation of separate storage rooms for fuel and hazardous substances
* Routine health and safety inspection to identify and control hazards in the workplace
* Training of project staff on occupational health and safety hazards and their control measures.
* Development of an emergency evacuation plan and testing its effectiveness through a drill.

**6.2.3. Fire and Explosions**

Fires and or explosions resulting from ignition of flammable materials or gases can lead to loss of property as well as possible injury or fatalities to project workers.

**Mitigation measures**

* Storing flammables away from ignition sources and oxidizing materials. Further, flammables storage area should be:
* Remote from entry and exit points into buildings
* Away from facility ventilation intakes or vents
* Have natural or passive floor and ceiling level ventilation and explosion venting
* Use spark-proof fixtures
* Be equipped with fire extinguishing devices and self-closing doors, and constructed of materials made to withstand flame impingement for a moderate period
* Providing bonding and grounding of, and between, containers and additional mechanical floor level ventilation if materials are being, or could be, dispensed in the storage area. Where the flammable material is mainly comprised of dust, providing electrical grounding, spark detection, and, if needed, quenching systems

**6.2.3.1. Emergency Response Plan (ERP)**

It is important to develop procedures and practices for the handling of emergency response plan that allow for quick and efficient responses to accidents that may result in injury or fatality for human and environmental deterioration.

The ERP investment beneficiary PMU should prepare an Emergency Preparedness and Response Plan that should cover:

➢ Planning Coordination: This should include procedures for:

• Informing the public and emergency response agencies

• Documenting first aid and emergency medical treatment

• Taking emergency response actions

• Reviewing and updating the emergency response plan to reflect changes and ensuring that the employees are informed of such changes

➢ Emergency Equipment: The plan should include procedures for using, inspecting, testing, and maintaining emergency response equipment.

➢ Training: Employees should be trained in any relevant procedures

➢ Undertake regular emergency drills (fire, chemical spill) at healthcare facility, to test on emergency response and use the results to improve on the response mechanism.

➢ Report to the Bank within 48 hours of becoming aware of an incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers including, inter alia, any COVID outbreak in the Project area or serious OHS incident under the Project. Indicate immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Association’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.

# CHAPTER 7: ENVIRONMENTAL AND SOCIAL MANAGEMENT AND MONITORING PLAN

Table 1. lays out the specific adverse risks and impacts anticipated for the office block rehabilitation process and its operational use, specifies the respective mitigation measures, and lists monitoring responsibilities. This table is the core of the ESMP, because it shows exactly what must be done, by whom, when, and to what standard; and shows who will monitor its implementation and when.

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Table 1: Environmental and Social Management and Monitoring Plan** | | | | | | | | |
| **Project Phase** | **Potential E & S risk and Impact** | **Mitigation measures** | **Method of**  **Monitoring** | **Performance**  **indicator** | **Responsibility** | | **Time frame** | **Cost**  **estimate**  **(USD)** |
| **Mitigation** | **Monitoring** |
| Renovation | Soil erosion and soil contamination | -Minimize vegetation clearance and topsoil disturbance.  -To minimize water runoff and soil erosion, contour access roads.  -Use physical means (e.g., diversion culverts) to minimize sheet erosion  -Stockpile topsoil separately from subsoil.  We will fill the tower foundation first with subsoil and then evenly spread topsoil over excavated areas following the sequence of their removal.  -Scheduling to avoid heavy rainfall periods (i.e., during the dry season) to the extent practical.  -Minimize the use of pesticides, chemicals, and oils  -Training of workers on the use, handling, storage and disposal of used oils and chemicals  -Excavating/removal of contaminated soil in the event of accidental spill to reduce spread of contamination. | Routine inspection | Number of incidents and accidents | Contractor | PMU | Monthly | Included in contractors’ cost. |
| Renovation | Air pollution | All vehicles entering and leaving the subproject sites should be covered except when they are loading.  Spraying water on access and internal roads should be practiced in a timely manner.  Implement the speed limit of trucks and other construction vehicles.  Vehicles transporting loose soil materials shall be covered  Stockpiling of excavated materials for a long period should be avoided.  Stockpiles, i.e., excavated soil wastes should be covered as much as possible. | Routine inspection | Number of complaints | Contractor | PMU | Weekly | Included in contractors’ cost. |
| Renovation | Noise and Vibration | Identified high noise project activities and planned to minimize disturbance, using noise control devices, such as temporary noise barriers and deflectors for impact and blasting activities, and exhaust muffling devices for combustion engines.  Avoiding or minimizing project transportation through community areas.  Sensitize machinery operators to switch off engines of vehicles or machinery not being used.  Sensitize construction drivers to avoid gunning of vehicle engines or hooting especially when in the office premises.  Ensure that construction machinery is kept in good condition to reduce noise generation | Regular monitoring of noise levels during the construction process | Number of complaints  Noise levels should not exceed 90dBA | Contractor | PMU | Throughout | Included in contractor’s cost |
| Renovation | Generation of solid wastes | All non-hazardous wastes are characterized and sorted on site and deposited at designated areas.  Wastes of any type should be removed on time and on a regular basis.    Solid waste includes those materials which are no longer used for subproject activities and should be removed to a designated area on time.  Establish a waste management procedure at the subproject sites by considering domestic solid, liquid wastes and hazardous waste.  Place different dustbins based on the material species according to the site requirements. | Routine Inspection | Waste management procedure in place  Records of amount of waste disposed available | Contractor | PMU | Monthly | Included in contractors’ cost. |
| Renovation | Generation of hazardous substances | Job safety analysis to identify specific potential occupational hazards is implemented, to monitor and verify chemical exposure levels, and compare with applicable occupational exposure standards.  Hazard communication and training programs are required to be prepared for workers to recognize and respond to project area chemical hazards.  Maintain a register of hazardous materials used on site and store them in a sealed area at proper distance from construction activities and camps.  All substances will be clearly labeled and stored and obtain approval for handling and storing.  Put material safety data sheets in a place at the storage site and its content will be informed for all employees.  Isolate hazards waste on-site and provide ventilation in the area of storage if needed.  Prepare temporary on-site waste storage facilities include garbage bin and segregated waste storage plastic bin and trash can.  Be sure that the conductor is far from the transformer (not nearly into the transformer line).  Follow proper disposal mechanisms and dispose only in the authorized area.  On-site and Off-site transportation of waste should be conducted to prevent or minimize spills, releases, and exposures to employees and the public.  All waste containers designated for off-site shipment should be secured and labeled with the contents and associated hazards, be properly loaded on the transport vehicles before leaving the site and be accompanied by a shipping paper. | Routine Inspection | Waste management procedure in place  Records of amount of waste disposed available | Contractor | PMU | Monthly | Included in contractors’ cost. |
| Renovation | Resource Consumption (water and energy) | Encourage sustainable practices like switching of machines when not in use.  Minimizing water, and energy use by reusing and recycling where possible.  Monitoring the consumption records for water, energy, and raw materials.  Promote water recycling and reuse as much as possible  Minimize the wastage of water on construction site  Sensitize workers and staff on water conservation and saving techniques.  Ensure electrical equipment, appliances and lights are switched off when not being used  Install energy saving fluorescent tubes at all lighting points instead of bulbs which consume higher electric energy  Monitor energy use during construction and set targets for reduction of energy use. | Site Inspection | Water and Energy consumption records | Contractor | PMU | Monthly | Included in contractors’ cost. |
| Renovation | Water pollution | Proper handling, use, storage and disposal of hazardous chemicals and fuels  Excavated earth materials shall be reused for backfilling and leveling of ground | Site Inspection | Number of complaints received | Contractor | PMU | Monthly | Included in contractors’ cost. |
| Renovation | Traffic safety Issues | Use speed control devices to control the speed of vehicles  Develop a plan for on-site parking of cars.  Periodic supervision of the management of vehicle movement to access tower foundations should be done.  Emphasizing safety aspects among drivers.  Improving driving skills and requiring licensing of drivers.  Adopting limits for trip duration and arranging driver rosters to avoid overtiredness.  Avoiding dangerous routes and times of day to reduce the risk of accidents. | Routine Site Inspection | Safety warning signs in place  Traffic management plan in place  Training on traffic risks and hazards records | Contractor | PMU | Monthly | Included in staff costs |
| Renovation | Exposure to hazardous chemicals | Obtaining material safety data sheets for all chemicals containing essential information regarding their identity, suppliers’ classification of hazards, safety precautions and emergency procedures are provided and are made available to employees and their representatives  Keep a record of all hazardous chemicals used at the premises, cross-referenced to the appropriate chemical safety data sheets  Proper storage of all hazardous chemicals with their proper and appropriate labeling and marking.  There should be no eating or drinking in areas where chemicals are stored or used  Training of workers on the use, handling, storage, and disposal of chemicals. | Site Inspection | Health and Safety Inspection records | Contractor | PMU | Throughout | Included in Contractors  Budget |
| Renovation | Falling at height | Avoid work at height where possible  Training and use of temporary fall prevention devices, such as rails or other barriers able to support a weight of 200 pounds, when working at heights equal or greater than two meters or at any height if the risk includes falling into operating machinery, into water or other liquid, into hazardous substances, or through an opening in a work surface.  Training and use of personal fall arrest systems, such as full body harnesses and energy absorbing lanyards able to support 5000 pounds (also described in this section in Working at Heights above), as well as fall rescue procedures to deal with workers whose fall has been successfully arrested. The tie in point of the fall arresting system should also be able to support 5000 pounds.  Use of control zones and safety monitoring systems to warn workers of their proximity to fall hazard zones, as well as securing, marking, and labeling covers for openings in floors, roofs, or walking surfaces. | Site Inspection | Health and Safety Inspection records | Contractor | PMU | Throughout | Included in Contractors  Budget |
| Renovation | Demolition Hazard | Barricading of construction site to limit unauthorized access of visitors to the site  Conduct Job safety analysis and risk assessment prior to the start of demolition activities  Introduction of permit to work systems to control the risks associated with demolition  Use of appropriate method statements for performing demolition activities.  Mandatory use of personal protective equipment at the site. | Site Inspection | Health and Safety Inspection records | Contractor | PMU | Throughout | Included in Contractors  Budget |
| Renovation | Welding hazards like noise, fire, electric shock, exposure to toxic gases | Replacement of noisy welding generators with the less noisy ones.  Redesigning of generators by Installation of noise silencers to reduce the level of noise being generated.  Installation of soundproof and sound absorbing materials in noisy areas to reduce the level of sound generated to the neighboring offices.  Provision of personal protective equipment like earmuffs and earplugs to workers and visitors to reduce the level of noise being exposed to.  Replacement of hazardous materials with less hazardous ones to reduce exposure to toxic metal fumes  Rotation of workers according to shifts to limit exposure to metal fumes.  Introduction of Method statements and safe operating procedures for welding.  Training of workers on the health risks of welding  Use of personal protective equipment. | Site Inspection | Health and Safety Inspection records | Contractor | PMU | Throughout | Included in Contractors  Budget |
| Renovation | Use of child and forced Labour | Inducting of Contractors on the use of child labor before the start of construction works  Physical screening of contractor workers to ensure compliance with South Sudan Law labors and WB guidelines on Labour  Maintaining registry of all workers on site including their ages. | Site Inspection | -Labor register showing age and sex of persons engaged.  -Physical random inspection of Workers | Contractor | PMU | Weekly | Included in PMU Budget |
| Renovation | Delayed payment of construction workers leading to complaints and conflict | Timely payment of contractor payment by ECRP II after the completion of each milestone.  Contractors to share their workers payment plan, timeline, and payment records with PMU | Routine inspection | Payment records | Contractor | PMU | Monthly | Included in staff costs |
| Renovation | Underpayment of contracted workers or supply workers | Provide payment in accordance with the agreed and approved wages in the South Sudan Laws | Random Inspection | Payment records | Contractor | PMU | Monthly | Included in staff costs |
| Renovation | Labor and working conditions of construction workers may not comply with WB and South Sudan legislation – including occupational health and safety risks. | Contractor to be inducted on the labor and working conditions requirement of the project.  Contractor to share their labor management plan with PMU  Routine inspection of subproject site to ensure compliance with the requirement of the ESMP. | Random Inspection | Site Inspection records  List of available staff | Contractor | PMU | Monthly | Included in staff costs |
| Renovation | Discrimination against women in employment | Contractor to develop Labour Management Plan that enables fair working conditions and women’s safe and equitable participation.  List number of workers, indication of origin, gender, and nationality  Training and Induction of contractors and project staff on GBV/SEA | Site Inspection | List of workers available  Signed CoC with provisions on SEAH/GBV all included, and workers trained on them | Contractor | PMU | Monthly | Included in staff costs  Training on GBV/SEA 2,000 |
| Renovation | Spread of communicable diseases (Sexually Transmitted Infections, HIV/AIDS, Covid-19 & Ebola etc..) among construction workers and the public. | Sensitization of workers on preventing spread of communal diseases among project workers and communities  Communication of risks through locally appropriate means – targeting specific social groups and genders | Site Inspection | Number of grievances received | Contractor | PMU | Throughout | Included in Contractors  Budget |
| Renovation | Risk of GBV/SEA, including sexual harassment | Training and induction of staff and contractor workers on GBV/SEAH  Mandatory signing of CoC for all staffs and contracted workers | Routine inspection | Quarterly Reports  Signed CoC  Training records | Contractor | PMU | Monthly | Included in staff costs |
| Operation | Air pollution and emission of greenhouse gases | Adoption of clean energy sources for the generation of electricity for the LGB offices.  Regular maintenance of vehicles and generators to minimize their gaseous emissions and air pollution.  Turning off generators, vehicles, and Air Conditioning systems when not in use to reduce and limit the generation of greenhouse gases. | Routine inspection | Number of complaints | PMU | PMU | Weekly | Included in PMU’ cost. |
| Operation | Generation of solid wastes | All non-hazardous wastes are characterized and sorted on site and deposited at designated areas.  Wastes of any type should be removed on time and on a regular basis.  Solid waste includes those materials which are no longer used for subproject activities and should be removed to a designated area on time.  Establish a waste management procedure at the subproject sites by considering domestic solid, liquid wastes and hazardous waste.  Place different dustbins based on the material species according to the site requirements. | Routine inspection | Number of complaints | PMU | PMU | Weekly | Included in PMU’ cost. |
| Operation | Occupational health and safety risks like trips and slips, ergonomic hazards, fire, and electricity hazards | Practice and maintenance of good housekeeping practices in the office  Installation of firefighting equipment in the office at fire hotspots.  Designation of separate storage rooms for fuel and hazardous substances  Routine health and safety inspection to identify and control hazards in the workplace  Training of project staff on occupational health and safety hazards and their control measures.  Development of an emergency evacuation plan and testing its effectiveness through a drill. | Routine inspection | Number of complaints | PMU | PMU | Weekly | Included in PMU’ cost. |
| Operation | Fire and explosions | Storing flammables away from ignition sources and oxidizing materials. Further, flammables storage area should be:  o Remote from entry and exit points into buildings  o Away from facility ventilation intakes or vents  o Have natural or passive floor and ceiling level ventilation and explosion venting  o Use spark-proof fixtures  o Be equipped with fire extinguishing devices and self closing doors, and constructed of materials made to withstand flame impingement for a moderate period  · Providing bonding and grounding of, and between, containers and additional mechanical floor level ventilation if materials are being, or could be, dispensed in the storage area.  Where the flammable material is mainly comprised of dust, providing electrical grounding, spark detection, and, if needed, quenching systems | Routine inspection | Number of complaints | PMU | PMU | Throughout the project | Included in PMU’ cost. |

## Training and Capacity building Need and Targets

The ESMP would also include detailed capacity building/training for staff of ECRP II at the PMU and the contractor. The table below depicts a breakdown of the proposed training and cost implications.

**Table 2: Training and Capacity building Need and Targets**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Capacity Need** | **Participants** | **Subject** | **Resource Person** | **Frequency** | **Cost (USD)** |
| Training on Environmental and Social Management Plan Implementation | ECRP PMU Staffs and Contractors | Overview of Environmental and Social Impact Assessment Process  Overview of Potential Environmental and Social Impacts of Project  World Bank Environment and Social Standards ESS1 to ESS 10  Environmental Pollution & Control  Environmental and Social Management Plan  Environmental Performance Monitoring  Monitoring Mitigation Measures in ESMP | Environmental Specialist | Quarterly | Included in personal costs |
| Training on Construction HSE | PMU staff and Contractors | Introduction to Construction  HSE  Mandatory Induction on Health and Safety  Overview of Health and Safety Hazards in Construction  Incidents: Causation, Investigation & Reporting  Construction Site Inspection  Personal Protective Equipment use and Maintenance | Environmental Specialist | Monthly | 500 |
| Grievance and Redress Mechanism | Contractors and Project stakeholders | Classification of GRM  How to report GRM  Conducting GRM lodging process, procedures for addressing Complaints, Appeal process  How to handle project related Grievances | Senior Social Safeguards Specialist | Monthly | 500 |
| Enhance knowledge and awareness on GBV Action Plan | Contractors,  Subcontractors, Primary  Suppliers,  Workers and ECRP Staff | GBV risks and Management | Senior Social Safeguards Specialist  Social Development Specialist | Monthly | 500 |
| Enhance knowledge and awareness on LMP | Contractors,  Subcontractors, Primary  Suppliers,  Workers and ECRP Staff | Labor risks management  Child and Forced Labour | Senior Social Safeguards Specialist | Monthly | 500 |
| **Total (Capacity Building)** |  |  |  |  | **2,000** |

**Note:** This cost is exclusive of the cost of the hall, and other logistics which shall be undertaken by ECRP under management cost.

# CHAPTER 8: INSTITUTIONAL ARRANGEMENTS

The successful implementation of this ESMP depends on the commitment and capacity of various institutions and stakeholders to implement the ESMP effectively. Thus, the arrangement as well as the roles and responsibilities of the institutions and persons that will be involved in the implementation, monitoring and review of the ESMP are discussed below. There are 5 institutions involved in the Implementation and supervision of the ESMP. They include the Ministry of Environment and Forestry, The World Bank, Contractor, Ministry of Finance and Planning (Represented by the ECRP II PMU based at the LGB) and other stakeholders like GIZ, South Sudan Land Commission and the general public.

## 8.1. Institutional arrangement

The project will be implemented by MoFP in collaboration with the LGB on behalf of the Republic of South Sudan.

## Ministry of Environment and Forestry

### Roles and Responsibilities

* Supervision and provision of technical support and guidance for ESMP.
* Recommend additional measures for strengthening the management framework and implementation performance.

## Construction Contractor

### Roles and Responsibilities

* The contractor will prepare a detailed construction-ESMP (C-ESMP) that is costed, with sufficient budget to mitigate E&S risks.
* Contractors shall ensure that all their personnel or sub-contractor’s personnel have received proper induction and awareness arising as necessary on ESMP, health and safety management practices, and are aware of relevant site rules.
* Keep the health and safety records of their subcontractors or partners in a joint venture and keep those records available for PMU inspection at any time.
* Contractors will include environmental and social requirements in the procurement and contracting process including bidding documents, for potential civil works.
* Relevant requirements are included in contracts and subcontracts consistent with the requirements of Environment and Social Standards (ESSs); codes of conduct are required for contractors, subcontractors, primary suppliers, and their workers.
* Contractor’s commitment and compliance will be monitored in accordance with ESSs and ESMP.
* Contractors will be trained by PMU in grievance redress mechanisms and their subcontractors are expected to do the same to the affected stakeholders.
* The contractor will develop a grievance mechanism to handle the concerns of their employees.
* Conducting weekly HSE Inspection and submitting the reports to the Environmental Specialist based at the PMU.
* Contractors will provide Monthly and quarterly details on contractor’s oversight on environmental, social, health and safety (ESHS) performance
* Contractor shall have a Labor Management Plan (LMP), which conforms to the requirements of the LMP and Environmental Social Standards 2. ESS2.
* Set up plans for action to be taken in the event of spills or leakages of hazardous materials, and other environmental emergencies.
* Prepare reports on all aspects of environmental and social compliance.
* Maintain lists of all workers, including their age and gender.
* Maintain a workers’ grievance mechanism.
* Prepare and maintain an OHS Plan.
* Provide training to all workers on the OHS Plan.
* Ensure signing of CoC by every worker, including issues of Sexual Harassment, Gender-Based Violence (GBV) and Sexual Exploitation and Abuse.

## World Bank

### Roles and Responsibilities

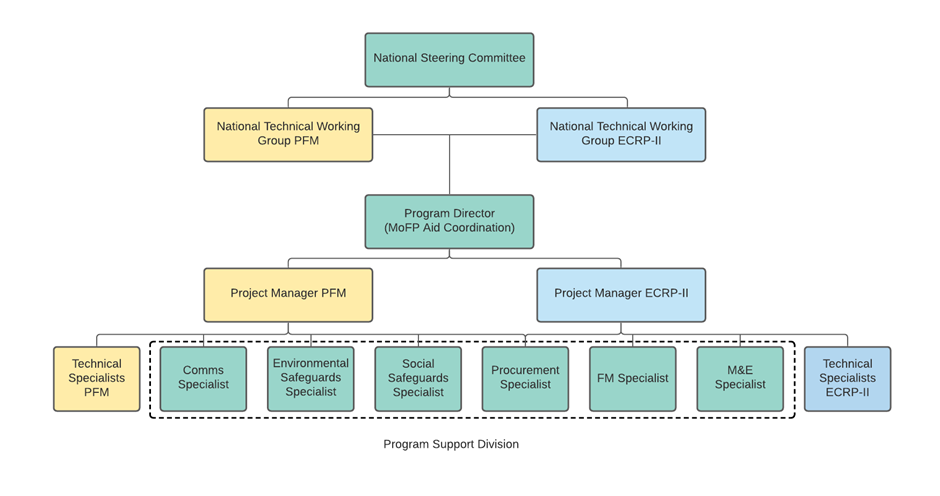
* Overall supervision and provision of technical support and guidance.
* Recommend additional measures for strengthening the management framework and implementation performance.
* Supervising the application and recommendations of Construction ESMP.

## Other Stakeholders like GIZ, South Sudan Land Commission and the public

### Roles and Responsibilities

* Identify environmental and social issues that could derail the project and support project impacts and mitigation measures

The Project Management Unit Based at the LGB shall be responsible for the implementation, Supervision, and reporting on the status of ESMP.



**Figure 3: ECRP II PMU Structure**

## 8.2. Role and responsibility of division

The Environmental specialist and social safeguard specialist based at the PMU shall be key personnel in the implementation and supervision of this ESMP. Their roles and responsibilities are further described below. One Environmental Specialist and one (1) Social Safeguards specialist shall be responsible for the smooth implementation and Supervision of this ESMP under the overall supervision of the Project Manager.

## ECRP Management Unit

The Project management Unit Consist of 7 staffs in total which includes a Project Manager, (1) Environmental Specialist, (1) Social Safeguards Specialist, (1) Procurement Specialist, (1) Communication Specialist, (1) Monitoring and Evaluation Specialist, and (1) Financial Management Specialist.

### Roles and Responsibilities of the PMU

* Develop the ESMP instrument and ensure adequacy in accordance with the ESMF for the ECRP-II which have been prepared World Bank Environmental and Social Framework, WB EHS General Guidelines and South Sudan’s E&S policies and legal frameworks
* Ensure that the subproject design and specifications adequately reflect the recommendations of the ESMP.
* Coordinate application, follow up processing and obtain requisite clearances required for the subproject, if required.
* Prepare compliance reports with statutory requirements.
* Develop, organize, and deliver training programs for the project staff, the contractors and others involved in the project implementation.
* Review and approve the Contractor’s Implementation Plan for the environmental measures, as per the ESMF.
* Liaise with the Contractors on the implementation of the ESMP.
* Liaise with various National government and State Government agencies on environmental and other regulatory matters.
* Review the performance of the project through an assessment of the periodic environmental and social monitoring reports.
* Provide a summary of the same to the Project Manager and initiate necessary follow-up actions.
* Management, implementation, monitoring and compliance of the ESMP, and any approval conditions, including construction supervision and performance of project staff, contractors, and subcontractors.
* Review of ESMP performance and implementation of correction actions
* Stop work procedures, in the event of breaches of ESMP conditions that may lead to serious impacts on local communities, or affect the reputation of the Project
* Ensure effective communication and dissemination of the content and requirements of the ESMP to contractors and subcontractors.
* Assisting the contractor with implementation of ESMP sub-plans.

**Environmental safeguard specialist**

**Role and responsibility**

* Oversee the implementation and monitoring of the ESMPs.
* Make sure wastes are collected, transported, and disposed on time in designated area.
* Ensure the provisions of ESMP are implemented for waste management.
* Ensure all applicable national legislation and policies are observed by the contractors and their subcontractors.
* Prepare and submit monthly Environmental management issues to the representative of the client for review.
* Undertake awareness creation and consultations during the project implementation. i.e., hazardous waste storage and disposal, water, energy, and material use; ecosystem services management; soil and water conservations, application of mitigation measures.
* Ensure and provide workers with personal protective equipment (PPE).
* Ensure the first aid kits are distributed at the workplaces.
* Ensure the safety signs are kept throughout the site.
* Ensure the construction debris is managed properly.
* Provide training to the employees and communities on OHS, traffic safety and fire safety aspects.
* Ensure measures for the Occupational Health & Safety Management Plan are applied.
* Apply all requirements of the Emergency Response Plan.
* Ensure PPEs (face masks, hand sanitizers etc.) are available at site and should also arrange for Covid vaccination at site when required.
* Ensure dust abatement measures are implemented on a regular basis.
* Ensure all requirements of Biodiversity Management Plan are applied.
* Ensure all requirements of the Air Quality Management Plan are applied, particularly dust management from demolition activity.

**Social Safeguards Specialist**

**Roles and Responsibilities**

* In collaboration with the Environmental Safeguard Specialist oversees the implementation and monitoring of the ESMP.
* Oversee the Grievance and Redress Mechanism and ensure that all reported grievances are resolved and reported within the stipulated time.
* Ensure the implementation of provisions of the ESMP for prevention of the use of child and forced Labour during the rehabilitation process of the building are always enforced.
* Ensure that all the subproject stakeholders are inducted on the grievance and redress mechanism procedures.
* Ensure that there are adequate means for filing, receiving, and resolving project related grievances.
* Carry out awareness creation sessions to contractors and project staff on SEA/SH, gender and social inclusion topics including aspects of labor and working conditions.
* Report fully on gender and GBV-related activities and incidents (including follow-ups) in the regular project progress reports and ensure that all cases are adequately recorded.
* Conduct weekly inspections on the subproject site to ensure compliance with the ESMP requirement including reporting on the same.
* Sensitize contractor workers and project staff on the spread and prevention of communicable diseases.
* Ensure that all the contractor workers are inducted on the Environment and Social requirements of the Subproject and ensure that they sign a Code of Conduct for the prevention of SEA/SH at the subproject location.
* Develop referral systems for gender-based violence (GBV), identifying mitigation measures and responses, and monitoring compliance with these measures in the field and in close coordination with the Environmental Safeguard Specialist.
* Ensure all the requirements for the Labor Management Plan are applied during the subproject implementation.

**Note:** The implementation and Monitoring of the ESMP will be done throughout the subproject Life Cycle.

**Table 3: ESMP Implementing schedule**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **S/N** | **Activity** | **Responsibility** | **Pre-Construction** | **Construction** | **Operation & Maintenance** |
| **Environment and Social Management** | | | **1st Month** | **2nd & 3rd Month** | **4th Month** |
|  | Formal Disclosure of ESMP | PMU |  |  |  |
|  | Develop Environmental/Social Requirements in Bid Documents for contractors | PMU |  |  |  |
|  | Allocate Budget for ESMP | PMU |  |  |  |
|  | Training of Contractors on the ESMP | PMU |  |  |  |
|  | Implementation of Environmental and Social Mitigation Measures | Contractor |  |  |  |
|  | Supervision of pre-Construction and Construction activities | PMU |  |  |  |
|  | Supervision of ESMP Implementation | PMU |  |  |  |
|  | Environmental and Social Monitoring and Auditing | PMU |  |  |  |
|  | Reporting on ESMP Implementation | PMU |  |  |  |

## Proposed budget for ESMP implementation

The total cost for implementing this ESMP is estimated to be **6,600** **USD only.**

The table below breaks down the budget estimate and the responsibility for implementation of the ESMP.

**Table 4: Proposed budget for ESMP implementation**

|  |  |  |  |
| --- | --- | --- | --- |
| **S/N** | **Item** | **Responsibility** | **Cost Estimate (USD)** |
| 1 | Mitigation | Contractor and PMU | 2,000 |
| 2 | Monitoring | PMU | 2,000 |
| 3 | Capacity Building | PMU | 2,000 |
| 4 | Miscellaneous | 10% of subtotal | 600 |
| **Total** | | | **6,600** |

## Monitoring and Reporting

Environment and Social Management Reports shall be produced through the course of implementation of monitoring programs, collecting incident/grievances forms, consulting with neighbors and auditing performance of existing mitigation measures outlined in the ESMP.

**Table 5: Types of reports required**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Responsibility | Type of Report | Purpose/Details of Reporting | Frequency of Submission | Submit to: |
| Contractor | Accidents/ Incident Report | Filing/notification of accidents or unplanned events | Within 24 hours of the incident | Environmental Specialist |
| Site Inspection Report | Report of compliance and noncompliance issues / measures | Weekly | Environmental Specialist |
| PMU | Incident Investigation/  Review report | Filing/notification of accidents or unplanned events | Not more than 5 days form occurrence | World Bank |
| Quarterly Compliance Report | Report of compliance and noncompliance issues / measures  Quarterly report of compliance to ESMP | Whenever the need arises  Quarterly | World Bank |

## ESMP Disclosure

The ESMP shall be disclosed to the Public following the review and clearance by the Ministry of Environment and Forestry and the World Bank.

**Table 6: ESMP Disclosure**

|  |  |
| --- | --- |
| **Activity** | **Responsibility** |
| Disclosure of the ESMP at the National Level on the Public notice boards and Project site | PMU will liaise with the relevant government authorities and the nearby communities. |

# **CHAPTER 9**: GRIEVANCE REDRESS MECHANISMS

Under the new World Bank ESSs, Bank-supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project. One of the key objectives of ESS 10 (Stakeholder Engagement and Information Disclosure) is ‘to provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow borrowers to respond and manage such grievances. This Project GRM facilitates the Project to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project. ECRP-II will provide mechanisms to receive and facilitate resolutions to such concerns. This section lays out the grievance redressal mechanisms (GRM) for the ECRP. It is based on lessons from the GRM of the initial Local Governance Development Project (LGSDP) and the ECRP-I.

As per World Bank standards, the GRM operates in addition to a GBV/SEAH and Child Protection Prevention and Response Plan, which includes reporting and referral guidelines (see GBV/SEAH and Child Protection Prevention and Response Plan in the ECRP II ESMF). It also operates in addition to specific workers’ grievance redress mechanisms, which are laid out in the LMP.

Additionally, in line with the provisions of ESS2, a grievance mechanism will be provided to all direct workers and contracted workers to raise workplace concerns. Workers will be informed of this grievance mechanism at the time of recruitment and the measures put in place to protect them against any reprisal for its use.

The GRM aims to address concerns in a timely and transparent manner and effectively. It is readily accessible for all project-affected parties. It does not prevent access to judicial and administrative remedies. It is designed in a culturally appropriate way and can respond to all needs and concerns of project-affected parties.

**GRM Value Chain**

**Step 1:** **Grievance Uptake:**

Multiple channels must be available for aggrieved parties to file their complaint, grievance, or feedback. The aggrieved party must be able to select the most efficient institution, the most accessible means of filing a grievance, and must be able to circumvent partial stakeholders in the Project, which may be implicated in the complaint. He or she must further be able to bypass some grievance channels that are perceived as potentially not responsive or biased.

**Means of Filing a Grievance**

There are four distinct means, at least two of which must be made available at the subproject locality for any person to file a grievance:

1. **A phone number for a hotline operator:** The phone number of a grievance hotline operator must be widely disseminated among project stakeholders. The Hotline Operator shall be available from 8.00 am to 5.00 pm every day through a toll-free number. The hotline operator is set up and managed by the PMU. Any concerned party can call the hotline number and file a grievance with the Project.
2. **A help desk** may be set up by PMU during the implementation of sub-project activities at the LGB office. It shall be managed by a member of the PMU staff, especially the Environment and Social safeguards team. At the help desk, PAPs can inquire about information about project activities, or they can file a grievance directly with the person managing the desk. The help desk shall be operational from 8.00 am to 5.00 am on daily basis.
3. **Relevant assigned personnel** available at the subproject site will be required to accept formal grievances and ensure that avenues for lodging grievances are accessible to the public and all PAPs. The first point of contact for all potential grievances from community members may be the contractor or the local government official. Such personnel will be required to accept formal grievances; or they can point out the Hotline Operator’s number, the Help Desk or Suggestion Box. Should a complainant have challenges with the use of the other available channels for registering their grievances like the suggestion box or hotline number they can alternatively report their grievances directly to the assigned personnel for registering their grievances at the subproject site. Their grievance shall be recorded by the assigned staff and forwarded to the relevant personnel for handling and resolution. The assigned personnel need to be present at the subproject site throughout the working days in order to receive grievances.
4. **A suggestion box** Shall be installed at the sub-project site. Suggestion boxes provide a more anonymous way of filing a grievance or for providing feedback. Grievances or feedback submitted to the Suggestion Box must be expressed in writing. The suggestion box shall always be locked with a padlock and the key shall be kept by the Social Development Specialist based in the PMU. The Suggestion box shall be emptied twice a week preferably every Wednesday and Fridays in order to check for its content. The received grievances shall be documented, investigated, and followed up to ensure it is addressed before a timeline of 5 working days.

**GBV/SEA/SH-related Grievance**

Given the sensitive nature of GBV complaints, the GRM provides diverse ways to submit grievances. All grievance uptake channels can be used to report on GBV/SEA/SH-related grievances. No grievance uptake mechanism can reject such grievances, and all personnel directly receiving grievances will be trained by the Gender Specialist based in the PMU on the handling and processing of GBV/SEA/SH-related grievances. Information on available services will be provided to survivors prior to any disclosure of case details by the survivor, for example through initial awareness raising sessions on the GRM. This will allow protect the survivor-centred approach when reporting case to the World Bank. Any GBV related incident needs to be notified to the World Bank within 24hrs of occurrence. Only, age and sex of the survivor shall be disclosed, whether the preparator is project staff or not(Yes/No) and if the survivor received any service(yes or No).

The GBV survivor has the freedom and right to report an incident to anyone: community member, project staff, GBV case manager, local authorities. All recipients of the report should – with the survivor’s informed consent – report the case to one of the ECRP’s formal grievance recipients. Furthermore, a survivor can ask someone else to act as a survivor advocate and report on her/his behalf.

Cases of GBV/SEA/SH can be reported through the general Project GRM – any project staff, staff manning help desks, through the suggestion box, or through the GRM Hotline Operator

The grievance recipient will be responsible for the recording and registration of the complaint. A GRM operator cannot reject a GBV/SEA/SH complaint. At the same time, however, the project can only respond to a GBV/SEA/SH complaint if it is directed into the designated GRM channels.

**Confidentiality:**

All grievance recipients and anyone handling the GBV/SEA/SH related grievances must maintain absolute confidentiality regarding the case. Maintaining confidentiality means not disclosing any information at any time to any party without the informed consent of the person concerned. When reporting a case to the World Bank, only information on age and sex of the survivor shall be disclosed, whether the preparator is project staff or not (Yes/No) and if the survivor received any service (yes or No).

**Informed Consent:**

The survivor can only give approval to the processing of a case when he or she has been fully informed about all relevant facts. The survivor must fully understand the consequences of actions when providing informed consent for a case to be taken up. Asking for consent means asking the permission of the survivor to share information about him/her with others (for instance, with referral services and/or IPs), and/or to undertake any action (for instance investigation of the case). Under no circumstances should the survivor be pressured to consent to any conversation, assessment, investigation, or other intervention with which she does not feel comfortable. A survivor can also at any time decide to stop consent.

If a survivor does not consent to sharing information, then only non-identifying information can be released or reported on. In the case of children, informed consent is normally requested from a parent or legal guardian and the children. The respective IP at the state level will decide whether the grievance can be solved locally, with local authorities, implementers, or contractors and whether an investigation is required. The first ports of call will have in-depth knowledge of communal socio-political structures and will therefore be able to address the appropriate individuals if the case can be solved at the local level.

At all times, the IP will provide feedback promptly to the aggrieved party, for example through the phone or through the community facilitator. Feedback is also communicated through stakeholder meetings and beneficiary meetings during project activities. For sensitive issues, feedback is given to the concerned persons bilaterally.

Records of all feedback and grievances reported will be established by the implementing partner or the PMU. All feedback is documented and categorized for reporting and/ or follow-up if necessary. For all mechanisms, data will be captured in an excel spreadsheet. The information collected, where possible, should include the name of the person providing feedback as well as the boma, payam and county, cooperating partner (where applicable), the project activity and the nature of feedback or complaint.

**Step 2: Sort and Process:** All registered grievances will be transferred to the GRM Focal Point at the respective PMU – either by the Hotline Operator, local personnel, or the Help Desk Officer. The GRM focal point will categorize the complaint. Worker-related grievances will be handed over to a workers’ GRM. Where grievances are of sexual nature and can be categorized as

GBV/SEAH or child protection risk, the focal point shall handle the case appropriately, and refer the case to the GBV reporting protocols and referral system, defined in the GBV/SEAH and Child Protection Prevention and Response Plan. Dedicated training on how to respond to and manage complaints related to GBV/SEAH will be required for all GRM operators and relevant project staff.

For grievances handled under the general Project GRM, the GRM Focal Point will determine the most competent and effective level for redress and the most effective grievance redress approach. The focal point will further assign timelines for follow-up steps based on the priority of the grievance and make a judgment and reassign the grievance to the appropriate staff or institution. The person will exclude grievances that are handled elsewhere (e.g., at the court). The focal point should offer the complainant option/s for resolution of their grievance.

The GRM Focal Point will also transfer the grievance information into a more comprehensive grievance register.

**GBV/SEA/SH**

All reporting will limit information in accordance with the survivor’s wishes regarding confidentiality and in case the survivor agrees on further reporting, information will be shared only on a need-to-know-base, avoiding all information which may lead to the identification of the survivor and any potential risk of retribution.

Data on GBV cases recorded will only include the nature of the complaint (what the complainant says in her/his own words), whether the complainant believes the perpetrator was related to the project and additional demographic data, such as age and gender, will be collected and reported, with informed consent from the survivor. If the survivor does not wish to file a formal complaint, referral to available services will still be offered even if the complaint is not related to the project, that referrals will be made, the preference of the survivor will be recorded, and the case will be considered closed. If the survivor provides informed consent, the grievance recipient should inform the GBV Focal Point. The GBV Specialist at the PMU will inform the World Bank.

The report will be on the anonymized incident as soon as it becomes known to the PMU. Data shared will include the nature of the allegation; if the alleged perpetrator is associated with the ECRP; the survivor’s age and sex’ and whether the survivor was referred to other services.

**Step 3: Acknowledgement and Follow-Up:** The PMU will decide whether a grievance can be solved locally, with local authorities, contractors, or NGOs, and whether an investigation is required. For GBV related cases the project shall not investigate them. The project shall only link the survivor to access the available services based on her/his need and following survivors cantered approach.

The first ports of call will have in-depth knowledge of communal socio- political structures and will therefore be able to recommend to the GRM Focal Point the appropriate individuals that could be addressed with the case, if the case can be solved at the local level.

At all times, the implementer, or the PMU (the GRM Focal Point) will provide feedback promptly to the aggrieved party (unless the case was filed anonymously), within 5 working days after the grievance is filed.

Feedback can be provided through the phone, in writing or through the community facilitators. Feedback is also communicated through stakeholder meetings and beneficiary meetings during Project activities. For sensitive issues, feedback is given to the concerned persons bilaterally.

**GBV/SEA/SH**

Referrals are a process through which the survivor gets services . Services can include health, psycho-social, security and protection, legal/justice, and economic reintegration support. The grievance recipient will instantly provide the survivor with contacts of the available referral services in the respective area. Referral services are provided even in cases, where the survivor opts to not pursue the case through the GRM or through legal channels.

The grievance recipient explains to the survivor his or her right to control whether and how information about the case is shared with other entities as well as any implications of sharing information. The survivor will be informed about his or her right to place limitations on the type of information they want shared. The survivor’s consent must be documented.

**Step 4: Verify, Investigate and Act:** The GRM Focal Point, will then undertake activity-related steps in a timely manner. The activities will include verifying, investigating, redress action and plan. This step is not required for GBV/SEA related cases.

**Verification:**

➢ Check for eligibility (objectively based on set standards and criteria) of complaint in terms of

relevance to the project.

➢ Escalate outright grievances that require high level interventions within the implementer or PMU

➢ Refer outright grievances that are outside the project jurisdiction (e.g. refer to PMU or relevant external institution)

Once eligibility is determined, the IP will categorize the complaint into defined categories:

**Assessment**➢ GRM Focal Point to appoint an independent assessor (safeguards experts, professional outside the Implementing institution) who is a neutral assessor with no stake in the outcome of the investigation

➢ Collect basic information (reports, interviews with other stakeholders while ensuring

triangulation of information, photos, videos)

➢ Collect and preserve evidence

➢ Analyse to establish facts and compile a report

**Grievance Action Plan**

➢ Based on the findings determine the next steps and make recommendations: (i) direct

comprehensive response and details of redress action; (ii) referral to the appropriate institution

to manage the grievance, where the IP has no jurisdiction

➢ undertake mutually agreed follow-actions

➢ Update of complainant

➢ Provide users with a grievance redress status update and outcome at each stage of redress, (iii)

update the IP team on grievance redress across the GRM value chain.

**GBV/SEA/SH**

The PMU GBV and Gender Specialist will be the key focal point for management of such grievances and concerns and will work closely with respective GBV Specialist counterparts at the implementers in the implementation of the GBV/SEA/SH Action Plan, which contains all information on the GBV/SEA/SH referral system.

Once a case has been taken in by a GRM recipient, and informed consent of the survivor is obtained to proceed with the case, the case file will be submitted to the ECRP GBV Specialist. The GBV Specialist will first ensure that the survivor has been provided with all necessary GBV referral services and will ensure that the survivor is in safety.

Where the GBV/SEA/SH grievance was allegedly committed by a project worker, the grievance will be reported to the respective employing agency. The PMU GBV Specialist will follow up and determine jointly with the GRM Focal Point of the respective partner the likelihood that the allegation is related to the project. The GBV Specialist will follow up and ensure that the violation of the Code of Conduct is handled appropriately, e.g. the worker is removed from his or her position and employment is ended. The handling GBV/SEA/H cases shall ensure that the safety of the survivor is taken care of.

The responsibility to implement any disciplinary action lies with the employer of the perpetrator, in accordance with local labour legislation, the employment contract, and the code of conduct The GBV Specialist will report back to the survivor on any step undertaken and the results. Where the survivor has opted to take a formal legal route with the case, the PIU GBV Specialist will ensure that the survivor has all the support required to file a case at court. The GRM process will still proceed with the survivors’ consent. Ensuring due process is a matter of the formal justice system and not the grievance handlers. Unlike other types of issues, it is not part of the GRM’s remit to conduct investigations, to make any announcements, or to judge the veracity of an allegation.

The GRM should refer the case to the domestic regulatory framework to process the case if the consent of the survivor is received. Since this project assumes a fully survivor-centred approach, no information can be passed on without the consent of the survivor. If the survivor does not wish for the case to be pursued, the survivor shall be offered access to referral services and the GRM operator or grievance recipient should note that the survivor did not wish for the case to be pursued, and the case is considered solved. Case closure requires a) the case has been referred to GBV service providers (if the survivor consented) for support and appropriate actions; and appropriate actions have been taken against the perpetrator according to SEA mechanisms; b) the service provider has initiated accountability proceedings with the survivor’s consent.

If the survivor does not want to launch a complaint with the employer, the case is closed. If the complaint proceeds, the case is reviewed by the PMU GBV Specialist and a course of action is agreed on with the respective IP/employer. The alleged perpetrator’s employer takes agreed-on disciplinary action. Once the action is deemed appropriate by the GBV Specialist, the case is recorded as closed.

**Step 5: Monitor, Evaluate and Provide Feedback:** The GRM Focal Point will provide feedback to GRM users and the public at large about the following except for GBV/SEA/H cases:

➢ results of investigations.

➢ actions taken.

➢ why GRM is important.

➢ enhance the visibility of the GRM among beneficiaries; and

➢ increase in users’ trust in the GRM

Any implementer will report on its GRM to the PMU monthly. Monthly reporting to the PMU

should provide information on the grievance and how it was managed as well as all information from the grievance register. However, it can omit the names of the aggrieved parties where necessary.

The PMU will undertake the following monitoring actions:

➢ develop indictors for monitoring the steps of GRM value chain.

➢ track grievances and assess the extent to which progress is being made to resolve them.

➢ conduct a stakeholder satisfaction survey for the GRM services

➢ conduct analysis on the raw data on the following: average time to resolve grievances, percentage of complainants satisfied with action taken, and number of grievances resolved at first point of contact

➢ provide a report on grievance redress actions pertaining to the steps of GRM value chain

The PIU will evaluate the GRM by

➢ analysing grievance data to reveal trends and patterns,

➢ sharing GRM analysis in management meetings; and

➢ taking corrective action on project implementation approaches to address the grievance

**GBV/SEA/SH**

All entities reporting on GBV/SEA/SH-related cases will ensure that reports do not contain any information with the potential of identifying survivors (including names of survivors, families, and perpetrators). Furthermore, the grievance recipient needs to provide ongoing feedback to the survivor throughout the process. After conclusion of any investigation, the survivor must be informed first to determine whether the perpetrator can be informed and proposed sanctions against the perpetrator can be taken.

# CHAPTER 10: CONCLUSION AND RECOMMENDATION

## Conclusion

The proposed renovation of Local Government Board Office Blocks is one of the subprojects under South Sudan Enhancing Community Resilience Project Phase II (ECRP II). The subproject aims to facelift the two existing office blocks at the LGB. The office blocks shall be used for housing the ECRP II PMU staffs.

This ESMP was prepared to help mitigate potential environmental and social risks and impacts during the renovation and operation phase. The Environment and Social risks and impact for proposed renovation and operation phase of the subproject were classified as moderate, mostly consisting of typical civil works related risks and impacts.

The ESMP was prepared to help guide the PMU and the construction company on environmental and social risk mitigation measures to be implemented throughout the works to ensure compliance with all ECRP II E&S instruments, World Bank Environmental and Social Standards (ESSs) and South Sudan legislation.

The Environmental and Social Management and Monitoring Plan provided in chapter seven details a pathway for sustainable project implementation throughout the renovation and operation phase. The plan provides strategies and activities that need to be implemented to mitigate the anticipated negative environmental and social risks and impacts of the rehabilitation process including their mitigation measures, Implementation timelines, responsibilities, and their cost estimates.

## Recommendation

It is recommended that contractors and all the stakeholders mentioned in the ESMP implement the recommendations in the environmental and social management and monitoring plan. To this effect, the ESMP shall be included in the procurement and contracting process including bidding documents for the renovation of civil works, as well as other WB standard EHS terms and conditions for procurement. A Potential Contractor will prepare, adopt, maintain, and implement a Health and Safety Plan including community health and safety risk management as part of the Construction-ESMP (C-ESMP). This is to ensure that the potentially affected environment is well managed and that accidents are prevented during project implementation. The Proponent is expected to comply with the relevant legal and policy requirements about project implementation. During the operation of the office blocks, it is necessary that environmental regulations are strictly adhered to.

# REFERENCES

1. Environment and Social Management Framework-South Sudan Enhancing Community resilience and Local Governance Project ECRP II, Amended on June 09, 2022, for ECRP Phase II. First Version June 04, 2020.
2. Enhancing Community Resilience and Local Governance Project II, Project Implementation Manual, May 01, 2022.
3. <https://climateknowledgeportal.worldbank.org/country/south-sudan/climate-data-historical> Website, Accessed on 05-Dec-2022.
4. <https://www.csrf-southsudan.org/county_profile/juba/> Website, Accessed on 05-Dec-2022.

# APPENDICES

## ANNEX 1: ENVIRONMENT AND SOCIAL SCREENING REPORT

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**ENVIRONMENT AND SOCIAL SCREENING REPORT**

**SECTION A: GENERAL INFORMATION**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | **Social and Environmental Screening Report -ECRP II** | | | | | |
| **Projects are screened for their inherent social and environmental risks regardless of planned mitigation and management measures.** It is necessary to identify potential inherent risks if mitigation measures are not implemented or fail. This means that risks should be identified as if no mitigation or management measures were to be put in place. | | | | | | |
| **SECTION A: General Information** | | | | | | |
| Date of screening | 14-Nov-2022 | | | | | |
| Project/Subproject title | ECRP II | | | | | |
| Project/Subproject component | Renovation of Local Government Board Office Blocks | | | | | |
| Implementing Agency | Ministry of Finance and Planning | | | | | |
| Proposed project budget | … | | | | | |
| Proposed project duration | 2 Months | | | | | |
| ES Screening Team Leader and Contact Details | Yengi Emmanuel Daro-**Environmental Specialis**t, [eyengi52@gmail.com](mailto:eyengi52@gmail.com) Tel: 0928392199 | | | | | |
| ES Screening Team Members | Augustino and Justine | | | | | |
| Program/Site/Activity location | Office Renovation- Juba, South Sudan | | | | | |
| Project Description.  Briefly describe project activities, activities that  interact with the ES | Site Clearance, Fumigation, Relocation of furniture, fittings, fixtures, and reinstallation, replace ceiling, Repair roof, Refinish doors and windows, Painting (interior and exterior), Repair veranda, Anti‐termite treatment, Construction of water tank stand for 3,000 L tank, Connection of sanitary system, Commissioning of water supply and sanitary system | | | | | |
| Categorize Project Activities into four Risks, High, Substantial, Moderate and Low | **Risk-Moderate** | | | | | |
| **Potential Environmental/Social Risks Impacts of Activities** | | | | | | |
| Risk Category  *(Please check each line appropriately. At this stage, questions are answered without considering magnitude of impact – only yes, no or I don’t know are applicable answers)* | | Yes | No | I don’t know | If these risks (‘yes’) are present, refer to: | Comment |
| **ESS 1: Assessment and Management of Environmental and Social Risks and Impacts** | | | | | | |
| Is an Environmental and/or Social Assessment required where a project is undertaken? | |  |  |  | ESMF |  |
| Is there a risk of diversion of project benefits? | |  |  |  | Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM) | No Risk for diversion of project benefit |
| Is there a risk of lack of monitoring of project activities due to remoteness of location and insecurity? | |  |  |  | Security Management Plan (SMP) | Project located in the capital city Juba |
| Is there a risk that project benefits may not reach truly vulnerable populations? | |  |  |  | Stakeholder Engagement Plan (SEP) |  |
| Is there a risk that subprojects may be manipulated by different factions? | |  |  |  | Stakeholder Engagement Plan (SEP) |  |
| Is there a risk that the selection of the activity location or beneficiaries will lead to conflict? | |  |  |  | Security Management Plan (SMP)  Grievance Redress Mechanisms (GRM) |  |
| Does the activity pose a security risk for local staff? | |  |  |  | Security Management Plan (SMP) |  |
| Is there a risk that the activity firms up contested local authority structures? | |  |  |  | Stakeholder Engagement Plan (SEP) |  |
| **SS 2: Labour and Working Conditions** | | | | | | |
| Does the activity include any of the known labor rights / ESS 2 non-compliance risks in South Sudan (child and forced labor)? | |  |  |  | Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS) |  |
| Does the activity include a construction component? | |  |  |  | Labor Management Procedures (LMP)  C-ESMP Occupational Health and Safety Plan (OHS) | Renovation of exiting office blocks at the Local Government Board |
| Does the activity include labor-intensive manufacturing? | |  |  |  | Labor Management Procedures (LMP) |  |
| Does the activity include primary agricultural activities? | |  |  |  | Labor Management Procedures (LMP)  Occupational Health and Safety Plan (OHS) |  |
| Will the activity require a larger contractor workforce? | |  |  |  | Labor Management Procedures (LMP)  Occupational Health and Safety Plan  (OHS), C-ESMP |  |
| Is there a security risk for Project Workers? | |  |  |  | Security Management Plan (SMP) |  |
| is there a risk that the operation and maintenance of subproject facilities cause OHS issues? | |  |  |  | Occupational Health and Safety Plan (OHS) |  |
| Is there a risk of lacking OHS for workers at the construction site? | |  |  |  | Occupational Health and Safety Plan  (OHS) Pest Management Plan (PMP) |  |
| Is there a risk of delayed payment of workers? | |  |  |  | Labor Management Procedures (LMP |  |
| Is there a risk that workers are underpaid? | |  |  |  | Labor Management Procedures (LMP) |  |
| Is there a risk that women will not be included in deployment in equal numbers? | |  |  |  | Labor Management Procedures (LMP)  GBV Action Plan |  |
| Is there a risk that provision of employment or contracts sparks conflicts? | |  |  |  | Security Management Plan (SMP)  Grievance Redress Mechanisms (GRM) |  |
| **ESS 3: Resource Efficiency and Pollution Prevention Management** | | | | | | |
| Will the activity result in the production of solid waste? (Directly by the project or by workforce) | |  |  |  | Waste Management Plan, based on  *WBG Environmental, Health, and Safety General Guidelines*  Pest Management Plan (PMP), C-ESMP |  |
| Will the activity result in the production of toxic or hazardous waste? (e.g., used oils, inflammable products, pesticides, solvents, pharmaceutics, industrial chemicals, ozone depleting substances) | |  |  |  |  |
| Will the activity result in the generation of dust and noise? | |  |  |  | C-ESMP |  |
| Will the activity result in soil erosion? | |  |  |  | C-ESMP |  |
| Will the activity produce effluents (wastewater)? | |  |  |  | C-ESMP, Waste Management Plan |  |
| Will the activity result in increased levels of vibration from construction machinery? | |  |  |  | C-ESMP |  |
| Will the project produce air pollution? (e.g., significant greenhouse gas emissions, dust emissions and other sources) | |  |  |  | C-ESMP |  |
| Will the activity disturb any fauna and flora? | |  |  |  | C-ESMP |  |
| Will the activity result in irrigation water with high TDS with more than 1,500 ppm? | |  |  |  | C-ESMP  Waste Management Plan |  |
| Can the project affect the surface or groundwater in quantity or quality? (e.g., discharges, leaking, leaching, boreholes, etc.) | |  |  |  |  |
| Will the project require the use of chemicals? (e.g., fertilizers, pesticides, paints, etc.) | |  |  |  |  |
| Is there any risk of accidental spill or leakage of material? | |  |  |  |  |
| **ESS 4: Community Health and Safety** | | | | | | |
| Is there a risk of increased GBV/SEA cases due to labor influx? | |  |  |  | GBV/SEA Action Plan  Labor Management Procedures (LMP |  |
| Is there a risk of spread of communal diseases due to labor influx? | |  |  |  | Labor Management Procedures (LMP); C-ESMP |  |
| Is there a security risk to the community triggered by project activities? | |  |  |  | Security Management Plan (SMP) |  |
| Does the activity have the potential to upset community dynamics? | |  |  |  | Stakeholder Engagement Plan (SEP)  Grievance Redress Mechanisms (GRM) |  |
| Will the activity include payments or cash transfers? | |  |  |  | Stakeholder Engagement Plan (SEP)  Grievance Redress Mechanisms (GRM) |  |
| Will the activity expose community members to physical hazards on the project site? | |  |  |  | C-ESMP |  |
| Will the activity pose traffic and road safety hazards? | |  |  |  | C-ESMP |  |
| Is there a possibility that the activity contaminates open wells? | |  |  |  | Waste Management Plan; C-ESMP |  |
| Is there a possibility that the activity spreads pathogens and other pollutants (e.g., latrines) | |  |  |  | Waste Management Plan; C-ESMP |  |
| Can the activity contribute to the spread of disease (e.g., health facilities)? | |  |  |  | Waste Management Plan |  |
| **ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement** | | | | | | |
| Will the project lead to the displacement of a population? (e.g., forceful relocation, relocation of the local community) | |  |  |  | See negative list |  |
| Is the project located in a conflict area, or has the potential to cause social problems and exacerbate conflicts, for instance, related to land tenure and access to resources (e.g., a new road providing unequal access to a disputed land)? | |  |  |  | Stakeholder Engagement Plan (SEP)  Grievance Redress Mechanisms (GRM) |  |
| Would the project potentially discriminate against women and girls based on gender, especially regarding participation in design and implementation or access to opportunities and benefits? | |  |  |  | Stakeholder Engagement Plan (SEP)  Grievance Redress Mechanisms (GRM) |  |
| Is there a risk that the activity leads to loss of income, assets or means of livelihoods? | |  |  |  | See negative list |  |
| Will the activity lead to disputes over land ownership? | |  |  |  | ESMF |  |
| **ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources** | | | | | | |
| Will the activity impact sensitive areas? | |  |  |  | ESMF |  |
| Is there a risk that the project causes ecological disturbances? | |  |  |  | ESMF |  |
| Is there a risk that the activity causes changes in landform and habitat, habitat fragmentation, blockage or migration routes, water consumption and contamination? | |  |  |  | ESMF |  |
| Is there a risk that the activity causes loss of precious ecological assets? | |  |  |  | ESMF |  |
| **ESS 8: Cultural Heritage** | | | | | | |
| Will the project be in or close to a site of natural or cultural value? | |  |  |  | Chance Find Procedures (ESMF) |  |
| Is the project site known to have the potential for the presence of cultural and natural heritage remains? | |  |  |  |  |
| **ESS 10: Stakeholder Engagement and Information Disclosure** | | | | | | |
| Is there a risk that the activity fails to incorporate measures to allow meaningful, effective, and informed consultation of stakeholders, such as community engagement activities? | |  |  |  | Stakeholder Engagement Frameworks (SEF) |  |
| Is there a historical exclusion of disabled persons in the area? | |  |  |  | Stakeholder Engagement Frameworks (SEF) |  |
| Is there a lack of social baseline data? | |  |  |  | Stakeholder Engagement Frameworks (SEF) |  |
| Are women likely to participate in decision-making processes regarding the activity? | |  |  |  | Stakeholder Engagement Frameworks (SEF) |  |
| Is there a risk that exclusion of beneficiaries leads to grievances? | |  |  |  | Stakeholder Engagement Frameworks (SEF)  Grievance Redress Mechanisms (GRM) – see ESMF |  |
| Is there a risk that the activity will have poor access to beneficiaries? | |  |  |  | Stakeholder Engagement Framework (SEF)  Grievance Redress Mechanisms (GRM) – see ESMF |  |
| Will the Covid-19 outbreak hamper proper stakeholder engagement? | |  |  |  | WB and FGS guidance and regulations on Covid-19 |  |

**SECTION B: SUMMARY OF THE SCREENING PROCESS**

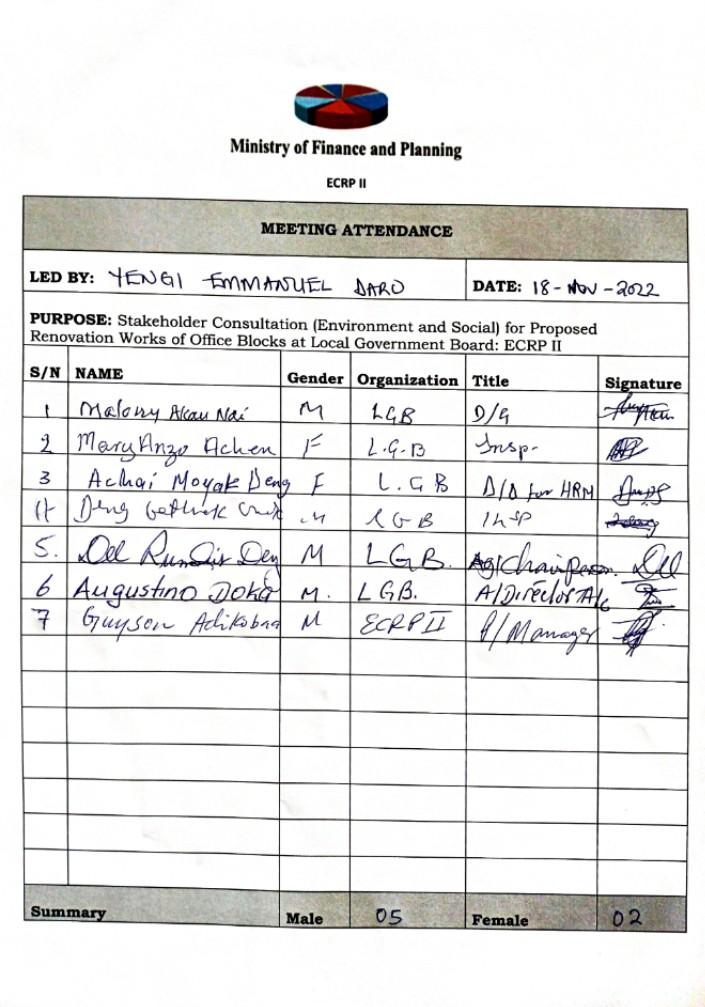
|  |  |  |  |
| --- | --- | --- | --- |
| E&S Screening | Results and Recommendations | |  |
| Screening Results:  Summary of Critical Risks  and Impacts Identified | **Risk/Impact** | **Individual Risk/ Impact**  **Rating** | **Mitigation**  At the end of the screen process, tabulate the mitigation measures in  an ESMP Format (Appendix C) |
|  | Exposure of public to road traffic hazards during the transportation of construction materials to site | Moderate | Undertake safety precautions to address safety hazards for the nearby community, including, safety/warning signage, safety barrier around the construction site, and safe driving practices  Informing public about construction risks  Introduction of speed limit around the construction area |
| Noise generation | Moderate | Sensitize machinery operators to switch off engines of vehicles or machinery not being used.  Sensitize construction drivers to avoid gunning of vehicle engines or hooting especially when in the office premises.  Ensure that construction machinery is kept in good condition to reduce noise generation  Ensure that all generators and heavy-duty equipment are insulated or placed in enclosures to minimize ambient noise levels.  The noisy construction works will entirely be planned to be during daytime when most of the neighbors will be at work. |
| Solid waste generation | Moderate | Use of an integrated solid waste management system through 1. Source reduction 2. Recycling 3. Composting and reuse 4. Combustion 5. Sanitary land filling.  Use of durable, long-lasting materials that will not need to be replaced as often, thereby reducing the amount of construction waste generated over time  Provide facilities for proper handling and storage of construction materials to reduce the amount of waste caused by damage or exposure to the elements |
| Air Pollution arising from demolition activities and gaseous emissions from use of motorized equipment | Moderate | All vehicles entering and leaving the subproject sites should be covered except when they are loading.  Spraying water on access and internal roads should be practiced in a timely manner.  Implement the speed limit of trucks and other construction vehicles.  Vehicles transporting loose soil materials shall be covered  Stockpiling of excavated materials for a long period should be avoided.  Stockpiles, i.e., excavated soil wastes should be covered as much as possible. |
| Soil contamination by chemicals and solvents used in the renovation | Low | Provision of spill containment kits.  Designation of storage areas for chemicals.  Training of workers on chemical use, storage, disposal, and emergency response. |
|  | Use of child and Forced Labour | Low | Inducting of Contractors on the use of child labor before the start of construction works  Screening of contractor workers to ensure compliance |
| Is Additional Assessment  Necessary? Evaluate the Risks/Impacts and reflect on options in Appendix B.  Is the activity excluded  under the project (does it  fit under List C in Appendix  A)? | **Screening Result** | | **Summary of Screening Result Justification** |
| 1. No 1. No further ES Assessment required. | |  |
| 1. **No 2. No further ES Assessment required but requires simple ESMP.** | | The Environment and social risks were identified during the screening process, and it is categorized as moderate risk, therefore, it is not requiring a further environmental and social assessment but rather a simple Environment and Social Management Plan is enough to manage the identified E&S risks and impacts during the renovation and operation phase of the subproject. |
| 1. Yes 1. Detailed ESMP. Done internally. | |  |
| 1. Yes 2. Detailed ESMP. Contracted to Consultancy. | |  |
| 1. YES 2. ESIA required. Contracted to consultancy. | |  |
|  |  | |  |

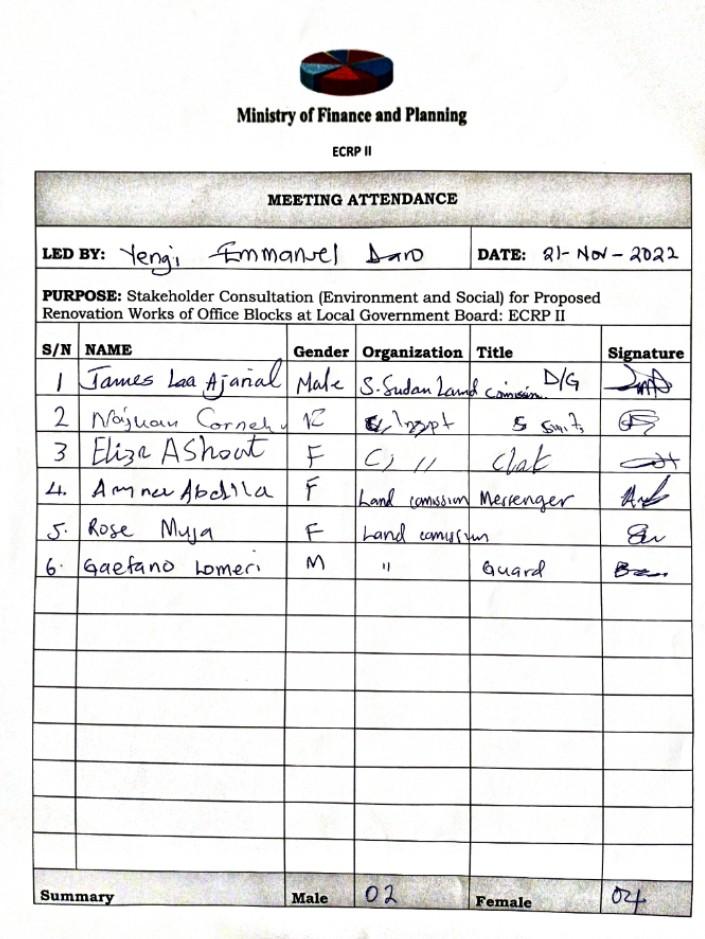
**ES Screening Conducted by (Names and Signatures) Recommended Approved by Project Manager**

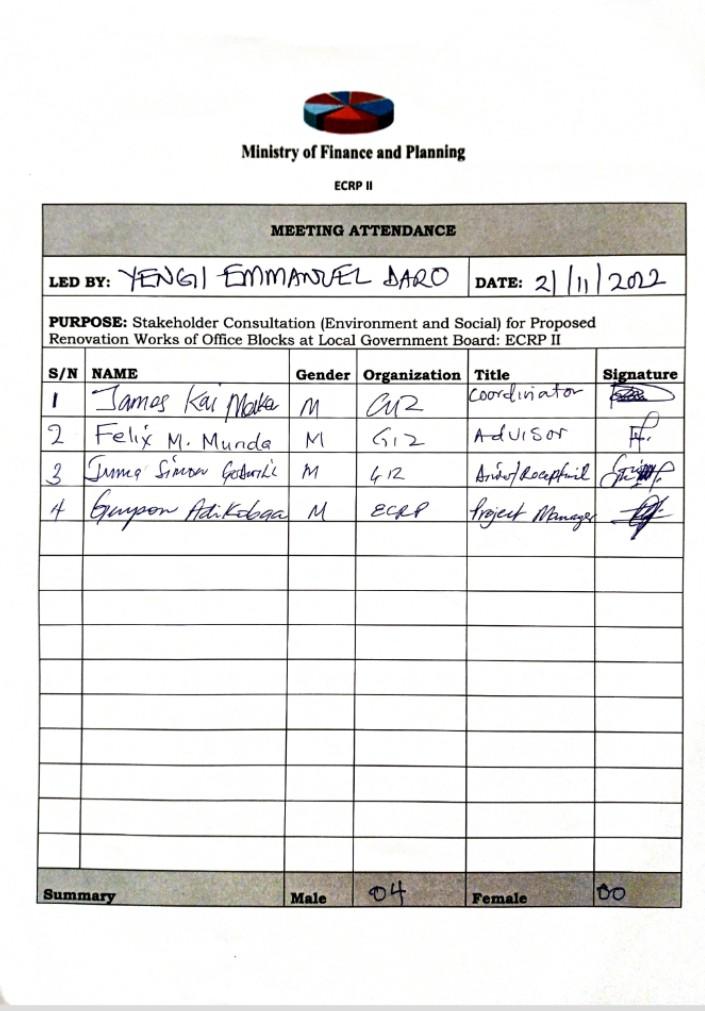
Yengi Emmanuel Daro. Guyson Andikoba Androga

Environmental Specialist Project Manager

## ANNEX 2: STAKEHOLDER ENGAGEMENT ATTENDANCE REGISTER







1. [↑](#footnote-ref-1)
2. [↑](#footnote-ref-2)