

ETHIOPIA

MINISTRY OF FINANCE



**Governance Modernization to Enable Efficient Service Delivery Project
(p178808)**

**ENVIRONMENTAL AND SOCIAL MANAGEMENT
FRAMEWORK (ESMF)
(DRAFT)**

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Abbreviations and Acronyms

AABE	Accounting and Auditing Board of Ethiopia
COPCD	Channel-One Projects Coordination Department
CSC	Civil Service Commission
EPA	Environment Protection Agency
EHSGs	Environmental, Health and Safety Guidelines
ES COP	Environmental and Social Codes of Practice
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESRM	Environmental and Social Risk Management
ESSs	Environmental and Social Standards
FEPA	Federal Environment Protection Authority
FPPPA	Federal Public Procurement and Property Agency
GBV	Gender-Based Violence
GMEESD	Governance Modernization to Enable Efficient Service Delivery Project
GoE	Government of Ethiopia
GRM	Grievance Redress Mechanism
HRM	Human Resources Management
HUPPF	Historically Underserved Peoples Planning Framework
IBEX	Integrated Budgeting and Expenditure
ICSMIS	Integrated Civil Service Management Information System
ICT	Information and Communications Technology
IFAC	International Federation of Accountants
IFMIS	Integrated Financial Management Information System
IHRPS	Integrated Human Resource and Payroll Information System
LMP	Labor Management Procedures
MinT	Ministry of Innovation and Technology
MoA	Ministry of Agriculture
MoF	Ministry of Finance
MoH	Ministry of Health
MoLS	Ministry of Labor and Skills
MoR	Ministry of Revenue
NMRTS	National Medium Term Revenue Strategy
NPCU	National Project Coordination Unit
ORAG	Office of the Regional Auditor General
PAD	Project Appraisal Document
PIU	Project Implementation Unit
POM	Project Operational Manual
PSC	Project Steering Committee
REPA	Regional Environmental Protection Authority
SEP	Stakeholder Engagement Plan
SH/SEA	Sexual Harassment/Sexual Exploitation and Abuse
SRAMP	Security Risk Assessment and Management Plan
VAT	Value Added Tax
VGs	Vulnerable Groups

Executive Summary

The World Bank will be supporting the Ministry of Finance, the Federal Civil Service Commission, and the Ministry of Revenue in implementing the Governance Modernization to Enable Efficient Service Delivery Project (GMEEDP). The objective of the project is to improve government capacity to manage public resources efficiently and increase transparency and accountability of service delivery. The project will support activities under four integrated components: component 1 will focus on improving human resource management capabilities, supporting the Civil Service Commission (CSC) to transition towards a data-informed approach to Human Resources Management (HRM), develop and promulgate competency-based recruitment and performance management processes, and address the fragmented institutional arrangements for civil servant capacity building and training. This component will also include a Reform Innovation Facility to help public bodies develop and implement key reform action plans. Component 2 will support initiatives to improve domestic revenue mobilization capabilities, with an emphasis on improving voluntary compliance through improved taxpayer services, and closing compliance gaps by leveraging technology and data analytics. Component 3 will focus on Public Financial Management (PFM), supporting the scale up of digital solutions for PFM, addressing critical process deficiencies across the PFM cycle, supporting the professionalization of accountancy and procurement functions, and embedding an institutionalized approach to PFM system and process support within the GoE. Component 4 will support project management to ensure timely and successful implementation.

The project activities will be implemented by selected Key Ministries such as the Ministry of Finance (MoF), the Ministry of Revenue (MoR), the Civil Service Commission (CSC), and other government institutions such as the Federal Public Procurement and Property Agency (FPPPA), the Accounting and Auditing Board of Ethiopia (AABE), Regional Bureaus of Finance to be selected by the GoE where the reforms under component 1 will be adapted and implemented in the first phase before they are scaled up at government wide. The beneficiary institutions and including the specific beneficiary regions to be included in the project are not known at this stage, because sub-project activities will be identified at later stage based on the needs to be identified for the target Ministries and regional bureaus. The sub-project locations will be known after the launching of the project at the key implementing Ministries.

This Environmental and Social Management Framework (ESMF) has been prepared to identify the potential environmental and social risks and impacts of proposed Project activities and propose suitable mitigation measures to manage these risks and impacts. It maps out the Ethiopian laws and regulations and the World Bank policies applicable to the Project, and describes the principles, approaches, implementation arrangements. The potential environmental and social risks for project activities are identified as impacts linked tax warehouse construction, ICT infrastructure installation, maintenance of buildings, and activities related to civil service reform, financial management, procurement modernization, improved revenue collection, digital solutions, e-government service, e-waste issues and associated pollution of soil, water and air linked with the procurement and use of ICT infrastructure. The project activities will be mainly implemented in selected Ministries in Addis Ababa and will later cascade to the regional bureaus. Some of the key potential E&S risks and impacts can be managed at the early stages of the planning and design by avoiding or minimizing the impacts using the exclusion criteria.

Table 1. Potential E&S risk and impacts mitigation measures at the planning and design phase

<i>Potential environmental and social risks and impacts from sub-project activities</i>	<i>Planning and design measures to Avoid/minimize risks and impacts</i>
<p>Civil works during data warehouse construction, maintenance, demolition for ICT infrastructure installation</p> <p>Removal of vegetation/trees with impact on biodiversity, damage to cultural heritages,</p>	<ul style="list-style-type: none"> ✓ Apply the exclusion criteria in this ESMF during sub-project activity and site identification and propose alternative sites ✓ Avoid selecting construction sites in and around nature reserves, cultural heritages, or species conservation areas during planning ✓ Comply with design standards ✓ Adjust design to avoid removal of natural vegetation ✓ Select qualified design consultants through a transparent and standard procurement procedures of GoE and WB, make this ESMF part of the TOR ✓ Adjust sub-project activity designs to avoid/minimize the risks on biodiversity ✓ For unavoidable impacts, conduct ESIA and prepare ESMPs
<p>Soil disturbance and initiation of soil erosion, during transport of goods, equipment and materials from mining sites</p>	<ul style="list-style-type: none"> ✓ Prepare construction site management plan ✓ Exclude routes that cause unintended soil disturbance and propose alternatives ✓ Design must minimize or avoid vegetation clearing and soil exposure ✓ Ensure proper ESIA is done and appropriate ESMP is prepared, TOR for design includes this ESMF ✓ During design preparation, provide sufficient drainage management options towards natural waterways so that erosion can be minimized or reduced ✓ Conduct participatory site identification for sub-projects to avoid sensitive routes before design and planning commences ✓ Ensure sub-project activities do not cause physical damage to roads and the infrastructure
<p>Solid, liquid and hazardous waste generation from construction/maintenance debris (e.g., asbestos) generation, disposal, contamination</p> <p>Risk of pollution from E-waste (disposal of obsolete computers, servers, cables, cartridges, solar panels, other disposables and gadgets, etc....). Electric and Electronic devices contain hazardous toxic materials such as mercury, lead, arsenic, cadmium, or brominated flame retardants, etc., beyond threshold quantities,</p>	<ul style="list-style-type: none"> ✓ Re-rout and avoid potential contamination to water sources; design treatment of waste water before discharge as per the EPA specific standards ✓ Prepare waste management plan for liquid and solid waste ✓ Prepare a design to contain the release and containment of toxic substances away from water sources ✓ Prepare waste recycling and reuse plans; ✓ Prepare Safe disposal and management plan, as per recommendations of EPA and EHS Guidelines of the World Bank ✓ Prepare E-waste management plan that clearly indicates the collection, segregation, storage and disposal of hazardous and non-hazardous e-waste materials

that harm people and the environment	
Noise pollution from machineries, trucks; and air pollution from dust from construction activities	<ul style="list-style-type: none"> ✓ Comply with noise pollution control standards and include the same as part of the planning ✓ Ensure construction sites are selected outside of residential areas and noise control measures are put in place (rules, guidelines, relevant laws applied) ✓ Prepare construction site management guideline to be implemented by contractors ✓ Conduct appropriate ESIA and prepare ESMP to manage impacts of construction machineries ✓ Ensure design components include dust minimization and control measures during planning ✓ Include appropriate PPEs as part of the planning and design preparation
Road accidents or fatalities from increased movement of vehicles	<ul style="list-style-type: none"> ✓ Prepare and apply a traffic management plan detailing traffic control procedure, training materials, sign posts and signals, etc....
Resource use inefficiency, increased consumption and waste of energy and water as a result of new construction, renovation	<ul style="list-style-type: none"> ✓ Prepare resource use guideline and control measures ✓ Provide awareness training to contractor workers on resource use efficiency ✓ Prepare a recycling and reuse plan
Labor risks involving working conditions, management of worker relationships, child labor and minimum age, and labor grievance	<ul style="list-style-type: none"> ✓ Provide awareness training on the LMP ✓ Provide training on code of conduct ✓ Introduce the GRM
Exclusion of disadvantaged or vulnerable individuals and groups such as blind employees, employees with mobility impairment, and female employees.	<ul style="list-style-type: none"> ✓ Conduct inclusive and participatory consultations with the VGs through their representatives or groups ✓ Arrange separate consultation methods (e.g. one-on-one interview or focus group discussion) for VGs and consider their views and special needs in designing the subproject activities. ✓ Prepare appropriate/differential mitigation measures for VGs ✓ An inclusive work environment for employees with mobility impairment (e.g. give them an office on the ground floor, facilitate transportation service in traveling for capacity-building training, toilet facilities with special needs service . . . etc.) ✓ Allocation of budget dedicated to mitigating the special needs of the VGs. ✓ Awareness-raising activities for the management members regarding the special needs of the VGs.

These risks will be managed and mitigated through the application of the national environmental and social assessment procedures and the ESS1 of the World Bank. The E&S specialists at the National Project Coordination Unit (NPCU) NPCU will identify sub-project activities with the participation of the beneficiaries in the implementing agencies. The first step is to screen the proposed sub-project activities

against the exclusion criteria and ensure that they do not fall under the exclusion list, which will be followed by E&S screening using a standard screening form (Annex 1) to identify and assess the relevant environmental and social risks specific to the activities, and identify the appropriate mitigation measures using site specific instruments (e.g. ESMPs) as indicated in the annexes of this ESMF. When site specific ESMPs are necessary, the E&S staff of the NPCU or Contractors will prepare such ESMPs and will share it with stakeholders and affected parties for consultations. The ESMPs will be submitted to the World Bank for prior review and no objection, and the MoF/NPCU will complete the documentation, permits and clearances required under the government's environmental regulation before any project activities begin. Then, the ESMPs will be implemented by the NPCU and/or Contractors during project implementation.

Implementation Arrangements: the ESMF will be implemented by the MoF/NPCU and PIUs to be established at the designated implementing agencies (MoF, CSC, and MoR .) at the Federal level and at later stage, the activities will cascade to regional line bureaus as part the government-wide scaling up of the results from the target Ministries. The CSC will be responsible for Component 1, the MoR for Component 2 and the MoF for Component 3. At the regional line bureaus, the government node for good governance, represented by a focal person, will be responsible for the coordination of project implementation activities, including the ESMF and other ESRM instruments of the project. Contractors will be responsible for implementing some sub-project activities and hence, responsible for the ESMF (ESMPs, LMP, SEP) implementation.

Monitoring: The MoF/NPCU and regional focal points at the nodes will be responsible for the monitoring of the ESMF implementation. The NPCU will monitor through site visits and receiving written progress reports on quarterly basis from the PIUs and regional focal points. The NPCU will be responsible for reporting to the World Bank quarterly. The PIUs will monitor progress at the implementing agencies and the regional nodes will monitor progress at the region level monthly through site visits and written reports from contractors.

A separate **Stakeholder Engagement Plan (SEP)** has been prepared for the Project, based the World Bank's Environmental and Social Standard 10 on Stakeholder Engagement. The SEP can be found on the project website.

1. Introduction

This Environmental and Social Management Framework (ESMF) is developed to support the environmental and social due diligence provisions for activities financed by the World Bank in the Governance Modernization to Enable Efficient Service Delivery Project (GMEESDP). The project aims to improve government capacity to mobilize and manage public financial as well as human resources efficiently, and increase transparency and accountability in service delivery. The project will be implemented in key Federal Institutions and the respective regional sector bureaus. The Ministry of Finance (MoF), the Civil Service Commission (CSC), and Ministry of Revenue will be implementing the Project activities. Other beneficiary Ministries such as Agriculture, Health, Education, Planning, Labor and Skills will be reached out in later stages of the project to be included in the implementation of the project activities. The Ministry of Finance will lead and coordinate the implementation of the Project activities at the national level.

This ESMF follows the World Bank Environmental and Social Framework (ESF) as well as the national laws [and state and local laws, if applicable] and regulations of Ethiopia. The objective of the ESMF is to assess and mitigate potential negative environmental and social risks and impacts of the Project consistent with the Environmental and Social Standards (ESSs) of the World Bank ESF and national requirements. More specifically, the ESMF aims to (a) assess the potential environmental and social risks and impacts of the proposed Project and put forward appropriate mitigation measures; (b) establish procedures for the environmental and social screening, review, approval, and implementation of activities; (c) specify appropriate roles and responsibilities, and outline the necessary reporting procedures, for managing and monitoring environmental and social issues related to the activities; (d) identify the staffing requirements, as well as the training and capacity building needed to successfully implement the provisions of the ESMF; (e) address mechanisms for public consultation and disclosure of project documents as well as redress of possible grievances; and (f) establish the budget requirements for implementation of the ESMF.

This ESMF should be read together with other plans prepared for the project, including the Stakeholder Engagement Plan (SEP), the Environmental and Social Commitment Plan (ESCP), and the relevant instruments and procedures annexed to this ESMF.

1.2. Objectives of the ESMF

The main purpose of this ESMF to provide a framework of analysis for the assessment, mitigation and monitoring of the potential E&S risks and impacts of the Governance Modernization to Enable Efficient Service Delivery Project (P178808) since the full nature, scope and specific locations of sub-project activities are not known at the time of preparing this ESMF. The ESMF provides procedures to guide the screening processes and the preparation of necessary management tools to avoid, reduce and mitigate the associated risks and impacts. A list of exclusion criteria is provided to pre-screen specific sub-project activities that are not eligible for implementation under this project. The document outlines proposed mitigation measures to manage the anticipated risks and impacts of the sub-projects.

1.3. Approaches and Methodology

This ESMF was prepared by collecting data and relevant information through various methods that allowed getting diverse and adequate information on the potential E&S risks and impacts as well as mitigation measures. The key approach was conducting stakeholder consultations at relevant institutions and remotely with selected regional sector bureaus. Methods include document review, key informant interviews, face-to-face meetings and group discussions, telephone interviews and physical visits to selected institutions for observations.

Desk review of relevant documents, policy and legal provision:

The desk review assessed the PAD, Civil Service Reform Roadmap, Public Financial Management Strategy, and the Digital Ethiopia 2025 Strategy. Besides, relevant policy and legal documents were reviewed including the World Bank Environmental and Social Framework (ESF) Environmental and Social Standards (ESSs) and GoE's environmental and social policies, legal and institutional frameworks related to environmental and social risk management, social protection, social inclusion, gender mainstreaming, and others policy documents relevant to the project.

Key Informant Interviews:

Key informant interviews were conducted to generate first-hand information on the anticipated and potential environmental and social risks and impacts associated with the implementation of the project components, E&S risk/impact management practices, ICT infrastructure and technical capacity, soft and hard capacity gaps to manage E&S risks and impacts. The interview was conducted with stakeholders at the Federal and regional levels. The key informants were drawn from the implementing agencies/Ministries such as the MoF, MoR, CSC and from the respective line bureaus in the regions. The main issues were institutional capacity and gaps (staff digital literacy, access to ICT and digital devices, gender disparity in staff digital literacy) for the implementation of this ESMF and E&S instruments.

Group discussions (face-to-face meetings) and site observation:

Whenever possible, small group discussions were held through face-to-face meetings at the Federal institutions. Discussions were held with experts from various units of the respective Ministries/agencies such as gender desks, E&S units, M&E units, NPCU, ICT units and finance management units. Site observations (physical observations) of the key institutions, particularly the ICT units were held to observe capacity gaps, e-waste management and handling, health and environmental hazards caused by obsolete hardware and software products.

2. Project Description

The project activities will be implemented under four major components which are Improving Human Resource Management Capabilities; Improving Domestic Revenue Mobilization Capabilities; Improving Public Financial Management Capabilities; and Project Management, supporting the management, coordination, and M&E of project activities and funds. The sub-component activities are actions that target improving efficiency and transparency, quality and standard service delivery by deploying digital solutions that require investment in ICT infrastructure such as hardware and software, and operating systems and data management systems, deploying innovative technologies for improving government capacity in human resources management, tax data management and public finance management. The Ministry of Finance will be responsible for the overall coordination of the project activities, including day-to-day implementation, coordination, supervision, and management of project. The CSC will take the lead for improving human resource management capabilities (Comp1), the MoR will lead improving the domestic revenue mobilization capabilities (Comp2), and the MoF will lead improving public finance management capabilities (Comp3).

Component 1: Improving Public Administration Capabilities: this component will focus on three fundamental building blocks aligned with the GoE's Civil Service Reform Roadmap and Civil Service Policy. The component will address the paucity of personnel and workforce data available to inform policy making, the limited application of competency-based human resource management systems and practices in the recruitment and performance management of public sector workers, and the fragmented approach to civil servant capacity-building and training. By focusing on productive and service delivery sectors, the project also ensures that these systemic reforms will result in a more effective civil service in the ministries and local governments that engage with citizens and businesses.

Subcomponent 1.1: Developing an Evidence-based and Data-Informed Approach to Human Resource Management: this sub-component will support the GoE to improve the functionality of HR information systems. The Project will support the design, acquisition, configuration, and deployment of an Integrated Human Resource and Payroll Information System (IHRPS), with online transaction and analytical processing functionalities and effect integration into the GoE's Integrated Financial Management Information System. The project will additionally support tailored training on HR Data Analytics with a particular focus on analyzing gender disaggregated data, within the CSC and participating public bodies.

Subcomponent 1.2: Competency-based Human Resource Management: the sub-component will support the transition towards competency-based human resource management practices, to enable the government to align officials' knowledge, skills, and attitudes with its priorities, resulting in performance improvement and operational efficiencies. Project activities will be sequenced in order to build standardized processes within the CSC, before piloting tailored activities with federal and regional public bodies in the Health and Agriculture sectors. The sub-component will: (a) support structural-level changes, including the specification of job families, occupational classifications and competency frameworks, and the development of a detailed job catalog, with clearly defined career paths for critical roles; (b) support the adoption of merit- and competency-based recruitment that is encouraging of gender parity through the establishment of an online recruitment portal and Competency Assessment Centers under the CSC, and specialized training of HR units within the CSC and selected public bodies; and (c) the development and adoption of performance incentives and management practices that align with performance outcomes.

Subcomponent 1.3: Institutionalizing Training, Capacity Building, and Change Management: the sub-component will address the need to institutionalize a coherent, sustainable approach to civil servant

capacity building, based on a whole-of-government approach. The Project will support: (a) the development of a National Human Resource Development Strategy, including for increasing the representation of women in senior civil service positions; (b) streamlining of the fragmented approach to training delivery in core GoE training institutions, including the Civil Service University, the Ethiopia Management Institute, and the Africa Leadership Excellence Academy; and (c) the development of an integrated digital learning platform and content creation, with an initial emphasis on developing critical competencies in human resource management, domestic revenue mobilization, and public financial management (including accounting and procurement), and in cross-cutting themes, including climate adaptation and mitigation and gender bias in the public sector.

Subcomponent 1.4: Reform Innovation Facility: the project will support the establishment of a Reform Innovation Facility within the CSC, to help public bodies develop and implement key reform action plans. Clear criteria and processes will be developed as part of the design and be reflected in the Project Operational Manual (POM). This sub-component will also support the CSC to fulfill its regulatory and oversight mandate with regards to supporting public bodies in developing service standards, systems, processes, and capacities that allow for greater efficiency and transparency in service delivery. The sub-component will initially focus on core Implementing Agencies, as well as Ministries of Health, Education, Agriculture, Planning, and Labor and Skills Development.

Component 2: Improving Domestic Revenue Mobilization Capabilities: the component will support the GoE in implementing key tax administration reforms to help it achieve the National Medium Term Revenue Strategy (NMRTS). The component will leverage digital technology to address the need to strengthen voluntary compliance by improving the quality and availability of taxpayer services, as well as to use data analytics to help close tax gaps and improve tax administrative efficiency. This component will work with the Ministry of Revenue and MoF's Tax Policy Directorate, at both central and branch office-levels.

Subcomponent 2.1: Leveraging Technology and Data Analytics to Support Risk-Based Tax Administration: The Project will support the GoE to leverage data analytics and technology to help close tax gaps. The Project will support: (a) the articulation of functional requirements and detailed specifications for new digital solutions and/or enhancements to existing digital solutions to improve their interoperability and functionality; (b) the development of an e-invoicing system; (c) a comprehensive Tax Data Warehouse; (d) the digitization of excise administrative processes and establishing a modern excise tax administration; (e) improved data sharing, and (f) the development of a system for automated selection of cases for audit. **Several administrative measures will be supported that will work to improve compliance.** Compliance measures could include an approach to encourage consumers to ask for VAT receipts, provide SMEs better advice and support to comply and implement a stronger, risk-based approach to VAT controls. Data-driven, risk-based audits are critical to ensure that enforcement activities, including audits and other control measures, are effective and help reduce compliance gaps by detecting and penalizing tax underpayment to create an atmosphere of deterrence.

Subcomponent 2.2: Improving the Quality and Availability of Taxpayer Services: the sub-component will support improved voluntary compliance by improving the quality and availability of taxpayer services. This sub-component will improve the coverage and utilization of e-filing and e-payment solutions and develop the capacity of front-line tax collection agents to engage with citizens productively. This sub-component will support: (a) the streamlining and strengthening of e-filing and e-payment systems; (b) an overhaul of organizational arrangements, processes, and information systems to educate taxpayers and procedures and actions to detect and penalize tax evasion; (c) the development and promulgation of a taxpayers' bill of rights; (c) strengthen GoE taxpayer services and education programs; (d) streamline complaints management processes; and (e) the develop and implement internal and external communications

strategies, with a focus on improving management coordination, information sharing, mutual trust, and morale. This sub-component will help the Ethiopian MoR in developing the capacity of front-line tax collection agents to engage with citizens productively. It will complement enhancements to e-tax governance processes so that e-filing and e-payment can be rolled out increasingly to cover all taxpayers. This work will also have an important gender impact by making it easier for women entrepreneurs to meet their tax compliance obligations remotely, thus reducing their exposure to risks from discrimination, harassment and of physical security when attending tax offices.

Component 3: Improving Public Financial Management Capabilities: the component will support the GoE in critical investments aligned with the PFM Strategy. This component will support the GoE in scaling up the use of technology, addressing critical deficiencies along the PFM cycle, the professionalization of accountants and procurement professionals within the public service, and the institutionalization of core training and Government-to-Government capacity building.

Subcomponent 3.1: Scaling up the use of technology for improved public financial management: the sub-component will support the improved functionality and utilization of core government financial management information systems. This sub-component will: (a) support enhancements and upgrades to the IFMIS and IBEX systems; (b) support the enhancement and roll-out of the e-GP procurement system; (c) support the design, acquisition, interfacing, and uptake of ancillary systems, including the Treasury Single Account System, e-payment systems, debt management systems, public investment management systems, computer-assisted audit tools and software, monitoring and evaluation systems for service delivery information and performance tracking, and (d) the overhaul public facing web portals and online citizen engagement platforms.

Subcomponent 3.2: Address critical public financial management deficiencies: the sub-component will address fundamental constraints along the public financial management cycle which undermine efficient service delivery. The Project will support the review of legal frameworks, guidelines, structures, processes and manuals across critical PFM business processes, with a particular emphasis on ensuring the mainstreaming of citizen engagement, gender and climate consideration across the cycle.

Subcomponent 3.3: Institutionalizing Professional Training, Capacity Building, and Change Management: the sub-component seeks to address the dearth of qualified professional accountants and procurement professionals. This sub-component will support the institutional development of the Ethiopian Institute of Certified Public Accountants, and the development of a Procurement Professionalization and Certification Program. The sub-component will additionally support the institutionalization of core training and Government-to-Government capacity building. The project will support the establishment and operationalization of dedicated Help Desk and Contact Centers for the IFMIS and the E-GP solutions, to ensure that an institutional arrangement for supporting GoE uptake of these solutions is in place. The project will also support the establishment of a training center for under the OFAG, which will firstly serve as a mechanism for the training of OFAG and ORAG staff prior to being operationalized as a regional hub for audit professionalization. Finally, this sub-component will also support the development of targeted training across the PFM cycle, including through the generation of content for the e-learning platform proposed under sub-component 1.3.

Component 4: Project Management: the component will support the management, coordination, and M&E of project activities and funds. Key activities that will be supported include (a) hiring of consultants to support project management including for critical functions in the Project Implementation Units to be established; (b) Design and development of monitoring and evaluation (M&E) mechanisms; (c) Engagement Surveys on the civil service (d) global HR summits (e) Knowledge sharing events and visits (f) Design and implementation of an initiative to provide selective honorariums for high performing reform champions in key institutions. The M&E costs, as well as operating costs, audit and impact evaluations will also be financed through this component.

3. Environmental and Social Policies, Regulations, and Laws

3.1. Ethiopian Legal Framework

The Environmental and Social risks and impacts, which may be anticipated during the design and implementation of sub-project activities under the GMEESD project shall be addressed in the framework of the provisions in the relevant national policies, regulations and laws described in the Table below.

Table 2. Ethiopian Relevant Legal Framework

Law	Description and Relevance to Project Activities
Environmental Protection	In the FDRE constitution of 1995, environmental rights are enshrined in articles 43, 44 and 92. The articles state that citizens have the right to improved living standards and to sustainable development, and to participate in national development, and to be consulted with respect to policies and projects affecting their community. It states that GoE shall endeavor to ensure that all Ethiopians live in a clean and healthy environment, and development programs shall not damage environments; and people have the right to full consultation and expression of views in the planning and implementation of projects that affect them directly
Environmental Policy of Ethiopia 1997	Requires adherence to principles of sustainable development, and the need to ensure that Environmental Impact Assessment considers impacts on human and natural environments; it provides for early consideration of environmental impacts in projects and programs design; recognizes public consultation; includes mitigation and contingency plans; provides for auditing and monitoring; and is a legally binding requirement.
Biodiversity Conservation and Research Policy 1998	Provides comprehensive provisions on the conservation and sustainable utilization of biodiversity, underlines the requirements for implementers of projects engaged in biological resource utilization to adopt and follow ESIA procedures during planning and operational phases of projects. Data warehouse construction need to be assessed for impacts on biodiversity.
EIA Proclamation (No. 299/2002)	ESIA is mandatory for specific categories of projects implemented either by public or private sector and implementation of any project that requires an ESIA, and is subject to an authorization from the federal Environmental Protection Authority (EPA) or from Regional Environmental Agency (REA). Those sub-project activities involving construction will require environmental clearance from relevant environmental agency before implementation.
Environmental Pollution Control Proclamation No. 300-2002	Promulgated to eliminate or mitigate pollution as an undesirable consequence of social and economic development activities. The objective is to provide basis for the set-up of standards on protection of ambient environmental quality in Ethiopia and to endorse the respect of these standards. The GMEESD may cause pollution from wastes to be generated from sub-activities.
Solid Waste Management Proclamation No.513/2007	The proclamation sets the rules for sustainable management of wastes in order to achieve social and economic development out of projects and preserve nature and protect environment. The project will generate waste that will need to comply with this proclamation in relation to its onsite management, storage, collection and final disposal.

Hazardous Waste Management and Disposal Control Proclamation No. 1090/2018	The law has provisions on how to create a system for the environmentally sound management and disposal of hazardous Waste; and how to prevent the damage to human or animal health, the environment, biodiversity and property due to the mismanagement of hazardous waste.
Electrical and Electronic Waste Management Disposal Regulation No. 425/2018	The regulation defined Electrical and Electronic wastes as any electrical and electronic equipment powered by electric current or electromagnetic fields including those used for the generation, transmission, and measurement of electric current and electromagnetic fields. This regulation is applicable to this project as E-waste is anticipated as a major risk.
Research and Conservation of Cultural Heritage Proclamation No. 209/2000	The proclamation was decreed to protect Cultural Heritage against man-made and natural disasters; to enable the benefits of Cultural Heritage assist in the economic and social development of the country; and to discover and study Cultural Heritage. The construction of the data warehouse in the project should adhere to requirements in this law.
Occupational Health and Safety (OHS)	<p>Article 92 of the Ethiopian Labor Proclamation No. 1156/2019 stipulates that an employer shall take the necessary measures to safeguard adequately the health and safety of workers; it shall in particular:</p> <ul style="list-style-type: none"> • Take appropriate steps to ensure that workers are properly instructed and notified concerning the hazards of their respective occupations; assign a safety officer; and establish an occupational health and safety committee (Sub-Article 2). • Provide workers with protective equipment, clothing, and other materials and instruct them on their use (Sub-Article 3). <p>Take appropriate precautions to ensure that all the processes of work in the undertaking shall not be a source or cause of physical, chemical, biological, ergonomic, or psychological hazards to the health and safety of the workers (Sub-Article 7).</p>
Labor Law	<p>All the Project Components will have a subproject engaging direct, primary supplier workers and contracted workers involving issues of LMP. In line with this, the Ethiopian Labor Law has provisions in the LMP. Article 4 of the Proclamation sets out on Elements of a Contract of Employment:</p> <ul style="list-style-type: none"> • A contract of employment shall be stipulated clearly and in such a manner that the parties are left with no uncertainty as to their respective right and obligations under the terms thereof (Sub-Article 2). • A contract of employment shall specify the type of employment and place of work, the rate of wages, the method of calculation thereof, the manner and interval of payment, the duration of the contract, incentives, benefits, and the conditions for contract termination (Sub-Article 3). <p>Article 89 of the Ethiopian Labor Proclamation No. 1156/2019 has provisions protecting the workforce including children and young workers:</p> <ul style="list-style-type: none"> • As per Sub-Article 2, it is prohibited to employ a person less than 15 years of age. • Sub-Article 1 specifies the minimum age for a young worker as a person who has attained the age of 15 but is below the age of 18 years. However, as provided in Sub-Article 3, it is prohibited to assign young workers to work,

	<p>which on account of its nature or due to the condition in which it is carried out endangers their lives or health.</p> <p>The Ethiopian Labor Law includes provisions on further LMP:</p> <ul style="list-style-type: none"> • Sub-Article 1 of Article 113 recognizes the right of workers’ organizations <p>Details of the Labor Grievance Mechanism are given in the provisions of Articles 137-144.</p>
SEA/SH	<p>Article 14 Sub-Article 1(h) of the labor law states the provision that prohibits the acts of SH, to persuade or convince another through utterances, signs, or any other manner, to submit for sexual favor without his/her consent, and sexual violence, sexual harassment accompanied by force or an attempt thereof.</p>
Disadvantaged or Vulnerable Individuals and Groups	<p>There are national laws that address the needs of individuals or groups who may be disproportionately impacted or further disadvantaged by the project’s activities including women and people with disabilities. For example:</p> <ul style="list-style-type: none"> • As stated in Article 89 Sub-Article 6 of the Ethiopian Constitution, women have equal rights as men to full consultation in the formulation of national development policies, and the designing and execution of development projects that affect their lives. This provision requires the project to devise special measures to mitigate the social risks that impede women’s equal participation and benefits. • The provision in the environmental policy of Ethiopia requires to subject all policies, programs, and projects to impact assessments to maximize equity for economic, ethnic, social, cultural, gender, and age groups, especially the disadvantaged (p. 21). <p>The provision in the Ethiopian Labor Law recognizes the differential risks to female workers and workers with disability and prohibits assigning to work that may be hazardous to their health such as night work (Article 14).</p>
Historically Underserved Communities (HUCs)	<p>Article 89 of the Ethiopian Constitution recognizes regions and peoples historically underserved or least advantaged in economic and social developments to equally participate in and benefit from the implementation of the proposed subprojects. Consequently, the provision in Sub-Article 4 of the same Article requires the project design measures to mitigate the disproportionate adverse risks and impacts of the project.</p>
Protection of Cultural Heritage	<p>Component 2 will finance the construction of a Tax Data Warehouse within the compound of the MoR that may pose risks to cultural heritage. The Environmental Policy of Ethiopia has provisions for the protection of cultural heritage in this regard. It promotes a sustainable heritage conservation and management program that seeks to understand all the elements of the system, their interrelationships, and how each contributes to social and economic developments (p.18). This provision requires the project to assess the risks to cultural heritage and develop the Chance Find Procedure.</p>
Anti-Discrimination Law	<p>Article 14 Sub-Article 1(f) of the Ethiopian Labor Proclamation No. 1156/2019 prohibits discrimination between workers based on nationality, race, color, sex, religion, political opinion, national extraction, social origin, HIV/AIDS status, disablement, and others which effect nullifying or impairing equality of opportunity or treatment in employment or occupation.</p>
Stakeholder Engagement	<ul style="list-style-type: none"> • Article 43 Sub-Article 2 of the Ethiopian Constitution declares that all persons have the right to be engaged in national development issues and, in

	<p>particular, to be consulted concerning policies and projects that affect their lives.</p> <ul style="list-style-type: none"> • The provision in Article 92 of the Constitution particularly refers to the need for engaging people on environmental matters. The declaration in Sub-Article 3 is read as: “People have the right to full consultation and to the expression of views in the planning and implementation of environmental policies and projects that affect them directly”. • As set out in the Environmental Policy of Ethiopia, the undertaking of development projects at all phases, from project conception to planning and implementation to monitoring and evaluation needs to ensure the active participation of the affected communities (p.20). <p>However, the national legislation has no specific provision for the development of a project-specific SEP.</p>
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3.2. National Environmental and Social Assessment and Permitting/ESMF Process/

The federal EPA has overall responsibility for the national SEA/ESIA system and is the lead agency for federal or trans-regional projects. For those ESIA processes managed by the EPA, regional environmental authorities will have the chance to provide inputs for considerations, including the commenting on the terms of reference (TOR), on the environmental and social impact assessment (ESIA) results, and in the environmental and social management plan. Regional authorities in turn have the responsibility to “adopt and interpret” federal ESIA guidance within their region and oversee the ESIA process for projects with only regional jurisdiction.

Proclamation 295/2002 requires regional states to establish or designate their own REPAs. Regional Environmental Protection Bureaus/Offices have been established in almost all the regions. The REPAs are responsible for coordination, formulation, implementation, review, and revision of regional conservation strategies as well as environmental monitoring, protection, and regulation (Article 15). Relating to ESIA specifically, Proclamation 299/2002 gives regional environmental agencies the responsibility to evaluate ESIA reports of projects that are licensed, executed, or supervised by regional states and that are not likely to generate interregional impacts. REPAs are also responsible for monitoring, auditing, and regulating implementation of such projects.

The environmental and social screening of the subprojects in the GMEESD project should be made by the E&S safeguard specialists of the implementing Ministries including the MoF/NPCU, CSC/PIU and MoR/PIU. The steps of the environmental and social screening process will lead towards the review and approval by the Federal Environmental Protection Agency (FEPA) or the regional bureaus of environment for every sub-project activity under components 1, 2 and 3. The assessment and identification of environmental and social impacts associated to the specific sub-project activities is important during the project studies to avoid sensitive areas and take steps to ensure that projects stay environmentally and socially sustainable and sound. Every sub-project or project activity to be financed by the GMEESD project will be subject to E&S screening.

The screening process will use the checklist shown in Annex 1. This will guide in identifying key environmental and social risks and impacts, prior to the project design in connection with implementations of sub-project activities. The Environmental and social screening checklist asks key questions on matters that are of environmental and social importance to the project and will be completed by filling out responses to the questions. Adverse impacts of the sub-project activities on the

local environment or to the community can be minimized through changes in the project design and/or the use of mitigation measures to avert and reduce or mitigate the negative effects.

- (i) **Step 1: sub-project identification:** the MoF/NPCU through the institutional structure will identify the sub-projects in consultation with beneficiary target Ministries, regional bureau experts involving in the project implementation
- (ii) **Step 2: sub-project preparation:** the proposals for the identified projects can be prepared by independent consultants, experts from the implementing partner sector offices in consultation and coordination with the NPCU.
- (iii) **Step 3: Screening of sub-projects and risk classification:** this is a critical step in the ESMF implementation. This screening is done to determine whether a sub-project requires ESIA and preparation of an ESMP, Environmental and social audit report, and the level of assessment of the E&S risks. Those proposed sub-projects prepared in the annual operational plan will have to be specified by location and sufficient description.

The E&S specialists of the GMEESD project from the MoF/NPCU together with the E&S specialists from the key implementing Ministries will conduct this screening. Conducting visits to the subproject site and developing an understanding of the biophysical and social environments including existence of sensitive environment around the project site is essential to appraise how the subproject activities will affect the environment and communities.

The screening technique focuses on all subprojects with potentially adverse environmental and social impacts or whose impacts that are not fully known. Thus, appraisal of the subproject site and having adequate level of information about future subproject activities is essential to anticipate, identify and examine the magnitude of potential environmental impacts which is necessary for conducting the screening exercise.

Experts from the project implementing agencies and the E&S specialists at the MoF/NPCU will conduct the screening. The E&S screening process will be done in accordance with the principles and requirements of the WB ESSs and the relevant E&S categorization provisions given in the ESIA guideline of Ethiopia.

The overall residual risk of the GMEESD project is rated “**Substantial**” because of the nature of the project with respect to political governance and security, technical design, fiduciary and the E&S risks. The ESIA guideline (2000) categorizes projects into three different ‘schedules’ based on the potential risks/impacts.

- ✓ *Schedule 1:* Projects which may have adverse and significant environmental impacts, and may, therefore, require full ESIA
- ✓ *Schedule 2:* Projects whose type, scale or other relevant characteristics have potential to cause some significant environmental impacts but not likely to warrant an environmental impact assessment.
- ✓ *Schedule 3:* projects that would have no impact and does not require environmental assessment

The GMEESD sub-projects, particularly from components 2, and moderately from 1 and 3, will likely have different levels of risks from substantial to low. According to the WB ESF, all subprojects are subject to environmental and social screening and risk classification, after the type, scope and location of the subprojects are defined as per the procedures described in Annex 1.

Eligibility screening: those sub-projects that cause significant harm to cultural and heritage sites, religious and sacred sites (as described in the exclusion criteria in Table 7) will be ineligible and will be excluded from financing.

Sub-projects of substantial concern: those sub-projects that are of significant environmental and social

concern will be further screened with a checklist to categorize the risk levels (Schedule 1, 2 or 3 and/or substantial, moderate or low) as per the descriptions in the ESIA guideline and the checklist.

Sub-projects that need special attention: those sub-projects that require special attention because of the significant risk they pose, will be identified and will be subjected to further screening by the MoF/NPCU E&S safeguard experts and the necessary documents (ESIA and ESMP) will have to be required.

After reviewing and compiling of the screening reports, the MoF/NPCU and the PIUs of the MoR and CSC will submit the reports to the Federal EPA for official review and subsequent approval. The report screening report will include the list of the sub-projects and the adverse impacts, categorization of the sub-projects according to the level of risks, sensitivity analysis of the project site, the level of the public interest, the institutional arrangement, environmental management and monitoring considerations.

(iv) Step 4: Review and appraisal of screening reports by FEPA/REPA: the review will be done by E&S safeguard experts and review results will fall into (a) approval of the sub-project risk classification and recommended implementation; (b) seek for amendments and/or request for change on sub-project categorization; (c) reject the document with comments of what is required to submit an acceptable report.

Schedule 1 or Substantial -Risk Subprojects: The overall risk rate of the GMEESD project is substantial, and those sub-projects may be rechecked and will be redesigned or the routing will be changed. If such sub-projects do not fall under the ineligible category/exclusion, the redesign or re-routing will lower the risk and the ESIA/ESMP will be prepared to address the adverse impacts.

Schedule 2 or “Moderate Risk” Subprojects: sub-projects without any significant/potentially harmful to people and the environment and not located in sensitive locations. Moderate risk sub-projects are site-specific, and without likelihood of impacts beyond the project foothold. Such projects will conduct an ESIA and will implement mitigation measures guided by ESMPs.

Schedule 3 or “Low Risk” subprojects: these are sub-projects without any specific type of negative social and environmental risks. A schedule 3 or low risk sub-project will not require any further assessment beyond E&S screening. Nevertheless, the WB ESS1 requires all subprojects to be assessed for potential environmental and social impacts.

(v) Step 5: Preparation of site-specific ES instruments (ESIAs/ESMPs): For those sub-projects classified as “substantial risk and/or moderate risk”, ESIA and/or ESMP will be prepared and mitigation measures will be implemented based on an ESMP that will be prepared by independent consultant and contractors, respectively. The ESIA will be conducted by an independent consultant. The ESMP examines the subproject's potential negative and positive environmental impacts and recommends measures needed to prevent, minimize, mitigate, or compensate for adverse impacts and improve environmental performance.

(vi) Step 6: Review and Clearance of site-specific instruments(e.g., ESIAs/ESMPs): the MoR/NPCU will submit the prepared ESIA and/or ESMP and other instruments to the Federal EPA with an application for review and approval. The documents will also be submitted to the World Bank for no-objection and further disclosure.

The ESIAs will be reviewed by the World Bank by providing no-objection on the scope of work or the terms of reference and consultant selection; through review of the ESIA in parallel to submission to the FEPA.

(vii) Step 7: Disclosure : congruent to the World Banks requirements, the ESIA reports related with Substantial and Moderate risk subprojects will be made available to the public as follows:

- ✓ By availing a copy of the ESIA report including a brief summary of the report in the local language at the implementing Ministry (MoF)
- ✓ By providing a copy of the full report and copies of the summary in local language to the World Bank country office;

✓ By uploading the report on the World Bank website.

- (viii) Step 8: Subproject implementation: MoF/NPCU** will inform the MoR/PIU and CSC/PIU to integrate the ESMPs into the contractor selection process and the beneficiaries to start implementation of the subproject in accordance with approved subproject document and to act on the decisions and requirements provided by the FEPA and/or the REPA with the approval reports. Contractors will also be required to submit their own C-ESMPs as part of the bid process. The Implementation of the E&S mitigation measures will be done in parallel with the project activities and in line with sector guidelines and checklists to be provided.
- (ix) Step 9 – E&S management supervision and monitoring:** as per the ESMP monitoring plan, monitoring of implementation of measures and management of the identified risks/impacts must be carried out by the E&S experts of the MoF/NPCU. External monitoring and supervision by FEPA/REPAs would be carried out in consultation with and support from the World Bank, to ensure sound implementation of environmental and social risk management instruments. The NPCU ensures and checks the performance of the E&S of the project in accordance with the legal agreements, the World Bank ESSs and also ensure that sufficient resources, institutional arrangements, required experts are available to conduct the monitoring activities.
- (x) Step 10: Environmental and Social Audit:** An independent consultant will conduct an environmental and social audit. The E&S audit is done every two years to determine whether project is in compliance with procedures and guidelines for management of environment and social issues as prescribed in this ESMF and other project E&S instruments such as the LMP, SEP, SRAMP; to ensure that the mitigation measures are being identified and implemented; and if the necessary capacities are there and if training needs met in order to ensure successful implementation.
- (xi) Step 11: Project evaluation:** project evaluations will be done in the middle and end of subproject implementation. The evaluation will be done by an independent external consultant. The evaluation is focused mainly on the impacts of the project, its management of the social and environmental impacts and other requirements of project evaluation including efficiency, effectiveness and outcomes.

3.3. World Bank Standards and Key Gaps with the National Framework

The project will follow the World Bank Environmental and Social Standards (ESSs), as well as the World Bank Group Environmental, Health and Safety Guidelines. Based on these policies, the environmental and social risk of the project is categorized as substantial. The environmental risk rating is moderate while social risk is substantial. The potential EHS risks and impacts are mainly associated with Supporting Civil Service Efficiency (Comp.1), Improving Domestic Revenue Mobilization (Comp 2) and improving PFM systems and functions as well as enabling more responsive governance (Comp. 3) -all of which will require digital solutions, including the procurement & use of ICT infrastructure such as hardware & software programs and operating systems. Component 2 will also finance development of a Tax Data Warehouse at the MoR within the compound of the Ministry. The main EHS risks and impacts linked with digital solutions could include e-waste issues and associated pollution of soil, water and air linked with the procurement and use of ICT infrastructure. The substantial social risk rating is due to the technical assistance to the civil service reform, financial management & procurement modernization, & improved revenue collection (property tax), e-government services. Implementing such reforms will cause some level of retrenchment of workers. The World Bank's environmental and social standards applicable to project activities are summarized below.

Table 3. Relevant World Bank ESS and Key Gaps with the National Framework

<i>E&S Standard</i>	<i>Relevance and gaps</i>
1. Assessment and Management of Environmental and Social Risks and Impacts	ESS1 is relevant for the project because the GMEESD sub-project activities are expected to pose environmental and social risks including pollution from e-waste, water and soil contamination, toxic substances related to use of materials that have hazardous chemical, pollution from dust and particulate matter from new construction, social discrimination and exclusion of vulnerable groups, security, gender-based violence, demolition of houses and fence, communicable diseases, cultural impacts, etc...The national laws tend to stress on environmental risks and are lenient in the social risks. Hence, the ESS1 provisions are upheld.
2. Labor and Working Conditions	ESS2 is relevant for the project because there are certain labor risks for project workers. Labor-related risks include (i) inadequate terms and conditions of employment, and (ii) occupational health and safety risks (iii) security risks to project workers, (iv) traffic and road safety issues. Most of the provisions in the proclamation (1156/2019) are consistent with the ESS2. However, the ESS2 broadly and explicitly addresses the conditions of vulnerable, disadvantaged and migrant workers.
3. Resource Efficiency and Pollution Prevention and Management	ESS3 is relevant for the project because sub-project activities are expected to cause pollutions from e-waste and solid wastes to be generated from data warehouse construction, and other wastes from disposal materials, demolitions during hardware installations, etc.... The national laws equally sufficiently address the risk and its management.
4. Community Health and Safety	ESS4 relevant because the sub-project activities may increase community exposure to risks and impacts such as communicable diseases, contaminations, health risks related to pollution of water systems from e-waste, risks of accidents, which are likely to cause adverse health and safety risks. The ESS4 broadly addresses the community health risks with detailed requirements to be adhered to. Hence, the ESS4 provisions are upheld in this project.
5. Land Acquisition, Restrictions on Land Use and voluntary Resettlement	The GMEESD project may not require land acquisition at this stage. The project involves construction of tax data warehouses and the construction is going to be conducted at the premises of the MoR. ,
6. Biodiversity Conservation and Sustainable Management of Living Natural Resources	Consistent with ESS6 and ESMF, where relevant, adopt and implement mitigation measures for subprojects with moderate E&S risks including E&S screening process, and analysis of alternatives as part of subproject specific E&S tools (such as ESMPs). The exclusion list include that the project will not: (i) be either implemented in environmentally sensitive areas or finance any activities that will affect environmentally sensitive areas; (ii) finance any physical digital connectivity or large ICT infrastructure, except the purchase of energy-efficient server equipment to complement extant ICT infrastructure, in accordance with internationally recognized best practices on energy efficiency; and (iii) finance any subprojects or activities that would be Significant Environmental Risk per ESF and ESSs.
7. Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	ESS7 applies to a distinct social and cultural group identified in accordance with paragraphs 8 and 9 of the ESS7. Since the GMEESD Project activities are to be implemented in regions where underserved communities or groups are residing, this standard shall be applied. These includes disadvantaged or Underserved and Vulnerable groups in emerging regions such as Gambella, Benishangul Gumuz, Sothwest, Somali and Afar regions as well as pastoralists in Oromiya, South Ethiopia and South-West Ethiopia Regions of the country.
8. Cultural Heritage	ESS8 is relevant as the project will involve rehabilitation of offices and overhaul/development of ICSMIS, IHRPS, and IFMIS in existing government premises; thus, the potential adverse impacts of these activities are expected to be low. Thus, the project's ESMF has incorporated "chance finds" procedures to address potential adverse impacts on cultural heritage consistent with the ESS8 requirement. . The national legislation Proc. No 209/2000 addressed broadly

	provisions of the ESS8 requirements. Thus, ESS8 requirements will be implemented along with the national regulation.
10. Stakeholder Engagement and Information Disclosure	ESS10 is relevant for all projects given the need to engage with beneficiaries and stakeholders on development activities that affect their lives. The national laws on stakeholder consultation plans and procedures are not comprehensive, and disclosure of project information to stakeholder is limited and their views on the risks and impacts are not fully captured. The ESS10 provision of the SEP preparation is more inclusive and hence upheld.

4. Potential Environmental and Social Risks and Impacts and Standard Mitigation Measures

The Environmental and Social risk classification of the project is substantial. The environmental risk rating is moderate, while the social risk is substantial. The potential EHS risks and impacts are mainly associated with Supporting Civil Service Efficiency (Comp.1), Improving Domestic Revenue Mobilization (Comp 2) and improving PFM systems and functions as well as enabling more responsive governance (Comp. 3) -all of which will require digital solutions, including the procurement & use of ICT infrastructure such as hardware & software programs and operating systems. Component 2 will also finance development of a Tax Data Warehouse at the MoR within the compound of the Ministry. Accordingly, the main EHS risks and impacts linked with digital solutions could include e-waste issues and associated pollution of soil, water and air linked with the procurement and use of ICT infrastructure. There are also moderate EHS risks and impacts including vibration, pollution due to generation of noise, dusts, solid and liquid wastes, and associated disposal issues which could result in air, soil and water pollution), associated with the development of a Tax Data Warehouse, and overhaul/development of ICSMIS, IHRPS and IFMIS.

The proposed project social risk rating is substantial due to the technical assistance to the civil service reform, financial management & procurement modernization, & improved revenue collection (property tax), e-government services. Implementing such reforms will cause some level of retrenchment of workers. Component 1 has Sub-component 1.1. Developing an Evidence-based and Data-Informed Approach to Human Resource Management, Sub-component 1.2. Competency-based Human Resource Management, and Sub-component 1.3. Institutionalizing Training, Capacity Building, and Change Management. The reform shall include packages of capacity building for civil service workers to enable them meet the new levels of competences due to support to civil service reform. The limitations in digital literacy among the civil servants & public sector office holders will become a potential holding ground to advance the implementation of the various reforms. Potential risks include lack of digital literacy in the civil service on service provision on the demand/supply side & the challenges of digital penetration & familiarity on the system in remote & historically underserved areas. This could lead to exclusion of those who have no access to digital tools & technology, people who have different forms of disability, pastoralists, residing in remote areas. The project involves construction of Tax Data Warehouse for the MoR. If any of the tax data warehouse happen in the regions & areas affected by conflict, security is a major risk, which requires a risk management plan. The different risks and impacts can be addressed during planning and design, implementation and operation.

Table 4. Environmental and Social Risks and Mitigation Measures

Component/ Activity	Subcomponent	Risks and Impacts	Mitigation Measures	
Potential environmental risks and impacts				
Component 1 ■ Sub-component 1.1: <i>Developing an Evidence-based and Data-Informed Approach to Human Resource Management</i> ■ Sub-component 1.2: Competency-based Human Resource Management ■ Sub-component 1.3: Institutionalizing Training, Capacity Building, and Change Management ■ Sub-component 1.4: Reform Innovation Facility		Impact on biodiversity	<ul style="list-style-type: none"> ✓ Avoid waste disposal in areas of biodiversity significance ✓ Avoid excavating materials and dumping of refurbishment/ construction waste in areas where there are natural vegetations with biodiversity significance, Prioritize and minimize impacts or avoid damage to indigenous trees of significant importance as a result of construction related waste, E-waste disposal ✓ Ensure there are no sensitive fauna and flora species waste disposal sites ✓ Conduct planting and re-vegetation of sites to compensate for loss of trees and vegetation if any during quarry mining ✓ The Design phase of the construction planning should take into account of unavoidable potential damages and plan mitigation measures ✓ 	
		<ul style="list-style-type: none"> ✓ Soil disturbance and initiation of soil erosion through excavation, leveling, clearance of surface vegetation; and transport of goods, equipment and materials from mining sites will make the top soil vulnerable to water and wind erosion 	<ul style="list-style-type: none"> ✓ Ensure construction site within the MoR is selected in such a way that avoids impacts to potential heritage sites, that result in heavy disturbance to the surrounding environments, release waste offsite resources. ✓ Design of the construction should provide sufficient drainage management options towards natural waterways so that erosion can be minimized or reduced ✓ Earth works of the construction should be done in the dry season ✓ Properly rehabilitate material excavation sites (selected materials) using nature-based solutions ✓ Re-vegetate the land that is vulnerable to erosion and sediment deposition. ✓ Avoid or minimize vegetation clearance, excavation and inappropriate disposal of soil ✓ Dispose excavated soils in designated dump sites or cart away sites following local regulations 	
	Component 2			
	■ Sub-component 2.1: Leveraging Technology and Data Analytics to Support			

<p>Risk-Based Administration</p> <p>Sub-component 2.2: Improving the Quality and Availability of Taxpayer Services</p> <p>Component 3</p> <p>Sub-component 3.1: Scaling up the use of technology for improved public financial management</p> <p>Sub-component 3.2: Address critical public financial management deficiencies</p>	<p>✓ Solid, liquid and hazardous waste generation from construction/maintenance debris (e.g., asbestos) generation, disposal, contamination</p>	<p>✓ Comply with environmental standards such as WB EHS guidelines and national guidelines specified in this ESMF on handling and disposal of harmful waste substances (see annex 6)</p> <p>✓ Adhere to recommended waste disposal practices. Recyclable materials such as wooden plates for trench works, steel, site holding, packaging material, etc., shall be segregated and collected for recycling</p> <p>✓ Use recommended waste collection, handling, transport and disposal methods including the WB EHS guidelines and national regulations</p> <p>✓ Store solid waste temporarily on-site in a designated place prior to off-site transportation and disposal.</p> <p>✓ Collect and dispose in legally permitted disposal sites, landfills. Open burning and burial of waste shall not be allowed.</p> <p>✓ Demand contractors to develop a waste management plan as per national guidelines, standards and as per the World Bank’s Environmental, Health, and Safety Guidelines.</p> <p>✓ Follow the <i>Environmental and Social Codes of Practice (ESCOs) included in Annex 2</i></p>
<p>Sub-component 3.3: Institutionalizing Training, Capacity Building, and Change Management Construction of Tax-Data Warehouse (Comp 2)</p> <p>Maintenance of existing infrastructure/buildings for system upgrading (Components 1,2,3)</p>	<p>Noise pollution from machineries, trucks</p>	<p>✓ Adhere to the environmental standards set by the EPA guidelines (noise pollution control regulation) and WB EHS guidelines</p> <p>✓ Reduce or avoid loud horns around residential areas and around health facilities</p> <p>✓ Reduce or avoid usage of machines for minor activities that can be done with human labor</p> <p>✓ Apply or adhere to work place code of conduct for construction workers to reduce unwanted noise</p> <p>✓ Minimize the movement of vehicles around residential and commercial areas</p> <p>✓ Unavoidable noise causing activities should be restricted to the day-time and working hours</p> <p>✓ Machine or equipment producing high levels of noise should be avoided or screened when working within close proximity to any sensitive noise receptors;</p>
	<p>Risk of data loss due to inappropriate location of IT servers in</p>	<p>✓ Conduct climate risk assessment before making decisions on locations of data storage serves</p>

<ul style="list-style-type: none"> • Wiring and cabling works to upgrade and renovate existing systems (Components 1,2,3) • Maintenance and overhauling of existing data management systems such as ICSMIS, IHRS, IFMIS (Component 2) • Digitalization of operations and installation of ICT infrastructure (Hardware and software) (Components 1,2,3) • Renovation works of operating systems (Components 1,2,3) • Policy and legal reforms (Components 1,2,3) • Institutional capacity building (soft and hard capacity) (Components 1,2,3) 	<p>the implementing and beneficiary institutions, due to extreme weather events such as floods and intense rain</p>	<ul style="list-style-type: none"> ✓ Install proper flood protection measures and prepare flood risk management plans in cases of such events
	<p>Air pollution from dust from construction activities</p>	<ul style="list-style-type: none"> ✓ To reduce dust, use appropriate construction site management guidelines (e.g., sprinkling the surface with water to minimize dust blow during construction and rehabilitation) ✓ Reduce movement of vehicles during rush hours, public events, school hours ✓ Use manual labor to avoid use of machines for minor activities that can be done with human power ✓ Dust control and suppression measures including regular application of water on or near construction sites and settlement areas ✓ Reduce dust generation by practicing traffic speed limits ✓ Avoid open burning of debris, cut vegetation (trees, undergrowth) or construction waste materials; ✓ Ensure regular maintenance of vehicles, machinery and equipment used at project site and ✓
	<p>Risk of damage to cultural heritages</p>	<ul style="list-style-type: none"> ✓ Avoid areas designated as cultural heritages from project activities and maintain sufficient distance of operation from such sites ✓ If project activities cross any designated area of tangible or intangible cultural heritages, find alternatives and redesign ✓ Protect heritage sites from damage during construction excavation and transport ✓ Comply with the appropriate law governing cultural heritages (Proclamation No. 209/2000) ✓ In case of chance encounters of cultural heritage sites, follow chance finds procedures as described in Annex 6 of this ESMF

		<ul style="list-style-type: none"> ✓ Assess the risks from the excavations, demolitions, or other physical changes involving the construction subproject activities in Component 2 to the known cultural heritage in or in the vicinity of the construction site. ✓ To manage the risks to previously unknown cultural heritage, as per this ESMF covering the identification, notification, documentation, and management of chance finds. ✓ Details of mitigation measures are included in the CFP (Annex 7)
	<p>Risk of pollution from E-waste (disposal of obsolete computers, servers, cables, cartridges, solar panels, other disposables and gadgets, etc...). Electric and Electronic devices contain hazardous toxic materials such as mercury, lead, arsenic, cadmium, or brominated flame retardants, etc., beyond threshold quantities, that harm people and the environment</p>	<ul style="list-style-type: none"> ✓ Apply e-waste disposal guidelines and regulations described in this ESMF and as per the WB EHS guidelines, a safe disposal procedure for broken, end of life ICT equipment, solar panels, cables, and other electronic gadgets ✓ Prepare and implement subproject specific E-Waste Management Plan as per the procedures in this ESMF (Annex 6) ✓ Implement a safe disposal procedure for worn-out, malfunctioned, obsolete, dilapidated, defect, etc... electronic equipment should be stored and handled separately, disposed as per e-waste management plan (Annex 6) ✓ Prepare and implement subproject specific E-Waste Management Plan ✓ Reduce or minimize the hazardous e-waste generation by implementing stringent e-waste segregation to prevent the commingling of non-hazardous and hazardous e-waste ✓ Store e-waste in closed containers (radioactive proofed), away from direct sunlight, wind and rain; ✓ Limiting access to hazardous e-waste storage areas to only employees who have received proper training ✓ Demarcating the area, including documentation of its location on a facility map or site plan; and, ✓ Conducting periodic inspections of e-waste storage areas and documenting the findings.
	<p>Road accidents or fatalities from increased movement of vehicles</p>	<ul style="list-style-type: none"> ✓ Apply all required road safety measures including installing appropriate signs, signals and warnings ✓ Install traffic controllers in place during work hours ✓ Prepare and apply a traffic management plan detailing traffic control procedure,

		<ul style="list-style-type: none"> ✓ Train staff and personnel on traffic management procedures, travel speed limits and control measures; ✓ Impose and enforce compliance with company speed limits for other uses of the roads in construction sites; ✓ Minimize or avoid safety hazards and inconvenience to other road users, the may result from hauling vehicles, <p>All drivers should be trained on road safety and checked for discipline and adherence to rules</p>
		<ul style="list-style-type: none"> ✓
	<p>Community Health and Safety risks</p> <ul style="list-style-type: none"> - Risk of exposure to pollution of hazardous substances - Risk of communicable diseases - Risk of traffic accidents and Safety 	<ul style="list-style-type: none"> ✓ Provide awareness training on OHS before commencement of work, provide PPE ✓ Prepare emergency response plan in cases of incidences of accidents ✓ Provide training to contract workers and community labor on risk of communicable diseases (HIV/AIDS; COVID 19, STDs, etc..) ✓ Awareness training on GBV/SE/SH, use CoC ✓ Put in place functioning GRM ✓ Provide awareness to local communities through stakeholder engagement ✓ Enforce/implement measures related to traffic accident prevention and safety ✓ Implement speed limit for construction vehicles inside the construction site, and in proximate areas (around schools, settlements) ✓ Provide barriers or exclusion zones around sites where machines and trucks are operated as part of the construction process ✓ Train the construction crew on safe driving to protect the community in the construction area ✓ Follow all traffic rules when sub-project vehicles and trucks are using main roads and highways. ✓ Provide safety signs to local community the damager ahead.
	<p>Resource use inefficiency, increased consumption and waste of energy and water as a result of new construction, renovation</p>	<ul style="list-style-type: none"> ✓ Install energy efficient equipment ✓ Use renewable energy such as solar powered devices (heaters, lighting, fans, fixtures, electric motors, pumps, etc...) ✓ Install water use efficiency measures including control technology and waste minimization measures

		<ul style="list-style-type: none"> ✓ Ensure to avoid or minimize water usage to the extent of causing serious impact on water availability to local communities/people and the environment ✓ Install water conservation measures such as avoiding leakages in the system, tightly regulating utilization, monitoring losses ✓ Apply alternative water supply sources for non-consumptive use and use consumption offsets to maintain total demand and supply ✓ Seek alternative locations and siting during planning of the project in case of larger demand for water beyond the supply capacity
	Inefficient use of raw materials and inputs, resulting in wastage losses	<ul style="list-style-type: none"> ✓ Ensure efficient use of materials through strict control during data warehouse construction, installation of ICT infrastructure and renovation of facilities ✓ Adopt techniques and apply recycling, reuse of materials such as waste water treatment, repacking and reusing ✓ Reduce waste of usable materials and put in place resource use guideline ✓ Provide awareness training to contractor workers on resource use efficiency
Potential social risks and impacts		
Digitalizing the Civil Service and Public Financial Reforms	Lack of digital literacy	<ul style="list-style-type: none"> ✓ Assess the skill gaps in line with the ICSMIS, design and deliver intensive capacity building and behavioral change training programs to the managers and employees of the HR units in the participating public institutions. ✓ Develop competency-based selection criteria, set standard tests, design a transparent online recruitment portal, and recruit skilled/performance-oriented civil servants.
	Institutional capacity gaps (structural, technical, system, and material)	<ul style="list-style-type: none"> ✓ Assess the institutional capacity gaps in the respective implementing agencies. ✓ Develop a functional and technical design of an IHRPS tailored to the needs of the participating public institutions. ✓ Establish a Competency Assessment Center under the CSC that sets the standards for competency-based selection criteria, oversees enforcement, plays an advisory role, and provides technical support in the ICSMIS across public institutions.

		<ul style="list-style-type: none"> ✓ Financing support to develop software and acquire supportive infrastructure necessary to operationalize the designed IHRPS and ICSMIS.
<p>Social risks crosscutting multiple subcomponent activities:</p> <p><i>(a) Digitalizing the Civil Service</i> <i>(b) Sustaining and Deeping PFM Reforms</i> <i>(c) Supporting Digital Platforms and Integrating E-Services</i> <i>(d) Strengthening Public Procurement Performance</i> <i>(e) Open Government Reforms and</i> <i>(f) Strengthening Change Management Strategy</i></p>	<p>Labor risks involving working conditions, management of worker relationships, child labor and minimum age, and labor grievance</p>	<p>Follow the relevant measures in the Labor Management Procedures-LMP (Annex 7).</p>
	<p>Occupational health and safety risks (exposure to physical hazards, biological hazards, and chemical hazards)</p>	<ul style="list-style-type: none"> ✓ Use appropriate PPEs (such as safety glasses, respirator, safety boots and shoes, chemical-resistant gloves and apron, face masks as necessary and make first aid kits available at construction sites and work places ✓ Conduct awareness trainings including on the use of PPE for the safety of construction workers. ✓ Provide protective clothing and firefighting equipment ✓ Provide appropriate warning signs for staff and public. ✓ Prepare and use occupational health and safety guideline; ✓ Use and apply EHS guidelines, standards and procedures ✓ Ensuring that the developed guidelines and standards are properly implemented
	<p>Exclusion of Historically Underserved Regions</p>	<ul style="list-style-type: none"> ✓ Before implementing the subcomponents’ activities, consult with the IAs management and civil servants of the line Regional Bureaus of the target institutions in the Historically Underserved Regions (Afar, Somali, Benishangul-Gumuz, Gambella, South Ethiopia and South-West Ethiopia Regional States). ✓ Identify the gaps in the supportive infrastructure and digital tools that may disproportionately adversely impact the implementation of the subcomponents. ✓ Based on the identified gaps, devise and implement differentiated mitigation measures.
	<p>Security risks</p>	<ul style="list-style-type: none"> ✓ For the regions with situations or active conflicts, consult with the IAs’ management and civil servants of the Regional Bureaus, and identify how the conflict-caused damages to the supportive ICT infrastructure or recurring service disruption impacts the implementation of each subcomponent activity.

		<ul style="list-style-type: none"> ✓ Consult with the respective IAs management and civil servants about how the security threats from the FCV situations or active conflicts impede their duties to implement each subcomponent activity. ✓ Accordingly, devise and implement differential mitigation measures. ✓ Follow the relevant mitigation measures provided in the Security Assessment and Management Plan (Annex 10).
	Exclusion of disadvantaged or vulnerable individuals and groups such as blind employees, employees with mobility impairment, and female employees.	<ul style="list-style-type: none"> ✓ Arrange separate consultation methods (e.g. one-on-one interview or focus group discussion) for VGs and consider their views and special needs in designing the subproject activities. ✓ Devise and implement differential mitigation measures for VGs, including: <ul style="list-style-type: none"> - Provide ICT tools with special programs, for example, screen readers such as Job Access With Speech (JAWS) and None Visual Desktop Access (NVDA) for blind employees to access digital content. - Capacity-building training for the VGs on digital literacy. ✓ An inclusive work environment for employees with mobility impairment (e.g. give them an office on the ground floor, facilitate transportation service in traveling for capacity-building training, toilet facilities with special needs service, etc.) ✓ Allocation of budget dedicated to mitigating the special needs of the VGs. ✓ Awareness-raising activities for the management members of implementing agencies regarding the special needs of the VGs.
	Exclusion of Historically Underserved Communities (HUCs)	<ul style="list-style-type: none"> ✓ Identify the project-affected HUCs and disclose the project information in the appropriate formats (e.g. using non-technical explanations) and language understandable to the affected HUCs. ✓ Arrange separate and meaningful consultations tailored to the culture and languages of the affected HUCs, consider their views and distinctive needs, and design and implement differentiated mitigation measures. ✓ Follow the relevant mitigation measures provided in the Historically Underserved Peoples Planning Framework (Annex 9).
	Project SEA and SH risks	<ul style="list-style-type: none"> ✓ Assess the national, regional, and local GBV risk factors that can exacerbate project SEA and SH risks. ✓ Effectively implement the mitigation measures in the SEA and SH Prevention and Response Action Plan (Annex 11).

4.1 Risks and Mitigation Measures Specific to Disadvantaged and Vulnerable Groups

The category of disadvantaged and vulnerable groups of people refers to people who may be disproportionately impacted or further disadvantaged by the project (due to age, gender, ethnicity, disability, economic status or extremely poor, illiterate persons) compared to other groups due to their vulnerable conditions. In the GMEESD project, the group broadly includes female civil servants, women in general, children, the elderly, disabled and chronically ill persons who are limited in their capacity to take advantage of the project development benefits, and workers in conflict affected regions and areas. In conflict affected areas, this group includes IDPs and migrants. Besides, civil servants in historically disadvantaged and underserved communities, who are described under ESS7, those historically underserved communities (HUCs) in SSA, who are socially marginalized and often far from access to project benefits due to social exclusion, poor representation in governance and lack of participation in development initiatives. These include the Afar, Benishangul Gumuz, Gambella and Somali regional states and pastoral and agro-pastoral areas of Oromia, South Ethiopia and South-West Ethiopia regions, who often miss development project benefits unintendedly due to their mobility. The disadvantaged and vulnerable groups face disproportionate social risks and may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. The following category summarizes the disadvantaged and vulnerable groups in this project:

- ✓ Female civil servants
- ✓ Women in maternity state (pre and post natal state)
- ✓ Children
- ✓ The elderly
- ✓ Disabled persons (deaf, blind, physically challenged persons)
- ✓ Chronically ill persons
- ✓ Workers in conflict affected regions and areas
- ✓ Protracted IDPs and migrants
- ✓ Civil servants in historically underserved regions/groups/communities
- ✓ Pastoralists and agro-pastoralists on mobility
- ✓ Unemployed youth/rural
- ✓ People living with HIV/AIDS
- ✓ Economically poor and less skilled persons

The major risks the vulnerable and disadvantaged groups face include the following:

- ✓ Exclusion because of low level of digital literacy and limited access to ICT infrastructure
- ✓ Intentionally and/or unintentionally denied access to project information and benefits
- ✓ Women may not be given equal opportunities for capacity-building training
- ✓ Women encounter non-consensual sexual advances in the workplace
- ✓ Low level of digital literacy for women compared to men civil servants
- ✓ Discrimination from taking project jobs
- ✓ Exclusion from participation (during consultations) and project activity identifications
- ✓ Exposure to physically challenging tasks, unsuitable for their conditions
- ✓ Risk of exposure to emotional, psychological and physical abuses
- ✓ Women face non-consensual sexual advance in return for job recruitment
- ✓ Project workers pressure women community members for non-consensual sexual act in return for promises of benefits from the project services
- ✓ Civil work and Primary Supply contractors may engage in child labor.
- ✓ Visually impaired employees may not access project information if documents are not in Braille form.

- ✓ Damages to and/or recurring interruptions of the ICT system, road blockades in HUCs areas can deny equal opportunities.
- ✓ Workers may be displaced in HUCs areas in fear of security threats.
- ✓ Exclusion due to unavailability or poor access to ICT system.
- ✓ Challenges of digital penetration and familiarity with the ICT system in remote & historically underserved areas.
- ✓ Historically Underserved Communities (HUCs) have a distinct language often different from the official language or languages of the country or region in which they reside. Hence, the project information may not be provided in the channels tailored to the needs of HUCs.
- ✓ HUCs have cultural, economic, social, or political institutions that are distinct or separate from those of the mainstream society or culture, thus, the methods of project information disclosure may not be provided in the formats that take these distinctive features into account.
- ✓ The social and economic status of the HUCs frequently limits their capacity to defend their rights to and interests in the project.

Risk mitigation measures:

- ✓ Conduct an inclusive and transparent community consultations as per the SEP procedures.
- ✓ Promote fair treatment, non-discrimination, and equal opportunity in trainings and job placements
- ✓ Apply affirmative actions for women and employees in HUC areas
- ✓ Establish a framework that provides opportunities for full participation at each stage of project activity preparation and implementation
- ✓ Provide successive ICT literacy trainings to Civil servants in HUC regions
- ✓ Implement GBV/SEA prevention and response action plan (Annex 10) in the respective work places
- ✓ Establish a framework to provide affected vulnerable and disadvantaged communities with all relevant information about the project (including an assessment of potential adverse effects of the project on the affected vulnerable and disadvantaged) in a culturally appropriate manner at each stage of project implementation, , translations of project documentations in local languages and dialects will be utilized.
- ✓ Ensure such groups are well represented in committees, associations, consultations either through individuals or representative associations in all project activities
- ✓ Ensure non-discrimination policy, laws and guidelines are properly observed and principles are adhered
- ✓ Ensure beneficiary selection and targeting criteria are inclusive enough and considerate of all disadvantaged and vulnerable groups
- ✓ Provide equal opportunity and strictly observe non-discrimination of vulnerable groups from any benefits
- ✓ Incorporate affirmative actions for vulnerable group in employment opportunity;
- ✓ Provide training and capacitate vulnerable groups to enable them to fully benefit from the projects (increase their digital literacy levels)
- ✓ Women should be fairly represented in the GRC
- ✓ There should be clear communication structure, means on grievance complaints filing process for women and other vulnerable groups
- ✓ Make all services accessible to vulnerable groups (fair distribution of benefits to beneficiaries)

4.2. Planning and Design Considerations for Avoidance of Environmental and Social Risks and Impacts

Among others, some of the potential environmental and social risks and impacts anticipated from the sub-project activities of the GMEESD project can be effectively avoided or minimized at the early stages of planning and design by considering, improving design structures, using technology inputs, maintaining quality and standards of design

materials, adhering to regulatory requirements, and preparing risk/impact management plans and emergency plans. These measures are described in Table 5 below.

Table 5. E&S risk and impacts mitigation measures at the planning and design phase of the project

<i>Potential environmental and social risks and impacts from sub-project activities</i>	<i>Planning and design measures to Avoid/minimize risks and impacts</i>
<p>Civil works during data warehouse construction, maintenance, demolition for ICT infrastructure installation</p> <p>Removal of vegetation/trees with impact on biodiversity, damage to cultural heritages,</p>	<ul style="list-style-type: none"> ✓ Apply the exclusion criteria in this ESMF during sub-project activity and site identification and propose alternative sites ✓ Avoid selecting construction sites in and around nature reserves, cultural heritages, or species conservation areas during planning ✓ Comply with construction design standards (as specified in construction permits) ✓ Adjust design to avoid removal of natural vegetation ✓ Select qualified design consultants through a transparent and standard procurement procedures of GoE and WB, make this ESMF part of the TOR, conduct E&S assessment to be integrated to the bid process ✓ Adjust sub-project activity designs to avoid/minimize the risks on biodiversity ✓ For unavoidable impacts, conduct ESIA and prepare ESMPs
<p>Soil disturbance and initiation of soil erosion, during transport of goods, equipment and materials from mining sites</p>	<ul style="list-style-type: none"> ✓ Require contractors to prepare refurbishment/construction site environmental and social management plans ✓ Exclude locations that cause unintended soil disturbance and propose alternatives. ✓ Design must minimize or avoid vegetation clearing and soil exposure ✓ Ensure proper ESIA is done and appropriate ESMP is prepared, TOR for design includes this ESMF. ✓ During design preparation, provide sufficient drainage management options towards natural waterways so that erosion can be minimized or reduced. ✓ Ensure sub-project activities do not cause physical damage to roads and the infrastructure
<p>Solid, liquid and hazardous waste generation from construction/maintenance debris (e.g., asbestos) generation, disposal, contamination</p> <p>Risk of pollution from E-waste (disposal of obsolete computers, servers, cables, cartridges, solar panels, other disposables and gadgets, etc....). Electric and Electronic devices contain hazardous toxic materials such as mercury, lead, arsenic, cadmium, or brominated flame retardants, etc., beyond threshold quantities, that harm people and the environment</p>	<ul style="list-style-type: none"> ✓ Re-rout and avoid potential contamination to water sources; design treatment of waste water before discharge as per the EPA specific standards, and WB EHS guidelines ✓ Prepare waste management plan for liquid and solid waste as per this ESMF (Annex 6) ✓ Prepare a design to contain the release and containment of toxic substances away from water sources ✓ Prepare waste recycling and reuse plans; ✓ Prepare Safe disposal and management plan, as per recommendations of EPA and EHS Guidelines of the World Bank ✓
<p>Noise pollution from machineries, trucks; and air pollution from dust from construction activities</p>	<ul style="list-style-type: none"> ✓ Comply with noise pollution control standards and include the same as part of the planning

	<ul style="list-style-type: none"> ✓ Ensure construction sites are selected outside of residential areas and noise control measures are put in place (rules, guidelines, relevant laws applied) ✓ Prepare construction site management guideline to be implemented by contractors ✓ Conduct appropriate ESIA and prepare ESMP to manage impacts of construction machineries ✓ Ensure design components include dust minimization and control measures during planning ✓ Include appropriate PPEs as part of the planning and design preparation
<p>Road accidents or fatalities from increased movement of vehicles</p>	<ul style="list-style-type: none"> ✓ Prepare and apply a traffic management plan detailing traffic control procedure, training materials, sign posts and signals, etc....
<p>Resource use inefficiency, increased consumption and waste of energy and water as a result of new construction, renovation</p>	<ul style="list-style-type: none"> ✓ Prepare resource use guideline and control measures ✓ Prepare a recycling and reuse plan
<p>Labor risks involving working conditions, management of worker relationships, child labor and minimum age, and labor grievance</p>	<ul style="list-style-type: none"> ✓ Introduce the GRM
<p>Exclusion of disadvantaged or vulnerable individuals and groups such as blind employees, employees with mobility impairment, and female employees.</p>	<ul style="list-style-type: none"> ✓ Conduct inclusive and participatory consultations with the VGs through their representatives or groups ✓ Arrange separate consultation methods (e.g. one-on-one interview or focus group discussion) for VGs and consider their views and special needs in designing the subproject activities. ✓ Prepare appropriate/differential mitigation measures for VGs ✓ An inclusive work environment for employees with mobility impairment (e.g. give them an office on the ground floor, facilitate transportation service in traveling for capacity-building training, toilet facilities with special needs service . . . etc.) ✓ Allocation of budget dedicated to mitigating the special needs of the VGs. ✓ Awareness-raising activities for the management members regarding the special needs of the VGs.

5. Procedures and Implementation Arrangements

5.1 Environmental and Social Risk Management Procedures

The environmental and social risk management procedures will be implemented through the Project's sub-project selection process at different stages of the project cycle. The procedure suitably integrates and prioritizes mitigation measures from the screening to the decommissioning stages in the project cycle. In summary, the procedures aim to do the following:

Table 6. Project Cycle and E&S Management Procedures

<i>Project Stage</i>	<i>E&S Stage</i>	<i>E&S Management Procedures</i>
<p>a. Assessment and Analysis:</p> <p>Subproject identification</p>	Screening	<ul style="list-style-type: none"> ✓ During subproject identification, ensure subproject eligibility by referring to the Exclusion List in table 7 below. ✓ For all activities, use the Screening Form in Annex 1 to identify and assess potential environmental and social risks and impacts, and identify the appropriate mitigation measures for the subproject. ✓ Identify the documentation, permits, and clearances required under the FEPA and REPA proclamations (EIA Proclamation No. 299-2002; and Proclamation No. 295/2002)
<p>b. Formulation and Planning:</p> <p>Planning for subproject activities, including human and budgetary resources and monitoring measures</p>	Planning	<ul style="list-style-type: none"> ✓ Based on Screening Form adopt and/or prepare relevant environmental and social procedures and plans. ✓ For activities requiring ESIA and Environmental and Social Management Plans (ESMPs), submit the first 5 EISA and ESMPs or more for prior review and no objection by the World Bank/EPA prior to initiating bidding processes (for subprojects involving bidding processes) and/or launching activities (for sub-project activities not subject to bidding). ✓ Ensure that the contents of the ESMPs are shared with relevant stakeholders (implementing sectors and partners) in an accessible manner and consultations are held with the affected communities in accordance with the SEP. ✓ Complete all documentation, permits, and clearances required under the FEPA/REPA Environmental Regulation. ✓ Train staff responsible for implementation and monitoring of plans (NPCU/PIU and E&S focal person, contractors E&S experts). ✓ Incorporate relevant environmental and social procedures and plans into contractor bidding

		documents; provide proper orientations to contractors on relevant procedures and plans. ✓ Make mandatory for contractors to submit C-ESMPs prepared by qualified/certified consultants
c. Implementation and Monitoring: Implementation support and continuous monitoring for projects	Implementation	✓ Ensure implementation of ESMPs through site visits, regular/monthly by the PIUs and regional focal points reporting from the field, and other planned monitoring (quarterly reports and biannual reports). ✓ Track grievances/resolutions/beneficiary feedback. ✓ Continue awareness raising and/or training for E&S focal points, sector staff, civil servants in the institutions
d. Review and Evaluation: Qualitative, quantitative, and/or participatory data collection on a sample basis	Operation/ Completion/decommission	✓ Assess whether plans have been effectively implemented. ✓ Ensure that physical sites are properly restored, stabilized and impacts are mitigated ✓ Ensure E&S measures are taken in accordance with legal agreements and WB E&S standards and national EPA requirement.

a. Subproject Assessment and Analysis – E&S Screening

As a first step, all proposed activities should be screened to ensure that they are within the boundaries of the Project’s eligible activities, and they are not considered as activities listed on the E&S Exclusion List in the table below.

Table 7. Exclusion List of criteria for sub-project identification and screening

<ul style="list-style-type: none"> ✓ If the activity is located in, and will negatively affect the environmentally sensitive areas such as wetlands, cultural heritage and religious sacred sites, important archeological and cultural sites, ground water recharge areas, and important water sources ✓ Any activity that may potentially have hazardous residual impact/effect on the environment and if difficult to mitigate ✓ Any activity affecting physical cultural heritage such as graves, temples, churches, historical relics, archeological sites, or other cultural structure ✓ Any activity that substantially uses natural resources that diminishes the potential use of the resource for any other purpose in the future ✓ If the activity poses a serious risk of land degradation, air pollution, water pollution, damage to wildlife habitat sacred sites ✓ Any project activity that will fall environmentally sensitive areas or any activities that will affect environmentally sensitive areas, including protected areas or priority areas for biodiversity conservation, as defined in national law ✓ Any physical digital connectivity or large ICT infrastructure, except the purchase of energy-efficient server equipment to complement extant ICT infrastructure, in accordance with internationally recognized best practices on energy efficiency;
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- ✓ Any subprojects or activities that would have Significant Environmental Risk per ESF and ESSs
- ✓ Activities that may cause or lead to forced labor or child abuse, child labor exploitation or human trafficking, or subprojects that employ or engage children, over the minimum age of 15 and under the age of 18, in connection with the project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development
- ✓ Any activity that will require Free, Prior and Informed Consent (FPIC) as defined in ESS7

As a second step, the MoF/NPCU will use the ***E&S Screening Form in Annex 1*** to identify and assess relevant environmental and social risks specific to the activities, and identify the appropriate mitigation measures. The *Screening Form* lists the various mitigation measures and plans that may be relevant for the specific activities (such as the Environmental and Social Codes of Practice, the Environmental and Social Management Plan, the Labor Management Procedures, Chance Find Procedures, etc.). The MoF/NPCU will also identify the documentation, permits, and clearances required under the government's Environmental Regulation.

b. Subproject Formulation and Planning – E&S Planning

Based on the process above and the Screening Form, the MoF/NPCU and PIUs of MoR and CSC will adopt the necessary environmental and social management measures already included in the Annexes of this ESMF (such as the ESCOPs, the LMP, SRAMP, GBV/SEA Plan, etc.) or develop relevant site-specific environmental and social management plans.

If site-specific ESMPs are necessary, the MoF/NPCU and/or the Contractor will prepare these ESMPs and other applicable documents as needed. The MoF/NPCU and the other implementing partners NPCU will provide approval and compile ESMPs and other applicable forms. The contents of the ESMPs will be shared with relevant stakeholders (implementing partners in other key sector Ministries and respective sectors regional bureaus) in an accessible manner (in hard and soft copies through direct deliveries and project websites, respectively), and consultations will be held with the affected civil servants/communities on the environmental and social risks and mitigation measures. If certain subprojects or contracts are being initiated at the same time or within a certain location, an overall ESMP covering multiple subprojects or contracts can be prepared. Some moderate risk subprojects may require the preparation of a site-specific environmental and social assessment prior to the preparation of an ESMP.

The first five or more ESIA/ESMPs or alternatively, the first five ESMPs in each category of subproject or a different number to be agreed with the World Bank, will also be submitted to the World Bank for prior review and no objection. After this first 5 reviews, the World Bank and the MoF/NPCU and the other implementing partners NPCU will reassess and decide whether prior review is needed for further ESMPs or a certain category of ESMPs, for example, for activities exceeding a certain budget, for certain types of activities. The MoF/NPCU will also complete the documentation, permits and clearances required under the government's Environmental Regulation before any project activities begin.

At this stage, staff who will be working on the various subproject activities should be trained in the environmental and social management plans relevant to the activities they work on. The MoF/NPCU should provide such training to field staff such as E&S experts, focal persons in other key sector Ministries and relevant line bureaus in the regions. The MoF/NPCU should also ensure that all selected contractors, subcontractors, and vendors understand and incorporate environmental and social mitigation measures relevant to them as standard operating procedures for civil works. The MoF/NPCU should provide training to selected contractors to ensure that they understand and

incorporate environmental and social mitigation measures; and plan for cascading training to be delivered by contractors to subcontractors and vendors. The MoF/NPCU should further ensure that the entities or communities responsible for ongoing operation and maintenance of the investment have received training on operations stage environmental and social management measures as applicable.

c. Implementation and Monitoring – E&S Implementation

During implementation, the MoF/NPCU will conduct regular monitoring visits. Contractors implementing subproject activities will be responsible for implementing the mitigation measures in the E&S risk management documents, under the MoF/NPCU oversight. The MoF/NPCU working to implement the project will ensure that monitoring practices include the environmental and social risks identified in the ESMF and will monitor the implementation of E&S risk management mitigation plans as part of regular project monitoring. At a minimum, the reporting will include (i) the overall implementation of E&S risk management instruments and measures, (ii) any environmental or social issues arising as a result of project activities and how these issues will be remedied or mitigated, including timelines, (iii) Occupational Health and Safety performance (including incidents and accidents), (iv) community health and safety, (v) stakeholder engagement updates, in line with the SEP, (vi) public notification and communications, (vii) progress on the implementation and completion of project works, and (viii) summary of grievances/beneficiary feedback received, actions taken, and complaints closed out, in line with the SEP. Reports from the other key sector Ministries and the regional line bureaus will be submitted to the MoF/NPCU at the national level, where they will be aggregated and submitted to the World Bank on a quarterly/biannual basis.

Throughout the Project implementation stage, the MoF/NPCU will continue to provide training and awareness raising to relevant stakeholders, such as staff of the implementing partners in the key Ministries, selected contractors, and civil servants and communities in the implementation regions, to support the implementation of the environmental and social risk management mitigation measures. An initial list of training needs is proposed below, in Section 5.5. The MoF/NPCU will also track grievances/beneficiary feedback (in line with the SEP) during project implementation to use as a monitoring tool for implementation of project activities and environmental and social mitigation measures. External independent consultants will carry out a mid-term and final evaluation on the progress of the implementation of the ESRM instruments, mitigation measures and results in management the risks and adverse impacts.

If the MoF/NPCU becomes aware of a serious incident in connection with the project, which may have significant adverse effects on the environment, the affected communities, the public, or workers, it should notify the World Bank within 48 hours of becoming aware of such incident. A fatality is automatically classified as a serious incident, as are incidents of forced or child labor, abuses of community members by project workers (including gender-based violence incidents), violent community protests, or kidnappings.

d. Review and Evaluation – E&S Completion

Upon decommissioning/operation/completion of Project activities, the MoF/NPCU will review and evaluate progress and completion of project activities, and all required environmental and social mitigation measures. Especially for civil works, the MoF/NPCU will monitor activities regarding site restoration and landscaping in the affected areas to ensure that the activities are done to an appropriate and acceptable standard before closing the contracts, in accordance with measures identified in the ESMPs and other plans. The sites must be restored to at least the same condition and standard that existed prior to commencement of works. Any pending issues must be resolved before a subproject is considered fully completed. The MoF/NPCU will prepare the completion report describing the final status of compliance with the E&S risk management measures and submit it to the World Bank.

5.2 Technical Assistance Activities

The MoF/NPCU will ensure that design consultancies, and other technical consultancies, and studies (including feasibility studies of sub-project activities), capacity building support and activities, training, and any other technical assistance activities sought from third parties under the Project are carried out in accordance with a well-designed Terms of Reference acceptable to the World Bank, that are consistent with the relevant ESSs. The draft Terms of Reference will be shared with the World Bank for review and No Objection approval prior to initiating the bidding process. They will also ensure that the outputs of such activities comply with the agreed Terms of Reference.

5.3 Implementation Arrangements

The ESMF will be implemented within the institutional arrangement for the GMEESD Project implementation. The GMEESD will be implemented through the framework of the institutional arrangements established under the Council for Good Governance in the Prime Minister's Office. The newly established Council for Good Governance is intended to act as the GoE's nodal point for governance modernization reforms, as part of its efforts to address reform fragmentation and weak horizontal and vertical policy coordination. The Civil Service Commissioner will act as a Secretariat for the Council, and be the interface between Government and Project Steering Committee. The ESMF will be implemented by the NPCU and PIUs to be established at the designated implementing agencies at the Federal level and at later stage, the activities will cascade to regional line bureaus as part the government-wide scaling up of the results from the target Ministries. At the regional line bureaus, the government node for good governance, represented by a focal person, will be responsible for the coordination of project implementation activities, including the ESMF and other ESRM instruments of the project.

Federal level:

The MoF/NPCU: the MoF is the main implementing agency for the GEESD project, and it will be implemented under the Channel-One Projects Coordination Department (COPCD), which is the responsible unit for WB project implementation. A National Project Coordination Unit (NPCU) will be established and will be headed by a Director, who will be responsible for the day-to-day implementation of the activities of the project. The NPCU will have project staff including an E&S specialist, who will oversee the implementation of the ESMF. A high-level project steering committee (PSC) will be established to oversee the overall implementation of the project. The PSC will be composed of the heads of CSC, MoR and MoF. Since the proposed core project activities are cross cutting and will be implemented in the selected sector Ministries and line bureaus, the PSC will be responsible for the inter-agency coordination of project activities amongst the public bodies involved in the project and ensures the horizontal and vertical coordination with relevant public bodies, who will be invited into the PSC meetings.

The NPCU will be responsible for timely preparation and execution of annual work plans and budgets; preparation, execution, and updating of procurement and implementation plans; performance of fiduciary functions; and preparation of financial and performance reports, including M&E and semi-annual progress reports. The NPCU will be responsible for processing disbursement of project funds, reviewing fund utilization and accountability, conducting quality assurance of annual performance audits, overseeing review meetings, and supervising consultants.

PIUs in key Implementing Agencies:

Project Implementation Units (PIUs) will be established in the implementing agencies such as CSC and MoR. The PIUs shall be populated with technical experts including E&S safeguard experts and complementary project management teams to fill the gap in experience and expertise in executing WB funded projects at the key implementing agencies,

particularly at the CSC. The PIU team will be responsible for the implementation of day-to-day project activities and coordinating with other partner institutions. The PIUs will report to the NPCU.

Regional level:

In the respective regions, the GoE’s good governance node, with a designated focal person will facilitate the implementation of the project activities in the line bureaus. The node and its focal person or the E&S expert at the region will directly report project implementation progress to the respective PIUs, which will later be compiled and submitted to the NPCU. Hence, the participating regions will have a designated project node with a focal person who will be responsible for the implementation of the ESMF along with project activities and coordinates with the PIUs at the Federal implementing agencies.

Local contractors will be required to comply with the Project’s E&S risk management plans and procedures, including the ESMPs, ESCOPs, LMP, and local legislation. This provision will be specified in the contractor’s agreements. Contractors will be expected to disseminate and create awareness within their workforce of environmental and social E&S risk management compliance for their effective implementation.

Contractors those to be engaged in the project activities implementation through contractual arrangements will be required to comply with the Project’s environmental and social mitigation and management measures as specified in the ESMPs, ESCOPs, and contract documents, as well as national and local legislation. They will have the responsibility to take all necessary measures to protect the health and safety of workers and community members, and avoid, minimize, or mitigate any environmental harm resulting from project activities. They will be required to fully comply with the World Bank EHSs.

Table 8. ESMF Implementation Arrangements

Level/ Responsible Party	Roles and Responsibilities
Federal Level MoF/ NPCU	<ul style="list-style-type: none"> ✓ Provide support, oversight, and quality control to the PIUs staff and E&S focal persons on environmental and social risk management. ✓ Collect, review, and provide quality assurance and approval to Screening reports and ESMPs as relevant. Keep documentation of all project activity progress. ✓ Conduct E&S screening and instruments preparation on project activities ✓ Oversee overall implementation of the ESRM instruments and monitor the environmental and social mitigation measures and management activities, compile progress reports from PIUs, and report to the World Bank on a quarterly basis. ✓ Train the key implementing partners’ staff at federal and regional levels, and some contractors who will be responsible for implementing the ESMF and other instruments during project implementation. ✓ During contracting and management, ensure that all bidding and contract documents include the relevant E&S management provisions per screening forms, ESMPs, and ESCOPs. ✓ Support the implementing partners and regional line sector bureaus in organizing capacity building programs and in the preparation of ESMP for sub-projects with environmental and social concerns; ✓ As required, update this ESMF and other instruments ✓ Disclose this ESMF, and other instruments to the public/stakeholders through appropriate channels
FEPA	<ul style="list-style-type: none"> ✓ Review and provide approval on Screening and ESIA reports for Schedule 1 and trans-regional sub-project activities

	<ul style="list-style-type: none"> ✓ Facilitate and provide training for the staff of Implementing Agencies, key sector Ministry experts and E&S experts at federal and regional levels
CSC/MoR/ PIUs	<ul style="list-style-type: none"> ✓ Oversee day-to-day implementation and monitoring of environmental and social risk and impact mitigation measures, and report progress and performance to the NPCU on a monthly basis ✓ Ensure project activities do not fall under the exclusion list. Fill out Screening Forms for relevant subproject activities and submit to the NPCU. ✓ If relevant, complete site-specific ESMPs for subproject activities and submit the same to the NPCU. ✓ Provide training to contractors and region level E&S safeguard experts on relevant environmental and social risk mitigation measures.
Regional Nodes, Line/Sector Bureaus	<ul style="list-style-type: none"> ✓ Coordinate and facilitate the implementation of project activities as well as monitoring of environmental and social risks and impact mitigation measures, and report progress and performances to the PIUs on a monthly basis ✓ During sub-project identification, ensure project activities do not fall under the exclusion list. Fill out Screening Forms for relevant subproject activities and submit to the PIUs. ✓ If contracting is managed regionally, ensure that all bidding and contract documents include all relevant E&S risk management provisions per screening forms, ESMPs, and ESCOPs. ✓ If relevant, complete site-specific ESMPs for subproject activities and submit the same to the PIUs. ✓ Provide training to contractors on relevant environmental and social risk mitigation measures.
REPA	<ul style="list-style-type: none"> ✓ Review and clear screening reports submitted by implementing line/sector bureaus; ✓ Review the preparation of ESIA/ESMPs by consultants where required, review and clear Terms of Reference, review and clear ESIA/ESMPs and participate on public consultation activities; ✓ Supervise implementation of the environmental and social risk mitigation measures by the regional level sector offices and local contractors ✓ Provide capacity building training and other technical support, as needed, for the regional level experts, GoE nodes, E&S safeguard focal persons;
Local contractors	<ul style="list-style-type: none"> ✓ Comply with the Project's environmental and social mitigation and management measures as specified in the ESMPs, ESCOPs, and contract documents, as well as national and local legislation. ✓ Take all necessary measures to protect the health and safety of workers and community members, and avoid, minimize, or mitigate any environmental harm resulting from project activities ✓ Fully comply with World Bank EHSGs

5.5 Proposed Training and Capacity Building

The project largely involves deployment of data management facilities and technologies, installation of necessary hardware and software systems, ICT infrastructure, operating systems, and overall efficiency of service delivery in key public sectors. Hence, cascaded training is necessary to capacitate partners and E&S specialists on the overall risks and impacts of sub-project activities, and create understanding as well as build knowledge and skills needed in

managing E&S risks and impacts as a result of sub-project activity implementation. Technical support and capacity building is an integral part of the GMEESD project. Component 4 and its sub-components are targeted to finance capacity building trainings, studies and technical assistance and provide necessary implementation support activities to ensure that the implementing institutions have adequate technical, planning, and operational capacity to implement the proposed project activities, establish knowledge management systems and contribute to national good governance reform program and national policy review. This ESMF is implemented under the overall project implementation institutional framework and hence, the goal of this proposed training and capacity building is to mainstream environmental and social consideration into the processes of sub-project identification, planning, implementation, risk/impact mitigation and monitoring. The training will enable the staff of the implementing agencies, particularly the E&S specialists and focal persons, to have the necessary skills and knowledge in screening, monitoring, inspecting, identification and analysis of environmental and social risks and impacts, and implementation of mitigation measures as proposed in this ESMF.

The stakeholder consultations with key implementing agencies indicated that there is a clear lack of institutional capacity in terms of facility, knowledge of World Bank funded projects and generally E&S risk management, gap in expertise skills and inadequacy of qualified manpower for project management, lack of overall awareness on E&S risks and impacts associated with project implementation, and low experience in E&S procedures, environmental laws and policies.

In order to address the gaps, the proposed capacity building training for effective implementation of the ESMF will include identification and assessment of E&S risks/impacts, selection and selection and application of relevant E&S risk management measures/instruments; E&S monitoring and reporting; Incident and accident reporting; application of LMP, including Code of Conduct, incident reporting, SEA/SH and application of SEP and the grievance/beneficiary feedback mechanism. This will be conducted by engaging E&S specialist consultants, preparing training materials and arrange training sessions before the start of the project implementation.

Table 9. Proposed Training and Capacity Building for ESMF implementation

<i>Level</i>	<i>Responsible Party</i>	<i>Target groups/ Audiences</i>	<i>Topics/Themes to be Covered</i>
Federal	World Bank/ Consultants/ FEPA	National staff at the MoF, NPCU, PIUs, MoR, CSC, other Key implementing agencies, PSC members (Finance managements, HR managers, ICT experts, M&E experts, Department heads, unit leaders, E&S safeguard specialists who are responsible for overall implementation of	<ul style="list-style-type: none"> ✓ Awareness on E&S risks, impacts and management mechanisms ✓ Identification of the E&S risks, impacts and management instruments ✓ Application of ESRM tools and processes (ESMF, ESMP, ESIA, and SRAMP) ✓ Selection and application of relevant E&S risk and impact management measures/ instruments ✓ E&S monitoring and reporting ✓ Incident and accident reporting ✓ Application of SEP and LMP, including Code of Conduct, GBV,SEA/SH, COVID-19 prevention ✓ GRM and E&S audit ✓ Occupational and Community Health and Safety risk management <p>Relevant policies and Laws</p>

Regional		this ESMF and other ESRM instruments	<ul style="list-style-type: none"> ✓ National policies and legislations ✓ World Bank ESS standards, EHSGs
	National staff/ Consultants/ REPA	Regional staff of key sector bureaus, Focal persons for good governance nodes, finance managers, ICT experts, M&E experts, Contractors	<ul style="list-style-type: none"> ✓ Awareness on E&S risks, impacts and management mechanisms ✓ Identification of the E&S risks, impacts and management instruments ✓ Application of ESRM tools and processes (ESMF, ESMP, ESIA, and SRAMP) ✓ Selection and application of relevant E&S risk and impact management measures/instruments ✓ E&S monitoring and reporting ✓ Incident and accident reporting ✓ Application of SEP and LMP, including Code of Conduct, GBV plan, SEA/SH, COVID-19 prevention ✓ GRM and E&S audit ✓ Occupational and Community Health and Safety risk management <p>Relevant policies and Laws</p> <ul style="list-style-type: none"> ✓ National policies and legislations ✓ World Bank ESS standards, EHSGs
	Regional staff/ E&S safeguard specialists	Contractors	<ul style="list-style-type: none"> ✓ Application of LMP, including Code of Conduct, incident reporting, GBV, SEA/SH, COVID-19 prevention measures ✓ Application of ESCOPs or ESMPs, as relevant ✓ E&S implementation, monitoring and reporting, E&S audit
Community level	Regional staff/ E&S safeguard specialists	Community members	<ul style="list-style-type: none"> ✓ Community health and safety issues ✓ Worker Code of Conduct ✓ GBV,SEA/SH issues, prevention, response measures ✓ Grievance redress mechanism

5.6 Estimated Budget

The E&S safeguard implementation is an integral part of the sub-project activities in all the components of the project. The E&S management mechanism is crucial to prevent adverse impacts and potential risks to society and the environment that emanate from the implementation of project activities. Hence, the E&S management instruments serve to ensure sustainability of project interventions. The costs for the implementation of this ESMF can be sourced from the Capacity building and technical support part of Component 4 of the project. This indicative budget is proposed for three major activities for the ESMF implementation.

- ✓ Management, implementation, monitoring (staffing and operation)
- ✓ Training and capacity building
- ✓ E&S auditing

The salaries of E&S safeguard specialists at the NPCU, PIUs and the regional E&S expert including the operational costs are covered under this ESMF budget. Periodic monitoring (quarterly by the NPCU/PIUs and monthly by focal persons or E&S expert at nodes) to observe the progress of E&S implementation and effectiveness of the mitigation measures will be carried out periodically, and the cost of monitoring is covered under this budget. Whereas the actual cost of the mitigation measures are not included in the ESMF implementation budget, since such costs are covered directly or indirectly by contractors as part of the cost for construction under each component. The following table lists estimated cost items for the implementation for the ESMF, which can be drawn from the component 4.

Table 10. **Estimated budget for ESMF Implementation**

Activity/Cost Item	Estimated Cost (USD)	
	Sub-total	
A. Management, implementation and monitoring	Sub-total	498,000.00
✓ Equipment, gadgets and materials, software for data collection / supervision / monitoring / grievance redress		125,000
✓ Preparation of site-specific ESIA and ESMPs and other site-specific plans		80,000
✓ Supervision and monitoring of the implementation of site-specific ESMPs and other site-specific plans		128,000
✓ Quarterly Supervision and evaluation by Regional nodes focal persons OR E&S experts		135,000
✓ Cost of obtaining clearances or permits		30,000
B. Training and Capacity Building	Sub-total	555,000.00
✓ Training of Federal level experts and stakeholders (2 per year for three years)		200,000
✓ Trainings for stakeholder and Regional staff (2 per year for three years)		105,000
✓ Biannual Environmental and Social workshop at NPCU		120,000
✓ Biannual Environmental and Social workshop at Regional nodes		100,000
✓ Training materials preparation		30,000
C. E&S Audit	Sub-Total	100,000.00
✓ Environmental and Social Audit (REPAs)		40,000
✓ E&S audit by external consultants		60,000
Grand TOTAL		1,153,000.00

6. Grievance Redress Mechanism

The Grievance Redress Mechanism (GRM) addresses grievances in an efficient, timely and cost-effective manner that arise in the Project area either due to the actions of the implementing institutions (MoF, CSC, MoR, etc.) or by the activities of contractors/subcontractors employed. The MoF/ NPCU and IAs/PIUs will be responsible for managing the GRM and cascade the responsibilities to regional focal points, contractors and subcontractors who are engaged in implementing sub-project activities at region levels. The E&S specialists from MoF/ NPCU and IAs/PIUs shall monitor the grievance resolution process at the federal and regional levels of the respective implementing entities. Project Affected Persons (PAPs) and other potential complainants should be fully informed of the GRM, its functions, procedures, timelines, and contact persons both verbally and through written materials (often notice boards postings, emails, websites, flyers) and information brochures during consultations meetings and other stakeholder engagement activities. The MoF/ NPCU and IAs/PIUs will implement an effective GRM, to help third parties to avoid resorting to the judicial system as far as possible. Complainants can seek redress from the judicial system at any time. The step-by-step process does not deter them from approaching the courts. All grievances related correspondence shall be documented, and the grievance resolution process will be systematically tracked.

The Grievance Redress Process

The GRM process starts with establishing a GRC (Grievance Redress Committee) at the implementing agencies at the Federal level and at the regional nodes/focal points in the line bureaus. The composition, roles and responsibilities of the respective GRCs are described below:

Composition of GRCs at the federal and regional levels:

MoF/NPCU GRC: as MoF is the lead implementing agency, it will form a GRC at the NPCU, which will be composed of the NPCU coordinator, the E&S specialists, and senior technical Expert, Gender Specialist, HR Manager and M&E expert.

IAs/PIUs GRC (CSC, MoR, etc.): the key implementing agencies will have their own GRCs, which will be composed of the project implementation unit head, the E&S specialists, senior technical expert, HR manager, Gender expert, M&E expert.

Regional bureau GRC: the respective line bureaus will have a focal point at the good governance node. The focal point will be the leader coordinator. Hence, the regional GRC will be composed of the regional focal point, E&S experts, senior technical expert, gender expert, HR-manager, and M&E expert.

Roles of GRCs:

The E&S specialists will be the secretariat of the GRCs. The GRCs will be responsible for:

- Receiving complaints from the beneficiaries/complainants, log/document them and carryout verification
- Provide hearing and resolution
- Refer complaints to higher levels if not resolved

When complainants present a grievance, any of the followings are expected from the project management/channel of grievance resolution or the GRCs:

- Acknowledgement of their grievance
- An honest response to questions/issues brought forward
- An apology, adequate compensation; and
- Modification of the actions/activities that caused the grievance and some other fair remedies.

The GRC will follow up complaints from different stakeholders over the project. The complaint to be filed

should be in line with the project components and/or to its implementation and management. The GMEESD project grievance resolution process will involve the following main steps:

- ✓ *Receipt of grievances*: anyone from the affected communities or believing they are affected by the Project can submit a grievance (written, verbal, text message, telephone, etc. as appropriate for the complainant).
- ✓ *Registering the complaint*: the GRC secretariat/focal person who received the complaint will use the GRM logbook for registering.
- ✓ *Referral and examination of complaints*: the GRC will examine the complaint, resolve, or refer to the appropriate body such as next higher body (PSC) or formal courts.
- ✓ *Notifying the complainant*: the decision/solution/action by the grievance committee shall be communicated to the complainant as per the stipulated timeline for feedback.
- ✓ *Closing the complaint*: where the decision/solution of the complaint is accepted by the complainant, or complaint that is not related to the project or any of its components, or a complaint that is being heard by the judiciary will be closed following the appropriate procedure based on the acknowledge and signed off by the complainant.

There should be clear complaints raising channels such as a dedicated phone number for call, a number for SMS/text message, an email address and a focal point and physical address to register complaints. This must be well circulated to beneficiaries. Posters and other dissemination materials must be made visible. The steps and timelines of the redress process is described below.

Table 11. Steps in the Grievance Redress Process

Steps	Process	Description	Completion time frame	Responsible Body or Person
1	Receipt of complaint	Record date of receipt, name of complainant, nature of complaints, inform the NPCU/PIU-GRC	1 day	Secretary to GRC at the regional node, the NPCU and PIUs in IAs
2	Acknowledgement of grievance	By letter, email, phone,	1 day	By the secretary of the GRC
3	Screen and Establish the Merit of the Grievance	Visit the site; listen to the complainant/community; assess the merit	3 days	NPCU/PIU/ regional GRC
4	Implement and monitor a redress action	Where complaint is justified, redress the issue	10 days	The relevant GRC (NPCU/PIU/ regional GRC)
5	If not solved in 15 days, escalate to NPCU/PIU-GRC	GRC Review the redress steps and conclusions, provide intervention solution	15 days of receiving of complaint	The relevant GRC (NPCU/PIU/ regional GRC)
6	If not solved in 15 days, escalate to NPCU-GRC and PSC	Review the redress steps and conclusions, provide intervention solution	15 days of receiving complaint	MoF/ NPCU-GRC, PSC
7	Judicial adjudication	Take complaint to court of law	No fixed time	Complainant

The complaints recorded, resolved and referred will be reported quarterly with the environmental and social implementation performance report to the World Bank and other relevant stakeholders.

World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond.

For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service> .

For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

7. Stakeholder Engagement, Disclosure, and Consultations

A separate Stakeholder Engagement Plan (SEP) has been prepared for the Project, based on the World Bank's Environmental and Social Standard 10 on Stakeholder Engagement and Information Disclosure. The SEP can be accessed at the project website. The stakeholder consultation is to provide a framework for achieving effective stakeholder involvement and promoting greater awareness and understanding of issues so that the project will be carried out effectively within project period to the satisfaction of all concerned parties. All feedbacks and concerns collected from the stakeholders and communities will be addressed by the NPCU and PIUs. Further feedbacks that have concern and grievances will be addressed through the GRM of the project. Although the purposes of consultations are mentioned explicitly in the SEP, stakeholder consultations serve the following purposes and address the issues:

- ✓ Develop and maintain avenues of communication between the project and stakeholders to ensure that their views and concerns are incorporated into sub-project design, implementation, and monitoring with the objectives of reducing negative impacts to enhance benefits;
- ✓ Inform and discuss about the nature and scale of adverse impacts and to identify priorities of remedial measures for the impacts in a more transparent and participatory manner;
- ✓ Include the attitudes of the community and officials who will be affected by the project so that their views and proposals are mainstreamed to formulate mitigation and benefit enhancement measures;
- ✓ Understand the priorities and aspirations of stakeholders when implementing the proposed mitigation measures;
- ✓ Increase public awareness and understanding of LLRP II to ensure its acceptance; and
- ✓ Inform to the concerned authorities about the impacts of the project, solicit their views, and discuss their share of responsibility for a smooth functioning of the overall projects activities.

The consultation process adopts a participatory approach throughout the entire planning and implementation of sub-projects. Public participation and consultations will take place through community meetings and all aspects of the subproject including the anticipated environmental and social risks and mitigations will be presented publicly. The proposal of subprojects and the community consultation will be held in accordance with the procedures in the SEP and this ESMF.

Disclosure or the provision of access to relevant information for communities and other stakeholders helps them to understand risks, impacts and opportunities of the GMEESD sub-projects. The potential social and environmental adverse effects of the project should be disclosed in the project website using the major local languages at the federal and regional implementing agencies. The disclosure in World Bank website will be made in English language. Besides, public disclosure will be made through billboard, banners, flyers, magazines and other media outlets. In compliance with the World Bank's Public Consultation and Disclosure Policy, the NPCU will make available copies of the ESMF at accessible places to the public to allow the public and other stakeholders to express their views and comment on the possible environmental and social impacts of the projects and the respective E&S risk management to minimize or avoid the anticipated impacts. In this ESMF document, stakeholder concerns raised, community views and responses provided by the project preparation team are summarized and documented in Annex 11 of the ESMF.

Annexes

Annex 1. Screening Form

The E&S Screening procedure comprises of two stages-process: (1) Initial screening by using the **Exclusion List** in Table 7 of the ESMF; and (2) Screening the proposed activities to identify the approach for E&S risk management. This Screening Form is the second stage of screening process and is to be used for all subproject activities. The completed forms will be signed and kept in the Project ESF file. The World Bank may review a sample of the forms during implementation support visits.

1. Subproject Information:

Subproject Title	
Subproject Location	
Regional Unit in Charge	
Estimated Cost	
Start/Completion Date	
Brief Description of Subproject	

2. Environmental and Social Screening Questionnaires

Questions	Answer		Next Steps
	Yes	No	
ESS1			
1. Is the subproject likely to have significant adverse environmental impacts that are sensitive and unprecedented that trigger the 'Ineligible Activities' or other exclusion criteria?			If "Yes": Exclude from project.
2. Does the subproject involve <u>new construction or significant expansion</u> of ponds, small and micro dams, solid waste management systems, shelters, roads (including access roads), community centers, cold stores, veterinary centers, laboratories, livestock marketing facility, schools, bridges and jetties?			If "Yes": 1. Prepare a site-specific E&S Assessment and/or ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.
3. Does the subproject involve <u>renovation or rehabilitation</u> of any small-scale infrastructure, such as groundwater wells, latrines, showers/washing facilities, or shelters?			If "Yes": 1. Apply relevant measures based on the ESCOPs in Annex 2 (unless one of the questions below raises specific environmental risks and requires a site-specific ESMP). 2. Include E&S risk management measures in bidding documents.
4. Will construction or renovation works require new borrow pits or quarries to be opened?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.

5. Does the project lead to any risks and impacts on, individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable. ¹			If "Yes": Apply relevant measures described in the ESMF and SEP.
ESS2			
6. Does the subproject involve uses of goods and equipment involving forced labor, child labor, or other harmful or exploitative forms of labor?			If "Yes": Exclude from project.
7. Does the subproject involve recruitment of workforce including direct, contracted, primary supply, and/or community workers?			If "Yes": Apply LMP in Annex 4.
8. Will the workers be exposed to workplace hazards that needs to be managed in accordance with local regulations and EHSs? Do workers need PPE relative to the potential risks and hazards associated with their work?			If "Yes": Apply LMP in Annex 4.
9. Is there a risk that women may be underpaid when compared to men when working on the project construction?			If "Yes": Apply LMP in Annex 4.
ESS3			
10. Is the project likely to generate solid or liquid waste that could adversely impact soils, vegetation, rivers, streams or groundwater, or nearby communities?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.
11. Do any of the construction works involve the removal of asbestos or other hazardous materials?			If "Yes": Apply asbestos guidance provide in the ESCOP
12. Are works likely to cause significant negative impacts to air and / or water quality?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.
13. Does the activity rely on existing infrastructure (such as discharge points) that is inadequate to prevent environmental impacts?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.
ESS4			
14. Is there a risk of increased community exposure to communicable disease (such as COVID-19, HIV/AIDS, Malaria), or increase in the risk of traffic related accidents?			If "Yes": Apply LMP in Annex 8 and relevant measures in SEP.
15. Is an influx of workers, from outside the community, expected? Would workers be expected to use health services of the community? Would they create pressures on existing community services (water, electricity, health, recreation, others?)			If "Yes": Apply LMP in Annex 8.
16. Is there a risk that SEA/SH may increase as a result of project works?			If "Yes": Apply LMP in Annex 8
17. Would any public facilities, such as schools, health clinic, church be negatively affected by construction?			If "Yes": Apply relevant measures based on the ESCOPs in Annex 2 (unless one of the

¹ "Disadvantaged or vulnerable" refers to those individuals or groups who, by virtue of, for example, their age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation, gender identity, economic disadvantages or ethnic peoples status, and/or dependence on unique natural resources, may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits.

			other questions in the screening form raises specific environmental and social risks and requires a site-specific ESMF).
18. Will the subproject require the government to retain workers to provide security to safeguard the subproject?			If "Yes": Prepare a site-specific ESMP for the proposed subproject, including an assessment of potential risks and mitigation measures of using security personnel.
ESS5			
19. Will the subproject require the involuntary acquisition of new land (will the government use eminent domain powers to acquire the land)? ²			If "Yes": Exclude from project.
20. Will the subproject lead to temporary or permanent physical displacement (including people without legal claims to land)?			If "Yes": Exclude from project.
21. Will the subproject lead to economic displacement (such as loss of assets or livelihoods, or access to resources due to land acquisition or access restrictions)?			If "Yes": Exclude from project.
22. Has the site of the subproject been acquired through eminent domain in the past 5 years, in anticipation of the subproject?			If "Yes": Exclude from project
23. Are there any associated facilities needed for the subproject (such as access roads or electricity transmission lines) that will require the involuntary acquisition of new land?			If "Yes": Exclude from project.
24. Is private land required for the subproject activity being voluntarily donated to the project? ³			If "Yes": Exclude from project.
ESS6			
25. Does the subproject involve activities that have potential to cause any significant loss or degradation of critical habitats ⁴ whether directly or indirectly, or which would lead to adverse impacts on natural habitats ⁵ ?			If "Yes": Exclude from project.
26. Will the project involve the conversion or degradation of non-critical natural habitats?			If "Yes":

² Environmental and Social Standard 5, Footnote 10: "In some circumstances, it may be proposed that part or all of the land to be used by the project is donated on a voluntary basis without payment of full compensation. Subject to prior Bank approval, this may be acceptable providing the Borrower demonstrates that: (a) the potential donor or donors have been appropriately informed and consulted about the project and the choices available to them; (b) potential donors are aware that refusal is an option, and have confirmed in writing their willingness to proceed with the donation; (c) the amount of land being donated is minor and will not reduce the donor's remaining land area below that required to maintain the donor's livelihood at current levels; (d) no household relocation is involved; (e) the donor is expected to benefit directly from the project; and (f) for community or collective land, donation can only occur with the consent of individuals using or occupying the land. The Borrower will maintain a transparent record of all consultations and agreements reached."

³ Environmental and Social Standard 5, Footnote 10: "In some circumstances, it may be proposed that part or all of the land to be used by the project is donated on a voluntary basis without payment of full compensation. Subject to prior Bank approval, this may be acceptable providing the Borrower demonstrates that: (a) the potential donor or donors have been appropriately informed and consulted about the project and the choices available to them; (b) potential donors are aware that refusal is an option, and have confirmed in writing their willingness to proceed with the donation; (c) the amount of land being donated is minor and will not reduce the donor's remaining land area below that required to maintain the donor's livelihood at current levels; (d) no household relocation is involved; (e) the donor is expected to benefit directly from the project; and (f) for community or collective land, donation can only occur with the consent of individuals using or occupying the land. The Borrower will maintain a transparent record of all consultations and agreements reached."

⁴ Environmental and Social Standard 6, paragraph 23: "Critical habitat is defined as areas with high biodiversity importance or value, including (a) Habitat of significant importance to Critically Endangered or Endangered species, as listed in the IUCN Red List of threatened species or equivalent national approaches; (b) Habitat of significant importance to endemic or restricted-range species; (c) Habitat supporting globally or nationally significant concentrations of migratory or congregatory species; (d) Highly threatened or unique ecosystems; and (e) Ecological functions or characteristics that are needed to maintain the viability of the biodiversity values described above in (a) to (d)."

⁵ Environmental and Social Standard 6, paragraph 21: "Natural habitats are areas composed of viable assemblages of plant and/or animal species of largely native origin, and/or where human activity has not essentially modified an area's primary ecological functions and species composition."

			<p>1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3.</p> <p>2. Include E&S risk management measures in bidding documents.</p>
27. Will this activity require clearance of riverine vegetation?			If "Yes": Exclude from project.
28. Will this activity require clearance of trees, including inland natural vegetation?			<p>If "Yes":</p> <p>1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3.</p> <p>2. Exclude from project if more than x hectares of tree and vegetation cutting is expected.</p> <p>2. Include E&S risk management measures in bidding documents.</p>
29. Will there be any significant impact on any ecosystems of importance (especially those supporting rare, threatened or endangered species of flora and fauna)?			If "Yes": Exclude from project.
ESS7			
30. Underserved and Vulnerable Local Communities present in the subproject area and are likely to be affected by the proposed subproject negatively?			If "Yes": Prepare an Indigenous Peoples Plan OR Include the requirements of an Indigenous Peoples Plan in the SEP.
ESS8			
31. Is sub-project located near buildings, sacred trees or objects having spiritual values to local communities (e.g. memorials, graves or stones) or require excavation near there?			If "Yes": Apply Chance Find Procedures in Annex 5.

3. Conclusion

The category of the sub-project: high/substantial/moderate/ low. As per the screening and risk level categorizing of the sub-projects, list sub-projects into Schedule 1 (substantial risk), Schedule 2, moderate risk, and Schedule 3 (low risk) sub-projects. _____

Based on the result from the screening above, please list the E&S risk management instruments to be prepared / adopt and implemented:

- a)
- b)

Name and title of person who conducted screening:

Date of screening:

Annex 2. Environmental and Social Codes of Practice (ESCOP)

To manage and mitigate potential negative environmental impacts, the GMEESD project applies Environmental and Social Codes of Practice (ESCOPs); outlined in this document. The ESCOPs contain specific, detailed and tangible measures that would mitigate the potential impacts of each type of eligible subproject activity. They are marked as relevant for the planning phase, the implementation phase, or the post-implementation phase of activities (shown in brackets). They are intended to be simple risk mitigation and management measures, readily usable to the MoF/NPCU and contractors to be engaged. Compliance to particular ESCOPs by contractors is mandatory and will be integral part of contractual terms

and conditions. Non-compliance or violation of the procedures in the ESCOPs will result in suspension of payments, and subject to the provisions in the agreements, may result in termination of engagement.

a. ESCOPs for Infrastructure/ civil works and maintenance/renovation works in Components 1, 2 and 3 Subprojects

General ESCOP for ICT Infrastructure/Data Warehouse construction/any civil work in Components 1, 2 and 3

Issue	Environmental Prevention/Mitigation Measures	Responsible Party
1. Noise during construction	<ul style="list-style-type: none"> a) Plan activities in consultation with communities so that noisiest activities are undertaken during periods that will result in least disturbance. (Planning phase) b) Use when needed and feasible noise-control methods such as fences, barriers or deflectors (such as muffling devices for combustion engines or planting of fast-growing trees). (Implementation phase) c) Minimize project transportation through community areas. Maintain a buffer zone (such as open spaces, row of trees or vegetated areas) between the project site and residential areas to lessen the impact of noise to the living quarters. (Implementation phase) 	NPCU, PIUs, Contractors Implementing partners
2. Soil erosion	<ul style="list-style-type: none"> a) Schedule construction/earth work during dry season. (Planning phase) b) Contour and minimize length and steepness of slopes. (Implementation phase) c) Use mulch, grasses or compacted soil to stabilize exposed areas. (Implementation phase) d) Cover with topsoil and re-vegetate (plant grass, fast-growing plants/bushes/trees) construction areas quickly once work is completed. (Post-Implementation phase) e) Design channels and ditches for post-construction flows and line steep channels/slopes (e.g., with palm frowns, jute mats, etc.). (Post-Implementation phase) 	Contractors Implementing partners
3. Air quality	<ul style="list-style-type: none"> a) Minimize dust from exposed work sites by applying water on the ground regularly during dry season. (Implementation phase) b) Avoid burn site clearance debris (trees, undergrowth) or construction waste materials. (Implementation phase) c) Keep stockpile of aggregate materials covered to avoid suspension or dispersal of fine soil particles during windy days or disturbance from stray animals. (Implementation phase) d) Reduce the operation hours of generators /machines /equipment /vehicles. (Implementation phase) e) Control vehicle speed when driving through community areas is unavoidable so that dust dispersion from vehicle transport is minimized. (Implementation phase) 	Contractors Implementing partners
4. Water quality and availability	<ul style="list-style-type: none"> a) Activities should not affect the availability of water for drinking and hygienic purposes. (Implementation phase) b) No soiled materials, solid wastes, toxic or hazardous materials should be stored in, poured into or thrown into water bodies for dilution or disposal. (Implementation phase) c) Avoid the use of waste water pools particularly without impermeable liners. d) Provision of toilets with temporary septic tank. (Implementation phase) e) The flow of natural waters should not be obstructed or diverted to another direction, which may lead to drying up of river beds or flooding of settlements. (Implementation phase) f) Separate concrete works in waterways and keep concrete mixing separate from drainage leading to waterways. (Implementation phase) 	Contractors Implementing partners

<p>5. Solid and hazardous waste</p>	<p>a) Segregate construction waste as recyclable, hazardous and non-hazardous waste. (Implementation phase)</p> <p>b) Collect, store and transport construction waste to appropriately designated/controlled dump sites. (Implementation phase)</p> <p>c) On-site storage of wastes prior to final disposal (including earth dug for foundations) should be at least 300 metres from rivers, streams, lakes and wetlands. (Implementation phase)</p> <p>d) Use secured area for refuelling and transfer of other toxic fluids distant from settlement area (and at least 50 metres from drainage structures and 100 metres from important water bodies); ideally on a hard/non-porous surface. (Implementation phase)</p> <p>e) Train workers on correct transfer and handling of fuels and other substances and require the use of gloves, boots, aprons, eyewear and other protective equipment for protection in handling highly hazardous materials. (Implementation phase)</p> <p>f) Collect and properly dispose of small amount of maintenance materials such as oily rags, oil filters, used oil, etc. Never dispose spent oils on the ground and in water courses as it can contaminate soil and groundwater (including drinking water aquifer). (Implementation phase)</p> <p>g) After each construction site is decommissioned, all debris and waste shall be cleared. (Post-Implementation phase)</p>	<p>Contractors Implementing partners</p>
<p>6. Asbestos</p>	<p>a) If asbestos or asbestos containing materials (ACM) are found at a construction site, they should be clearly marked as hazardous waste. (Implementation phase)</p> <p>b) The asbestos should be appropriately contained and sealed to minimize exposure. (Implementation phase)</p> <p>c) Prior to removal, if removal is necessary, ACM should be treated with a wetting agent to minimize asbestos dust. (Implementation phase)</p> <p>d) If ACM is to be stored temporarily, it should be securely placed inside closed containers and clearly labeled. (Implementation phase)</p> <p>e) Removed ACM must not be reused. (Implementation and post-implementation phase)</p>	<p>Contractors Implementing partners</p>
<p>7. Health and Safety</p>	<p>a) When planning activities of each subproject, discuss steps to avoid people getting hurt. (Planning phase)</p> <p>It is useful to consider:</p> <ul style="list-style-type: none"> • Construction place: Are there any hazards that could be removed or should warn people about? • The people who will be taking part in construction: Do the participants have adequate skill and physical fitness to perform their works safely? • The equipment: Are there checks you could do to make sure that the equipment is in good working order? Do people need any particular skills or knowledge to enable them to use it safely? • Electricity Safety: Do any electricity good practices such as use of safe extension cords, voltage regulators and circuit breakers, labels on electrical wiring for safety measure, aware on identifying burning smell from wires, etc. apply at site? Is the worksite stocked with voltage detectors, clamp meters and receptacle testers? <p>b) Mandate the use of personal protective equipment for workers as necessary (gloves, dust masks, hard hats, boots, goggles). (Implementation phase)</p> <p>c) Follow the below measures for construction involve work at height (e.g. 2 meters above ground (Implementation phase):</p> <ul style="list-style-type: none"> • Do as much work as possible from the ground. 	<p>NPCU, PIUs, Contractors Implementing Partners</p>

	<ul style="list-style-type: none"> • Do not allow people with the following personal risks to perform work at height tasks: eyesight/balance problem; certain chronic diseases – such as osteoporosis, diabetes, arthritis or Parkinson’s disease; certain medications – sleeping pills, tranquillisers, blood pressure medication or antidepressants; recent history of falls – having had a fall within the last 12 months, etc. • Only allow people with sufficient skills, knowledge and experience to perform the task. • Check that the place (eg a roof) where work at height is to be undertaken is safe. • Take precautions when working on or near fragile surfaces. • Clean up oil, grease, paint, and dirt immediately to prevent slipping; and • Provide fall protection measures e.g. safety harness, simple scaffolding/guard rail for works over 4 meters from ground. <p>d) Keep worksite clean and free of debris on daily basis. (Implementation phase)</p> <p>e) Provision of first aid kit with bandages, antibiotic cream, etc. or health care facilities and enough drinking water. (Implementation phase)</p> <p>f) Keep corrosive fluids and other toxic materials in properly sealed containers for collection and disposal in properly secured areas. (Implementation phase)</p> <p>g) Ensure adequate toilet facilities for workers from outside of the community. (Implementation phase)</p> <p>h) Rope off construction area and secure materials stockpiles/ storage areas from the public and display warning signs including at unsafe locations. Do not allow children to play in construction areas. (Implementation phase)</p> <p>i) Ensure structural openings are covered/protected adequately. (Implementation phase)</p> <p>j) Secure loose or light material that is stored on roofs or open floors. (Implementation phase)</p> <p>k) Keep hoses, power cords, welding leads, etc. from laying in heavily travelled walkways or areas. (Implementation phase)</p> <p>l) If school children are in the vicinity, include traffic safety personnel to direct traffic during school hours, if needed. (Implementation phase)</p> <p>m) Control driving speed of vehicles particularly when passing through community or nearby school, health centre or other sensitive areas. (Implementation phase)</p> <p>n) During heavy rains or emergencies of any kind, suspend all work. (Implementation phase)</p> <p>o) Fill in all earth borrow-pits once construction is completed to avoid standing water, water-borne diseases and possible drowning. (Post-Implementation phase)</p>	
8. Biodiversity	<p>a) No cutting of trees or destruction of vegetation other than on construction site. [Implementing agency] will procure locally sourced materials consistent with traditional construction practices in the communities. (Planning phase)</p> <p>b) No hunting, fishing, capture of wildlife or collection of plants. (Implementation phase)</p> <p>c)</p>	Contractors Implementing partners

Specific ESCOPs for Infrastructure Subprojects (new buildings and renovation for ICT infrastructure installation)

Subproject Type	Environmental Prevention/Mitigation Measures	Responsible Party
<i>New Buildings</i>		

Subproject Type	Environmental Prevention/Mitigation Measures	Responsible Party
In general	a) Provide adequate drainage in the building's immediate surroundings to avoid standing water, insect related diseases (malaria, etc.) and unsanitary conditions. (Implementation phase) b) Include sanitary facilities such as toilets and basins for hand-washing. (Implementation phase) c) Restrict use of asbestos cement tiles as roofing. (Implementation phase) d) Tiled floors are preferred for easier cleaning and more hygienic. (Planning and implementation phases)	Contractors Implementing partners
Electrification/Solar panels installation		
Solar power supply	a) Avoid solar installation sites that create visual obstruction and areas of public importance (biodiversity, social gathering, etc...) b) Tidy wiring for easy maintenance and reduces the risk of accidents. (Implementation phase) c) Need to raise community awareness on electrical hazards and health and safety concerns, as well as proper maintenance of solar panels (Implementation and post-implementation phases) d) Need to raise community awareness on proper disposal of solar panels, specifically avoiding disposal of panels near water bodies (Post-implementation phase)	NPCU, PIUs, Contractors and Implementers
Wastewater Systems from buildings		
Solid Waste Management	a) Solid waste depots/disposal need to be located on hard-standing areas that prevent waste entering surface or groundwater. (Implementation phase) b) Waste depots/storage/disposal should be contained, sealed and/or roofed/covered to prevent storm water contamination. Wastes need to be emptied regularly. (Implementation phase)	Contractors Implementing partners
Reporting	a) The contractor shall monitor, keep records, and report all environmental and social issues (major worker related incidents, accidents, and near miss)	

Annex 3. Environmental and Social Management Plan (ESMP) Template

Sub-project activities of GMEESD, particularly under Components 1, 2 and 3 will involve civil works and that require engaging labor. Environmental and social risks and impacts are strongly linked to subproject location and scope of activities. Thus, site specific instruments (such as ESMPs), or as parts of ESIA, will be prepared for each specific subproject /project activities.

1. Subproject Information

Subproject Title:	
Estimated Cost:	
Start/Completion Date:	

Introduction

2. Site/Location Description

This section concisely describes the proposed location and its geographic, ecological, social and temporal context including GPS points, any offsite investments that may be required (e.g., access roads, water supply, etc.). Please attach a map showing relative location of the site onto the ESMP.

Methodology of the assessment

Policy and Legal framework review

3. Subproject Description and Activities

This section lists all the activities that will take place under the subproject, including any associated activities (such as building of access roads, flood protection structures, small irrigation dams, clinics, storage facilities, etc...).

Environmental and Social Baseline survey

4. ESMP Matrix: Risk and Impacts, Mitigation, Monitoring

This section should identify anticipated site-specific adverse environmental and social risks and impacts; describe mitigation measures to address these risks and impact; and list the monitoring measures necessary to ensure effective implementation of the mitigation measures. It may draw from the ESMF's pre-identification of potential risks/impacts and mitigation measures, as applicable, and drill down further to ensure relevance and comprehensiveness at the site-specific level. For subprojects involving construction, two sets of tables may be needed, for the construction phase and the operation phase.

Environmental and Social Management Plan

Anticipated E&S Risks and Impacts	Risk Mitigation and Management Measures	Responsible body	Location	Timeframe	frequency	Cost estimate

Environmental and Social Monitoring plan

Anticipated E&S Risks and Impacts	Risk Mitigation and Management Measures	Responsible body	Indicators of monitoring	Methodology	frequency	Cost estimate

5. Capacity Development & Training

Based on the implementation arrangements and responsible parties proposed above, this section outlines any capacity building, training or new staffing that may be necessary for effective implementation.

6. Implementation Schedule and Cost Estimates

This section states the implementation timeline for the mitigation measures and capacity development measures described above, as well as a cost estimate for the implementation. The cost estimate can focus on the line items that will be covered by the project implementing agency, with costs of mitigation measures to be implemented by the contractor left to the contractor to calculate.

7. Attachments

ESCOPs, site specific SEP etc.

IV. Review & Approval

Prepared By:(Signature) Position: Date	
Reviewed By:(Signature) Position:Date	Approved By:(Signature) Position: Date

Annex 4: Guideline for ESMP Preparation and contents of ESMP

An ESMP consists of the set of mitigation, monitoring, and institutional measures to be taken during implementation and operation of a project to eliminate adverse environmental and social risks and impacts, offset them, or reduce them to acceptable levels. The ESMP also includes the measures and actions needed to implement these measures.

The content of the ESMP will include the following:

(a) Mitigation: The plan will include compensatory measures, if applicable. Specifically, the ESMP:

- identifies and summarizes all anticipated adverse environmental and social impacts
- describe with technical detail each mitigation measure,
- estimates any potential environmental and social impacts of these measures; and
- Takes into account, and is consistent with, other mitigation plans required for the project (e.g., for involuntary resettlement, indigenous peoples, or cultural heritage).

(b) Monitoring: the ESMP identifies monitoring objectives and specifies the type of monitoring, with linkages to the impacts assessed in the environmental and social assessment and the mitigation measures described in the ESMP. Specifically, the monitoring section of the ESMP provides (a) a specific description, and technical details, of monitoring measures, including the parameters to be measured, methods to be used, sampling locations, frequency of measurements, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective actions; and (b) monitoring and reporting procedures to (i) ensure early detection of conditions that necessitate particular mitigation measures, and (ii) furnish information on the progress and results of mitigation.

(c) Capacity Development and Training

- The ESMP draws on the environmental and social assessment of the existence, role, and capability of responsible parties on site or at the agency and Ministry level.
- Specifically, the ESMP provides a specific description of institutional arrangements, identifying which party is responsible for carrying out the mitigation and monitoring measures
- The ESMP recommends the establishment or expansion of the parties responsible, the training of staff and any additional measures that may be necessary to support implementation of mitigation measures

(d) Implementation Schedule and Cost Estimates: For all three aspects (mitigation, monitoring, and capacity development), the ESMP provides

- An implementation schedule for measures that must be carried out as part of the project
- The capital and recurrent cost estimates and sources of funds for implementing the ESMP.

Annex 5: Sample ToR for Environmental and Social Impact Assessment (ESIA)

An ESIA expert conducting environmental and social impact assessments should be an experienced expert in the field and have sufficient experience on environmental and social analysis of projects. The TOR must provide the necessary background information on the sub-project activity, geographical location including maps, description of inputs, products, processes, involvement of communities, methods of implementation and operations, monitoring and evaluation, financial conditions, etc...as part of the assignment. The ESIA report should be organized in the following manner:

Executive Summary: Concisely discusses significant findings and recommended actions

Introduction: Gives overview of the project conception and the necessity of carrying-out an ESIA.

Legal and Institutional Framework: Analyzes the legal and institutional framework ; and compares the client's existing environmental and social framework and the WB ESSs and identifies the gaps between them

Project Description: Concisely describes the proposed project and its geographic, environmental, social, and temporal context, includes a map of sufficient detail, showing the project site and the area that may be affected by the project's direct, indirect, and cumulative impacts

Baseline Data: Sets out in detail the baseline data that is relevant to decisions about project location, design, operation, or mitigation measures. This should include a discussion of the accuracy, reliability, and sources of the data as well as information about dates surrounding project identification, planning and implementation. It identifies and estimates the extent and quality of available data, key data gaps, and uncertainties associated with predictions; and assess the scope of the area to be studied and describe relevant physical, biological, and socioeconomic conditions;

Environmental and Social Risks and Impacts: takes into account all relevant environmental and social risks and impacts of the project

Mitigation Measures: identifies mitigation measures and significant residual negative impacts; and identifies differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable; assesses the feasibility of mitigating the environmental and social impacts; the capital and recurrent costs of proposed mitigation measures, and their suitability under local conditions; and the institutional, training, and monitoring requirements for the proposed mitigation measures.

Analysis of Alternatives: systematically compares feasible alternatives to the proposed project site, technology, design, and operation including the "without project" situation terms of their potential environmental and social impacts; assesses the alternatives' feasibility of mitigating the environmental and social impacts; the capital and recurrent costs of alternative mitigation measures, and their suitability under local conditions; and the institutional, training, and monitoring requirements for the alternative mitigation measures; and for each of the alternatives, quantifies the environmental and social impacts to the extent possible, and attaches economic values where feasible

Design Measures: Sets out the basis for selecting the particular project design proposed

Annexes

List of the individuals or organizations that prepared or contributed to the environmental and social assessment; References; Record of meetings, consultations and surveys with stakeholders; Tables presenting the relevant data referred to or summarized in the main text; List of associated reports or plans

Annex 6: Waste Management Plan Guideline

Generally, waste management or waste disposal includes the process and actions required to manage waste from its generation to its final disposal. This includes the collection, transport, treatment, and disposal of waste, together with monitoring and regulation of the waste management process and waste-related laws, technologies, and economic mechanisms. Waste can be solid, liquid, or gases and each type have different methods of disposal and management. Waste management deals with all types of waste, including industrial, biological, household, municipal, organic, biomedical, radioactive wastes. In most cases, waste poses a serious risk to human health. Health issues arise directly through the handling of solid/liquid waste, indirectly through the consumption of contaminated water, soil, and food. Wastes are produced by human activities during extraction and processing of raw materials, production and consumption of goods. Hence, preparing waste management plan mainly to avoid or reduce adverse effects of wastes on the environment and human health.

The implementation of development project activities will generate various types of wastes (liquid and solid) that can cause unintended harmful impacts on people and the environment in project sites and beyond. This generic waste management plan will serve as a guideline to prepare project specific waste handling and management plan during planning, implementation and operations of the specific project activities.

The Governance Modernization to Enable Efficient Service Delivery Project will have likely potential Environmental Health and Safety (EHS) risks and impacts mainly associated with the project components of Supporting Civil Service Efficiency (Component 1), Improving Domestic Revenue Mobilization (Component 2) and improving Public Finance Management systems and functions as well as enabling more responsive governance (Component 3). The component activities will require digital solutions, including the procurement & installation of ICT infrastructure such as hardware & software programs and operating systems. Thus, the main EHS risks and impacts will emanate from generation of E-waste as a result of system overhaul, hardware and software deployment and installation. E-wastes associated EHS risks include pollution of air, water and soil. Besides, under Component 2, a new Tax-Data Warehouse will be constructed within the compound of the MoR. Since there will be various types of wastes (non-hazardous and hazardous) expected to be generated from the construction site, the disposal and management requires appropriate management plan in order to mitigate the EHS risks from air, soil and water pollution. **The project will potentially generate construction related wastes and E-wastes.**

(A) Construction/Generic Waste Management Plan

Construction/refurbishment works produce wastes from earth excavations, construction materials, machinery operations, utilization of concrete/cement during construction, paintings, packaging materials, fuel tankers, storage structures, wooden debris, metal scraps, demolitions, utility installations, etc...The wastes produced during implementation and operations will include, but not limited to, the following:

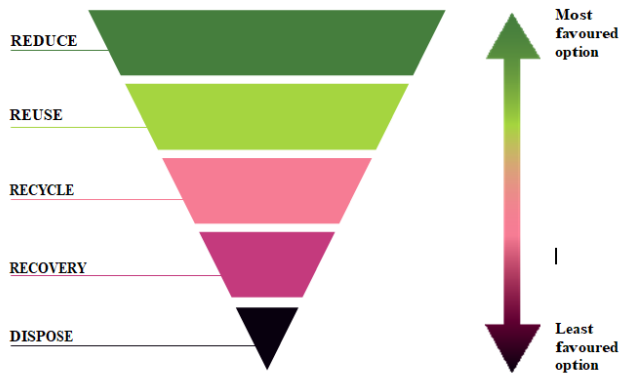
- Littering materials, excavated soil and rocks from excavation and earthworks;
- Packing/containers for various construction materials and plastics; metal scraps, nails,
- Used/waste oil, filters, lubricants and hydraulic fluids and containers of fuel, and paint;
- Used lumber for trenching works, scaffolding material, packing material;
- Waste generated by demolition of temporary facilities, breaking of existing concrete surfaces etc,
- Waste from on-site water use facilities (flow of waste water, overflow, washing facility, etc...),

- Construction chemicals (concrete drying and crack sealants chemicals)
- Domestic waste generated by construction workers, construction facilities, and
- Sanitary wastes from camps, offices, cafeterias, sewages, etc.

The above listed types of wastes require proper management and handling plan, especially because of the risks posed on surface and ground water facilities, in the form of runoff and percolation processes through the sub-soil, as well as soil pollution around the construction sites and beyond. Hence, waste management actions should be taken to collect, segregate, store, transport and dispose by following applicable standards (WB EHS standards), regulations (Solid Waste Management Proclamation, Proc. No. 513/2007; the Environmental pollution Control Proclamation, Proc. No. 300/2002; the Hazardous Waste Management and Disposal Control Proclamation, Proc. No. 1090/2018)

The General Waste Management Practice

The general Waste Management Practice prioritizes the most favored efforts of managing wastes from the generation to the final disposal as shown in the diagram below. The first priority is to avoid the generation of waste from the start followed by putting the maximum efforts to reduce/minimize the amount of to be generated, and to encourage reuse, recycle and recover usable components of waste. The last resort for unrecoverable and no-end-use waste is to dispose safely in designated waste disposal sites. The hierarchy shown in the below diagram is generally applied in waste management practices.



For construction waste, the following are the general practices:

- Construction wastes shall not be allowed to accumulate on the construction site but shall be collected promptly and removed regularly from the site;
- Random disposal of solid waste are strictly prohibited;
- Provide sufficient number of garbage bins and container at all construction sites;
- Place waste materials and store in suitable containers. Maintain storage areas and containers in a sanitary condition and cover to prevent spreading of wastes by water, wind or animals;
- Place and/or dispose all organic and inorganic materials so as not to directly or indirectly impact any watercourse or groundwater

- Solids, waste water and other pollutants generated as a result of construction should be disposed of in a manner that prevents their direct or indirect discharge to any watercourse or ground waters;
- Any waste material that is inadvertently disposed in or adjacent to watercourses shall be removed immediately in a manner that minimizes adverse impacts, and the original drainage pattern will be restored; and
- All wastes which are not designated as combustible waste to be burned on-site, shall be recycled, disposed of in an approved landfill, or transported to an approved disposal facility.

Procedures of managing construction wastes:

Collection and Handling: it is required that all wastes generated from the project sites shall be:

- Characterized according to their composition, source, and type of wastes produced, disposal methods;
- Handled in accordance with its class (hazardous or non-hazardous) ;
- Segregated at source and contained in appropriately labeled and/or color coded (green for all recyclables, yellow for general waste and red for hazardous waste) waste containers or waste storage boxes/bags

Transporting: Transport all wastes from source to storage facilities and final disposal sites in the appropriate manner, taking the following into account:

- The nature, composition and integrity of transport packaging and containers shall be appropriate to the type and class of waste being transported.
- Transport vehicles will cater for the type, class and quantity of waste being transported in terms of its composition, load capacity, covering etc.
- Loading and unloading procedures to avoid waste loss shall be followed
- Provided training to personnel in the correct procedure to address accidents and emergencies.
- Personnel must be given the right PPE for waste handling and transporting to storage or disposable sites

Storage and Segregation: Collect hazardous and general (non-hazardous) waste at source and transport for storage at temporary or permanent storage facilities. These storage facilities shall be appropriately designed i.e. appropriate flooring/ lining, covered (to protect from direct sunlight, wind and rain) if necessary, and bundled where required to contain accidental spills or leaks. The following procedures shall be undertaken during storage and handling:

i). For general (non-hazardous) waste

- Store general wastes at a temporary storage facility in large skips (designed, registered and operated to store general waste),
- Design temporary storage facility in accordance with the necessary national legislations
- Segregate wastes wherever appropriate. Separate storage areas shall be constructed and utilized where appropriate.
- If a hazardous waste is mixed with non-hazardous waste, the entire consignment will be regarded as hazardous.
- Protect temporary waste storage facilities/ landfill sites from access by the public, livestock and/or local fauna (e.g. birds, rodents).

ii). For hazardous wastes: these are substances/wastes that have the potential to cause adverse effects or damage to human or animal health, the environment, biodiversity, and property. For such wastes, in addition to the general waste, the following measures shall be applied to store hazardous wastes:

- Appropriately design temporary hazardous waste storage facility to prevent any contamination to biophysical environment;
- Where appropriate, store hazardous waste in sealed containers and place them in a fenced and gated storage facility that is secured by a security guard. The facility shall have a concrete floor and be covered to prevent rain from entering.

Storage facilities for hazardous waste shall have the following precautionary measures:

- Materials and equipment for fire-fighting purposes and mountings for fire extinguishers;
- Cleaning equipment and a system for flushing out ducts, receptacles and containers;
- Sufficient quantities of absorbent material to absorb or collect any spilled or leaking waste;
- All areas shall be tightly sealed in such a way that there is no risk of soil or groundwater becoming contaminated.
- Fencing must be erected to prevent access by the public, livestock and/ or local fauna.
- Appropriate signage shall be erected in the various waste areas

Procedures for Waste Management by Open Burning: the recommended measures include:

- Open burning must be planned so that it does not adversely affect local residents and construction workers
- Locate open burning site at least 1 km from settlement areas;
- Burn on site only wastes which are not designated as combustible;
- Employ burning methods that will prevent heat or smoke damage to all vegetation;
- The use of waste oil and/or tires as fire accelerator is not permitted; and
- To protect the groundwater from pollution by leachate, burning in a waste disposal site shall be thorough and complete and impermeable clay be placed and compacted at the base of the disposal sites.

Procedures for Waste Management by Disposal: the recommended measures include the following:

- All of waste materials generated during construction shall be collected and disposed where necessary in authorized areas incorporating recycling systems and the separation of materials;
- Recyclable materials such as wooden plates for trench works, scaffolding material, packaging material, etc. shall be collected and separated on site from other waste sources;
- Clean up landfill releases to prevent groundwater pollution and compact and cover dumped waste frequently with several inches of soil to reduce odor, to control insects and rodents and, finally, to protect public health;
- Control placement of all construction wastes at approved disposal sites (at least 300m from water bodies)
- A perimeter fence shall be constructed at the burning and disposal sites to protect the nearby residents including children and stray animals from intruding and roaming around in searching any usable items and being exposed to a higher health risk;
- Rehabilitate those areas used to bury waste and when parts of the waste disposal area are full, they shall be covered by a minimum depth of 1.5 m of soil;
- A sign shall be placed at convenient locations around the site indicating the installation is a waste disposal site with potential health hazard, and wording used that discourages trespassing; and
- Collected waste shall be disposed of properly through a licensed waste collector.

Procedures for Concrete and Related Wastes Management: recommended measures include

- Containers or trucks carrying cement or fresh concrete shall be washed only at designated site
- Concrete waste, including wastewaters from batching or cleaning, will only be disposed of at approved and designated disposal sites.
- All cement-contaminated wastewater from cleaning or mixing is to be considered toxic, and must be prevented from entering any watercourse.

Table 1. Management Plan for Construction/Generic wastes. All site specific waste management plans will follow WB ESHGs and GIIP procedures in addition to local laws and regulations

Risks and impacts	Mitigation measures	Indicators	Responsibility	Monitoring	Frequency of monitoring
Construction Phase					
Tax-data warehouse construction waste	<p>Disposal of construction wastes including liquid and solid wastes and debris according to local regulations and GIIP procedures</p> <p>Final disposal will be on authorized sites and in line with GIIP as possible</p> <p>Substitute raw materials or inputs with less hazardous or toxic materials, or with those where processing generates lower waste volumes</p> <p>Take procurement measures that recognize opportunities to return usable materials such</p>	<p>Records of collections and disposals;</p> <p>No. of grievance cases filed;</p> <p>No. of procurement measures taken</p>	Contractor	MoF	Monthly

Water pollution (surface and ground)	as containers and which prevents waste and debris over ordering of materials				
	Disposal of construction debris to avoid water pollution according to GIIP and local regulations	No. of grievances filed in regard to groundwater pollution	Contractor	MoF	Monthly
	Handling, storage and disposal of used oil according to GIIP and local regulations	Amount of debris that is disposed properly			
	Disposal of wastewater /from cement mixers at the construction site according to local regulations and GIIP procedures	No. of oil spills and leakages reported			
Used oil spill pollution from trucks and machineries	Storage, handling and disposal of oil and oil wastes according to GIIP and local regulations	No. of oil spills and leakages reported	Contractor	MoF	Monthly
	Maintain vehicles and equipment	No. of vehicle maintenance logs available			
	Maintenance of construction vehicles should be carried out in the Contractor's	No. of vehicles with appropriate maintenance			
		No. of vehicles maintained in the camp			

Workmanship	camp or at appropriate location				
	Provide proper sanitation facilities on site and in workers' camp	No. of sanitation facilities on site No. of sanitation facilities in camp	Contractor	MoF	Monthly
OHS	Train workers appropriately on OHS risks, hazards and safe handling of equipment and procedures, based on EHS Guidelines on OHS	No. of trainings conducted for workers No. of workers issued with appropriate PPE	Contractor	MoF	Throughout subproject implementation
	Provide appropriate PPE, continuous reminders to use PPE, use of signage and continuous supervision, based on EHS Guidelines on OHS	No. of workers grievances filed and responded to			
	Communicate and implement workers' GRM	No. of C-ESMPs that include OHS measures No of bidding documents that include OHS requirements			
	Develop and implement C-ESMP including OHS				
	Implement Labor Management				

Community Safety	Procedures (LMP)				
	<p>Include OHS requirements into bids and contracts</p> <p>Contractor bid and contract to include various OHS requirements</p>				
Demobilization	Disposal of solid and sanitary waste at construction site of disposal sites according to GIIP	No. of identified sites for appropriate solid and sanitary waste disposal	Contractor	MoF	Monthly
	Design and locate latrines prudently	No of latrines available			
	Have communal facilities				
Demobilization	Clean-up site after construction	No. of sites clean up after rehabilitation	Contractor	MoF	After subproject is finalized
	Remove all debris	No. of sites with all debris removed in an appropriate manner			
	Remove to original condition	No. of sites that have been returned to their original condition			

(B) E-waste Management Plan

E-waste materials generally are those electronic materials that have reached end-of-life or end-of-use stages and equipment that need current or electro-magnetic fields in order to function properly. This covers a broad range of electronic devices, ranging from large household appliances, ICT equipment, lighting equipment, medical devices, monitoring and control instruments, automatic dispensers, and consumer electronics, such as electrical and electronic tools, toys, leisure and sports equipment, and mobile phones and computers. Components of electric and electronic equipment (EEE), such as batteries, electric cables from end-of-life vehicles (ELVs), printed circuit boards (PCBs), plastic casings, cathode-ray tubes (CRTs), activated glass, and lead capacitors are also classified as e-waste. Possible e-wastes to be generated from the Governance Modernization to Enable Efficient Service Delivery Project may include computers, scanners, printers, servers, copiers, electric cables, cell phones, backup generators, etc.

Electronic wastes contain substances that are toxic and hazardous to the environment and humans health, which are sourced from electronic materials such as Cathode Ray Tube (CRT), insulation, plastic, circuit boards, batteries, rubbers, Liquid Crystal Display (LCD), florescent lamps, etc. that can release potentially toxic substances such as lead, mercury, cadmium, and beryllium as shown in the Table below. E-waste also contains precious and special metals, including gold, silver, palladium, and platinum. Therefore, responsible end-of-life management of e-wastes is imperative in order to recover valuable components and properly manage hazardous and toxic components. End-of-life management of e-waste includes reuse of functional electronics, refurbishment and repair of electronics, recovery of electronic components, recycling e waste, and disposal.

Table 2. Toxic substances likely to be released from e-waste products

Component of E-waste	Possible hazardous waste
Plastic Phthalates plasticize	Brominated Flame Retardant (BFR)
Insulation	Insulation ODS in foam, asbestos refractory ceramic fiber
CRT (Cathode ray Tube)	Lead, Antonyms, Mercury, Phosphorous
LCD (Liquid Crystal Display)	Mercury
Rubber	Phthalates plasticize, BFR
Wiring/ Electrical	Phthalate Plasticize, BFR, lead
Circuit Board	Lead, Beryllium, Antimony, BFR
Florescent Lamp	Mercury Phosphorus
Flame Retardant Batteries	Lead, Lithium, Cadmium, Mercury
Thermostat	Mercury
External Electrical cables	BFRs, Plasticizers
Electrolyte Capacitor (over L/D 25mm)	Glycol, other unknown substances

Therefore, reusing, refurbishment, or repair of electronic products is most desirable since this option increases the life span of the electronic products and higher resource efficiency. The consequences of improper e-waste disposal in landfills or other non-dumping sites pose serious threats to current public health and can pollute ecosystems for the generation to come. When e-wastes are improperly disposed and end up in landfills, toxic chemicals are released, impacting the earth’s air, water, food systems and ultimately the human health.

The negative effects of E-waste

Effects on Air: when e-waste is informally disposed; by dismantling, shredding, or melting the materials, releasing dust particles or toxins, such as dioxins, into the environment that cause air pollution and damage respiratory health. E-waste of little value is often burned, and burning is also a way to extract valuable metal from electronics, like copper. Chronic diseases and cancers are at higher risk to occur when burning e-waste as it also releases fine particles, which can travel thousands of miles, creating numerous negative health risks to humans and animals.

Effects on Soil: the improper disposal of e-waste in regular landfills or in places where it is dumped illegally, both heavy metals and flames retardants can seep directly from the e-waste into the soil, causing contamination of underlying groundwater or contamination of crops that may be planted nearby or in the area in the future. When the soil is contaminated by heavy metals, the crops become vulnerable to absorbing these toxins, which can cause many illnesses and may reduce the productivity of the farmland. The large particles released from burning, shredding, or dismantling e-waste, quickly re-deposit to the ground and contaminate the soil.

Effects on Water: soil contamination by e-waste constituents of heavy metals such as Mercury, Lithium, Lead, and barium will lead to seepage of the heavy metals to reach groundwater. Then, they eventually make their way into ponds, streams, rivers, and lakes. Through these pathways, acidifications are created in the water, which is unsafe for animals, plants, and communities even if they are miles away from a recycling site.

Effects on Human: the health effects of the toxins such as Mercury, Lead, Cadmium, Poly-brominated flame retardants, Barium, and lithium, on humans include brain, heart, liver, kidney, and skeletal system damage. It can also considerably affect the nervous and reproductive systems of human body, leading to diseases and birth defects. Furthermore, when e-waste is dismantled plastic materials are burnt, metals are recovered through chemical processes and discarded parts are disposed of on land or water under unsafe manner.

The appropriate handling of e-waste can both prevent serious health and environmental damage and recover valuable materials, especially for common metals and precious metals. The recycling chain for e-waste is classified into three main subsequent steps: i) collection; ii) sorting/dismantling and pre-processing (including sorting, dismantling and mechanical treatment); and iii) end processing. All three steps should operate and interact in a holistic manner to achieve the overall recycling objectives.

E-Waste Management Procedures

E-waste can be managed as per the provisions provided in the Regulation No. 425/2018 on E-Waste Management, the Environmental Pollution Proclamation No. 300/2002 and the Hazardous Waste management and Disposal Control No. 1090/2018, in addition to the WB ESHGs and the GIIP procedures.

E-waste Minimization and Prevention: the following set of measures can be taken to prevent and/ or minimize the quantities of e-waste generated and the hazards associated with e-waste.

- Procure electronic devices from credible manufactures to avoid purchasing second hand, refurbished, or obsolete devices with a short shelf life or already categorized as e-waste. In order to achieve this, project related Information and Communication Technology (ICT) procurement shall be done according to the World bank procurement procedures and GIIP in the ICT sector.

- Instituting good housekeeping and operating practices, including inventory control to reduce the amount of e-waste resulting from materials that are out-of date, off specification, contaminated, damaged, or excess to operational needs; and
- Minimizing hazardous e-waste generation by implementing stringent waste segregation to prevent the co-mingling of non-hazardous and hazardous e-waste to be managed.
- Instituting procurement measures that recognize opportunities to return usable materials.

E-waste Recycling, Recovery, and Reuse: operational assessment of end-of-life equipment shall be conducted by running appropriate tests to assess the functionality when replacing or retrofitting project related equipment. A sample of a functionality test shall be conducted (See Table 3) and the total amount of e-waste may be significantly reduced through the implementation of reuse and recycling plans.

Table 3. Sample Functionality Test for Used Computing Equipment for environmentally sound material recovery and recycling of end-of-life computing equipment

Computing Equipment	Functionality Test	Test Result
Central Processing Units (CPUs) including desktop PCs routers, and other equipment.	Power on Self-Test (POST) Switch on the computer and successfully completing the boot up process. This will confirm that the principal hardware is working, including power supply and hard drive. <ul style="list-style-type: none"> • A working monitor will need to be used if non-present. • Ensure that cooling fans are functioning. • Remove dust as much as possible (e.g. delicately using a vacuum cleaner is possible), in order to ensure better cooling and stable operation. 	Computer should boot up successfully. Computers should respond to keyboard and mouse input. Cooling fans should operate normally. No strong mechanical sound denoting end-of-life of fan
Cable and power cords	Assess cable insulation inspect plugs	Cabling and plugs should be completed and free of damage e.g., has no cracked insulation. Any detachable with damage should be replaced by a new one to avoid electric shocks or premature failures
Components (removed from equipment) including motherboard, other circuit boards, sound cards, graphic cards, hard drives power supplies and cords/cables)	Components should be gently wiped from dust to improve thermal exchange and allow better cooling. Components should be tested for functionality either before removal from the host computer or laptop, by insertion	Components should be fully functional Power supplies and cords/cable should be complete and free of damage e.g., has no cracked installation. Any detachable cable with damage should be replaced by a new

	in a test bench computer using diagnostic software, or a known working device as applicable	one to avoid electric shocks or premature failures.
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E-waste Storage: MoF/NPCU staff and consultants/contractors shall ensure that the storage of project related e-waste is being conducted in accordance with the national laws and regulations, GIIPs guidelines, and the World Bank EHS Guidelines containing measures on hazardous waste. E-waste shall be stored in a way that prevents and controls accidental release to natural resources (air, soil, and water). The following measures are to be followed in the storage of e-waste.

- Temporary storage containers shall be available on site until transported into their final storage location.
- E-waste shall be stored in closed containers, each depending on type and composition away from direct sunlight, rain, wind, electrical fixtures, water systems and in an area where ventilation system is not circulated to other rooms or facilities.
- E-waste shall be stored in an appropriate manner preventing the mixing or contact between different sorts of e-waste and in a separate location from solid waste.
- The storage arrangement shall allow for inspection between containers to monitor leaks or spills.
- The contractor, employees involved in the e-waste management, and the disposal or recycling enterprises shall provide their personnel with training and induction on the proper handling of e-waste.
- Employees involved with e-waste management shall be provided with the appropriate Personal Protective Equipment (PPEs),
- Containers with different types of e-waste shall be correctly labeled, with a datasheet attached and specified for each type including number of containers, units within each container, type, weight, hazardous material content (Lead, Mercury, etc....), date of collection, e-waste management personnel name, receiver, and final disposal method.
- Conduct periodic inspection/monitoring of e-waste storage area and document the findings (See Table 4).

E-Waste Transportation: all e-waste containers designated for off-site transport shall be secured in the designated storage location and shall be labeled with the contents, associated hazards, receiver, destination, and other information. E-waste shall then be properly loaded onto the transport vehicles in accordance with OHS guidelines on loading and unloading, specified in the World Bank EHS Guidelines, GIIP guidelines.

E-waste Treatment and Disposal: in cases when e-waste is still generated after the implementation of feasible e-waste prevention, reduction, reuse, recovery and recycling measures, e-waste materials should be treated and disposed of, and all measures should be taken to avoid potential impacts to human health and the environment.

Annex 4. E-waste storage inspection and monitoring form template

E-Waste source	Hazardous content	Segregated	Stored	Recycled/Reused/Recovered	Disposed	Satisfactory
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<p>Barium can cause brain swelling, muscle weakness, damage to the heart, liver, and spleen.</p> <ul style="list-style-type: none"> • Pollution of water bodies <p>(Ground and surface water pollution).</p>	<p>Establish E-Waste collection points in all project sites, including collection bins/receptacles.</p> <p>Conduct awareness and sensitization targeting the users of the electronic devices to ensure that they engage in best practice for E-waste management.</p>	<p>and licensed hazardous waste landfills/disposal facilities.</p>	
<ul style="list-style-type: none"> • Pollution of land resources including landfills <p>(Soil contamination if not disposed of carefully)</p>	<p>Procure Electronic devices from credible manufactures to avoid purchasing second hand, refurbished or obsolete devices with a short shelf life or already categorized as E-Waste. If possible, select sources offering repair and take back schemes. Ensure insurance coverage and electronic physical protective devices are fitted.</p> <p>Reuse or Recycle all E-waste.</p> <p>Establish E-Waste Collection Centers in all project sites, including collection bins/receptacles.</p> <p>Use licensed hazardous waste contractors and licensed hazardous waste landfill sites/disposal facilities.</p> <p>Create and maintain records of all E-waste items for disposal, securely store and</p>	<p>Warranty and take back schemes for Electronic Devices purchased.</p> <p>Credibility of manufacturers supplying the electronic devices.</p> <p>Availability of E-waste receptacles in each project site.</p> <p>Number of awareness and training conducted for users of electronic devices on E-waste</p> <p>E-waste certificates of disposal using licensed hazardous waste contractors and licensed hazardous waste landfills/disposal facilities.</p>	<p>MoF/NPCU</p>

	<p>prepare for shipment correctly.</p> <p>Conduct awareness and sensitization targeting the users of the electronic devices to ensure that they engage in best practice for E-waste management.</p>		
<p>Growth of informal E-waste disposal centres.</p> <p>Improper and indiscriminate disposal of E-waste is likely to lead to the exponential increase of informal waste disposal centers in communities near project sites which may further exacerbates the problem of E-waste.</p>	<p>Procure Electronic devices from credible manufactures to avoid purchasing second hand, refurbished or obsolete devices with a short shelf life or already categorized as E-Waste. If possible, select sources offering repair and take back schemes. Ensure insurance coverage and electronic physical protective devices are fitted.</p> <p>Reuse or Recycle all E-waste.</p> <p>Establish E-Waste Collection Centres in all project sites, including collection bins/receptacles.</p> <p>Use licensed hazardous waste contractors and licensed hazardous landfill sites/disposal facilities.</p> <p>Create and maintain records of all E-waste items for disposal, securely store and prepare for shipment correctly.</p>	<p>Warranty and take back schemes for Electronic Devices purchased.</p> <p>Credibility of manufacturers supplying the electronic devices.</p> <p>Availability of E-waste receptacles in each project site.</p> <p>Number of awareness and training conducted for users of electronic devices on E-waste.</p> <p>E-waste certificates of disposal using licensed hazardous waste contractors and licensed hazardous waste landfills/disposal facilities.</p>	<p>MoF/NPCU</p>

	Conduct awareness and sensitization targeting the users of the electronic devices to ensure that they engage in best practice for E-waste management.		
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Annex 7. Chance Find Procedures

While implementing the sub-project activities of GMEESD under components 1, 2, and 3, there is potential possibility to encounter structures, archeological features, sacred artifacts, etc... that are of cultural heritage, historical monuments, religious and national significance. Cultural heritage encompasses tangible and intangible heritage, which may be recognized and valued at a local, regional, national or global level. *Tangible cultural heritage*, which includes movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Tangible cultural heritage may be located in urban or rural settings, and may be above or below land or under the water. *Intangible cultural heritage*, which includes practices, representations, expressions, knowledge, skills—as well as the instruments, objects, artifacts and cultural spaces associated therewith— that communities and groups recognize as part of their cultural heritage, as transmitted from generation to generation and constantly recreated by them in response to their environment, their interaction with nature and their history.

In the event that during construction of the Tax Data Warehouse at the MoR, and other renovation works during ICT infrastructure installation and system overhaul, resources or artifacts of cultural value are found, the following procedures for identification, protection from theft, and treatment of discovered artifacts should be followed and included in standard bidding documents. These procedures take into account requirements related to Chance Finding under national legislation including Proclamation No. 209/2000 on research and conservation of cultural heritage.

- Halt the construction activities in the area of chance find temporarily.
- Delineate and secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a guard shall be arranged until the responsible local authorities take over. These authorities are the local Culture and Sports office and the local Peace and Security.
- Notify the relevant MoF/NPCU or PIU staff and the local Culture and Sport office immediately. The MoF/NPCU staff will inform the higher level management.
- The relevant local culture and sport office shall promptly carry out the necessities and inform the Ministry of Culture and Sports immediately from the date on which the information is received.
- The Ministry of Culture and Sports would be in charge of evaluation /inspection of the significance or importance of the chance finds and advise on appropriate subsequent procedures.
- If the Ministry of Culture and Sports determines that chance find is a non-cultural heritage chance find, the construction process can resume.

- If the Ministry of Culture and Sports determines chance find is an isolated chance find, the Ministry of Culture and Sports would provide technical supports/advice on chance find treatment with related expenditure on the treatment provided by the entity report the chance find.
- Relevant findings will be recorded in World Bank Implementation Supervision Reports (ISRs), and Implementation Completion Reports (ICRs) will assess the overall effectiveness of the project's cultural property mitigation, management, and activities, as appropriate.

Annex 8. Labor Management Procedures (LMP)

1. Overview of Labor Use on The Project

1.1 Number of Workers

Identifying the nature of the employment relationships with the project workers is important to categorize and estimate the number of workers appropriately for the LMP. As per the ESS2, an employment relationship exists when a person performs work or provides services for the project under certain conditions in return for remuneration. Given the labor requirement for the different subproject activities, the types of project workers are categorized as direct workers, contracted workers, and primary supply workers. This LMP is a living document, developed during Ethiopia Governance Modernization to Enable Efficient Service Delivery project preparation and will be reviewed and updated throughout project implementation period, as and when needed.

Direct workers are the workers with whom the project implementing agencies (MoF, CSC, and MoR) have a directly contracted employment relationship and specific control over the work, working conditions, and treatment of the project worker. Component 4 will include the recruitment of crucial experts for the management, coordination, and monitoring and evaluation (M&E) of the project implementation activities including the implementation of the ESMF (comprising, as annexes, LMP, SMP, HUPPF, CFP, and SEA/SH Prevention and Response Action Plan). The required expertise includes project managers, environmental and social safeguards specialists, technical leads or ICT staff running the day-to-day operation of the digitalization system, financial management specialists, procurement specialists, M&E specialists, and non-technical staff such as secretaries and drivers. In addition to the PIUs in the MoF, CSC, and MoR, dedicated environmental and social focal persons are required in the MoH, MoA, AABE, and the respective line Regional Bureaus. Based on these labor requisites, the estimate of the number of direct workers is given in Table 1 below.

Contracted workers are workers employed or engaged by a third party to perform work or provide services related to the core functions of the project, where a third party exercises control over the work, working conditions, and treatment of the project worker. Core functions of the project constitute those production and/or service processes essential for a specific project activity without which the project cannot continue. The activities of all the project components involve core functions that require engaging contracted workers. Supporting Civil Service Reform (Component 1), Sustaining and Deepening PFM Reforms (Component 2), and GovTech for Better Service Delivery (Component 3) have digitalizing sub-project activities such as financing support for functional, technical, and software designs/digital platforms and associated staff capacity-building activities and regular maintenance services. All three components have activities (e.g. competency-based human resource management, behavioral changes, supporting the accountancy profession, and strengthening change management strategy) that necessitate the use of technical services. These are core functions that will require the project to engage contractors competent to supply the necessary technical and labor services. Component 2 has a subproject with construction works requiring the project to engage civil work contractors (sub-contractors, site engineers,

labor workers, etc.) and supervising engineers. The exact sub-project activities are not defined yet. Hence, the estimated number of the contracted workers is stated in the table below.

Primary supply workers are workers employed or engaged by a primary supplier, providing goods and materials to the project, over whom a primary supplier exercises control for the work, working conditions, and treatment of the person. All the project components involve the use of goods and equipment. Components 1, 2, and 3 have sub-project activities involving a mass procurement of supportive infrastructure and digital tools. The civil work activities and establishment of a Competency Assessment Center under the CSC and Ethiopian Institute of Certified Public Accountants include procurement of a large amount of goods and equipment. Further, all components have sub-project activities that require the supplies of office equipment and secretarial materials. As per the government procurement policy, therefore, the project will bid for the Primary Suppliers that provide the necessary goods and equipment for the project on an ongoing basis. Given this, the table below gives an estimate of the number of Primary Supply workers.

Table 1: Estimated number of project workers

Category	Estimated Number
Direct workers	
NPCU staff in the MoF; PIUS' staff in the CSC, and MoR	100
E&S Safeguards focal persons in the MoH and MoA	4
E&S Safeguards focal persons in the respective Regional Bureaus	100
Contracted workers	500
Primary Supply workers	350
Total	1054

1.2 Characteristics of Project Workers

The likely characteristics of the project workers are described based on the nature of work required in the project as categorized above. In addition, Labor Force and Migration Surveys are the most important sources of data that provide information regarding the characteristics of the labor force in a country. Hence, the 2021 Ethiopia Labor Force and Migration Survey (ELFMS) findings are used as a source of information to provide the likely characteristics of project workers. The proposed project activities are largely implemented at the ministerial and line regional bureaus. This means that the project locations are Addis Ababa, Dire Dawa, and other regional capitals. As Per the findings of the 2021 ELFMS, the formal and informal labor forces in the major towns comprise an overwhelming percentage of migrant workers, people who have migrated from one part of the country to another for employment. Based on this fact, it is likely that the national migrant workers compose the majority of the project workers for all categories. As described earlier, the types of work for direct workers and contracted workers demand people with high educational or technical competency. As assessed in the 2020 Ethiopian Urban Employment and Unemployment Survey, these are the types of occupations dominated by male workers. Hence, it is likely that the composition of direct workers and contracted workers will be largely male. On the other hand, the labor workers and the types of labor requirements for Primary Supply workers are likely to compose vulnerable individuals including children under the age of 14, migrant females, uneducated youth, unemployed, IDPs, and college graduates). Also, Primary Suppliers are likely to employ adolescents below the age of 18.

1.3 Timing of Labor Requirements

The recruitment of direct workers will be required in two terms. The key expertise (project managers, environmental and Social Safeguards specialists, financial management specialists, and procurement specialists) for the PIUs in the respective implementing agencies need to be on board at least a quarter before the commencement of sub-project activities. The recruitment of environmental and social safeguards focal persons in the MoH, MoA, and line Regional Bureaus will be required in the first six months after implementation. The services of contracted workers for the supportive infrastructure and functional, technical, and software designs in the MoF, CSC, and MoR will be required right after the project implementation launched and will continue at the line regional bureaus. The requirements for contracted workers for capacity-building activities parallel in the same way. The civil work contractors and sub-contractors will be required during the construction of a Tax Data Warehouse in the MoR and rehabilitation of existing facilities for ICT infrastructure deployment. The engagement of Primary Supply workers will be a quarter before the sub-project activities and continue throughout the project lifecycle as necessary.

2. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

All the project components have subproject activities with potential labor risks. However, the overall potential labor risk for the project is rated moderate. Key potential labor risks are identified below.

- The Civil Service Reform (Component 1), Public Financial Management Reform (Component 2), and GovTech for Better Service Delivery (Component 3) have digitalizing sub-project activities. These include undertaking activities related to ICT infrastructure development such as cable networks, installation of physical servers, and functional/physical structure. Component 2 has civil work sub-project activities (the construction of a tax data house in the MoR). The nature of such activities requires working in height, use of machinery, use of sharpened materials (e.g., nails), manual handling, specks of dust, vibration/noises, and moving/carrying loads. These may cause various OHS risks including falls from height, cuts/physical injuries, slips, pneumoconiosis, and eye irritation. However, the risks of these OHS risks are expected to be moderate.
- All the project components will involve a mass procurement of goods and equipment. Also, the civil work sub-project activities in Component 2 will involve the movement of construction materials. Both of these subproject activities will require the use of load and unload labor workers. Consequently, there will be the risk that Primary Suppliers and direct workers will use child labor or adolescents and other exploitative forms of labor such as the exploitation of migrants. Also, there will be the risk that women labor workers may be underpaid when compared to men, particularly in construction work.
- As described in Section 1.1, Components 1, 2, and 3 include subproject activities that require the engagement of contracted and Primary Supply workers. Component 4 will recruit direct workers. Hence, there is a likelihood of labor disputes. In particular, the risk of labor disputes is substantial for the contracted and Primary Supply workers.
- For the nature of activities highlighted in Section 1.1, it is likely the contracted and Primary Supply workers will largely compose vulnerable groups including migrant workers, uneducated youth, women household heads, and young school dropout girls with low awareness of OHS requirements and use of Personnel Protective Equipment (PPE).

3. BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

Provisions on Terms and Conditions of Work

As set out in Article 4 of the Ethiopian Labor Proclamation No. 1156/2019, 'worker' means a person who has an employment relationship with an employer. The provisions in this Article are relevant to the terms and conditions of work underpinning the categories of project workers identified in Section 1.1 by stipulating that:

- 1) A contract of employment shall be deemed formed where a natural person agrees directly or indirectly to perform work for and under the authority of an employer for a definite or indefinite period or piece of work in consideration of a wage.
- 2) A contract of employment shall specify the type of employment and place of work, the rate of wages, the method of calculation thereof, the manner and interval of payment, and the duration of the contract.
- 3) A contract of employment can be made in writing or without written consent.

Article 10 Sub-Article 1 sets out provisions on the terms and conditions of payment or wage that apply to the different categories of project workers identified in Section 1.1. Accordingly, a worker can be paid for a contract of employment that may be concluded for a definite period or piece of work in the case of:

- 1) The performance of a specified piece of work for which the employee is employed;
- 2) The performance of urgent work to prevent damage or disaster to life or property, to repair defects or breakdowns in works, materials, buildings, or plants of an undertaking;
- 3) An irregular work which relates to a permanent part of the work of an employer but performed on irregular intervals;
- 4) Seasonal works relate to the permanent part of the work of an employer but are performed only for a specified period of the year but which are regularly repeated in the course of the years; and
- 5) An occasional work that does not form part of the permanent activity of the employer but which is done intermittently.

Provisions on Determination of Wages

Depending on the terms and conditions of works described above, the following provisions on wages can apply to all categories of project workers.

- Wages means the regular payment to which a worker is entitled in return for the performance of the work that he/she performs under a contract of employment (Article 53).
- The amount of wages shall be determined as per the Regulation of the Council of Ministers or collective agreement between the employer and the employee (Article 55).
- Wages shall be paid at such intervals as provided for by law (every month), collective agreement, work rule, or contract of employment (Article 58)
- As stated in Article 56, unless agreed otherwise, wages shall be paid on working days and at the place of work. In the case where the day of payment falls on a weekly rest day or a public holiday, the day of payment shall fall on the preceding working day.

Provisions on Deduction from Wages

The provisions in Article 59 that state about deduction from wages apply for all categories of project workers:

- The employer shall not deduct from, attach, or set off the wages of the worker except where it is provided otherwise by law, collective agreement, work rules, in accordance with a court order, or a written agreement of the worker concerned (Sub-Article 1).
- Unless the worker expresses his consent in writing, the amount that may be deducted at any one time, from the worker's wage shall in no case exceed one-third of his monthly wage (Sub-Article 2).

Provisions on the Benefits:

The Ethiopian Labor Proclamation makes the distinction between direct workers who are paid wages every month and contracted and Primary Supply workers on some benefits who are not paid their wages on a regular monthly basis.

For instance, the following provisions invariably apply to all categories of the project workers:

- In addition to his normal wage, a worker who works over-time shall be entitled to overtime payment (Article 68).
- Unless otherwise determined by a collective agreement, a worker shall be entitled to a weekly rest period covering not less than twenty-four non-interrupted hours in the course of each period of seven days (Article 69).

Whereas, the scope of provisions on the following benefits are exclusive to direct workers:

- A worker who is paid on a monthly basis shall incur no reduction of his wages on account of having not worked on a Public Holiday (Article 74 Sub-Article 1).
- As per Article 77, workers are entitled to annual leave: Sixteen (16) working days for the first year of service and 16 plus one working day for every additional two years of service.
- Similarly, the scope of the provisions of the Ethiopian Labor Proclamation on entitlement to special leaves (such as leave for family events and union leave) and pension only apply to direct workers.
- Whereas, contracted and Primary Supply workers are not entitled to the aforesaid benefits. Rather, as stipulated in the Proclamation, the benefits for the contracted and Primary Supply workers shall be determined based on the collective agreement between the parties in the contract.

Provisions Related to Women under Ethiopia Labor Proclamation No. 1156/2019

The Ethiopia Labor Proclamation No. 1156/2019 recognizes further benefits addressing the special needs of women including provisions related to maternity leave, sexual harassment and violence. A provision acknowledging affirmative action to women is also included. Accordingly, women candidates who score equal points with men will have right to priority in competitions for employment, promotion and related opportunities.

Article 87 and 88 states provisions on the working conditions of women.

- Women shall not be discriminated against in all respects on the basis of their sex. Without prejudice to the generality of this provision, priority shall be given to women if they get equal result with men when competing for employment, promotion or any other benefit.
- It is prohibited to assign women on works that may be listed by the Ministry of Labor and Skills to be particularly dangerous to women or hazardous to their health.
- No pregnant woman shall be assigned to night work between 10 p.m. and 6 a.m. or be assigned on overtime work.
- She shall be transferred to another place of work if her job is hazardous to her health or to the fetus as ascertained by a physician.

Maternity Leave

A pregnant woman is granted a total of 120 days of maternity leave: 30 consecutive days of prenatal and 90 consecutive days of post-natal leave. It also granted leave for medical examination connected with her pregnancy, as confirmed with medical certificate. In addition, in case where a woman encounters miscarriage of pregnancy and it is confirmed by a medical certificate, the provisions for reduction of wage upon sickness will not apply. Despite the reduction of wage applicable on a worker who has been sick for more than a month, a woman who encounters miscarriage will be entitled to 6 months sick leave with payment of 100% of her salary.

Sexual Harassment and Violence

The Proclamation obviates the need for interpretation of sexual harassment and sexual violence by providing definitions. It also provides prohibitions and punishments specific to the acts. The commission of either or both of the two acts at workplaces either by the employee or employer may be used as grounds of termination of an employment contract without notice by the employer or the employee

respectively. Additionally, an employee who resigns on the ground of sexual harassment or violence is entitled to severance pay as well as a compensation amounting to 90 times the daily rate of the last week of service of the employee.

4. OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY

This section sets out the *key aspects* of the national labor legislation about occupational health and safety, and how national legislation applies to the different categories of workers identified in Section 1. The overview focuses on legislation that relates to the items set out in ESS2, paragraphs 24 to 30.

The Ethiopian Labor Proclamation has issued provisions on Occupational Health and Safety that are inclusive to direct, contracted, and Primary Supply workers. Accordingly, Article 92 stipulates the obligations of an Employer: An employer shall take the necessary measures to safeguard adequately the health and safety of workers. As further declared in the Sub-Articles 1-7, in particular, an employer is responsible to:

- Take appropriate steps to ensure that workers are properly instructed and notified concerning the hazards of their respective occupations, assign a safety officer, and establish an occupational health and safety committee.
- Provide workers with protective equipment, clothing, and other materials and instruct them on their use.
- Register employment accidents and occupational diseases and report the same to the labor inspection service in the Ministry of Labor and Social Affairs.
- Ensure that the workplace and premises of the undertaking do not pose threats to the health and safety of workers.
- Take appropriate precautions to ensure that all the processes of work in the undertaking shall not be a source or cause of physical, chemical, biological, ergonomic, or psychological hazards to the health and safety of the workers.
- Implement the OHS instructions given by the Competent Authority.

Benefits in the Case of Employment Injuries

As per the Ethiopian Labor Proclamation No. 1156/2019, where a worker sustains employment injury, the employer shall cover the following expenses, among others, include:

1. General and specialized medical and surgical care.
2. Hospital and pharmaceutical care.
3. Any necessary prosthetic or orthopedic appliances.

A worker who has sustained employment injury shall be entitled to:

- a. Periodical payment while he is temporarily disabled.
- b. Disablement pension or gratuity or compensation where he sustains permanent disablement.
- c. Survivors' pension or compensation to his dependent when he dies.

The Occupational Health and Safety risks can be mitigated through the following measures:

- i. Project beneficiaries will be trained on appropriate OHS practices to mitigate risks arising from unsafe practices related to use of tools and machinery to be financed by the project, and as part of promoting Good Agricultural Practices.

- ii. For direct workers and consultants, there will be an assessment of office facilities to ensure OHS risks, especially related to man-made causes (e.g., fires) and natural events (e.g., flash flooding, etc.) are appropriately considered and managed. There will also be procedures to manage OHS risks due to direct workers travelling to project sites by roads for works related to the project. Provision of necessary PPE will be ensured and awareness shall be created on potential OHS risks that may be encountered during project-related site visits by project staff.
- iii. Community workers will be trained on appropriate OHS practices to mitigate risks arising from use of various tools and equipment during labor intensive public works (e.e., rangeland restoration and soil and water conservation works).
- iv. During procurement of contractors, FPCU will avail the ESMF or any subproject ESMP to the aspiring contractors so that contractors include the budgetary requirements for occupational health and safety and community health and safety measures in their respective bids.
- v. Contractors will develop and maintain an occupational health and safety management plan that is consistent with the scope of work, duration of contract, Ethiopian OHS regulatory requirements, sub-project ESMP, WB EHSGs on Occupational Health and Safety, and any other conditions in contract bid or contract.
- vi. Contractors will adopt the sub-project ESMPs and where necessary develop Contractor's-Environmental and Social Management Plans (C-ESMPs) to help manage construction risks.
- vii. Contractors appoint an appropriately qualified Safeguard specialist whose responsibilities is to advise the employer on an Safety and Health related issues.
- viii. Contractors prepare task specific risk assessment (TRA) and safe working procedures (SWP) for executing works.
- ix. Contractors provide preventive and protective measures, including modification, substitution or elimination of hazardous conditions or substances informed by the TRA and SWP
- x. Contractor provides for appropriate training/induction of project workers and maintenance of training records on occupational health and safety subjects including TRA and SWP.
- xi. Contractor documents and reports on occupational accidents, diseases and incidents.
- xii. Contractor provides emergency prevention and preparedness and response arrangements to emergency situations including and not limited to: Workplace accidents; Workplace illnesses; Flooding; Fire outbreak; Disease outbreak; Labor unrest; and Security.
- xiii. Contractors to comply with all requirements of applicable occupational Health and Safety legislation and Environmental legislation including WB EHS guidelines.
- xiv. Contractors shall maintain all such records for activities related to the safety health and environmental management for inspection by the PCUs or the World Bank.

Handling cases of fatality and serious incidents

- xv. Cases of severe incidents will be notified to the World Bank office within 24 - 48 hours after learning of the incident or accident using World Bank Environmental and Social Incident Reporting Template (ESIRT).
- xvi. A detailed report of the incident will be provided within fifteen (15) days of occurrence of the accident. In the event of an occupational fatality or serious injury, the contractor shall report to WPCUs and consequently, WPCUs shall report to the RPCU and FPCU, for escalation to the World Bank as soon as becoming aware of such incidents, and inform the government authorities, local authorities/law enforcement office, in accordance with national reporting requirements.
- xvii. Corrective actions shall be implemented in response to project related incidents or accidents. Contractors in collaboration with the WPCU or, where relevant the contractor, will be required to conduct a root cause analysis for designing and implementing further corrective actions.

5. RESPONSIBLE STAFF

The functions and/or responsible individuals within the project depend on the types of project workers categorized in Section 1.1.

Table 2. Responsible Staff

Responsible Staff	Roles and Responsibility
<p>The Human Resource Development and Administration Directorate Director in the respective IAs</p>	<ul style="list-style-type: none"> • Engagement and management of direct project workers including the PIU staff and environmental and social safeguards focal persons in the respective project regions or branch offices. • Provide direct project workers with information and documentation that is clear and understandable regarding their terms and conditions of employment. • Design and implement OHS measures to address (a) the identification of potential hazards to direct project workers (b) the provision of preventive and protective measures (c) documentation and reporting of occupational accidents and (d) remedies for adverse impacts such as occupational injuries, deaths, disability, and disease. • Facilitate training for direct project workers based on plan and need assessments; coordinate and deliver short-term and long-term training for capacity building. • Address grievances and complaints raised by the direct project workers.
<p>The Project Implementing Unit in the respective IAs</p>	<ul style="list-style-type: none"> • Engagement and management of the Contractors. • Monitor the performance of the Contractors with contracted workers. As appropriate to the project, this may include: <ul style="list-style-type: none"> ✓ Review the personal records of the contracted workers and inspect for engagement of child labor and minimum age. ✓ Periodic audits, inspections, and/or spot checks of project locations or work sites and/or of labor-management records and reports compiled by the Contractor ✓ Regular inspection of records of workplace incidents and implementation of corrective OHS measures. ✓ Records of training provided for contracted workers to explain labor and working conditions and OHS for the project. ✓ Periodic audits and inspections relating to records of grievances raised by contracted workers and their resolution. • Monitor the Primary Suppliers' performance of labor-management procedures with the primary supplier workers including the above listed for the Contractors.

Contractors	<ul style="list-style-type: none"> • Engagement and management of the contracted workers, exercise control over the work, working conditions, and treatment of the contracted workers. • Provide training for the contracted workers to explain labor and working conditions and OHS for the project. • Inform the contracted workers about the project grievance mechanisms and how they work. • Addressing grievances raised by the contracted workers.
Primary Suppliers	<ul style="list-style-type: none"> • Engagement and management of the primary supply workers, exercise control for the work, working conditions, and treatment of the primary supply workers. • The Primary Supplier employer shall take the necessary measures to safeguard adequately the health and safety of the primary supply workers in compliance with the OHS requirements provided in the project LMP.

6. POLICIES AND PROCEDURES

Employers of all categories of workers should comply with the OHS requirements provided in the Ethiopian Labor Proclamation No. 1156/2019. In particular, Article 92 of the Proclamation sets out the obligations that apply to the employers of direct, contracted, and primary supply workers alike. Accordingly, an employer shall take the necessary measures to safeguard adequately the health and safety of workers; it shall in particular:

- Comply with the OHS requirements provided for in the Proclamation.
- Take appropriate steps to ensure that workers are properly instructed and notified concerning the hazards of their respective occupations, assign a safety officer, and establish an occupational health and safety committee.
- Provide workers with protective equipment, clothing, and other materials and instruct them on their use.
- Ensure that the workplace and premises of the undertaking do not pose threats to the health and safety of workers.
- Take appropriate precautions to ensure that all the processes of work in the undertaking shall not be a source or cause of physical, chemical, biological, ergonomic, or psychological hazards to the health and safety of the workers.
- Implement the OHS instructions given by the appropriate authority.

Likewise, the Proclamation includes provisions that require employers' records of occupational incidents and cooperation for monitoring the implementation of OHS instructions. The provision in Article 95 (Sub-article 4) stipulates requires employers to register occupational accidents (including fatal injuries and death) and occupational diseases and report the same to the labor inspection service. As per Article 178 (Sub-article 1), the Ministry of Work and Labor Skill or the appropriate Authority compliance with the provisions in the Proclamation shall assign labor inspectors who are authorized to carry out the responsibilities of follow-up and supervision of the OHS. The employers should provide the necessary information and cooperate with the labor inspectors in due process.

7. AGE OF EMPLOYMENT

Given the nature of workforce involved, the project will not recruit children for project related works and project monitoring will include this aspect.

The WB ESS2 states that the minimum age of employment is 14 years while the Ethiopian Labor Proclamation has extended the minimum year of employment to 15 years. However, both WB and Ethiopian law prohibits engagement of children under 18 years of age in works that have hazardous nature. The IAs of the Ethiopia Governance Modernization to Enable Efficient Service Delivery Project

will ensure that all project workers, including those engaged by contractors, will have the right to report and remove themselves from dangerous work situations without being subject to reprisal or negative action.⁶ This and other provisions of the LMP will be part of the awareness raising and training sessions of the project.

Generally, in cases of differences between the international conventions, national legislation, regulation, and the World Bank Environment and Social Standards, the more rigorous provision will be applied.

As specified in ESS2 and Ethiopian Labor Proclamation No. 1156/2019, alike “a child” refers to a person less than 15 years of age while “a young worker” means a natural person who has attained the age of 15 but is below the age of 18 years. In line with this requirement, a child shall not be engaged for employment on the project.

The LMP specifies the minimum age for employment or engagement in connection with the project as the age of 15. However, as set out both in the ESS2 and Ethiopian Labor Proclamation, a child over the minimum age and under the age of 18 will not be employed or engaged in connection with the project in a manner that is likely to be hazardous, interfere with the child’s education, or be harmful to the child’s health or physical, mental, spiritual, moral, or social development.

8. TERMS AND CONDITIONS

The World Bank’s ESF ESS2 and Ethiopian Labor Law set out provisions that are relevant to the terms and conditions for the employers and workers engaged in the project. The provisions in ESS5 (paragraph 10) are relevant for direct project workers. Accordingly, direct project workers will be provided with information and documentation that is clear and understandable regarding their terms and conditions of employment. The information and documentation will set out their rights under national labor and employment law (which will include any applicable collective agreements), including their rights related to hours of work, wages, overtime, compensation, and benefits, as well as those arising from the requirements of the ESS2. This information and documentation will be provided at the beginning of the working relationship, and when any material changes, to the terms or conditions of employment occur. The provisions in paragraphs 31-33 and paragraphs 39-42 require similar terms and conditions for contracted and primary supply workers, respectively.

Whereas, the Ethiopian Labor Proclamation No. 1156/2019 issued details of terms and conditions applicable to all categories of workers required in the project. Relevant terms and conditions include the following ones.

⁶ ESS2, paragraphs 26 and 27.

Mode and Execution of Payments

- **Mode of payment:** Wages shall be paid in cash, provided, however, that where the employer and workers agree, it may be paid in kind (Article 55 Sub-Article 1).
- **Execution of payments:** Unless agreed otherwise, wages shall be paid on working days and at the place of work (Article 56 Sub-Article 1). In case where the day of payment mentioned falls on weekly rest day or a public holiday, the day of payment shall fall on the preceding working day (Sub-Article 2).
- **Payment in person:** Unless otherwise provided by law or collective agreement or work rules, wages shall be paid directly to the worker or to a person authorized by him (Article 57).
- **Time of payment:** Wages shall be paid at such intervals as provided for by law or collective agreement or work rule or contract of employment (Article 58).
- **Deduction from wages:** The employer shall not deduct from, attach or set off the wages of the worker except where it is provided otherwise by law or collective agreement or work rules or in accordance with a court order or a written agreement of the worker concerned (Article 59).
- **Keeping record of payment:** The employer shall keep a register of payment specifying the gross pay and method of calculation of the wage, other remunerations, the amount and type of deduction, the net pay and other relevant particulars on which the signature of the worker is a fixed unless there is a special arrangement.

Hours of Work

- **Maximum daily or weekly hours of work:** “Normal hours of work” means the time during which a worker performs work or avails himself for work. Accordingly, the normal hours of work shall not exceed 8 hours a day or 48 hours a week (Article 61).
- **Arrangement of weekly hours of work:** Hours of work shall spread equally over the working days of a week, provided, however, where the nature of the work so requires, hours of work in any one of the working days may be shortened and the difference be distributed over the remaining days of the week without extending the daily limits of eight hours by more than two hours (Article 63).

Overtime Work

- Work done in excess of the normal daily hours of work shall be deemed to be overtime (Article 66 Sub-Article 1). A worker may not be compelled to work overtime, however, overtime may be worked whenever the employer cannot be expected to resort to other measures and only where there is: (a) accident, actual or eminent, (b) force-majeure, (c) urgent work, and (d) substitution of absent workers assigned on work that runs continuously without interruption (Article 67 Sub-Article 1).
- Article 68 stipulates, a worker who works over-time shall be entitled to payment in addition to his normal wage. As per Sub-Article 1, the rate of overtime payments are calculated as following: (a) in the case of work done between 6:00 am in the morning and 10:00 pm in the evening, at the rate of 1.5 multiplied by the ordinary hourly rate, (b) in the case of night time work between 10 pm in the evening and 6 am in the morning, at the rate of 1.75 multiplied by the ordinary hourly rate, (c) in the case of work done on weekly rest day, at the rate of 2 multiplied by the ordinary hourly rate, and (d) in the case of work done on a public holiday, at the rate of 2.5 multiplied by the ordinary hourly rate. Sub-Article 2 declares that payment for over-time work shall be effected on the day fixed for payment of wage and together with wage.

Weekly Rest

- As stated in Article 69, a worker shall be entitled to a weekly rest period covering not less than twenty-four non-interrupted hours in the course of each period of seven days. Unless otherwise determined by a collective agreement or work rule, the weekly rest day shall, whenever possible: (a) fall on a Sunday and (b) be granted simultaneously to all of the workers of the undertaking.
- Notwithstanding the provisions of this Article, where the nature of his task did not enable the worker to make use of his weekly rest day, the employer shall grant 4 working days of rest in a month.

Working Conditions of Women Workers

- As provided in Article 87: (1) women shall not be discriminated against in all respects on the basis of their sex (2) priority shall be given to women if they get equal result with men when competing for employment, promotion or any other benefit (3) no pregnant woman shall be assigned to night work between 10 pm and 6 am or be assigned on overtime work and (4) an employer shall not terminate the contract of employment of women during her pregnancy and until four months after her confinement.
- The provisions in Article 88 declares that: (1) an employer shall grant leave to a pregnant worker with pay, for medical examination connected with her pregnancy, provided, however, that she may be required to present a medical certificate of here examination (2) a pregnant worker shall, upon the recommendation of a physician, be entitled to a leave with pay and (3) a pregnant worker shall be granted a period of 30 consecutive days of leave with pay of pre-natal leave and a period of 90 consecutive days of leave post- natal.

Working Conditions of Young Workers

- Normal hours of work for young workers shall not exceed seven hours a day (Article 90).
- It is prohibited to assign young workers to work, which on account of its nature or due to the condition in which it is carried out endangers their lives or health (Article 89).
- Article 91 states that it is prohibited to assign young workers to (1) night work between 10 pm and 6 am (2) overtime work (3) work done on weekly rest days or (4) work done on Public Holidays.

9. GRIEVACNE MECHANISM

Workplace concerns are usually different from issues raised by project-affected parties and other stakeholders. In the course of project engagement, labor dispute may occur between a worker and an employer for various reasons including: in respect of the application of law; collective agreement; work rules; disciplinary measures including dismissal; claims related to the termination of employment contracts; claims related to hours of work, remuneration, leaves and rest day; claims related to the issuance of certificate of service and clearance; and claims pertaining to employment injury, training and other similar issues. This calls the LMP provide grievance mechanism for all direct workers and contracted workers separately from the grievance mechanism required under ESS10.

The Ethiopian Labor Proclamation No. 1156/2019 recommends numerous alternative labor dispute settlement mechanisms before using the Labor Court as a last resort. Among the relevant grievance mechanisms relevant to the direct and contracted workers include:

- **Social dialogue:** Employers and workers may introduce social dialogue in order to prevent and resolve labor disputes amicably.
- **Assigning of Conciliator:** When a labor dispute in respect of matters specified earlier is brought to the attention of the Ministry of Work and Labor Skill or any other appropriate Authority (e.g. the Ministry of Women and Social Affairs and its Regional and Woreda Offices) by either of the parties to the dispute it shall assign a conciliator with a view to amicable settlement of the case.

The Ministry or the Appropriate Authority may assign conciliators at the Federal, Regional and, when necessary, at the Woreda levels. The duty and responsibility of the appointed Conciliator is to bring about a negotiated settlement between a worker and an employer regarding the labor disputes in question. A conciliator shall endeavor to bring about an amicable settlement by all means as he considers appropriate.

- **Conciliation and Arbitration:** The parties to a dispute may agree to submit their case to arbitrators or conciliators, of their own choice for settlement in accordance with the appropriate law.
- **Labor Relations Board:** The Ministry of Work and Labor Skill or appropriate Regional or Woreda Authority may assign permanent or *ad hoc* Labor Relations Board to hear and decide the labor disputes. A worker or an employer can bring the issue to the Board for consideration. Before disposing the case, a permanent or *an ad hoc* Board shall summon the parties concerned and provide them the opportunity to be heard. At least ten working days advance notice shall be given to the parties and the summons shall specify the date, time and place of the hearing.
- **Labor Court:** If the parties in despite falls to reach agreement through one or other alternative labor grievance redress mechanism, the parties are allowed to bring the case in front of the labor division of a Federal or Regional First Instance Court. Any of the parties dissatisfied with the decision of First Instance Labor Court can submit appeals to the Labor Division of Appellate Court. The decision by the Appellate Court is the final.

The IAs and third parties engaged in the project inform direct and contracted workers, respectively, about the available grievance mechanisms, and how they work as highlighted above. The relevant information will be made available throughout project duration in a manner that is clear, understandable, and accessible to workers, for example, by including it in workers' handbooks, on notice boards, or through similar communication mechanisms. Such workers will be informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against reprisal for its use. Measures will be put in place to make the grievance mechanism easily accessible to all such project workers.

10. CONTRACTOR MANAGEMENT

The IAs will make reasonable efforts to ascertain that third parties who engage contracted workers are legitimate and reliable entities and have in place *labor management procedures* applicable to the project that will allow them to operate in accordance with the requirements of the ESS2, except for paragraphs 34–42.

Information obtained as part of the process to contract third parties who engage contracted workers helps to ascertain the legitimacy and reliability of the third party. Depending on the nature of the project and the potential risks and impacts, information provided by the third party or otherwise obtained may include:

- Information in public records, for example, corporate registers and public documents relating to violations of applicable labor law, including reports from labor inspectorates and other enforcement bodies;
- Business licenses, registrations, permits, and approvals;
- Documents relating to a labor management system, including OHS issues, for example, *labor management procedures*;
- Identification of labor management, safety, and health personnel, their qualifications and certifications;
- Workers' certifications/permits/training to perform required work;
- Records of safety and health violations and responses;

- Accident and fatality records and notifications to authorities;
- Records of legally required worker benefits and proof of workers' enrollment in the related programs;
- Worker payroll records, including hours worked and pay received;
- Identification of safety committee members and records of meetings; and
- Copies of previous contracts with contractors and suppliers, showing inclusion of provisions and terms reflecting ESS2.

The IAs will establish procedures for managing and monitoring the performance of such third parties in relation to the requirements of the ESS2. In addition, the IAs will incorporate the requirements of the ESS2 into contractual agreements with such third parties, together with appropriate noncompliance remedies. In the case of subcontracting, the IAs will require such third parties to include equivalent requirements and noncompliance remedies in their contractual agreements with subcontractors.

The IAs will depend on different ways to manage and monitor the performance of third parties in relation to contracted workers, focusing on compliance by such third parties with their contractual agreements (obligations, representations, and warranties). As appropriate to the project, this may include periodic audits, inspections, and/or spot checks of project locations or work sites and/or of labor management records and reports compiled by third parties. Third parties' labor management records and reports may include: (a) a representative sample of employment contracts or arrangements between third parties and contracted workers; (b) records relating to grievances received and their resolution; (c) reports relating to safety inspections, including fatalities and incidents and implementation of corrective actions; (d) records relating to incidents of noncompliance with national law; and (e) records of training provided for contracted workers to explain labor and working conditions and OHS for the project.

11. PRIMARY SUPPLY WORKERS

As identified in Section 2.1, the types of labor requirements for Primary Supply may have significant risks of child labor and minimum age. The IAs will require the primary supplier to identify those risks consistent with paragraphs 17 to 20 of the ESS2. For this purpose, the LMP will apply measures that will be followed to verify the age of project workers:

- Documentation and verification of age are important steps in preventing employment or engagement of child labor, and, as appropriate to the project circumstances, may include the following, which are undertaken before the employment or engagement of a project worker and kept on file:
 - ✓ Obtaining written confirmation from the applicant of their age; and
 - ✓ Where there is any reasonable doubt as to the age of the applicant, requesting and reviewing available documents to verify age (such as a birth certificate, national identification card, and medical or school record)
- If a child under the minimum age is discovered working on the project, measures will be taken to terminate the employment or engagement of the child in a responsible manner, taking into account the best interest of the child. Possible measures will be outlined in the LMP.

Annex 9: Historically Underserved Peoples Planning Framework

1. Introduction

To prepare the Historically Underserved Peoples Planning Framework (HUPPF), the term Historically Underserved Communities (HUCs) is used consistent with the definition given in ESS7 (paragraph 8)⁷. As per the provisions in Article 89 of the Constitution of the Federal Democratic Republic of Ethiopia, Somali, Afar, Benishangul-Gumuz, Gambella, and pastoralists and agro-pastoralists in parts of Oromia, South Ethiopia and South-West Ethiopia regions are recognized as the least advantaged in economic and social development. The pastoral and agro-pastoral communities living in these areas are recognized as HUCs. The proposed Governance Modernization Project affects all the regions and communities recognized as socio-economically disadvantaged or historically underserved.

In line with the requirements of the ESS7, the preparation of this HUPPF recognizes that the project-affected HUCs have identities and aspirations that are distinct from mainstream groups in national societies and often are disadvantaged by traditional models of development. In many instances, they are among the most economically marginalized and vulnerable segments of the population. Their social, cultural, and economic status frequently limits their capacity to defend their rights to, and interests in, benefiting from the proposed services of the project. In many cases, they do not receive equitable access to project benefits, or benefits are not devised or delivered in a culturally appropriate form, and they may not always be adequately consulted about the design or implementation of the development projects that would profoundly affect their lives or communities.

Therefore, the purpose of the HUPPF is to establish the requirements of ESS7, implementation arrangements, and design criteria to be applied to subprojects to be prepared during project implementation.

2. Objective of the HUPPF

- To ensure that the development process from the proposed project fosters full respect for the identity, culture, and livelihoods of the project-affected HUCs.
- To avoid adverse impacts of the project on Historically Underserved Communities (HUCs), or when avoidance is not possible, to minimize, mitigate, and/or compensate for such impacts.
- To promote sustainable development benefits and opportunities for HUCs in a manner that is accessible, culturally appropriate, and inclusive.
- To improve project design and promote local support by establishing and maintaining an ongoing relationship based on meaningful consultation with the HUCs affected by the project throughout the project's life cycle.
- To recognize, respect, and preserve the culture, knowledge, and practices of affected HUCs and to provide them with an opportunity to adapt to changing conditions in a manner and in a time frame acceptable to them.

Footnote⁷ The term HUCs refers to a distinct social and cultural group possessing the following characteristics in varying degrees: (a) self-identification as members of a distinct social and cultural group and recognition of this identity by others (b) collective attachment to geographically distinct habitats, ancestral territories, or areas of seasonal use or occupation, as well as to the natural resources in these areas (c) customary cultural, economic, social, or political institutions that are distinct or separate from those of the mainstream society or culture and (d) a distinct language or dialect, often different from the official language or languages of the country or region in which they reside.

3. Socio-economic Description of Project Affected Historically Underserved Regions and Communities

As per the provisions in Article 89 of the Constitution of the Federal Democratic Republic of Ethiopia, Somali, Afar, Benishangul-Gumuz, Gambella, and parts of Oromia and South Ethiopia regions are recognized as the least advantaged in economic and social development. The pastoral and agro-pastoral communities living in these areas are recognized as Historically Underserved Communities (HUCs). The proposed Governance Modernization Project affects all the regions and communities recognized as socio-economically disadvantaged or historically underserved. The discussions that follow provide socio-economic descriptions of these regions and communities.

3.2 Somali Region

The Ethiopian Somali region is located in the south-eastern part of the country sharing borders with the Afar region, the Republic of Djibouti and the de facto state of Somaliland in the north, Kenya in the south, Oromia region in the west, and mainland Somalia in the east and south. The region has a land size of 350,000 km² comprising nine administrative zones and 68 woredas. Based on the Central Statistical Agency Population Projection of Ethiopia for All Regions (2017), the Somali region has a total population of 5,748,998 (3,094,002 male and 2,654,996 female). Of the total population, 4,911,000 (2,643,000 male and 2,268,000 female) are rural population while 838,000 (451,000 male and 387,000 female) are urban population.

The Somali region occupies 52% of the total pastoral communities in Ethiopia. It is the region with the largest livestock population as well. According to the Ethiopian Livestock and Livestock Characteristics Survey (2021), the Somali region has 2,646,940 cattle, 9,188,394 sheep, 1,700,167 goats, and 1,213,235 camels. The Somali region is one of the parts of Ethiopia with relative political stability and peace. However, the findings of the social assessment reveal that resource-driven conflicts, particularly competition over access to grazing land and water, are the major source of inter-clan conflicts in the region and with neighboring areas. This is complicated by vulnerability to climate impacts such as food insecurity, water scarcity, pests and diseases, flooding, malnutrition and famine, and waterborne diseases in the region.

The Somali region is the least advantaged in economic and social development. Significant disparities exist in the availability and access to basic services. As per the 2016 Ethiopian Demographic and Health Survey (EDHS), 48% of the total population in the Somali region depend on unimproved sources of water. The level of adult literacy and access to health services are the lowest in the Somali region. The overwhelming majority (95.9%) of women and 88.2% of men have no education or are illiterate. To illustrate low access to primary health care services, 56% of the total women do not receive ANC, 82% deliver at home with no medical facilities staffed with skilled assistance, 87.4% do not receive PNC, and only 21.8% of children receive all basic vaccinations. As shown in the Education Statistics Annual Abstract (2020), the Net Enrolment Rate for primary education in the region was 72% meaning 28% of children are out of school.

3.2 Afar Region

Afar regional state is situated in the northeastern part of Ethiopia with an area of around 150,000 km² that stretches into the lowlands covering the Awash Valley and the Danakil Depression. It is divided into six administrative zones with a total of 36 woredas. Afar region is a very strategic location of the country as it is entirely situated along the Ethio-Djibouti route. The region is bordered to the northwest by the Tigray region, to the southwest by the Amhara region, to the south by the Oromia region, and to the southeast by the Somali region. The region also shares international borders to the east by Djibouti and to the northeast by Eritrea. Based on the Central Statistical Agency Population Projection of Ethiopia for All Regions (2017), the total population of the Afar region is 1,812,002 out of which 991,000 are male and

821,002 female. The same data source reveals that 346,000 (189,000 male and 157,000 female) of the total population are urban residents in comparison to 1,466,000 (802,000 male and 664,000 female) rural residents.

In terms of economic activity, over 90% of the Afar people are pastoral. Out of the total pastoral communities in Ethiopia, the Afar comprise 29% making it the second largest next to the Somali region. The Afar pastoral communities are highly dependent on extensive livestock production; other employment opportunities are limited. The mobile lifestyles of the Afar pastoral communities are associated with increasing environmental degradation and vulnerability to drought and flooding, exacerbated by climate change, and interacting with other factors to cause disease outbreaks, pressure, and conflicts over resources such as water and grazing land.

As per the 2016 EDHS, of all the project target regions, access to water is the least in Afar—49.5% of the households have no access to improved sources of drinking water. In terms of education, the Net Enrolment ratio (NER) for Afar is only 11.5% making it the least region in Ethiopia. Access to health services in the region is not different either. For instance, about half (48.4%) of the women do not receive ANC, the vast majority (85.1%) of women deliver at home without any medical facilities supported by skilled assistance, 93.4% of women do not receive PNC, and 85% of children miss all basic vaccination.

3.3 Benishangul-Gumuz Region

The Benishangul-Gumuz regional state is located in the western frontier of Ethiopia. The region has a total surface of 50,380 km². It shares borders with Sudan in the northwest, South Sudan in the west, the Amhara regional state in the east, and the Oromia region in the south. The region is organized into three administrative zones (Metekel, Assosa, and Kemashi) that have 20 Woredas altogether. According to the CSA Population Projection of Ethiopia for all Regions at Wereda Level (2017), the total population of the region is 1,066,001 (541,002 male and 524,999 female). Out of the total population, 230,000 (117,000 male and 113,000 female) are urban residents and the remaining 836,000 (424,000 male and 412,000 female) are living in rural areas.

One of the key features of the socio-cultural composition in the region is that the Constitution of the Benishangul-Gumuz regional state differentiates between indigenous and other peoples living in the region. As per the provision in *Article 2* of the Constitution, the Berta, Gumuz, Shinasha, Mao, and Komo are classified as the indigenous people. However, none of these five ethnic groups has a numerical majority. The Berta (25.9 %), the Gumuz (23.3%), and the Shinasha (7.6%) are among the groups with relative numbers. The Mao constitute 1.9% and Komo (0.96) count for less than 1% of the total population. Striking is the large number of Amhara (22.1 %) and Oromo (8.93%), an illustration of the impact of migration. However, the provisions of the Constitution about the institutional and governance give no political representation for the non-indigenous peoples who make up the majority in terms of number but the minority in terms of political representation. Evidence supports that such group-based division in the region has been one of the major drivers of inter-ethnic tensions and violence in the region, in some cases leading to civil conflict such as between Gumuz and Amhara.

Evidence has shown that the inter-regional disparities in terms of availability of basic services often lead to massive disappointment contributing to tensions and conflicts in the region. The 2016 EDHS data revealed more than one-third (34.8%) of women do not receive ANC, 73.3% depend on home delivery, and only 83.3% of women receive PNC, and the coverage of all basic vaccinations for children is still 27%.

According to the Education Statistics Annual Abstract (2020), the Gross Enrolment Ratio (GER) of 37% in Benishangul-Gumuz is quite low compared to the national average. Since 2000, Benishangul-Gumuz has experienced an impressive 28% point decline in monetary poverty. Despite public questions over the years, the development of basic services and infrastructure in the region has been stagnant creating a sense of marginalization among the people in the region at large. This is one of the major reasons for the formation of insurgent armed groups such as the Gumuz Militia and Benishangul People's Liberation Army posing serious security threats in the region.

3.4 Gambella Region

The Gambella Peoples National Regional State is one of the federal regions of Ethiopia. It is located at the western edge of the country bordering South Sudan. The region has a total land area of 29,783 km². The regional capital is also named Gambella and is located at a distance of 777 km from Addis Ababa. Administratively, the Gambella region is divided into 4 Zones having 13 Woredas in total. According to the Central Statistical Agency Population Projection of Ethiopia for All Regions (2017), the Gambella region has a total population of 435,999 out of which 227,000 constitute male and 208,999 female. The main ethnic groups in the region in order of numerical size are Nuer, Anuak, Mezhenger, Kafficho, Shakacho, Amhara, and Oromo. Out of the total population, the majority (288,000) live in rural areas while the urban residents are small in number (148,000).

Competition over access to and use of resources underpinning the recurring inter-group conflicts in the Gambella region. There have always been clashes between the Anuak and the Nuer the two dominant ethnic groups in the region, mainly over resources further complicated for socio-cultural reasons. Incompatible modes of production and clashing livelihoods make the conflict between the Nuer and Anuak a matter of endless fact. The Anuak are agrarian who have developed a settled and more centralized political system, consisting of village states led by nobles known as *kuwari* (singular *kuwaaro*). Whereas the Nuer are agro-pastoralist and their political and socio-cultural organizations are based on the traditional clan chiefs. Reflecting this, during the wet season the Nuer and their cattle move to upland settlements away from flooding, while during the dry season, they move to the banks of the rivers, where the moisture provides abundant pasture. On the other hand, despite the economic values of land, the Anuaks' political, social, cultural, and emotional identities are strongly attached to their land. Consequently, the Nuers' crucial search for grazing land and drinking water with animals trespassing onto the territories belonging to the Anuak makes recurring conflicts between the two ethnic groups. What is striking is the intensity and escalation of the conflict beyond the two ethnic groups.

According to the 2016 EDHS data Gambella is among the regions in Ethiopia with the highest percentage of women (77.5%) and men (71%) with no education/illiterate. Gambella is also among the regions with the least access to basic services. For instance, 27.8% of the women do not receive ANC, 53.6% deliver at home with no professional assistance, 36.3% do not receive PNC, and 16.3% do not vaccinate their children. Quite a large number (41%) of women reported distance to the health facilities as the reason in this regard.

3.5 Pastoral Areas of the Oromia Region

Parts of the Oromia regions (Borena and Guji Zones) include the pastoral communities. The Borena and Guji pastoral communities are not only neighbors but also share similar social and economic organization. The overwhelming majority (91%) of the Borena people and 65% of the Guji people practice animal rearing

or pure pastoralism as a major economic activity. Goats, sheep, camel, donkeys, horses, mules, and cattle are the main livestock types in the areas. The livelihood of both Borena and Guji pastoral communities is characterized by vulnerability and food insecurity mainly because of recurrent drought, land degradation, high population pressure, high livestock population, and market price fluctuation. In times of drought and hardship, therefore, people always move up to 200 km far away from their homeland and families in search of available water and pasture for their livestock. This usually gets them into conflict with the neighboring pastoral communities. This is the case for the recurring inter-ethnic conflicts with the Digodi and Gerri clans in the Somali region and Burji and Gedeo in the South Ethiopia region. The Borena and Guji are the areas with the least access to basic infrastructure and services including road, electricity, ICT services, water, health, and education.

3.6. Pastoral Areas of South Ethiopia Region

The South Ethiopia Region is one of the newly formed regional states in Ethiopia following the administrative restructuring of the former South Nations Nationalities and Peoples' Region. It is restructured into 12 administrative zones including Wolayita, Gamo, Gofa, Gedeo, South Omo, Ari, Konso, Gardula, Burji, Amaro Koore, Basketo, and Ale. The last eight Zones are recognized as historically underserved areas. These areas characterize the diversity of pastoral communities in Ethiopia. Sixteen pastoral groups are living in the areas, namely: Konso, Derashe, Ari, Bana, Hamer, Dasenech, Nyangatom, Karo, Mursi, Kwegu, Bodi, Male, Tsemay, Arbore, Dime, and Bacha. The livelihood of all groups is primarily based on pastoralism composed of cattle, goat, and sheep herding complexes. According to a recent study, the degradation and reduced carrying capacity of the rangelands (encroachment and little, erratic rain) combined with continued overgrazing by large cattle herds made the inter-group conflict over access to water and grazing land a common phenomenon in the areas. Like other historically underserved areas discussed before, the pastoral areas of the South Ethiopia Region are characterized as the areas with the least access to basic infrastructure including electricity, ICT services, water, health, and education.

3.7. South-West Ethiopia Region

The South-West Region of Ethiopia is a regional state in southwestern Ethiopia. It was split off from the Southern Nations, Nationalities, and Peoples' Region (SNNPR) in November 2021 after a successful referendum. The region consists of the Keffa, Sheka, Bench Sheko, Dawro, West Omo Zones and Konta special woreda. The region covers an area of 39,884 km² and holding a total population of 3,302,952 (2022 population projection). The majority of the population is engaged in agriculture, however, pastoralists are also apparent in Keffa and West Omo Zones of the region.

4. Project Components affecting HUCs

All the proposed project components affect historically underserved regions and communities described in the preceding section. The target federal institutions have regional bureaus in Jijjiga, Semera, Gambella, and Assosa. Out of the Regional Capitals, the MoF has Custom Branch Offices in areas such as Moyale affecting the pastoral communities in the Oromia region. Therefore, the financing of Civil Service Reforms, Sustaining and Deepening PFM Reforms, and GovTech for Better Service Delivery have subproject activities that affect all the regions recognized as socio-economically disadvantaged or historically underserved.

5. Potential Adverse Social Impacts Arise from the Project

There are many ways by which the project benefits and services exclude historically underserved communities. The first way is assessed in terms of the disproportionate adverse impacts due to disparities in the availability of basic infrastructure and services. As highlighted in Section 3, access to basic services

including the ICT systems is the lowest in all the socio-economically disadvantaged regions. Likewise, the consultation findings with the informants from such regions reveal that key ICT tools such as computers and accessories are not accessible to most civil servants. These would have differential adverse impacts in benefiting from the implementation of digitalizing the civil service, sustaining and deepening PFM reforms, strengthening public procurement performance, supporting digital platforms, and integrating E-services. The second way of exclusion risks is assessed in terms of lack of digital literacy. The expertise and management in the regional bureaus who will be in charge of implementing the aforesaid subproject activities have low digital literacy. In particular, access to and opportunities for capacity-building training focusing on special digital platforms and systems have been seriously lacking. This will have potential disproportionate adverse impacts. The third way is assessed from the perspective of the HUCs. The pastoral communities and urban residents supposed to benefit from the improved public service delivery are unfamiliar with digital services. This will have the potential to exclude HUCs from the benefits and services of the project.

6. Procedures and Steps for the Preparation of Subproject

A key purpose of the HUPPF is to ensure that HUCs affected by the subproject activities are fully consulted about, and have opportunities to actively participate in, subproject design and the determination of project implementation arrangements. The scope and scale of consultation, as well as subsequent project planning and documentation processes, will be proportionate to the scope and scale of potential project risks and impacts as they may affect the HUCs. To this end, the preparation and implementation of the subprojects affecting HUCs will follow the following procedures and steps.

6.1 Conduct Targeted Social Assessment

The first step for the preparation of subproject activities affecting HUC is conducting Targeted Social Assessment for the purposes of ESS7, as set out in **Appendix A** of this HUPPF. A key aspect of the assessment is understanding the relative vulnerabilities of the affected HUC. The assessment is proportionate to the nature and scale of the proposed subproject's potential risks to, and impacts on, as well as the vulnerability of, the HUC. The assessment should consider differentiated gender impacts of the subproject activities and impacts on potentially disadvantaged or vulnerable groups within the community of HUC. Engaging qualified social specialists and accompanying meaningful consultations with the affected HUC are important to inform and support the assessment. Consultations with the affected HUC can support and strengthen the assessment of disproportionate adverse impacts and help in identifying their development priorities and preferences regarding both the subproject benefits and mitigation measures. Consultations are carried out with the affected HUC in a manner that is culturally appropriate, and their inputs are considered in the subproject design and Historically Underserved Peoples Plan (HUPP). Consultations continue throughout subproject design and implementation.

The HUCs affected by the subproject activities may be heterogeneous and may comprise multiple groups and different social units within these groups (such as individuals, clans, communities, and ethnic groups). Subprojects may be implemented at the national, regional, or local level, and issues of cultural identity, geographic access, language, governance structures, cohesion, and priorities may differ greatly among HUCs in question. Subprojects also may have different impacts on different subgroups within the affected HUC. For instance, women have frequently been marginalized within their own communities and as a result of differential access to the benefits and services of the subproject, and may have specific needs. The targeted social assessment for the purposes of ESS7 forms the basis for identifying the different groups and understanding the nature and significance of potential impacts on each of them from the implementation of the subproject activities. The consultation for the targeted social assessment will be conducted considering such differential impacts of the subproject activities within the affected HUC.

6.2 Preparation of the Historically Underserved Peoples Plan

Once the differential adverse impacts of the subproject activities are assessed, the next step is developing a mitigation plan. Thus, Historically Underserved Peoples Plan (HUPP) is prepared based on the findings of the Targeted Social Assessment. The scope and scale of the plan will be proportionate to the potential risks and impacts of the subproject activities. The plan is prepared that sets out culturally appropriate mitigation measures and benefits, and specifies the timing for completion of actions required. Proposed outlines of the HUPP are given in Appendix B.

6.3 Implementation Arrangements

The HUPP is developed in line with the Subproject activities defined for the MoF, CSC, and MoR. The Social Safeguards Specialist in the PIU of the respective implementing agency will be responsible for the overall implementation of the HUPP. The project manager of each PIU will coordinate and closely work with the Social Safeguards Specialist. Besides, a dedicated Social Safeguards Focal Person will be assigned for running the day-to-day performance of the HUPP in the region where it will be implemented.

6.4 Monitoring and Reporting

The Social Safeguards of the PIU in each IA will continuously monitor the implementation status of the HUPP. He/she will be closely work with the Regional Social Safeguards Focal Person in this regard. Besides daily communication with the regional focal person, the Social Safeguards in the PIU will make on-site visit every month to observe the status of implementation of the plan. Given the sensitivity of the issues of the HUPP, the regional focal person will prepare a weekly implementation status report and submit it to the Social Safeguards in the PIU. In turn, the Social Safeguards in the PIU will compile summary of weekly report from the regional focal person and prepare a monthly report to be submitted to the World Bank Social Safeguards Team. As a minimum, the content of the report include (a) the progress of the subproject activity under implementation (b) challenge/grievance raised, if there is any (c) measures taken by the focal person and (d) issues/measures that require further attention of the PIU.

7. Grievance Mechanism

The project IAs will ensure that a grievance mechanism is established for the project, as described in ESS10, which is culturally appropriate and accessible to the affected HUCs, and takes into account the availability of judicial recourse and customary dispute settlement mechanisms among the affected HUCs. The grievance mechanism is proportionate to the potential risks and impacts of the project, and should be accessible and inclusive. A well-functioning mechanism receives and facilitates resolution of grievances promptly and protects against reprisals for the use of its services.

Appendix A. Proposed Outlines of the Targeted Social Assessment

The breadth, depth, and type of analysis of the social assessment are proportionate to the potential risks and impacts of the proposed subproject activities on the affected HUCs. The outlines of the targeted social assessment include the following elements, as needed:

- A review of the legal and institutional framework applicable to HUCs.
- Gathering of baseline data on the demographic, social, cultural, and political characteristics of the project-affected HUC, the land, and territories that they have traditionally owned or customarily used or occupied; and the natural resources on which they depend.
- Taking the review and baseline data into account, the identification of project-affected parties, and the elaboration of a culturally appropriate process for involving and consulting with the project-affected HUC at each stage of project preparation and implementation.
- An assessment, based on meaningful consultation tailored to HUC, of the potential adverse and positive effects of the project. Critical to the determination of potential adverse impacts is an analysis of the relative vulnerability of, and risks to, the affected HUC, given their distinct circumstances and close ties to the land and natural resources, as well as their potential lack of access to opportunities relative to other social groups in the communities, regions, or national societies in which they live. The assessment should consider differentiated gender impacts of project activities and impacts on potentially disadvantaged or vulnerable groups within the community of HUC.
- The identification and evaluation of measures necessary to avoid adverse impacts, or if such measures are not feasible, the identification of measures to minimize, mitigate, or compensate for such impacts, and to ensure that the HUC receives culturally appropriate benefits under the project. This is based on meaningful consultation tailored to HUC and, where relevant, under the requirements of the UCP described above in the guidelines on Free, Prior, and Informed Consent
- Designing plans to promote access to benefits or measures to mitigate adverse impacts on HUC. It is important to include, in an analysis of vulnerability, factors such as HUCs' economic, social, and legal status; tenure security; their institutions, customs, culture, and/or language; their dependence on natural resources; their prior experiences with development activities; and their past and ongoing relationship to the authorities, the mainstream economy, and other groups in the area.

Appendix B. Proposed Outlines of the Historically Underserved Peoples Plan

- A summary of the Targeted Social Assessment, including the applicable legal and institutional framework and baseline data.
- A summary of the results of the meaningful consultation tailored to the affected HUC, and if the project involves the three circumstances specified in paragraph 24 of ESS7, then the outcome of the process of FPIC carried out with the affected HUC during project preparation.
- A framework for meaningful consultation tailored to HUC during project implementation.
- Measures for ensuring HUC receive social and economic benefits that are culturally appropriate and gender sensitive and steps for implementing them. If necessary, this may call for measures to enhance the capacity of the project implementing agencies.
- Measures to avoid, minimize, mitigate, or compensate HUC for any potential adverse impacts that were identified in the social assessment, and steps for implementing them.
- The cost estimates, financing plan, schedule, and roles and responsibilities for implementing the HUC Plan.
- Accessible procedures appropriate to the project to address grievances by the affected HUC arising from project implementation, as described in paragraph 35 of ESS7 and in ESS10.

- Mechanisms and benchmarks appropriate to the project for monitoring, evaluating, and reporting on the implementation of the HUC Plan, including ways to consider input from project-affected HUC in such mechanisms.

Annex 10. Security Risk Assessment and Management Plan

1. OVERVIEW OF THE SECURITY SITUATION

The implementation of large development projects like the Governance Modernization Project covering large geographic areas does not occur without the influences of contextual security risk factors. By their very nature, such development projects are likely to affect and be affected by the social, political, cultural, economic, and environmental dynamics at the national, regional, and local levels. Considering this, an overview of the security situations in the country and project target regions is highlighted below.

1.1 Country Security Context

Ethiopia is located in one of the world's most conflicted geopolitical regions where instability tends to spill across borders. Assessing from this perspective, in particular, Sudan and Somalia the countries with which Ethiopia shares longer geographic boundaries are classified as fragile states. The war between the Sudanese Armed Forces (SAF) and the Rapid Support Forces (RSF) entered its first year. Security and Humanitarian Reports have shown that the growing spillover of the conflict in Sudan is likely to destabilize the immediate border areas of Ethiopia which could have national-level security threats. The clashes in Sudan have led to an influx of refugees and returnees into Ethiopia. The primary entry point is the Metema border post in the Amhara region. Thus, the escalation of the ongoing conflicts in Sudan may cause populations to seek refuge, putting pressure on social cohesion, services, and access to resources. The flow of armed groups or combatants may pose security threats in the immediate border areas. Similarly, the Horn of Africa including Ethiopia has been unstable for more than three decades after the fall of Somalia's central government in 1991. Owing to this Fragility and Conflict Situation (FCS), Somalia has become a haven for the proliferation of internal and external terrorist groups. Ethiopia has been repeatedly affected by the terrorism perpetrated by Somalia-based terrorist groups such as Al-Shabab. The Amhara region is bordered by Sudan to the west and northwest. Given this, the security threats along the Ethio-Sudan border is relatively higher for the region. The Somali region shares a longer border with the neighboring country Somalia making it more vulnerable to terrorist attacks from Al-Shabab.

Internally, inter-ethnic tensions and conflicts characterize the country's security context. Ethiopia is home to different ethnic, religious, and linguistic communities. The existence of diversity within the population of the country, or differences between those communities, do not necessarily cause conflict between groups to threaten national security. Rather, discrimination based on such differences can create divisions in society, especially when such patterns become entrenched over time. Adopted in 1991, ethnic federalism indeed paved the way for the recognition, accommodation, and institutionalization of ethnocultural diversity. What is equally important, particularly in recent years, is the practice of ethnic federalism complicated state-society and inter-group relationships creating a favorable environment for inter-ethnic tensions and conflicts threatening national unity, eroding century-old values of coexistence. Likewise, that has created a hard ethnic boundary where administrative boundaries served as the system of political and ethnic exclusion. Territorial recognition and institutionalization of ethnicity gave room for the emergence of 'ethnic like and ethnic others' thinking, made minorities in different regions victims of politics and failed to provide sound accommodation mechanisms for them, and severely restricted people's constitutional rights including the right to mobility and right to work. Such a country security context can risk the effective implementation of the proposed project, particularly the subproject activities supporting the civil service reforms (Component 1). The current tendency of ethnic favoritism or exclusion in the civil service can challenge the implementation of Competency-based Human Resource Management activities such as measures supporting merit-based civil servant recruitment processes.

1.2 Regional and Local Security Contexts

All the project target regions, where the line Regional Bureaus of the respective implementing agencies are located, do not have the same security risk profiles. The security risk assessment that follows focuses on the regional and local security contexts with differential threats to the project implementation.

Active war: The security context in the Amhara region is characterized as an active conflict situation. The conflict between informal armed groups dubbed “Fano” and the Ethiopian National Defense Force started in August 2023. Currently, the violence is escalating and socio-political instability and security threats have intensified in most parts of the region. The Fano insurgents are scattered all over the Amhara region. The Fano fighters are engaged in guerrilla actions such as ambushing army convoys and the assassination of regional and local officials. This significantly increases the security risks in the region.

Recent history of war: The contextual security risk factors in the Tigray, parts of Amhara, and Afar regions include the influence of a recent history of war. The impacts of the war in the northern parts of the country such as the damages to public infrastructure, political instabilities, militancy, riots, community protests, and unrest can adversely impact the effective implementation of the project activities in general. For instance, the damages to basic infrastructure including power networks and ICT systems are not fully restored yet. This can impact the implementation of the digitalization subproject activities in all the project components. The instability of the civil servants due to political instabilities, recurring riots, community protests, and unrest such as in the Tigray region can threaten the implementation of subproject activities in all the project components. These contextual security risk factors would have differential impacts on the implementation of the project in the regions with a recent history of war.

The movement of insurgent armed groups: The findings of the SRA reveal that the movement of armed groups poses a serious security threat in the Oromia, Benishangul-Gumuz, and Gambella regions. The findings of the SRA have shown that the security threats from the insurgent armed group called “Shene” cover several areas in the Oromia region: Western Oromia (East, Western, Kelleme Wellega, Horo Guduru, and Bunno Bedele Zones), Central Oromia (Southwest Shewa, North Shewa, East Shewa, Arsi, and West Arsi Zones), and Southern Oromia (Guji, Borena, and Bale Zones). A combination of a government counter-insurgency against the armed groups such as the Gumuz Militias and Benishangul People’s Liberation Army has improved the security situation in the Benishangul-Gumuz region. However, the security threats from the movement of insurgent armed groups are still critical in the region. The principal parties to the conflict in the Gambella region are the armed segment of the Anuak tribe and the local police and military authorities. Influenced by such contextual risk factors, armed attacks (particularly, the assassinations of political officials and ethnic minorities), ambushes, armed robberies/raids, and kidnappings pose recurring security threats in the Oromia, Benishangul-Gumuz, and Gambella regions. Besides, the movement of the insurgent armed groups purposely targets the damages of basic infrastructure such as power networks, ICT systems, health, and educational institutions. They use road blockages and ban public transportation as strategies to put pressure on the government. Nevertheless, the assessment of the security threats for the project from the same contextual risk factors is not significant. The reasons for this are analyzed in the next section.

Political protests and social unrest: Political instabilities, community protests, escalation of personal, communal, or inter-group violence, IDPs, and GBV are contextual security risk factors in many regions including the Oromia, Tigray, Amhara, Benishangul-Gumuz, Gambella, South Ethiopia, and Central Ethiopia regions. Owing to these fragility and conflict situations, vandalism or deliberate damages to public infrastructure, social disorder, and common crimes serve as significant sources of security threats in the regions.

Localized security threats: In part, the contextual security risk factors in Afar, Somali, Gambella, Benishangul-Gumuz, and pastoral areas in Oromia and South Ethiopia regions are characterized by localized security threats such as competition over access to and use of resources, inter-clan or inter-ethnic tensions, and conflicts. Besides being valuable sources for making a livelihood, many natural resources such as rivers and forests or grazing areas serve as the boundaries between neighboring pastoral groups in these regions. Hence, conflicts over access to natural resources often transform into more protracted boundary and territorial conflicts. In some cases (e.g. between the neighboring pastoral groups in Oromia and Somali regions), this contextual risk factor has historical, political, social, and economic roots.

Common crimes: As stated earlier, the project activities will be implemented in the federal and regional capitals. The backdrop to this, urban crimes such as theft, burglaries, robberies, drug trafficking, assaults, homicides, and GBV are the security risk factors common to all project target regions including Addis Ababa and Dire Daw City Administrations.

2. ASSESSMENT AND IDENTIFICATION OF KEY SECURITY RISKS FOR RESPONSE

The overall security risk assessment for the project is rated as moderate. The SRA reveals that the nature and location of the subproject activities in all Components significantly minimize both the internal and external security risks for the project.

2.1 Security Risks Assessment for the Project

From the internal security risks assessment, the project will not have major civil work subproject activities. The proposed tax data warehouse will be constructed within the compound of the MoR. This significantly reduces direct project-related security risks in two major ways. First, the project will not require deploying workers and storing assets at the construction site vulnerable to security threats. This means the need to engage security personnel for the project's direct security protection is minimal. However, private security personnel (e.g security guards) may be required at the construction site such as the tax data warehouse. Consequently, the potential threats to the project workers, sites, assets, and activities as well as to the project-affected communities stemming from the use of security personnel will be low. Second, limited procurement of project construction materials and associated assets with no need or temporary storage at the construction site significantly reduces illegal, unethical, or inappropriate behavior of the project workers or those directly affiliated with it, such as employee theft, workplace violence, and labor unrest, potentially with associated sabotage.

From the external security risks assessment, these are regional and local contextual risk factors that the project cannot control but which could pose security threats to the project workers and implementation of the subproject activities. As assessed in the preceding section, the regional and local contextual security risk factors have critical threats. However, the regional and local contextual risk factors have no significant potential security threats for the project. The overall potential security risk for the project associated with the regional and local contextual factors identified in the previous section is assessed as low or moderate. This security risk rating is invariable across the project target regions. The findings of the SRA assessed important characteristics and locations of the subproject activities that commonly reduce the threats for the project across the target regions. Subproject activities for Supporting Civil Service Reforms (Component 1), Sustaining and Deepening PFM Reforms (Component 2), and GovTech for Better Service Delivery (Component 3) are all implemented in Addis Ababa and regional capitals with better security situations or protection. For instance, the threats from insurgent armed groups in Oromia including armed attacks, ambushes, armed robberies/raids, kidnappings, socio-political instabilities, vandalism, and other

social disorders are critical in most parts of the region. However, the subproject activities in all the Components will be implemented in the regional capital Addis Ababa making these security risks to the project insignificant. The same project SRA applies to those target regions with critical threats from the movement of insurgent armed groups, Gambella, Benishangul-Gumuz, and Amhara: The minimal subproject activities in remote areas with critical security threats, availability of air transportation, and avoidance of road transportation, etc. can avoid or significantly minimize the security risks for the project workers. The low or moderate potential security risk assessment for the project workers and implementation of the subproject activities from localized contextual risk factors such as competition over access to and use of resources, inter-clan or inter-ethnic tensions, and conflicts. Active conflicts such as in the Amhara region can pose a serious security threat to the project workers and activities relative to other regional and local contextual risk factors discussed in the earlier section. Despite this fact, the potential security risks for the project from such ongoing conflicts are assessed as moderate. The SRA assessed that the city of Bahir Dar where the subproject activities in the Amhara region are implemented has better security protection from the federal forces. The threats of the recent war in northern Ethiopia such as damages to supportive ICT infrastructure, socio-economic instabilities, protests and mobility among the civil servants, and common crimes may disproportionately fall for the implementation of project activities in the Tigray region.

Therefore, the summary of the project SRA states the following key points. First, considering the internal or direct project-related security risks assessment, the limited civil work subproject activities within the MoR avoid or significantly minimize the potential threats from the use of security personnel (such as excessive use of force, human rights abuse, and violations of other Good International Industry Practices (GIIP) and Codes of Conduct on the use of force and law enforcement) and illegal, unethical, or inappropriate behaviors of the project managers and workers (such as employee theft, workplace violence, and labor unrest, potentially with associated sabotage). This SRA is invariable in all the target regions. Second, from the external security risks assessment, the project target regions have differential security risk profiles. However, the locations of the subproject activities (for all Components) in the respective regional capitals reduce the impacts of the differential regional and local contextual security risk factors for the project workers and activities: The external security risks assessment across the project target regions are assessed as low or moderate. Third, following from the first and second, the overall SRA for the project is rated **low or moderate**. Finally, the subsequent identification, analysis, and rating of potential security risks specific to the project and the ensuing SMP are proportionate to the aforementioned summary finding of the project SRA.

2.2 Identification of Key Security Threats

This subsection identifies potential security risks for management taking the project security risk assessment highlighted before into account. The table below specifies the threat type and describes each.

Table 1. Key security threats for the project response

Threat No.	Threat type	Definition
1	Armed attacks	Assault on location within which the project activity is currently ongoing. Attacks are carried out by one or more groups of attackers armed with firearms. The scenario assumes that the attackers aim to cause maximum fatalities, kidnap, and steal possessions.
2.	Ambushes	A surprise attack on the project staff traveling to or from the project site by armed people lying in wait in a concealed position. The

		scenario assumes the ambush intends to kill and/or kidnap individuals for ransom.
3.	Armed robberies/raids	Armed robbery/raid of the project work site with intent to steal possessions and cash. The scenario assumes possible fatalities and severe injuries.
4.	Kidnappings	Abduction of the project workers or beneficiaries by insurgent armed groups, organized criminal groups, or other malign actors from the project site with the aim of terrorizing staff or extracting a ransom payment from the project contractor or the government. The scenario assumes possible severe injury or loss of life in the process.
5.	Armed conflict between government and non-government forces	The eruption of fighting in the area of the project operation between government forces and insurgent armed groups. Also, the insurgent armed groups may use deliberate damage to supportive infrastructure including power and ICT networks, road blockages, and ban public transportation as strategies to put pressure on the government. The scenario assumes possible disruption in the project operation and fatalities of the project workers or beneficiaries as collateral damage.
6.	Vandalism	Action involving deliberate destruction of or damage to public infrastructure such as power and ICT networks supporting the activity due to the fragility and conflict situations (e.g. political riots and the movement of insurgent armed groups) in the area of project operation. The scenario assumes possible disruption in the project operation/activity and severe injury or loss of life to the project workers or beneficiaries.
7	Community protests/civil unrest	Public demonstrations and organized protests may take place in different project operation areas as a means of people's expression of political or economic grievance or dissatisfaction with public service delivery. Consequently, access roads or routes may be unlawfully controlled, interrupted, or blocked and prevent vehicular or individual access to the project operation areas. Acts of vandalism targeting supportive infrastructure such as power and ICT networks. Escalation of political instabilities and civil unrest including personal, communal, or inter-group violence. The scenario assumes possible disruption in the project operation/activity and severe injury or loss of life to the project workers or beneficiaries.
8.	Localized security threats	Localized security threats such as competition over access to and use of resources, retaliation or blood feuds, cattle raiding, and personal revenge can lead to inter-clan or inter-ethnic conflicts. Such localized security threats can engulf an area of project operation resulting in casualties on all sides including project workers who have nothing to do with the grievances of either side.
9.	Common crimes	The project activities will be implemented in Addis Ababa and regional capitals. The backdrop to this is, that common urban crimes such as theft, burglaries, robberies, drug trafficking,

		assaults, and homicides can pose security threats to the project workers and assets. The scenario assumes the possible property crimes against the project assets and victimization of the project workers.
10.	Workplace protest and violence	Workplace protest and violence may occur for various reasons including questions associated with the amount of salary and wage payments, incentives, lack or inadequate provision of personal protective equipment, and other working conditions. The scenario assumes possible workplace protests and violence with adverse impacts on the project operation.
11.	Theft of equipment and material	Project workers steal project equipment and materials from the office store or at the construction site
12.	Project service/benefit-induced security risks	Digitalized Civil Service and Public Financial Systems may not be equally delivered in Historically Underserved Regions such as Afar, Somali, Benishangul-Gumuz, Gambella, and pastoral areas in Oromia, South Ethiopia and Southwest Ethiopia regions due to inadequate development of supporting infrastructure (such as power and ICT networks) and conflict-affected areas due to deliberate damage to these infrastructures or service interruption. Also, disadvantaged or vulnerable individuals (e.g. blind civil servants) and Historically Underserved Communities may not access the project services and benefits due to the unavailability of accommodative ICT tools or lack of digital literacy. In each case, the scenario assumes possible grievances or protests with security threats to the project operation.

2.3 Method of Security Risk Analysis

The method of security risk analysis depends on the calculation and evaluation of likelihood and impact. The **Likelihood Score** assesses the probability of occurrence for each of the key security threats identified in the table above taking the findings of the project SRA (see Section 2.1) into account. In line with each key security threat, the **Impact Score** assesses how severe the impacts would be for the project workers, activities/operations, and beneficiaries if it did occur. The severity of the impact is evaluated not only in terms of the potential for fatality but also in terms of physical injuries, psychological effects, escalating social tensions and conflicts, and impeding the project activities/operation. The **Risk Score** is calculated for each threat scenario by multiplying the Likelihood Score with the Impact Score. Finally, the Risk Scores are plotted onto a risk matrix. Based on this method of security risk analysis, the Likelihood Score, Impact Score, and Risk Matrix definitions are given as follows.

Table 2. Likelihood Score definitions

Likelihood Score	Likelihood	Definition
1	IMPROBABLE	The risk will occur only in the most exceptional circumstances
2	LOW	The risk is not expected to occur in most circumstances
3	MEDIUM	The risk will occur in some circumstances
4	PROBABLE	The risk will occur in most circumstances

5	FREQUENT	The risk will occur in just about all circumstances
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Table 3. Impact Score definitions

Impact Score	Impact	Definition
1	VERY LOW	Insignificant Injuries or health effects
2	LOW	Minimal Injuries or health effects
3	MEDIUM	Moderate Injuries or health effects
4	HIGH	Permanent disability and/or multiple hospitalizations, major health effects, individual fatalities
5	EXTREME	Multiple fatalities, multiple permanent disabilities or multiple hospitalizations, major health effects

Table 4. Example Risk Matrix

Risk Matrix		Impact				
		Very Low	Low	Medium	High	Extreme
Likelihood /Probability of Threat	Frequent (75%+)	Low	Moderate	Substantial	High	Extreme
	Probable (55-74%)	Low	Moderate	Substantial	Substantial	High
	Medium (40-54%)	Low	Low	Moderate	Substantial	Substantial
	Low (25-39%)	Low	Low	Low	Moderate	Moderate
	Improbable (-24%)	Low	Low	Low	Low	Low

2.4 Security Risk Rating and Prioritization

Following the example Risk Matrix given in Table 4, the **Risk Level** for each security threat is indicated in the box at the intersection of the row (Impact Score) and column (Likelihood Score). The Risk Level is then categorized as Extreme, High, Substantial, Moderate, Low, or Very Low. This is analyzed as a priority indicators for those security risks that are most likely to occur and that would have the greatest potential negative impact (on the project workers, operation, and/or affected community) if they did occur. Accordingly, Table 5 defines the Risk Level along with the action required.

Table 5. Risk level and priority indicators

Risk Score	Risk Level	Action Required
21-25	Extreme	PROJECT ACTIVITY TO BE SUSPENDED UNTIL RISK SCORE REDUCES (This is likely due to the activity of malign actors, implementing further risk mitigation measures will not have a measurable effect on the risk score).

16-20	High	Implement further mitigation measures with the highest priority until the risk is reduced to an acceptable level (<16. If risk cannot be reduced, the safety of the project workers and operation is in doubt. Limited project activity is allowed to continue on a case-by-case basis and only after sign-off for each proposed activity by the PIU Project Coordinator.
11-15	Moderate	Project activity can continue with the required risk mitigation measures in place. The Social Safeguards Specialist of the PIU in the respective implementing agencies will continuously review the likelihood of threat scenarios and the risk mitigation measures in place including M&E and audits of activity on the ground.
6-10	Low	Project activity can continue with the required risk mitigation measures in place. The Social Safeguards Specialists of the PIU in the respective implementing agencies will regularly review threat likelihood and risk mitigation measures.
1-5	Very Low	Project activity can continue, the Social Safeguards Specialists of the PIU in the respective implementing agencies will regularly review threat likelihood.

2.5 Security Risk Analysis and Evaluation Results for the Project

The Risk Score for the project is calculated based on the following essential points of analysis. As shown in the findings of the SRA (see Section 2.1), firstly, the internal or direct project-related security risks are assessed as low. This is invariable across the locations/regions of the subproject activities. Secondly, despite external or differential regional and local contextual security risk factors for the target regions, the ensuing variations of threats based on the project locations are not significant as such. Given the first and second points of analysis, the Risk Score is calculated for each key security threat identified for the project instead of the threat *vis-à-vis* variations based on project locations/target regions. Thirdly, the overall Risk Level rating for the project is taken as the average of the Risk Scores for all threats identified in the analysis. Accordingly, the calculated Average Risk Score for the project is 12.2. Therefore, as per the Risk Level categorization in Table 5, the overall security risk rating for the project is **moderate**.

Table 6. Calculated Risk Score for the Project

Threat No.	Threat type	Likelihood Score	Impact Score	Risk Score
1	Armed attacks	2	5	10
2	Ambushes	2	5	10
3	Armed Robberies/raids	2	5	10
4	Kidnappings	2	5	10
5	Armed conflict between government and non-government forces	3	5	15
6	Vandalism	4	4	16
7	Community protests/civil unrest	5	3	15
8	Localized security threats	4	3	12
9	Common crimes	4	3	12
10	Workplace protest and violence	3	3	9
11	Theft of equipment and material	4	3	12
12	Project service/benefit-induced security risks	5	3	15
Average Risk Score				12.2

2.6 Risk Matrix Summary for the Project

The **Risk Matrix Summary** is indicated using the threat number assigned for each threat (see Table 1). The **Risk Level** for each security threat is indicated in the box at the intersection of the row (Impact Score) and column (Likelihood Score). The Risk Level is then categorized as Extreme, High, Substantial, Moderate, Low, or Very Low. As shown in Table 7, priority indicators are for those security risks that are most likely to occur and that would have a potential negative impact (on the project workers, operation, and/or affected community) if they did occur.

Table 7. Risk Matrix Summary for the Project

Risk Matrix		Impact				
		Very low	Low	Medium	High	Extreme
Likelihood /Probability of Threat	Frequent			7, 12		
	Probable			8, 9, 11	6	
	Medium			10		5
	Low					1, 2, 3, 4
	Improbable					

2.7 Mitigation Measures

The findings of the SRA, security risk analysis, and evaluation results from the preceding sections reveal that it is not necessary to engage security personnel (private and public) for the project’s direct security protection. Also, the overall security risk for the project is rated moderate. These findings recommend that applying the anticipation, avoidance, and minimization principles in the mitigation hierarchy can significantly solve the security problem. Once avoided and minimized, the residual security risks can be managed with reasonable actions of mitigation measures including physical security arrangements and security operating principles. Further, proposed mitigation measures are stated below.

Table 8. Summary of proposed mitigation measures

Potential security risk	Proposed mitigation measures	Responsible body
Armed attacks	<ul style="list-style-type: none"> • Measures to anticipate security risks from insurgent armed groups include: <ul style="list-style-type: none"> ✓ Map out specific project areas with the risk of armed attacks, ambushes, robberies, and kidnappings. ✓ Increased coordination and information sharing on potential security risks from armed groups' locomotion in the project areas with trusted public security actors such as local and regional peace and security offices. ✓ Engage with local communities to identify the 'warning signs' that would be evidence of the risks. • Measures to avoid or minimize the risks and adverse impacts include: <ul style="list-style-type: none"> ✓ Establish formal and consistent reporting and communications mechanisms with concerned public security organizations (e.g. National, Regional, and Local intelligence and Security Service). Communicate information among the project workers for early warning and safety measures. ✓ Avoid unsafe roads/routes for the movement of project workers and materials, if possible. ✓ Use air transportation in the project areas having airport services. ✓ Create staff's crime security awareness. ✓ Apply the staff's Code of Conduct restricting unsupervised movement in the areas and timing that could increase the risk of insurgent armed groups. ✓ Suspension of program activities in areas where the presence of armed groups is detected within a 50km radius of the project area for the response time of security forces. Given that this equates to an area of approximately 1500 km² 	<ul style="list-style-type: none"> • Top Management of the respective implementing agencies • Social Safeguards Specialists of the NPCU/PIU in the respective implementing agencies • Regional Social Safeguards Focal Persons
Ambushes		
Armed robberies/raids		
Kidnappings		
Armed conflict between gov't and non-gov't forces	<ul style="list-style-type: none"> • Establish formal and consistent reporting and communications mechanisms with the public security organizations (e.g. National, Regional, and Local intelligence and Security Services) for early warning/conflict warning signs. • Accordingly, communicate security information among the project workers for early warning and proactive safety measures (e.g. cease staff duties and mobility ahead of the outbreak of the conflict). • Avoid unsafe roads/routes for the movement of project workers and materials, if possible. • Use air transportation in the project areas having airport services. • Create staff's crime security awareness and proactive safety measures 	<ul style="list-style-type: none"> • Top Management of the respective implementing agencies • Social Safeguards Specialists of the NPCU/PIU in the respective implementing agencies

	<ul style="list-style-type: none"> • Apply the staff's Code of Conduct restricting unsupervised movement in the areas and timing that could increase security threats from armed conflicts. 	<ul style="list-style-type: none"> • Regional Social Safeguards Focal Persons
Community protests/ civil unrest	<ul style="list-style-type: none"> • Establish formal and consistent reporting and communications mechanisms with the public security organizations (e.g. National, Regional, and Local intelligence and Security Services) for early warning on community protests. • Accordingly, communicate security information among the project workers for early warning and proactive safety measures (e.g. close staff office duties during the community protests, avoid any travel to road blockade). • Use air transportation in the project areas having airport services. • Strictly instruct the project workers not to join the protesting crowds and stay home to avoid any security risks that may be caused due to the social disorder from community protests/civil unrest. Impose disciplinary measures on those workers violating this safety instruction. 	<ul style="list-style-type: none"> • Top Management of the respective implementing agencies • Social Safeguards Specialists of the NPCU/PIU in the respective implementing agencies • Regional Social Safeguards Focal Persons
Localized security threats	<ul style="list-style-type: none"> • Conducting socio-economic conflict analysis to understand the factors for localized security threats such as local inter-clan/ethnic/religious conflicts. • Identify/consider conflict 'warning signs'. Communities can make a list of warning signs that would be evidence of increasing local inter-clan/ethnic/religious tensions and conflicts • Early identification and management of resource-driven conflict intensifying factors: ethnic conflict, recent violence, historic animosity, weakness of claimant groups to control potential break-outs. • Understand the factors that exacerbate resource-based conflicts other than the scarcity of local resources. • Map out and work with individuals, organizations, and strategies that could help resolve resource-driven conflicts. • Avoid the project workers' travel to the project areas with active inter-clan or inter-ethnic conflicts 	<ul style="list-style-type: none"> • Social Safeguards Specialists of the NPCU/PIU in the respective implementing agencies • Regional Social Safeguards Focal Persons
Vandalism	<ul style="list-style-type: none"> • Premises fencing, especially materials areas, storage areas, and construction sites 	<ul style="list-style-type: none"> • Social Safeguards Specialists of the NPCU/PIU in the respective implementing agencies
Common crimes	<ul style="list-style-type: none"> • Apply measures of protecting targets/target hardening such use of burglary-resistant doors, windows, and locks for storage, burglary arms, and CCTV surveillance systems around the storage area and construction site. 	
Theft of project equipment and materials	<ul style="list-style-type: none"> • Implementing access control system - secure and monitor entrance and outlet points of the workplace, proper badge and visitor card system, etc • Not leaving visitors unattended in the workplace • Ensuring proper security lighting. 	

	<ul style="list-style-type: none"> • Maintain a properly executed inventory system • Permanently etching on equipment (e.g., spray paint and initials on a piece of equipment) 	<ul style="list-style-type: none"> • Regional Social Safeguards Focal Persons • Project procurement specialists • Civil work contractors
Workplace protests and violence	<ul style="list-style-type: none"> • Adhere to all provisions in the project LMP • Provide training for the project workers on the project LMP and GRM • Use alternative dispute resolution: Conciliation, mediation and/or arbitration. 	<ul style="list-style-type: none"> • Social Safeguards Specialists of the NPCU/PIU in the respective implementing agencies • Civil work contractors • Primary Supply Firms
Project service/benefit-induced security risks	<ul style="list-style-type: none"> • For the target regions/project areas with the problem, assess how the security threats from the FCV situations or active conflicts differentially impede the project services/benefits. Accordingly, devise and implement differential mitigation measures. • Identify the project-affected HUCs and disclose the project information in the appropriate formats (e.g. using non-technical explanations) and language understandable to the affected HUCs. • Arrange separate and meaningful consultations tailored to the culture and languages of the affected HUCs, consider their views and distinctive needs, and design and implement differentiated mitigation measures. • Follow the relevant mitigation measures provided in the Historically Underserved Peoples Planning Framework (<i>Annex 8</i>). 	<ul style="list-style-type: none"> • Social Safeguards Specialists of the PIU in the respective implementing agencies • Regional Social Safeguards Focal Persons • Engage competent Social Consultants

Table 9. Estimated Budget for the Project Risk Mitigation Measures

Activities/Items	Estimated Unit Cost in USD	Estimated Total Cost in USD	Estimated Budget Lamp Sum	Remarks
Recruitment of Social Safeguards Focal Persons E&S experts in the respective target regions and branch offices	Monthly salary/1 staff = 500\$	25 staff X 500\$/month = 12,500\$	750,000\$	1 staff/target region & branch office

Training for the Social Safeguards Staff of the PIU in the respective implementing agencies and Social Safeguards focal persons in the respective regions. Subjects covered include: applicable national laws, World Bank's (WB) policies, Crime Security Awareness and Proactive Safety Measures, LMP, GRM, Environmental Health and Safety Guidelines (EHSGs), and OHS measures	250\$ per person	300\$ X 30 Staff = 9000\$	300\$ X 30 Staff = 9000\$	Once, during the first implementation year
Physical security measures, as appropriate include premises/fencing, safe store locks, Doors, window grills, CCTV surveillance system, lighting, and signage.	10,000\$ per project site	10,000\$ X 30 project sites = 300,000\$	300,000	Once, in the first implementation year
Air tickets for the Social Safeguards staff of the PIUs in the respective implementing agencies (travel to and from the respective target regions/branch offices)	200\$ in round-trip (to and from a region/branch office)	200\$ in round-trip X 25 target regions/branch offices = 5000\$	25,000\$	One round-trip in each target region/branch office every year
Air tickets for Social Safeguards Focal Persons in the respective target regions/branch offices (travel to and from AA)	200\$ in round-trip/person	200\$ X 25 staff = 5000\$	25,000\$	One round-trip per annum
Vehicles and fuel	200,000\$/1 Pickup Car	200,000\$ X 4 = 400,000\$	400,000\$	1 Pickup Car for each Implementing Agency (IA)
Engaging Social Consultant for independent security audit	20,000\$ per security audit	20,000\$ X 2 = 40,000\$	40,000\$	At the end of the 2 nd and 4 th implementation year
Total			1,549,000\$	
Contingency (10%)			154,900\$	
Grand Total			1,703,900\$	

3. SECURITY MANAGEMENT PLAN

The SMP is an important tool that describes how the project security will be managed and delivered. This section develops the project SMP proportionate to the findings of the SRA discussed earlier.

3.1 Objectives of the Project's SMP

The overall objective of the SMP is to protect against and mitigate security risks at the project level that could threaten the project workers, activities, assets, and affected communities. It provides direction, organization, integration, and continuity to the project security performance throughout the implementation period.

The specific objectives of the project's security risk assessment and management plan are to:

- Describe institutional and legal framework that identifies potentially affected persons and groups, in particular those that are disadvantaged or vulnerable. Please, refer to the description in the ESMF (Section 3) in this regard.
- Assess the country, regional, and local contextual security risk factors that could threaten the effective implementation of the project.
- Assess, identify, and analyze the project's key security risks for response.
- Rate the overall level of security risk for the project and propose mitigation measures.
- Develop the project's SMP proportionate to the findings of the SRA.

3.2 Project's Security Management Approach

3.2.1 Stakeholder Engagement

While the SMP itself will remain a confidential document and will not be publicly disseminated, key features of the SMP that pertain to managing security risks for beneficiaries and PAPs will be communicated to local stakeholders. In turn, local stakeholders will be regularly consulted to understand additional security threats and be able to develop potential mitigation measures. Information dissemination and consultations will be based on the Project's Stakeholder Engagement Plan (SEP). The SEP presents the stakeholder consultation and engagement process for the project. It describes a systematic approach to stakeholder engagement, thus contributing to the development and maintenance of a constructive relationship with stakeholders throughout the project implementation. The SEP provides a stakeholder identification and analysis of the project. It further presents strategies for information disclosure, consultation, timing, incorporation of vulnerable groups, and timelines. Different engagement methods are proposed in the SEP and cover different stakeholder needs including structured agendas, public workshops, community consultations, beneficiary surveys, formal meetings, meaningful consultation methods tailored to the culture and languages of HUCs, one-on-one interviews, focus group discussions, separate interview/discussion for vulnerable groups, and online platforms (e.g. emails and Social Medias). For details in this regard, please, refer to the SEP provided as a stand-alone document.

3.2.2 Project-Level Grievance Redress Mechanism

Under the World Bank ESF, 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 the implementing agencies to

respond and manage such grievances'. Therefore, the project SMP provides the project workers and affected communities a GRM with a clear and transparent process for allegations of abuse to be reported.

Special attention to how allegations of gender-based violence are to be managed. As per World Bank standards, the GRM will be operated in addition to a separate GBV/SEA Protection Risk Action Plan, which includes reporting and referral guidelines. However, the project GRM will also cater to GBV/SEA cases. 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.

3.2.3 Periodic Review of SMP

The Social Safeguards of the PIU in the respective implementing agencies in coordination with the Social Safeguards Focal Persons in the respective target regions and branch offices will be in charge of continuous monitoring of the project security performance. Periodic review of the SMP to ensure that it remains relevant and appropriate. Accordingly, significant changes in the project's security situation will be reported immediately to the Bank, which will allow for necessary changes to the SMP or ESCP. The SMP will be updated or reviewed whenever there are new security events or threats, but at least periodically on an annual basis.

3.3 SMP Governance

SMP governance describes project security policy architecture and priorities, roles, and responsibilities.

3.3.1 Project Security Policy Architecture

The project security policy architecture is the hierarchy of binding documents guiding the project security operation principles and procedures. These are identified and described below.

Project SMP: The SMP underscores important industry standards including the national legislation and the World Bank's ESF requirements that describe how the project security will be managed and delivered. This SMP is the project's overarching guidance document for the security arrangement and all other procedures and protocols related to security. To this end, the SMP meets the risk mitigation requirements identified in the SRA by codifying risk-handling instruments and defining procedural security requirements.

Environmental and Social Commitment Plan (ESCP): The ESCP incorporates an accurate summary of the material measures and actions by the implementing agencies MoF, CSC, and MoR (as proposed in this SMP) to manage risks to the human security of project-affected communities and project workers. ESCP forms the basis for monitoring the project security performances as set out in this SMP. The overall requirements and responsibilities will be set out clearly in the ESCP so that there is no ambiguity around compliance, timing, and monitoring.

3.3.2 The Main Implementing Agencies

As is the case for other ESMPs, the main implementing agencies for the SMP will be the MoF, CSC, and MoR. In the context of safety and security, the strategic direction for the project security management is set by the top management of the respective implementing agencies (MoF, CSC, and MoR). Whereas the Social Safeguards expertise in the respective PIU's will be responsible for running the day-to-day performance of the project SMP in cooperation with the Social Safeguards Focal Persons in the target regions and branch offices.

3.3.3 Management Structures and Responsibilities

The management structures describe the subjects of oversight and control of security operations including overall lines of control, accountability, and supervision for the security effort.

Top management of the implementing agencies

The top management includes the Minister or Deputy Minister of the MoF, CSC, and MoR. They are responsible for the project's security management issues that require a higher level decision such as (a) making communication with their counter management level in the National Intelligence and Security Services, establishing consistent mechanisms for sharing security information regarding the locomotion and threats from insurgent armed groups for proactive project security measures (b) sets the strategic security direction and necessary resources through the SMP (c) conducts review of SMP every 12 months and (d) seek WB no objections on SMP.

Project Implementing Unit (PIU)

The Social Safeguards of the PIUs in the respective implementing agencies will bear the overall responsibility for running the day-to-day performance of the project SMP. Further specific responsibilities of the Social Safeguards in the respective PIUs include:

- Give guidance and support to the Social Safeguards Focal Persons in the target regions and branch offices.
- Closely oversight and cooperate with the Social Safeguards Focal Persons in the target regions and branch offices to regularly monitor the implementation of the SMP in line with their respective Component and subproject activities.
- Bear project security management issues that require strategic and/or immediate decisions of the top management. For instance, report security incidents in any of the project areas with significant changes in the project SMP to the top management within 24 hours and to the World Bank within 48 hours.
- Collect and document monthly project security performance reports from the Social Safeguards Focal Person in each region and branch office. Compile key project security issues, prepare summary reports, and submit them to the World Bank every quarter.

Regional Social Safeguards Focal Persons

The Social Safeguards Focal Persons are responsible for the effective implementation of the project SMP in their respective regions or branch offices. Among their major responsibilities include:

- Closely work with the Social Safeguards in their counter-PIUs and regularly monitor the performance of the SMP in their respective project areas.
- Prepare project security performance specific to their regions/project areas and submit to the Social Safeguards of their counter PIUs every month.
- Report any major security incidents in their project areas to the Social Safeguards of their counter PIUs within 12 hours for further action.

Social Consultant

Among other things, the engaged Social Consultant is responsible for providing the PIUs technical support in assessing the disproportionate adverse security impacts from the project to disadvantaged or vulnerable groups and individuals such as Historically Underserved Communities (HUCs). Also, undertake independent security audit regarding the implementation of the project SMP including the differential mitigation measures for vulnerable individuals and groups such as HUCs. Further, the Social Consultant will be responsible for providing training for the PIU staff and regional focal persons covering the key issues proposed in the mitigation measures (see Table 8, within this Annex-SRA/MP).

3.4 Project Security Arrangement

3.4.1 Physical Security

As assessed in the findings of the project SRA, major security aspects of the project can be solved just through physical security systems. Depending on the level of security risk to project workers and the nature of the project assets for protection, the physical security measures may include: (a) *security barriers*—such as fences, gates, locks, fortifying facilities, and means of access control (b) *access-point operations*—this key procedure describes on the types of checks and screening for both people and vehicles at gates or other access points for the project (c) *surveillance/electronic security systems*—including CCTV, Intrusion Detection Systems, and surveillance guard posts and patrols (d) *security control center*—describing the means for bringing together reporting and controlling response and (e) *vehicle access control*—all vehicles accessing the project facilities will be accessed through with the driver only after going through a security check/search for prohibited items such as alcohol beverages, firearms, knives and dangerous drugs. Further physical security measures are described in the Security Operating Procedures annexed in the document.

3.4.2 Use of Security Personnel

As discussed earlier, the findings of the project SRA identify no subproject activities that require the use of private and public security personnel for the project's direct security protection services. Most implementing agencies' facilities already have public security personnel, or at least security guards that secure the facilities' compounds. Though the project does not deploy these, they protect project workers

from security risks. Also, please note that contractor(s) typically use their security guards even if the site is within existing government facilities. Therefore, the project security arrangement excludes the use of private and public security personnel.

3.5 Security Operating Procedures

Security Operating Procedures describes key procedures and how these fit together. These are common procedures including boundary security (perimeter and access control), access-point operations (screening of people and vehicles), incident response (who will respond, and how), security patrols, travel security, materials storage and control, information and communication. Details of the project security operating procedures are annexed to this SMP (**Annex 2**).

4. GRIEVANCE REDRESS MECHANISM

The project-level GRM is a structure that is being established by the requirements of ESS10 (SEP) and other relevant standards. Thus, the SMP adopts the project-level GRM provided in the ESF instruments such as SEP & ESMF to effectively record, investigate, and resolve issues related to the security and safety of project workers and other stakeholders.

The IAs will respond to concerns and grievances of the project workers and affected parties related to the environmental and social performance of the project including SMP in a timely manner. For this purpose, the implementing agencies will establish a project-level GRM to make the grievance mechanism accessible and inclusive by assigning dedicated and qualified staff. The project GRM will have the following channels and procedures.

4.1 Means of Receiving Complaints

The means of receiving complaints provides multiple options for submission of grievances by the project-affected persons in order to avoid barriers. Also, the means of submitting complaints will be publicized to the project-affected parties using different ways including community meetings, noticeboard, community radio, local newspaper, and TV channels. The publicity includes information that allow the project-affected parties know where to go and whom to talk to if they have a complaint, and understand what the process will be for handling it. The means of receiving complaints include but are not limited to:

- *In person*: This may be verbal or written submissions at any time through a face-to-face interaction with the project GRM staff.
- *Grievance box*: Grievance boxes placed in strategic places of the project implementation sites or communities where the project-affected parties would drop in their grievances at any time.
- *Hotlines or SMS*: Providing the project-affected parties with hotlines or call centers to submit complaints through phone call or SMS.
- *Community meeting*: Arrange periodic meetings with the project-affected communities and other stakeholders to express complaints.
- *Webpage/Social Media platforms*: For those with knowhow and have access to use, create a dedicated project webpage/Social Media platforms to submit complaints through online system.

4.2 GRM Protocols

The project GRM staff will consider the submitted complaints and attempt to resolve it within the same day. Otherwise, report the complaints to the Social Safeguards of the PIU in the respective IA. In turn, consult with the top management in the respective IA and resolve the complaints within a maximum of one week. The party with the complaints will let know the decision accordingly.

In events where the grievance is not resolved through the aforesaid process, the project GRM will not prevent the rights of the project-affected party with complaints to use the formal court option. The affected party shall be advised to take the cases to the regular court system. This would assist in creating an alternative space for the project-affected parties who would otherwise not be able to voice out their concerns through the project GRM.

4.3 Grievance log

The project grievance mechanism will have a log where grievances are properly recorded in a written documentation and will be maintained as a database. Among other things, the log will contain the following information:

- Point of grievance.
- Project site and region.
- Date the complaint was reported.
- Date the Grievance Log was added onto the project database.
- Date response was sent to complainant.
- Final decision/resolution.
- The date the complaint was closed out

5. IMPLEMENTATION AND MONITORING

The Social Safeguards Specialists in the respective PIUs will monitor the performance of the project security management on an ongoing basis. The level of detail in this analysis will be proportional to the level of risk and be referenced in the project Implementation Status and Report (ISR). The ISR should note any significant changes in the security situation that can higher the rating from moderate to high risk. To this end, monitoring uses diverse methods including but not limited to the following ones.

5.1 Site Visits

As required in the Good Practice Notes, the PIUs in the respective IAs will plan for and implement site visits to monitor the project's performance of security management. The frequency of the site visits may be determined as necessary, but the annual visit is the minimum requirement. To track the project's security performance, site visits will use different means of collecting information including scheduled meetings with the project workers and public beneficiaries and observation on site.

5.2 On Site Observation

On site observations provide the opportunity for many useful insights about security while arriving at and moving around the site. There should be an advance briefing about the project activities, sites, and security issues that may help focus questions and observations. The project site physical security arrangement proposed in Sub-section 3.4.1 can be used as a checklist for on site observation.

5.3 Security Audits

The Social Safeguards of the PIU in each IA will conduct internal security audit throughout the life-cycle of a contractor's contract period. The audits will be conducted on an ad hoc basis and with minimal warning. But it will be conducted at least annually. The security performance of the contractors will be audited based on the extent to which they effectively implement the security operating procedures provided in **Annex 2**.

5.4 External/Independent Security Audits

The security audits can be carried out through a third-party or independent expertise. This can be the case following a serious security complaints or incidents to the project workers. The security audits checklists are given in **Annex 3**.

Annex 1: Guiding Questions for the SRA

1. Are there armed insurgent attacks, armed robbery, or armed kidnapping specific to certain project target region or project location? What are the drivers of the armed attacks? Who are the targets of the attacks?
2. Are there conflicts between government and non-government forces in your region? Who are the actors in the conflicts?
3. Based on the contextual security risk in your region:
 - a) Is there a recent history of conflict or current violent conflict?
 - b) What are the geographical hotspots of conflict or violence?
 - c) Are there areas of post-conflict transition (where tensions may still be high)?
 - d) What is the role of public security forces in the current conflict? Will it affect the project's security arrangements (and those of the surrounding communities)?
 - e) Is there a history of misconduct or alleged human rights abuses by the police and/or military?
 - f) Do people (especially women and other vulnerable groups) feel intimidated by or scared of the security forces?
4. From your knowledge or past work experience in development projects, do crime levels differ between the project area and the surrounding areas, including between the project site and transportation routes? What types of crime are commonly prevalent in the project site?
5. Are there community grievances over public service delivery or governance issues? Are there recent protests that have involved fatalities or injuries near the project area? Who are the main groups that protest? (For example, what roles do youth, men, and women play?)
6. Is there a recent history of land disputes, such as over tenure, ownership, or land use in your region?
7. Has there been recent influx of refugees or IDPs in your region? What are the causes of the influx? What are the impacts of influxes on the security issues?

Annex 2. Security Operating Procedures

Security Operating Procedures describes key procedures and how these fit together. These are common procedures including boundary security (perimeter and access control), access-point operations (screening of people and vehicles), incident response (who will respond, and how), security patrols, travel security, materials storage and control, information and communication.

Operating Procedures

The following major operating security procedures should be put in place to ensure security within the project areas/sites

Boundary Security: The boundary security in the project site and associated facilities shall be marked by security fences.

Access-Point Operations: Project staff and visitors will access site through designated gates. Searches will only be conducted by security personnel who have received instructions and information regarding the procedure and the legal aspects of search and seizure. Body searches will only be conducted by security personnel of the same gender. Above all, implementing agencies, contractors, and sub-contractors shall have booking in and out procedures for all regular project workers and visitors.

Vehicle Access Control Procedures: All Vehicles accessing project facilities will be accessed through the approaching ways suggested in consultation with the project workers and at the gate with the driver only after going through a security check/search for prohibited items such as alcoholic beverages, firearms, knives, and dangerous drugs. The driver must declare his entire luggage at the main gate (Personal luggage) for checking. Besides, a vehicle access log will be maintained.

Materials Storage and Control: If applicable, describe any controls over the transport, inventory, and maintenance of storage areas for raw materials, equipment, etc. Note that these are stored in accordance with appropriate national laws and regulations and relevant good international industry practice, including the World Bank Group Environmental, Health and Safety Guidelines. Likewise, the provision in the ESMF set out that any sub-project that involve the use or storage of hazardous materials should establish management programs that are commensurate with the potential risks present. The use/handling of hazardous materials requires: the provision of sufficient quantities of appropriate protective gear for the users, appropriate application equipment with spare parts, and training in risk reduction including proper use of protective gear and proper application of products. Whereas proper storage of the hazardous materials requires: appropriate storage facilities, appropriate protective gear and materials for store keepers to handle emergencies, and Material Safety Data Sheets (product information with emergency instructions).

Vehicles: All project cars used for operations are to be parked within a secured compound. Besides, all vehicles must be licensed and checked periodically, and each vehicle must be equipped with a spare tire, a toolbox, a first aid kit, and a vehicle logbook. Above all, drivers

must abide by the traffic laws and not exceed the speed limit; they must immediately report any traffic accident.

Firearms Security: Project policy regarding firearms on-site, as well as the responsibilities and procedures for issuing and storing any security firearms, ammunition, and non-lethal weapons. This should include: location for storage; how weapons are properly secured during storage; records for issuance; who they may be issued to; safeguarding while in possession of the personnel; and audits.

Prohibited Items: Bringing items such as; knives, guns, alcoholic beverages, drugs, and explosives of any type to project sites by workers and visitors is strictly prohibited.

Incident Response: Any security incident related to the subprojects directly affecting project staff, equipment, and communities should be reported by the Regional Social Safeguards Focal Person to the nearest police post immediately. In the event of a serious insecurity occurrence, the Regional Social Safeguards Focal Person should report to the Social Safeguards of the PIU in the respective IA within 6 hours and, in turn, will notify the WB Bank within 24 hours.

Travel Security: Travel security will be required where subproject staff and equipment are transiting through areas with security risks. In this case, the arrangement for travel security shall be coordinated by the PIU or regional implementing agencies in coordination with the national information network security agency or regional/local security offices. Travel to high-risk areas is subject to a security risk assessment and that authority be sought from the PIU Coordinator. Where GSM coverage is not guaranteed, staff should be issued with a satellite phone. Staff should also carry a grab bag, containing food, water, first aid kit, medicines, etc.

Hierarchy of Hazard Management

Eliminate the Hazard: Determine if the process, plant, equipment, testing methods, materials or substances are necessary.

Substitute the Hazard: Reduce the risk by substituting a less hazardous process, plant, equipment, testing method, material, or substance (e.g. Replace ladder with scissor lift, Substitute solvent paint with water-based paint, Redesign plant to reduce noise levels, Replace frequent telephone use with headsets).

Isolate the Hazard: Isolate the hazard by using containment, shielding, or distance (Put protection around noisy equipment and Guards over moving parts).

Engineering Controls: Install barriers, guards, ventilation, or alarms to reduce the exposure to the hazard, and minimize the size or volume of the hazard. Rearrange the work area and workflow (e.g. Use mechanical aids to reduce manual handling).

Administrative Controls: Reduce the duration of exposure to the hazard Intersperse high demand or intense activity with lighter, less intense tasks. Establish safe work practices, and

provide training and supervision appropriate to the level of expertise of the personnel involved. Introduce procedures, signs permits to increase awareness of the hazard or limit exposure to the hazard. Administrative controls may be used as a secondary measure to supplement the other agreed risk controls (e.g. Job rotation, work instructions, restricting access to the area, keeping the area free of disorder, being prepared for emergencies, and Training and induction projects).

Personal Protective Equipment: Provide personal protection. This is the last resort because it is the least reliable and requires high levels of supervision, skills, and attention. Personal protection may be used as a secondary measure to supplement the other agreed risk controls (e.g. Hearing protective devices, respirators, hard hats, etc.)

Fire Protection

Flammable and explosive materials should also be managed to avoid uncontrolled reactions or conditions resulting in fire or explosion. Hence, Store incompatible materials in separate areas, and with containment facilities separating material storage areas. Besides, material-specific storage for extremely hazardous or reactive materials should be provided. In addition, select materials of construction compatible with products stored for all parts of storage and delivery systems, and avoid reuse of tanks for different products without checking material compatibility. Furthermore, store hazardous materials in an area of the facility separated from the main production works. In cases, where proximity is unavoidable, physical separation should be provided using structures designed to prevent fire, explosion, spill, and other emergency situations from affecting facility operations. Prohibition of all sources of ignition from areas near flammable storage tanks.

Occupational Health and Safety (OHS)

The project implementing agencies and project Contractors will ensure a safe and healthy working environment recognizing the potential OHS risks related to the project. Accordingly, they will ensure that reasonable precautions are taken to protect workers potentially exposed to project-related occupation risks. Hence, implementing agencies, contractors, and subcontractors shall assess the risks of injury to workers and the local community generated by the project activities; provide hostile environment training; provide adequate protective equipment (PPE).

Annex 3. Security Checklist for Audit Process

Name of Contractor:		Date:	Name of Respondent:		
No.	Criteria	Yes	No	Comment/Explanation	
1.	Does the Contractor conduct security risk assessments prior to all activity?				
2.	Is there a continuous review process of the security risk assessments in place?				
3.	Are all Security protocols linked to these risk assessments, i.e. does the level of risk identified directly impact on which security mitigation measures are employed?				
4.	Does the Contractor have a clear, formal and transparent internal Security hierarchy with clearly denoted security responsibilities?				
5.	Does the Contractor employ a full-time security professional to manage and mitigate risk for its personnel?				
6.	Do Contractor staff responsible for security have the authority to take or demand corrective action?				
7.	Does the Contractor maintain SOPs for the Security of personnel, property, and infrastructure?				
8.	Are all Contractor personnel aware of their responsibilities within these SOPs?				
9.	Does the Contractor hold and maintain communication protocols, are these robust enough to ensure communication with all personnel during emergencies?				
10.	Does the Contractor hold and maintain movement protocols, are these implemented effectively and are they linked to Security Risk Assessments?				
11.	Does the Contractor maintain access mapping?				
12.	Do clear lines of communication exist for project workers when organizing missions and understanding the required levels of security and mitigation measures?				
13.	Are there internal processes in place to record, track, and monitor the ongoing missions and any action taken on them?				
14.	Is there a templated and mandated security reporting framework?				
15.	Are project personnel provided with pre deployment briefings (security briefings), HEAT training, culture briefings, and training on the Contractor's security procedures?				
16.	Are all workers (including from sub-contractors) inducted to internal safety and security policies?				
17.	Does the Contractor maintain and train its personnel on in extremis 'Actions on'?				
18.	Does a process for quality assurance and periodic evaluation of the internal security policies and procedures exist, that informs proactive actions for development?				
19.	Is there a security component to the recruitment process, i.e. criminal background checks?				
20.	Does the Contractor have established community engagement protocols?				
21.	Does the Contractor have Crisis response procedures (including Hostage incident management protocols)?				

22.	Does the Contractor hold and maintain effective Relocation and Evacuation procedures? Are these tested regularly?			
23.	Does the Contractor request workers to sign a Code of Conduct with reference to internal safety and security policies?			
24.	Can the Contractor furnish records of all mission information and project worker incidents, and provide them to the PIU?			

Annex 4: Incident Reporting Procedure

Purpose

Incident reporting: means of receiving and reporting incidents and allegations, and guidelines for receiving and following up on them, including procedures for reporting to the project implementing agencies and the Bank, as required. The purpose of this procedure is to outline the requirements, methods and outcomes of reporting all incidents and accidents.

Scope

The following incidents and accidents will be reported, irrespective of the nature and level of severity:

- Fatality and critical injury/illness, illness or injury for which an employee receives/seeks medical attention
- First aid treatment, occupational disease,
- Property damage and fire
- Environmental release (chemical spillages)
- Explosions
- Exposures to biological, chemical or physical agents and other related.

Roles and Responsibilities

Social Safeguards in the PIU:

- Social Safeguards in the PIU closely work with Regional Social Safeguards Focal Persons and shall continue and regular monitoring and follow up project related incidents and accidents.
- Report serious project related incidents and accidents to the top management of IAs and World Bank with 24 hours.
- Ensure all project site staff are provided with incident and accident reporting Template, and the templates completed.
- Ensure injured or ill employees have received the required medical treatment and regularly update their health status to the PIU.

Regional Social Safeguards Focal Person:

- Conduct continuous and regular monitoring and follow up of security incidents and accidents in the project region.
- Report the case to the appropriate local administration entities and other relevant bodies.
- Ensure the injured persons have received the required medical treatment.
- Ensure Incident/accident Templates are completed.
- Report serious incident/accident to the Social Safeguards in the PIU within 6 hours for appropriate actions.

Reporting Security-posed GBV

Women civil servants are often vulnerable to security problems and reporting security-posed GBV requires special consideration. For GBV—and particularly SEA/SH—complaints, there are risks of stigmatization, rejection and reprisals against survivors. This creates and reinforces a culture of silence so survivors may be reticent to report. Specific considerations for reporting security-posed GBV include:

- In case of serious GBV, the Regional Social Safeguards Focal Person should report to the Social Safeguards in the PIU within 6 hours. In turn, should report to the World Bank within 24 hours for appropriate actions.
- To enable women to safely access the GM, multiple channels through which complaints can be reported in a safe manner.

- Confidentiality is essential throughout the process. Otherwise, the survivor risks retaliation and a loss of security.
- Protocols to comply with mandatory reporting requirements, if applicable under national law, including to inform survivors (ideally prior to disclosure) of this obligation and any limits on confidentiality
- The GM should assist SEA/SH survivors by referring them to GBV service provider(s) for support immediately after receiving a complaint directly from a survivor. This should be possible because a list of service providers would already be available before the project work commences as part of the mapping exercise.
- Protocols on responding to survivors, applying the survivor-centered approach, including a referral pathway to refer survivors to appropriate support services;
- Specific provisions to address allegations involving children who are survivors of SEA/SH, including the consideration of the best interests of the child, specialist support services, and the role of parents/guardians in the response process.

Annex 5: Security Incident Registration Form

Region----- **Project name** -----

Date:	
Section 1: recorder /investigator	
Name	Position
Section 2: Incident description	
Date and time of incident:	
Location of incident:	
Detail description of the incident:	
Detail description of the incident from eye wittiness:	
Section C: identify the root cause: what caused the incident to happen?	
Section D: Action taken to mitigate or incidents:	
Section E: Recommended corrective action to prevent future:	

Annex 10. SEA/SH Prevention and Response Action Plan

1. Contextual SEA and SH Risks

Identifying and understanding the project-related SEA/SH risk factors as they interact with other contextual risk factors is critical for developing appropriate prevention and mitigation measures. Multiple GBV risk factors may contribute to the risks of SEA/SH and the influence manifests at the national, regional, community, family, and individual levels.

- *In the national context*, low capacity for GBV service provision for survivors, legal barriers, and weak implementation of the existing GBV legislation and policy frameworks can contribute to the risks of SEA/SH. Also, as reported in the 2016 Ethiopian Demographic and Health Survey (EDHS), in Ethiopia, violence against women and girls continues to be a major challenge and a threat to women's empowerment. Women and girls face physical, emotional, and sexual abuses that undermine their health and ability to earn a living and disrupt their social systems and relationships.
- *In the regional context*, many of the Regional Bureaus of the target Ministerial Organizations are located in the regions with FCV situations or active conflicts. In such fragile or conflict-affected environments, the social fabric may have broken down and the rule of law may be difficult to enforce. This increases the vulnerability of Women/girls in general and female employees in the target Regional Bureaus in particular for GBV. This contributes to the risks of SEA, actual or threatened physical intrusion of a sexual nature such as rape.
- *In the community context*, among others, the cultural norms that justify or condone the use of violence against women and girls as a normal disciplinary measure, the patriarchal [systems or](#) gender norms that perpetuate the power differentials (control over the social participation and economic resources, decision making) between the women and men, lack of awareness on GBV, low educational level, and poverty are all the factors of GBV risks. The context provides the actual or attempted abuse of a position of vulnerability and differential power for committing SEA.
- *At the family level*, the findings of the 2016 EDHS revealed that the perpetrators of GBV including sexual violence are largely close family members, particularly husbands or sexual partners. Several other factors in the family context including marital control/jealous non-egalitarian decision-making, alcohol use, economic stress, not conforming to gender role expectations, and opposition to departure from social norms about gender roles pose the GBV risk factors. This situation increases the risks of SEA as close family members such as husbands and sexual partners are the main perpetrators of sexual violence rather than being the defenders of their women's family members.
- At the individual level, there are numerous factors including being a woman or a girl, low level of educational attainment, lack of information on where and how to report, being a gender minority, being a member of HUCs, age, being a person with a disability, lack of social support, and lack of sufficient personal income that increase the risks of GBV. These GBV risk factors increase the risks of SEA making the victims powerless to report the acts of SEA and use the justice system for solution.

2. Project SEA and SH Risks

All the project Components have subproject activities with potential risks of SH. The civil servants implementing all the project Components are composed of female and male employees working side by side or within the same office. SH can occur between the personnel of the project implementing agencies. This can take the form of an unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be

expected or be perceived to cause offense or humiliation to another. Such conduct among the employees may interfere with work to make a condition of employment or create an intimidating, hostile, or offensive work environment to properly implement the project. All the project Components have subproject activities involving capacity building for the personnel of the respective implementing agencies. This may be followed by a continuous assessment of the employee's competency and behavioral change to fit performance-oriented personnel management. Added to this, the position of management/decision-making in all the implementing agencies is occupied by males. The female employees may be requested for sexual favors to get the opportunity for capacity-building activities or unfairly evaluated in the competency assessment. The project SH risks in both cases are substantial.

The SEA risks for the project can occur in different forms. Components 1, 2, and 3 comprise subproject activities involving the delivery of crucial public services targeting a large number and different groups of the public. Despite the digital reform expected to significantly reduce the problem, abuse in the delivery of public services can occur by way of SEA. For instance, access to public services can be used to extract sexual gain: The management or employees of the respective implementing agencies can request the users for sexual favors in exchange for access to the public service in need. The SEA risk in this form is substantial. In addition, Component 2 has civil work subproject activities that pose the risks of SEA. A project worker (contractor staff, subcontractor staff, supervising engineer) can use unequal power or abuse a vulnerable position to force female labor workers into unwanted sex. However, the civil work activities are limited to the construction of a tax data warehouse within the MoR and the ensuing SEA risk is not significant as such. Yet, the employees of the implementing agencies, particularly in Historically Underserved Regions, may have sexual relationships with underage children and women members of HUCs. Based on the assessment of the ESMF, the overall risks of SEA/SH for the project are rated as **substantial**.

3. Risk Management Systems (status/proposed interventions)

Given the assessment of the risks of SEA/SH for the project highlighted before, appropriate risk management systems are proposed below.

- *Borrower Policies on SEA/SH:* The project implementing agencies are responsible for preparing the SEA/SH Action Plan which outlines: how the project will put in place the necessary awareness-raising strategies, protocols, and mechanisms to address the SEA/SH risks; and how to address any SEA/SH allegations that may arise.
- *Code of Conduct (CoC):* Behavioral standards, CoC, and disciplinary measures that explicitly prohibit SEA/SH are recommended. Explicit provisions that prohibit and define SEA/SH in line with international standards, including a prohibition on sexual activity with anyone under the age of 18, and define mandatory consequences elevate awareness of SEA/SH risks and provide a clear path of accountability for violations.
- *Referral Pathways for Survivor Care and Support:* The GBV service provider provides the necessary support to the survivor until it is no longer. Ideally, the survivor care and support include case management support, health services, psychosocial support, police support and security, access to legal services, and shelter, if needed. However, often, GBV service providers offer one or two services, but not the whole range of applicable services. To maximize access to all appropriate services a survivor might need, a service provider should be able to actively refer survivors to other service providers, to enable the survivor to get the range of services that will provide a path to healing. The referral pathways will be kept with a survivor-centered approach: (a) accessing services

should be the choice of the survivor, and (b) access to police and justice services should be made available should the survivor choose to pursue charges through the local justice system.

- **Safe and Confidential Staff and Community Reporting Mechanisms.**
- *SEA/SH GRM:* To enable women to safely access the GM, multiple channels through which complaints can be registered safely and confidentially can be enabled.
- *Accountability and Response Framework:* Include an Accountability and Response Framework that details how allegations of SEA/SH will be handled and disciplinary action for violation of the CoC by workers. The Accountability and Response Framework includes details on (a) how allegations will be handled, in what timeframe, and the range of possible disciplinary actions for violation of the CoC by workers, taking account of due process (b) procedures to report SEA/SH allegations internally for case accountability (c) protocols on responding to survivors (d) procedures that lay out confidentiality requirements for dealing with cases (e) specific provisions to address allegations involving children survivors (f) protocols to comply with mandatory reporting requirements (g) procedures for review of complaints or incident reports and (h) protocols for protection of whistleblowers and prohibition on retaliation against survivors.
- *Capacity to implement the SEA/SH Action Plan:* An adequate response to SEA/SH depends on the ability of the project to provide access to safe and ethical services for survivors. It is highly recommended that the project implementing agencies identify and work with GBV service providers at the local, regional, and federal levels. Also, to properly address the risks of SEA/SH, the training and sensitizing of the workers of implementing agencies, civil works contractors (including sub-contractors and suppliers and their workers, and supervising Engineers) is essential.

4. SEA/ SH Action Plan

Specific measures for mitigating SEA/SH risks under the project including the mitigation measures already in place as well as steps to be undertaken to further mitigate and respond to risks and allegations of SEA and SH in the project sites are described below.

SEA/SH Prevention and Response Action Plan

S/N	Activity to Address SEA/SH Risk	Steps to be taken	Timeline	Responsible	Who Monitoring	Output Indicators	Estimated Budget (Lamp Sum)
1.	<i>Sensitize Borrower (and, where relevant, Supervising Engineer and Contractor) on the importance of addressing SEA/SH on the project, and the mechanisms that will be implemented</i>						
	Train on SEA and SH to include: a. Accountability and Response Framework b. Responsibilities and reporting c. Confidentiality and whistle-blower protection clauses	<ul style="list-style-type: none"> • Prepare the training materials • Specify the appropriate trainees, communicate with and schedule the training program • Conduct the training 	Within the first quarter of the implementation period	Social Safeguards Specialists in the respective PIUs	Project Managers in the respective PIUs	<ul style="list-style-type: none"> • Training materials prepared • Number of training conducted • Number of workers taking training 	20,000\$
2.	<i>Conduct SEA and SH assessments at project sites</i>						
	Conduct an SEA and SH risk assessment in the project area to inform risk mitigation strategies, including analysis of GBV issues, services, and gaps in services	<ul style="list-style-type: none"> • ESRS at the concept stage • Conduct SEA/SH as part of the ESMF • Conduct SEA/SH as part of the ESIA • Assess SEA/SH throughout the project lifecycle 	Beginning with the project preparation stage and continuing throughout the project lifecycle	Social Consultant, Social Safeguards Specialist in the respective PIUs	-The Bank Social Safeguards Team -Project Managers in the PIUs	<ul style="list-style-type: none"> • SEA/SH risk assessment documented in the ESMF • SEA/SH risk assessment documented in the ESIA 	Part of the budget for the preparation of the ESMF and ESIA
3	<i>Map out GBV prevention and response service providers able to provide care to SEA and SH survivors</i>						
a.	Map out and review the capacity and quality of GBV service providers in the project area able to provide care and	<ul style="list-style-type: none"> • Identify GBV SEA/SH service providers in the project areas. • Assess the quality of identified GBV service providers in accordance 	In the first quarter of the implementation period	-Social Safeguards Specialists in the respective PIUs	Project Managers in the respective PIUs	<ul style="list-style-type: none"> • List of identified GBV service providers with quality services • Agreement/MoU signed with 	100,000\$

	support to SEA and SH survivors.	<p>with international standards that articulate a minimum basic package of services, ideally including case management support, health services, psycho-social support, police support and security, access to legal services, and shelter, if needed.</p> <ul style="list-style-type: none"> • Sign an agreement/MoU with those service providers with the minimum quality. • Deliver GBV/SEA/SH interventions by a qualified service provider 		-Social Safeguards Focal Persons in the respective project regions/branch offices		<p>qualified GBV service providers</p> <ul style="list-style-type: none"> • Number of GBV survivors received services 	
b.	Develop and/or update a multi-sectoral GBV/SEA/SH referral pathway(s) for all project sites	<ul style="list-style-type: none"> • Considering the mapped out GBV prevention and response service providers, a referral pathway for service providers will be developed/updated • Disseminate the referral pathway/list to stakeholders including service providers • Information dissemination on existing GBV response services and the importance of timely reporting will be conducted 	<p>-Within the first quarter of the kick-off of the work plan</p> <p>-To be frequently updated and maintained throughout project implementation.</p>	-Social Safeguards Specialists in the respective PIUs -Social Safeguards Focal Persons in the respective project regions/branch offices	Project Managers in the respective PIUs	<ul style="list-style-type: none"> • the referral pathway developed/updated • The level of dissemination undertaken • Information dissemination conducted 	30,000\$
c.	Stakeholder consultations	<ul style="list-style-type: none"> • Identify the right stakeholders including 	-Within the first quarter of the	-Social Safeguards	Project Managers	<ul style="list-style-type: none"> • List of appropriate stakeholders 	150,000\$

		<ul style="list-style-type: none"> ✓ SEA/SH survivors ✓ Leaders and expertise of the GBV Service Providers ✓ Leaders and expertise in local Women and Social Affairs Offices ✓ Leaders of community organizations working on women’s and girls’ rights ✓ Community leaders, clan leaders, religious leaders ✓ Leaders of local law enforcement • Prepare GBV issues for consultation including Accountability and Response Framework. 	kick-off of the work plan and continuous throughout the project implementation period	Specialists in the respective PIUs -Social Safeguards Focal Persons in the respective project regions/branch offices	in the respective PIUs	<p>identified for consultation</p> <ul style="list-style-type: none"> • Prepared structured agendas for consultation 	
d.	Capacity building of multi-sectoral GBV service providers on relevant GBV response topics.	The capacity building plan will be developed based on service mapping findings and appropriate budget will be allocated.	Within the first quarter of the implementation period	-Social Safeguards Specialists in the respective PIUs	Project Managers in the respective PIUs	<ul style="list-style-type: none"> • Capacity building plan developed (for service providers) • Number of participants receiving capacity-building activities 	50,000\$
4.	Strengthen Institutional capacity for SEA and SH risk mitigation and response						
a.	Engage/hire a GBV/SEA/SH Specialist to supervise and	<ul style="list-style-type: none"> • Recruit qualified and experienced GBV/SEA/SH specialist 	-Within the first quarter of the kick-off of the	-The World Bank	-The Bank Social	<ul style="list-style-type: none"> • Institutional gaps assessed 	50,000\$

	provide technical support for the implementation of SEA/SH Action Plan	<ul style="list-style-type: none"> Assess the institutional capacity gaps in the respective project IAs Provide the technical support as per the findings. 	work plan and continuous throughout the project implementation period	-IAs (MoF, CSC, & MoR) -Social Safeguards Specialists in the respective PIUs	Safeguards Team -Project Managers in the respective PIUs	<ul style="list-style-type: none"> The kind of technical support provided for the IAs 	
b.	Support capacity of local systems to respond to SEA and SH (e.g. police, health, legal, CDOs, CBOs): i) Strengthen the reporting mechanisms & procedures of local systems ii) Strengthen a survivor-centered referral and response. iii) Strengthen coordination for better services with local/national GBV/SEA service providers	<ul style="list-style-type: none"> Identify GBV survivors service providers in the project areas Assess the capacity of the GBV service providers to respond to SEA and SH survivors Develop and provide capacity-building activities 	-Within the first quarter of the kick-off of the work plan -As required throughout the project implementation period	GBV/SEA/SH Consultant	-The Bank Social Safeguards Team -Project Managers in the respective PIUs	<ul style="list-style-type: none"> List of GBV survivors service providers identified in the project areas Assessment findings of institutional gaps documented. Kind of capacity-building activities provided 	50,000\$
5.	<i>Integrate SEA and SH risk management in Borrower's and Contractors' Environment and Social Management Plan (ESMP)</i>						
a.	Incorporate SEA and SH risk in the Borrower's and Contractor's Environment and Social Management Plan (ESMP)	Ensure that the Borrower's and Contractor's ESMP clearly define the project's SEA/SH requirements through the specifications and employer's requirements including	-For the Borrower, disbursement precondition	Social Consultant	The Bank Social Safeguards Team	<ul style="list-style-type: none"> ESCP signed between the Borrower and the Bank 	5000\$

		<ul style="list-style-type: none"> ✓ Assessment of SEA/SH risks and prevention and mitigation measures ✓ CoC for GBV/SEA/SH ✓ Grievance Mechanism ✓ Monitoring and reporting procedures 	-For the Contractor, a precondition for bid evaluation and award of the contract			<ul style="list-style-type: none"> • Procurement document for bidding Contractors 	
b.	Develop and establish/review SEA and SH accountability framework to include: Allegation Procedures to report SEA and SH incidents and internally for case accountability procedures which should lay out confidentiality requirements for dealing with cases	<p>Accountability and Response Framework will be prepared which details at minimum how:</p> <ul style="list-style-type: none"> ✓ Allegations of SEA/SH will be handled. ✓ Procedures to report SEA/SH allegations internally for case accountability. ✓ Protocols on responding to survivors. ✓ Procedures that clearly lay out confidentiality requirements for dealing with cases. ✓ Protocols to comply with mandatory reporting requirements. ✓ Procedures for review of SEA/SH complaints or incident reports. ✓ Protocols for protection of whistleblowers and prohibition on retaliation against survivors. 	A precondition for the project disbursement	Social Consultant	The Bank Social Safeguards Team	Accountability and Response Framework developed	5000\$
6.	Review the Borrower's and Contractor's capacity to prevent and respond to SEA and SH						

a.	<p>Review for attention to SEA and SH:</p> <p>a. Human resource manuals and staff capacity.</p> <p>b. Existing SEA and SH Policies and Procedures.</p> <p>c. Project code of conduct.</p>	<ul style="list-style-type: none"> • Review the Borrower’s and Contractor’s human resource manuals and staff capacity to prevent and respond to the project’s SEA and SH • Review the adequacy of existing SEA and SH Policies and Procedures in the IAs • Develop the Project’s Code of Conduct 	A precondition for the project disbursement	Social Consultant	The Bank Social Safeguards Team	<ul style="list-style-type: none"> • Assessment finding gaps in the Borrower’s and Contractor’s human resource manuals, staff capacity, and policies and procedures to prevent and respond to the project’s SEA and SH • Prepared project SEA/SH CoC. 	2000\$
b.	Recruit/train an officer with GBV/SEA/SH-specific skills to support and supervise issues related to the subject.	<ul style="list-style-type: none"> • Recruit/train an officer with GBV/SEA/SH for the PIUs in the respective IAs. 	Within the first quarter of the implementation period	IAs (MoF, CSC, and MoR)	The Bank Social Safeguards Team	Hired/trained officer with GBV/SEA/SH specific skills in the respective PIUs	200,000\$
c.	Develop M&E program	<ul style="list-style-type: none"> • Purposed and continuous monitoring will conducted towards: <ul style="list-style-type: none"> ✓ Ensuring prompt, confidential responses to SEA, SH & GBV matters. ✓ Securing requisite support to SEA, SH & GBV survivors. ✓ Supporting the GRM teams to adhere to rules around consent and 	Ongoing throughout the Project implementation period.	-Social Safeguards Specialists in the respective PIUs	Project Managers in the respective PIUs	Quarterly M&E reports submitted to the Bank	50,000\$

		<p>confidentiality of the survivor.</p> <ul style="list-style-type: none"> ✓ Ensuring vulnerable groups' safe access to services (livelihoods). ✓ Paying attention to Community/beneficiaries response and feedback • Documented and recorded reports will be buttressed with the evidence of the findings and results of the activities. 					
d.	Conduct SEA and SH orientation training for project staff	Prepare training materials	Within the first quarter of the implementation period and as required throughout the implementation period	Social Consultant	-IAs -The World Bank	<ul style="list-style-type: none"> • Prepared training materials • Number of training sessions conducted 	5000\$
7.	<i>Inform project-affected communities about SE risks</i>						
a.	Establish partnerships with CBOs/CSOs and local government institution	<ul style="list-style-type: none"> • Identify CBOs/CSOs and government institutions working on women's affairs. • Sign an MoU for partnerships 	Within the first year of the implementation period and continuously throughout the project period	-Social Safeguards Specialists in the respective PIUs	Project Managers in the respective PIUs	An MoU signed with CBOs/CSOs and local government institutions for partnership	
b.	Identify, train, and establish community focal points for SEA activities	<ul style="list-style-type: none"> • Identify community focal points in each project area. • Prepare training materials. 	Within the first year of the implementation period	-Social Safeguards Specialists in	Project Managers in the	<ul style="list-style-type: none"> • List of identified community focal points 	20,000\$

		<ul style="list-style-type: none"> • Schedule and provide training. 		the respective PIUs	respective PIUs	<ul style="list-style-type: none"> • Prepared training materials • Number of participants and training sessions conducted 	
c.	Develop a Stakeholder Engagement Plan for SEA-related issues	<ul style="list-style-type: none"> • Identify the target stakeholders • Develop the methods to engage the target stakeholders 	Throughout the project implementation period	-Social Safeguards Specialists in the respective PIUs -Social Safeguards Focal Persons in the respective project regions/branch offices	Project Managers in the respective PIUs	<ul style="list-style-type: none"> • Target stakeholders identified. • Number of stakeholders consulted 	25,000\$
d.	Develop an information dissemination strategy	<ul style="list-style-type: none"> • Specify what information to be disclosed and for whom • Develop methods for information dissemination 	Throughout the project implementation period	-Social Safeguards Specialists in the respective PIUs	Project Managers in the respective PIUs	<ul style="list-style-type: none"> • The types of GBV SEA/SH-related information disseminated. • The number and categories of stakeholders addressed 	30,000\$
e.	Develop relevant IEC materials for community engagements	<ul style="list-style-type: none"> • Specify who is the target audience in the community • Then, develop audience-specific IEC materials to reach out to the target audience including brochures, Mass Media, 	Throughout the project implementation period	-Social Safeguards Specialists in the respective PIUs	Project Managers in the respective PIUs		

		community notice boards, and project websites					
f.	Outreach to schools on the risks of SEA	<ul style="list-style-type: none"> Identify schools in the project areas and contact school heads for cooperation. Organize orientations and campaigns for students and schools' communities on the risks of GBV/SEA/SH and mitigation strategies. 	Within the first year of the implementation period and frequently, as necessary	-Social Safeguards Specialists in the respective PIUs -Social Safeguards Focal Persons in the respective project regions	Project Managers in the respective PIUs	The number of schools, students, and school communities addressed in the campaign	50,000\$
g.	Conduct community sensitization	<ul style="list-style-type: none"> Develop a community engagement plan (including strategies to engage those in isolated locations) Conduct awareness-raising activities for the local administrative leadership, chiefs, elders, women groups, and community members considering their level of knowledge on GBV/SEA/SH risks 					30,000\$
8.	<i>Ensure SEA and SH- sensitive channels for reporting in GRM</i>						
a.	Develop/Review GRM for specific SEA/SH procedures	Develop/review the GRM for specific SEA/SH procedures that include at a minimum: <ul style="list-style-type: none"> Multiple complaint channels ((e.g., project focal GRM, local community 	Before project implementation	Social Consultant	-The World Bank Social Safeguards Team -Social Safeguards Specialists	GRM developed/reviewed with the minimum requirements	2000\$

		<p>organizations, health providers, etc.).</p> <ul style="list-style-type: none"> • Procedures to report SEA/SH Allegations. • Procedures that lay out confidentiality requirements. • Procedures on how allegations will be handled and in what timeframe. • Procedures for review of complaints or incident reports. • Protocols for responding to survivors. • Because of the best interest of the child principles, GMCs will need to have specific provisions for responding to cases involving children. 			in the respective PIUs		
b.	Identify and train SEA/SH focal points within the GMC who will be responsible for SEA/SH cases and referrals	<ul style="list-style-type: none"> • Establish the GMC who will be responsible for SEA/SH cases and referrals. • Train the GMC on the GRM for specific SEA/SH procedures as stated in (a). 	Within the first quarter of the project implementation period	<ul style="list-style-type: none"> -Social Safeguards Specialists in the respective PIUs -Social Safeguards Focal Persons in the respective project regions 	Project Managers in the respective PIUs	<ul style="list-style-type: none"> • The number of focal points identified and GMC established. • Number of GMCs received training 	10,000\$
c.	Review GRM reports/logs for SEA/SH sensitivity	Review GRM reports/logs regarding how sensitive SEA/SH issues (e.g., risks of	On quarterly basis	Social Safeguards Specialists in	Project Managers in the	Sensitive SEA/SH issues reported/logged in	No budget required

		stigmatization, rejection, and reprisals against survivors and child survivors) have been handled.		the respective PIUs	respective PIUs	line with the GRM Accountability and Response Framework.	
9.	Define and reinforce SEA/SH requirements in procurement processes and contracts						
a.	Incorporate SEA/SH Requirements and expectations in the contractor and consultants' contracts	Review the Procurement Document and Contracts for the contractors and consultants sufficiently incorporating the requirements for addressing SEA/SH	A precondition for the award of the contract and review bi-annually after	Social Safeguards Specialists in the respective PIUs	Project Managers in the respective PIUs	Contracts reviewed with sufficiently incorporating the requirements for addressing SEA/SH	No budget required
b.	Allocation of funds for SEA/SH-related costs in procurement documents.	Review the Contractor's ESMP for the appropriate allocation of funds to mitigate SEA/SH risks.	Part of the bid evaluation and contract award	Social Safeguards Specialists in the respective PIUs	Project Managers in the respective PIUs	The Contractor's ESMP allocated appropriate funds to mitigate SEA/SH risks from the civil works	No budget required
c.	Workers (Contractor/consultant) sensitization on SEA and SH	Monitor that civil works contractor (including sub-contractors and suppliers and their workers), supervising Engineers and consultants provide training and sensitize workers to properly address SEA/SH.	Throughout the contract period	Social Safeguards Specialists in the respective PIUs	Project Managers in the respective PIUs	Civil works contractor provided training and sensitize workers to properly address SEA/SH	No budget required
d.	Codes of Conduct signed and translated into the local language	Ensure that the contractor's CoC includes the necessary provisions for addressing SEA/SH	During the bid evaluation	Social Safeguards Specialists in the respective PIUs	Project Managers in the respective PIUs	Codes of Conduct signed and translated into the local language	No budget required
10.	Separate toilet and shower facilities for men and women and SEA and SH-free signage						

	Provide separate facilities for men and women and display signs, posters, and pamphlets around the project site that signal to workers and the community that the project site is an area where SH is prohibited	<ul style="list-style-type: none"> • Provide separate facilities • Design and print pamphlets and posters. • Distribute the pamphlets and posters to the project site • Install signage on the facilities Visit Project gangs/camps to check on the availability and usability of separate sanitary facilities. 	Before the commencement of the civil works	Project civil works contractor	Social Safeguards Specialists in the respective PIUs	<ul style="list-style-type: none"> • Number of separate toilet and shower facilities for men and women • Display signs/IEC materials 	The cost will be covered by the civil works contractor
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Annex 11: Stakeholders consultations Results during ESMF and other ESF Instruments Preparation for GMEESDP

Table 1. Records of Meetings or Consultations

Stakeholder (Group or Individual)	Dates of Consultations	Key Issues Discussed	Summary of Feedback	Response of Project Implementation Team	Follow-up Action(s)/Next Steps	Date to Complete Follow-up Action(s)
Summary of Previous Consultation						
Representatives of the IAs	January 16, 2024	Project information disclosure (Project Concept Note and Concept ESRS	Appreciate that the project is timely and vital in supporting the ongoing government strategies and efforts to the Civil Service and Public Financial Reforms	Inform the participant that the proposed project interventions are designed in line with the GoE's strategic needs (e.g. Civil Service Reform Roadmap) and build on previous World Bank-financed projects such as the Digital Ethiopia Foundation Project		

			Asking for clarification on the Concept Project Note	Clarification given on the proposed project Components and Subcomponent activities		
			Unfamiliarity by some participants about the World Bank ESF ESSs	Discussion on the World Bank ESM ESS1-10, the requirements, and the scope of application in each ESS		
			Who will conduct the environmental and social assessment for the project, prepare the required ESF instruments	Participants were informed that the World Bank will engage Environmental and Social Consultants to provide technical support for the environmental and social assessment and preparation of the required ESF	<ul style="list-style-type: none"> -Conduct stakeholder engagement -Representatives from each IA will facilitate stakeholder consultation -The Environmental and Social Consultants will prepare the ESMF for the project 	A precondition for project disbursement

Stakeholder (Group or Individual)	Dates of Consultations	Key Issues Discussed	Summary of Feedback	Response of Project Implementation Team	Follow-up Action(s)/Next Steps	Date to Complete Follow-up Action
Summary of consultations done during the environmental and social assessment and preparation of ESF instruments						
All stakeholder groups	February 19-29, 2024	Project information disclosure	On behalf of their respective institutions, the participants invariably express that the upcoming project is timely and will address the crucial needs currently facing the delivery of public services. Also, the participants promised their commitment to successfully implementing the proposed project.			
Implementing Agencies (IAs)		Assessment of institutional capacity gaps	Technical capacity gaps in the management of ESMF	Capacity building training will be given ESMF and approach: <ul style="list-style-type: none"> • Identification and assessment of E&S risks • Selection and application of relevant E&S risk management measures/instruments • E&S monitoring and reporting • Incident and accident reporting • Application of LMP, including Code of Conduct, incident reporting, SEA/SH • Application of SEP and the grievance/beneficiary feedback mechanism 	<ul style="list-style-type: none"> • Engaging Environmental and Social Consultants • Preparing training materials • Arrange training sessions 	Before implementation phase
			Inadequacy of qualified manpower	Component 4 will support the management, coordination, and monitoring and evaluation (M&E) of project activities and funds including the recruitment of crucial experts such as a project manager, a financial management specialist,	Recruitment of appropriate staff for the project management	Before implementation phase

				a procurement specialist, an M&E specialist, technical leads, and an environmental and social specialist.		
			Lack of material resources	The project will finance for supporting materials	Procurement of supporting materials	Before implementation and throughout project implementation, as necessary
Disadvantaged or Vulnerable Individuals and Groups		<p>Project disproportionate adverse impacts for the VGs</p> <p>Among the VGs, employees with visual and mobility impairments, female employees, employees in conflict areas, and Historically Underserved Regions were allowed to discuss the challenges that prevent them from equal inclusion and the benefits of the project.</p>	<p>There are views and concerns shared by all the consulted VGs including:</p> <ul style="list-style-type: none"> • Disregard or lack of awareness by the management members (Top Management, Directors, Unit Heads, and Team Leaders) about the employees with special needs. • Resource constraints (financial, material, and facilities) pose a bottleneck for mainstreaming employees with special needs. • Given all the Project Components comprise the digitalization subproject activities, the participants have raised concerns about their inclusiveness. In particular, the following are justified as the measure hindering factors in this regard: <ul style="list-style-type: none"> ✓ Lack of ICT tools with screen readers to access digital content for blind employees ✓ Low digital literacy level. ✓ Lack of awareness and/or commitment by the management members. ✓ Undermining the capacity of the VGs such as blind employees for the use of ICT 	The response was given to the participants focusing on how the project will consider their concerns. Clarification was made to the participants that the project would design and put in place mitigation measures taking their concerns into account		

			✓ No allocation or lack of budget to mitigate the special needs of the VGs			
Interested parties		Engagement in the project	How the project engage interested parties	Active engagement of interested parties through SEP	Preparation of SEP	Begin in the project preparation phase and throughout the implementation period

Table 2. List of Stakeholders Consulted during ESMF Preparation

Organization	Name	Position	Phone	Email
Federal Level				
Ministry of Finance	Mr. Degu	Channel Programs Coordination Directorate Director	One +251111402000	
	Mr. Melaku Kifle	Channel Programs Advisor	One Senior 01911122449	mkiflel@mofed.gove.et
	Mr. Gadisa	Channel Assistant	One 0941422099	
	Mrs. Abonash	Social Affairs Expert		agudeta@mofes.gov.et
	Mrs. Kassaitu	Social Affairs Expert		kassafantaw@yahoo.com
Ethiopian Civil Service Commission	Dr. Worku Dejene	Civil Service Reform Coordination	911347166	workudejenecsc@gmail.com
	Dr. Girma Taddese	Resource Mobilization Coordinator	0911862797	girmatadese@gmail.com
Ministry of Revenue	Serkalem Moges	Women and Children Affairs Directorate Director	0911858107	
	Abiot Anagaw	Gender Affairs Team Leader	0922753946	abotendalew2121@gmail.com
	Amere Tamrat	ICT Expert	941217862	amaretamerat3@gmail.com
	Ashebir Regassa	Financial Management Coordinator	913257540	aday2002@gmail.com
	Yisak Abera	Legal Service Directorate, Litigation and branch inspection officer	0922149652	Yisakabera3@gmail.com
	Genet	Tax Fraud Investigation Directorate, Audit Investigation Coordinator	0911600919	wgenet14@yahoo.com or genert.worku.2020@gmail.com
	Dr. Abiot Bayou	Director General Digital	0911034508	Abiyot.bayou@mint.et.gov

Ministry of Innovation and Technology		Transformation Program		
	Abreham Tesfaye	PIU staff	0911892693	
Regional Level				
MoF Hawassa Branch	Woinhareg Afework	Women and Social Affairs Team Leader	0961399667	Temesgena229@gmail.com
MoF Dire Dawa Branch	Etsehiwot Bizuneh	“	0915746203	bizunehetsehiwot@gmail.com
MoF Adama Brach	Jibril Ahmed		0926325876	
MoF Eastern AA Branch	Nuria Ebrahim		0911469991	
Addis Ababa Civil Service Commission	Mr. Adhine	Reform Supervision and Support Directorate Director	0911064956	
	Mr. Abebe Kassie	Reform Supervision and Support Team Leader	+2510912355609	Abebekassie21@gmail.com
	Mr. Abraham Ketema	Reform Supervision and Support Team Leader		Abrahamketema2011@gmail.com
	Mr. Berhanu Hunde	Reform Supervision and Support Team Leader	+251947576983	
Gambelle Region	Habtom Kindu	Reform Supervision and Support Coordinator	0920467967	Habtomkindu@gmail.com
	Tessema Eshete	Reform Supervision and Support Officer	0967126703	Dagitesema853@gmail.com
	Meseret Abebe	Employees with Disability in Gambella CSC	0913490171	
	Hareg Tadesse	Women employee in Gambella CSC	0985688691	
Afar-Science, Innovation and Technology Commission	Tewoled Birhan	Director-ICT	0904341924	Tewoled54@gmail.com
	Abdo Hannatu	Director-ICT	0904341924	Abdi2016@gmail.com

Afar-BoWSA	Amina Musa	Capacity Building Directorate Director	0911040974	
	Seadan Ahmed	Women Right Protection Unit Leader	0914118914	aminamussa2013@gmail.com