ENVIRONMENT AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)

FOR THE SOUTH SUDAN SAFETY NET PROJECT (SSSNP)

04 June 2020
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EXECUTIVE SUMMARY

The Environmental and Social Management Framework (ESMF) has been prepared to guide the implementation of the South Sudan Safety Nets Project (SSSNP), a follow-on project to the World Bank financed SNSDP. The SSSNP aims to contribute to strengthened household capacity to better withstand social and economic shocks and stresses, while also supporting increased community interaction and dialogue for enhanced local level social cohesion and unity. The SSNP will be implemented in at least 10 counties across South Sudan and has 3 components:

Component 1: Public Works Plus - Learning from the experience of SNSDP. (This component however goes beyond only providing a wage transfer to adopt a “public works plus” approach);

Component 2: Direct income support. This component provides unconditional cash transfers to vulnerable groups who lack able-bodied members in their households to can participate in public works activities;

Component 3: Strengthening Safety Net Delivery tools and Project Management. This component continues to strengthen safety net delivery and operational tools which have been put in place under the SNSDP.

The ESMF provides the necessary guidance for the implementation of the SSSNP. It seeks to establish clear procedures and methodologies for environmental and social planning, review, approval and implementation. It prescribes project arrangements for the preparation and implementation of projects in order to adequately address World Bank and UNOPS safeguard issues; assesses the potential environmental and social impacts of the programs/projects; proposes mitigation measures which will effectively address identified negative impacts; specifies appropriate roles and responsibilities; outlines the necessary reporting procedures for managing and monitoring environmental and social concerns related to sub-projects; and determines the training, capacity building and technical assistance needed to successfully implement the provisions of the ESMF.

Project implementation is associated with the following positive impacts: creating employment opportunities and generating income to support the livelihoods for the youth and women; and providing opportunities and resources to engage in agricultural production, wage and self-employment, and/or other economic activities.

It is expected that only the Public Works component may have negative environmental and social impacts. As such, the project has triggered five World Bank safeguards policies - Environmental Assessment (OP/BP 4.01), Pest Management (OP 4.09), Physical Cultural Resources (OP/BP4.11), Indigenous Peoples (OP/BP 4.10), and Safety of Dams (OP 4.37).

Social issues may include: (a) Lack of participation by some of the most vulnerable people as beneficiaries due to inclusion error, selection bias, and/or elite capture resulting in failure to receive wage transfers from participation in public works activities; (b) inadequate design of
public works activities failing to take into account specific gender considerations, i.e. activities requiring hard physical labor which may impede women’s participation; and; (c) communal conflicts over resource distribution in some areas of South Sudan.

However, due to the small-scale nature of public works investments, the potential negative environmental and social impacts of the proposed Project (under category B) are expected to be localized, temporary, and easily mitigated through sensible construction management techniques and diligent management practices. Therefore, proposed projects activities under public works will be designed at the local level to ensure that they are screened for potential impacts and that they comply with the requirements set out under World Bank safeguard policies. A solid Grievance Redress Mechanism (GRM) will help mitigate some of the socio-economic risks identified, it is built on lessons from previous GRMs.

1. INTRODUCTION

The ESMF guides the project implementation. It identifies the potential impacts of the with Public Works Component and seeks to mitigate the environmental and social impacts and during project development and implementation.

Consistent with the existing Republic of South Sudan (RSS) national legislation, World Bank and UNOPS guidelines, the objectives of the ESMF are to help ensure that activities under the SSSNP (1) protect human health and enhance positive environmental and social outcomes; (2) prevent or mitigate negative environmental impacts as a result of either individual projects/programs or their cumulative effects; and (3) prevent or compensate any loss of livelihood. It provides guidelines on how to carry out and prepare environmental and social screening/assessment, including an Environmental and Social Management Plan (ESMP) to mitigate negative environmental/social impacts of project activities, while also enhancing positive environmental/social aspects.

The specific objectives include:
- To establish clear procedures and methodologies for environmental and social planning, review, approval and implementation of the SSSNP.
- To prescribe project arrangements for the preparation and implementation of projects in order to adequately address World Bank and UNOPS safeguard issues;
- To assess the potential environmental and social impacts of the project;
- To propose mitigation measures which will effectively address identified negative impacts;
- To specify appropriate roles and responsibilities, and outline the necessary reporting procedures for managing and monitoring environmental and social concerns related to sub-projects; and
- To determine the training, capacity building and technical assistance needed to successfully implement the provisions of the ESMF.
2. PROJECT DESCRIPTION

The proposed SSSNP aims to bridge the humanitarian-development nexus by addressing urgent needs, while maintaining community assets and strengthening safety net delivery tools for longer term development. It builds on the results achieved and lessons learned from the SNSDP and other projects in South Sudan to scale up what works and pilot new initiatives, starting small and adopting a 'learning-by-doing' approach. Considering the country's capacity constraints and limited infrastructure at the local levels, as well as the changing dynamics on the ground, the proposed project design is kept simple. Flexibility and the ability to respond quickly is an important feature given the high political and security uncertainties facing the country.

The proposed project is a US$ 40 million IDA grant with three components, implemented over two years. The components are: (i) Labor Intensive Public Works “Plus” Interventions; (ii) Direct Income Support; and (iii) Strengthening Safety Net Delivery Tools and Project Management. Some of the proposed project activities, particularly under Component 1, contribute towards climate change adaptation and mitigation in the targeted geographic areas.

Component 1: Labor Intensive Public Works “Plus” Interventions (US$ 23.3 million equivalent)

This component scales up the public works component under the SNSDP to continue provision of access to temporary income, supported by a “plus” approach, which includes selection of complementary support. Broadly, this component finances: (a) cash transfers for the beneficiaries participating in labor intensive public works activities; (b) equipment, materials and skilled labor to ensure public works of reasonable quality; and (c) provision of complementary support under the “plus” approach. It provides income for poor and vulnerable households through a cash transfer, linked to participation in labor intensive public works, to sustain household assets and smooth consumption during economic hardships. The temporary income support enables households to adapt to shocks, including those from climate change.

Public works activities continue to be labor intensive, be selected by the communities based on their priorities, and focus on activities that benefit the community at large. Aligned with the amount of cash transfer provided by other partners on the ground, namely WFP, this project continues to transfer US$3 per day per household. The number of days worked increases from 90 days under the SNSDP to 120 days, provided over an 8-month period. The rationale for increasing the number of days is to respond to the reducing purchasing power of the SSP resulting from the deteriorating economic conditions by transferring a greater amount annually over a longer period of time (US$ 270 under the SNSDP to US$ 360 under the proposed SSSNP). It is expected that this allows households to plan better, save, and have more opportunities to engage in livelihoods activities. Further, focus is given to supporting women, such that at least 60 percent of those participating in labor intensive public works activities are female. Experience of the SNSDP demonstrated that this contributed to smoother
implementation.\textsuperscript{1} It also ensured that the funds were largely used for household needs, and positively contributed to gender outcomes by empowering women to take more control of household spending and engage in livelihoods activities.

The enhanced community assets, particularly those aimed at integrated watershed management, leads to better natural resource management, thereby contributing to climate change mitigation. It also supports the creation of enabling conditions for the voluntary return and integration of displaced South Sudanese, as is prioritized under the NDS, and is likely to increase should peace be consolidated under the most recent peace process. Learning from the activities that have been identified as priority by the communities under the SNSDP, the potential menu of public works activities for the SSSNP is presented below in Table 1. It is important to note that no new roads and/or physical structures will be constructed. Rather, all activities will focus on maintenance and/or rehabilitation of existing structures. Innovations piloted under the SNSDP aimed at promoting food security and livelihoods opportunities through group-based small scale agricultural activities is be given priority, as it directly contributes to food security in the household and community. Excess harvest can also be sold in markets where opportunities exist, further enhancing household economic situation.

Table 1: Possible Menu of Public Works Activities

<table>
<thead>
<tr>
<th>Areas of Work</th>
<th>Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community Access Roads</td>
<td>• Urban and rural community access roads</td>
</tr>
<tr>
<td>(maintenance and/or rehabilitation only)</td>
<td>• Access roads to community farms/public facilities and other villages</td>
</tr>
<tr>
<td>Waste and Sanitation Management</td>
<td>• Road-side drainage systems</td>
</tr>
<tr>
<td>(maintenance and/or rehabilitation only)</td>
<td>• Collection of waste from open drainage channels</td>
</tr>
<tr>
<td>Integrated Watershed Management</td>
<td>• General cleaning and landscaping of common areas</td>
</tr>
<tr>
<td></td>
<td>• Soil and water conservation</td>
</tr>
<tr>
<td></td>
<td>• Land productivity, soil fertility restoration</td>
</tr>
<tr>
<td></td>
<td>• Nursery site establishment and management</td>
</tr>
<tr>
<td></td>
<td>• Afforestation</td>
</tr>
<tr>
<td></td>
<td>• Area closure/fencing using woodlots</td>
</tr>
<tr>
<td></td>
<td>• Gully control</td>
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<td></td>
<td>• Small-scale dykes</td>
</tr>
</tbody>
</table>

\textsuperscript{1} The female participants were found to be more likely to come to work on time, comply with the work norms, including not drinking or being drunk at work, and engage in fewer physical altercations.
Gender consideration will be given to the selection of public works activities, given that majority of the participants are female, to ensure that they are appropriate for women’s needs and do not exacerbate GBV risks. For example, labor intensive public works activities are situated within their communities so that women do not have to travel far to get to work sites. Light work will be assigned to the women, and the time and duration of work will take into account women’s household and other responsibilities. Mobile temporary child care shelters will also be set up, continuing the practice of the SNSDP.

The public works implementation will be augmented through the provision of complementary support to ensure that beneficiaries receive a more integrated package of services, utilizing the “plus” approach. Learning from the experiences of financial literacy and WASH trainings piloted in Juba under SNSDP, it is expected that complementary activities support beneficiaries to use the cash received under the labor intensive public works intervention more effectively, thereby contributing to sustainability of efforts. These include: (i) provision of financial skills trainings (i.e., promotion of savings groups, provision of financial literacy training, etc.), (ii) WASH trainings; and (iii) early childhood development (ECD) and nutrition messages. These services were selected as priorities as they address key needs in the community, while also supporting the building of human capital. These are mandatory for all beneficiaries participating in the public works interventions, but the way in which the trainings and messages are delivered will depend on the social assessment of the communities, profile of the beneficiaries, and delivery modalities preferred by the communities (i.e., for an hour prior to start of public works, or on the weekends, etc.). Given that this is the first time that these trainings are scaled up, they will be done at small-scale adopting a learning-by-doing approach with flexibility to revise and refine on an on-going basis. Further details on the delivery of the complementary services are included in the Project Operations Manual (POM).

This component continues to promote intensive community engagement and is delivered using the operational tools established under the SNSDP. These include household targeting and biometric registration, selection of priority works; supervision and
oversight; and the GRM, among others. Attention is given to in-depth stakeholder mobilization and awareness building, including with target communities and local governments, through intensive beneficiary outreach and communication campaigns to enhance understanding and capacity to implement the proposed project, as well as to mitigate grievances and social safeguards issues during implementation. Stakeholder engagements will pay particular attention to marginalized and disadvantaged groups, as engagements will be tailored to their needs. Learning from the SNSDP experiences of what works, what are the risks, and how to mitigate them, a Community Engagement and Capacity Building plan will be developed during implementation and is included as part of the POM. Guidance on how to promote gender inclusion and minimize GBV risks in implementation of labor intensive public works will also be included as part of the POM, learning from regional experience, including the Kenya Development Response to Displacement Impacts Project.

Lastly, special efforts are given to strengthening local level cohesion and social unity through greater interaction and dialogue among diverse ethnicities in a community. One of the most important outcomes of the SNDSP efforts was the strengthened community cohesion and unity that was encouraged through participation in public works, as this provided a safe and neutral platform for bringing different ethnic groups in a community together. However, this outcome happened more organically, rather than due to concerted efforts by the project. Therefore, under the proposed SSSNP, efforts will be made to systematically reinforce peaceful cooperation, inclusion, and unity through targeted social messaging, facilitated dialogue, community discussions on key social issues, and other related efforts identified on the ground, as appropriate. To that end, nuanced communication and social messaging materials are being developed, as part of the Community Engagement and Capacity Building Plan mentioned above, to guide this effort. Relevant experiences and lessons learned from other countries in similar fragile and conflict-affected situations, i.e. Liberia, Lebanon, Iraq, Yemen, and others, are taken into consideration during implementation.

Component 2: Direct Income Support (US$ 4.1 million equivalent)

This component provides direct income support to poor and vulnerable households who lack able-bodied members in their households and are therefore unable to participate in labor intensive public works activities. The experience of SNSDP demonstrates that a segment of vulnerable households in a community who are often most in need of support are left out of the public works activities due to labor constraints in the household. This situation has worsened in the past two years because of the outbreak of the conflict in 2016, which has further deteriorated wellbeing and worsened vulnerabilities. As such, this component fills an urgent gap and ensure greater coverage of different profiles of poor and vulnerable households than previously reached under the SNSDP.

The eligibility criteria for households to receive direct income support is provided below. These households were identified to be particularly vulnerable based on profiles collected as part of the targeting exercise under the SNSDP and is in line with the priorities identified under the NSPPF. Analytical work undertaken by the World Bank’s Rapid Social
Vulnerability Assessment and the WFP-led Resilience Context Analysis also support these findings. The number of beneficiary households for each eligibility category receiving direct income support is determined based on the needs assessed on the ground and community identification and verification of beneficiaries. The eligibility criteria include:

a) Child headed households with no alternate income support
b) Poor and vulnerable households headed by pregnant and/or lactating women lacking able-bodied member and alternate income support
c) Poor and vulnerable households headed by an elder (as identified by the community) and lacking alternate income support
d) Poor and vulnerable households headed by persons who are disabled or chronically ill requiring fulltime care and lacking alternate income support

The delivery of the direct income support is closely aligned with the operational processes and cycles of the labor intensive public works “plus” intervention, as beneficiaries of both components are from the same communities. Therefore, community mobilization and sensitization; targeting and registration; beneficiary outreach and communication campaign; and related implementation activities take place concurrently for both components. Moreover, this component is delivered using the same operational tools that have been established under the SNSDP and will be used for the delivery of component 1, including the local level coordination and oversight structures; payment mechanism; and the GRM, among others. The annual value of the direct income support is equivalent to that of component 1 (US$ 360 per year) and is provided over the same period (8 months) and at the same time. In addition, households supported by this component are encouraged to participate in relevant complementary activities provided under the labor intensive public works “plus” interventions. However, participation in these activities is however not mandatory and a criterion for receiving the direct income support, as it is not clear if all eligible households have required members to take part in the activities, and whether all the trainings are relevant for all of the households selected.

Component 3: Strengthening Safety Net Delivery Tools and Project Management (US$ 12.6 million equivalent)

This component continues to strengthen safety net delivery and operational tools, which have been put in place under the SNSDP. Given the country’s challenging situation in terms of heightened implementation, fiduciary and safeguards risks, the SSSNP emphasizes resources for establishing a broader set of risk mitigation measures to ensure effective delivery of the cash transfer components. These include: (i) an enhanced GRM on the ground to better address grievances and emerging social risks, promote transparency and inclusion; and reinforce community mobilization and cohesion; (ii) the development a full-fledged MIS, including payment reconciliation, grievance monitoring and management etc., to strengthen accurate
reporting and oversight; (iii) strengthened payment delivery based on geo-tagged biometric tools linked to the MIS for accurate and timely payments with compliance checks to assure that payments are made to the selected beneficiaries; and (iv) intensified citizen engagement and community mobilization through strong community and outreach campaigns (building on the positive results of the mentioned SNSDP evaluation), including efforts to systematically reinforce peaceful cooperation, inclusion, and unity through targeted social messaging, and facilitation of community dialogue. As such, of the US$ 12.6 million allocated to this component, only 4.5 percent (US$ 1.8 million) are used for overhead cost, while the remainder is used to finance efforts aimed at strengthening of safety net delivery tools, enhancing citizen participation and social accountability, and project management, per above. Findings and recommendations from on-going analytical work\(^3\) inform the design and implementation of this component.

**Enhanced GRM.** The GRM established under the SNSDP support transparency, accountability, and community participation, contributing to improved governance of project cycles. It is a community-based mechanism, which aims to mitigate against escalated tensions, disputes, and in extreme cases, violence, with respect to operational processes such as targeting, beneficiary selection, identification and implementation of activities, payments mechanisms etc. It comprises of structures at the lowest level, i.e. Group Leaders of beneficiaries and Appeals Committees, to the highest level, i.e. the implementing agency and the World Bank task team. Members of the community and local level structures are trained on broader project aspects as well as on the purpose, functioning, and procedures of the GRM more specifically. Complaints and grievances are first received by the Group Leaders. If they are unable to resolve it, it is then escalated to the next structure (i.e. Community Supervision teams) onwards, until it has been resolved to the satisfaction of the complainant. In addition, beneficiaries have the flexibility to submit a grievance or complaints at any level of the structure (i.e. County Core Team) if s/he so wishes. This allows for checks and balances in the mechanism, as a beneficiary may not feel comfortable or be assured of the impartiality of community members (i.e. Group Leaders) – although access by beneficiaries to the various levels given the power dynamics in a community remains a challenge. The Appeals Committee in particular play a central role as they tend to the most preferred way of resolving grievances and complaints. Committee members are selected by the beneficiaries who are well respected in the community and that do not benefit from the SNSDP.

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3 Relevant analytical works include: Strengthening GRM to Ensure Gender Inclusion and Empowerment to Minimize Conflict Risks; Mobile Money Usage in South Sudan; Targeting Approaches in South Sudan; and Enhancing SP Systems for Conflict-Sensitive Delivery, among others.
The SNSDP GRM is considered to be robust and functioning, and capable of mitigating social safeguards risks facing target communities and beneficiaries, although further strengthening of the mechanism is required. The SNSDP GRM provides a safe platform where grievances can be reported with dignity, and a fair hearing and remedy can be accessed without cost to the beneficiaries. As decisions reached involve in-depth dialogue and facilitation in public forums, the GRM supports transparency and accountability in decision-making, and thereby contributes to greater trust in the mechanism. Therefore, it supports local level unity and stability by promoting peaceful resolution of complaints and grievances in an environment charged with high levels of mistrust and misinformation. Majority of the complaints received include: (i) exclusion from project benefits; and (ii) delays in payments. These have generally been resolved peacefully, although weaknesses exist. The GRM in Juba also piloted the inclusion of GBV focal points within the Appeals Committees in Juba. These focal points sensitized communities and beneficiaries regarding GBV issues, trained Appeals Committee members, Chiefs and local leaders that often handle domestic disputes and GBV cases, and conducted home visits to counsel the victims. These focal points have contributed to greater awareness of GBV issues in the community, such that there was increased reporting of cases to the focal points than was previously experienced.

Despite these achievements, recent incidents of violence against project staff in Kapoeta East\(^4\) have exposed weaknesses in the GRM. This includes inadequate review of the grievances and complaints received due to infrequent, incomplete and inconsistent reporting, limiting the ability of the SNSDP to quickly identify mitigation measures. The GRM has also been found to be too narrowly defined in that it only addresses community complaints and grievances, and thus fails to protect project staff against threats of violence. Weak capacity and motivation among the Appeals Committee members leads to low levels of understanding of the GRM structures and procedures, impacting on the functionality of the mechanism. This also increases the potential capture of the mechanism to serve the interest of powerful community members. Lastly, given the sensitivities and social taboos around GBV issues, it remains difficult to openly discuss these issues within a community, and under reporting continues to be a challenge. Moreover, lack of referral mechanisms and complementary support for GBV victims limit the effectiveness of the GRM.

Efforts aimed at enhancing the GRM focus on strengthening its functionalities to better address emerging social risks; protect against narrow interests and promote inclusion; and reinforce community cohesion. Attention is given to how the GRM can be embedded within existing community structures, building on traditional conflict resolution practices, to ensure its sustainability. The experience from Kapoeta East indicated that one of the main cause of the incidents was limited understanding of the objectives and guiding principles of the SNSDP by the communities resulting from inadequate community mobilization and

\(^4\) These incidents included: (i) detention of the Team Leader for 30 minutes by non-beneficiary youths demanding to be included under the project; (ii) slapping of a community mobilizer due to misunderstandings of the biometric registration process; and (iii) physical assault of the Team Leader by police forces due to grievances related to delayed payments. These incidents were resolved by the GRM structures at the level of the County Commissioner, and remedial actions were taken by the World Bank Task Team. Following assessments, activities were closed in two of the three affected bomas.
sensitization at the start of implementation. Intense community sensitization and awareness raising regarding all aspects of project operation, particularly those related to beneficiary enrolment and payments, are therefore undertaken by the SSSNP to ensure full understanding by communities and stakeholders, including non-beneficiaries. Strong emphasis is given to communicating the World Bank's zero-tolerance policy against violence, citing the suspension of the affected areas under the SNSDP as an example.

**Efforts are made to ensure that implementing staff and stakeholders, including local level coordination structures and Appeals Committees, understand the roles and responsibilities of the various actors.** This includes support to deepen the understanding of these actors regarding the project operational cycles, with special focus on community outreach and communication. Support is provided to improve the review, analysis, and reporting of the grievances and complaints received. Related, GBV protocol on addressing and reporting on claimed cases within the proposed project, if any, will also be developed. The GBV focal points are introduced to the GRMs in all the target locations, with focus given to supporting greater information and awareness raising of these issues within the communities, including information on available health and other related services for supporting GBV victims that are provided by partners such as UNICEF, UN Population Fund (UNFPA), World Health Organization (WHO) and others, and is proposed to be further strengthened through the World Bank funded Protection of Essential Health Services Project (PEHSP) in the pipeline. It is expected that these efforts empower the relevant actors to utilize the GRM more effectively to identify emerging risks early on, including risks facing project staff and other stakeholders, and to implement necessary mitigation measures. Further, consideration is given to ensure that relevant internal procedures for reporting and addressing incidents by the implementing agency are consistent with the GRM. A review of the GRM for conflict-sensitive delivery of safety net interventions is planned to be undertaken in the coming months as part of an on-going analytical work, and findings and recommendations of this will be included in the enhancement of the GRM envisioned under the proposed SSSNP.

**Full Functionality of the MIS.** The SNSDP MIS serves as a beneficiary database meant for data collection, storage, and retrieval, and includes various modules specific to the operations of the SNSDP – i.e. GRM module, payment module, beneficiary enrolment module, public works progress module etc. The MIS is also linked to the biometric system that is used to collect primary data of beneficiaries at the time of registration, such as fingerprints, photos and other bio-data details. Of these, the beneficiary enrolment, allocation per public works activities, attendance, and payment modules are the most advanced and functioning, and these are used to generate payrolls.

While the MIS has been an important step towards establishing a beneficiary registry that can be used as a national registry in the future, it continues to be limited in its functioning. Internal checks and controls continue to be inadequate, and separation of roles and authorizations needs further enhancement. The MIS also needs to be integrated with the biometric system, as the two are using different servers, which have not yet been integrated effectively. Lastly, lack of offline functionality which allows data to be saved in times of weak or
no internet connection for upload at a later time has been a major challenge, contributing to
duplicate and inaccurate data.

**This component therefore aims to improve the MIS so that it becomes fully functional.**
This is important for both planning, coordination, and M&E at the technical level, as well as for
decision-making at the management and policy level. It will also be in line with the recently
passed Civil Registry Act that is aiming to establish a national population registry. Specifically,
support is given to improve data quality checks and controls to detect duplicates and ineligible
records; enhance data collection, storage and upload capacity, including offline functionality;
establish clear user rights control mechanisms, designation of authority and data sharing
protocols; and develop business continuity and system security plans, among others. Attention
also focuses on improving the functionalities and reporting capabilities of the various modules,
particularly the GRM module to enable reporting and analysis of grievances/complaints by
categories. Further, this component develops a new module for the Direct Income Support
intervention. In addition, effort focuses on exploring how the MIS can be better linked to other
information systems, such as the UN-led SCOPE in the humanitarian sector, so that it can serve
as a wider registry of pre-targeted poor and vulnerable people that can be supported by other
partners. It is expected that this leads to greater cost-efficiency in the safety net and other
service delivery sectors, a key priority identified by partners in the PfRR. Operating process and
procedures guiding the use of the MIS will be detailed in a MIS manual to be also developed
under this component, and included in the POM. An MIS assessment will be undertaken in the
coming months which will inform the upgrading of the MIS.

**Improved Payment Mechanism.** The SNSDP has gone a long way in ensuring fiduciary
transparency and accountability of the payment mechanism. It has innovated a geospatial
biometric system whereby payment is made through commercial banks, namely Alpha Bank,
based on multi-factor authentication using beneficiary finger print, program ID, and
photograph to ensure positive identification and validation of beneficiaries during registration
and payment, respectively. Since the country’s financial market is largely under-developed, the
movement of cash to project sites presents significant challenges and high risk. This is mitigated
by transferring the risk to Alpha Bank, which has the necessary capacity and experience of
providing financial services and cash transfers in South Sudan. Selection of Alpha Bank was
conducted on a competitive basis with due diligence and fiduciary assessments undertaken by
World Bank’s financial management experts to ensure the appropriateness of using Alpha Bank
as the payment service provider. And, while Alpha Bank is a joint venture bank with South
Sudanese shareholders, no one shareholder has controlling interest, acting individually or in
concert. Moreover, the management functions are largely undertaken by foreigners, i.e.
Kenyans, as it has Kenyan origins.

**Risks of error, fraud and corruption in terms of beneficiaries receiving payments more
than once is also mitigated under the SNSDP, which is critical in a high risk and fragile
context such as South Sudan.** Specifically, GPS coordinates captured at specific
registration/payment centers are used to lock the biometric devices preventing payments in
another center; and (ii) households that have received a payment is automatically removed
from the payroll, preventing additional payments. Biometric validation also generates a unique
electronic signature for the beneficiary which is then used to secure audit trail for the payment.

Despite these efforts, there is a room for improvement in the payment mechanism, particularly to minimize delay of payments to beneficiaries. In fact, delayed payments constitute a large number of complaints under the SNSDP received through the GRM. This runs the risk of potentially exacerbating tension and conflict in target communities, as was experienced in the recent violent incidents in Kapoeta East, mentioned above. Key challenges include: (i) confirmation of attendance during public works due to use of manual attendance sheets; and (ii) confirmation of payee where an alternate has not been registered in the MIS and risk of double registration and payment due to intermittent internet connectivity in the field.

Under the proposed project, the payment mechanism will be strengthened to ensure more timely and accurate payments to beneficiaries. Specifically, attendance at public works will be automated through the biometric system, and beneficiaries are required to sign in electronically to provide evidence of attendance. The biometric records will be fully integrated with the MIS to avoid cases of data mismatch between the two systems. This will also be used to store attendance records and generate payrolls from the MIS. In the MIS, reconciliation modules are developed to confirm validity of data in the system, including reconciliation of beneficiary records after enrolment and reconciliation of payment data after every cycle of payment, clearly segregating between principal members and alternates, and matching the latter to the former. The system will also be strengthened to produce various exception reports, such as beneficiaries with similar program Identity Cards (IDs) and names, beneficiaries without photos and principal beneficiaries also registered as alternates etc., which will be used to conduct regular data validation and ensure faster reimbursement to the financial service provider. The ongoing independent financial audit of the SNSDP and the planned MIS assessment mentioned above, will provide key recommendations for improving the payment mechanism. An analytical work is also underway to explore how mobile money transfers can be used for safety net programming, expected to further inform the strengthening of the payment mechanism.

Lastly, this component supports day to day project management and implementation, monitoring, and coordination. It finances critical implementation activities such as community mobilization, targeting and registration; engagement of coordination structures for M&E; dissemination of communication strategy and messages etc. It also supports the cost of necessary human resources and technical assistance to implement the envisioned activities, including training and capacity building of the staff, to ensure that they are empowered to manage and use the delivery tools without technical assistance by the World Bank and others. Efforts are made to retaining the personnel who were closely engaged in the implementation of the SNSDP, as this ensures a smoother implementation of the proposed project. It also ensures that capacity continues to stay in country for future safety net operations beyond the proposed project. Lastly, this component finances related assets procurement and overhead.

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It is important to note that key technical personnel that were engaged in the implementation of the SNSDP were all South Sudanese.
This component focuses on ensuring that necessary monitoring and supervision arrangements have been put in place to track progress of implementation and identify challenges for timely response, particularly in the most conflict-affected and difficult to access areas. Related, this component includes a strong learning agenda, given the limited understanding and knowledge in the country in terms of the safety net approaches and implementation arrangements that can support strengthening of resilience and self-sufficiency of households. While it is not anticipated that a rigorous impact evaluation will be undertaken given the challenges posed by the on-going conflict, insecurity, and weak infrastructure, some form of process evaluation and qualitative assessments of the impacts will be undertaken to learn from the implementation experience of the proposed SSSNP. Specific details and nature of the monitoring and supervision arrangements are provided below in Section III.B.

3. General Overview

The Republic of South Sudan is the world’s newest country having gained its independence from Sudan on July 2011 following an overwhelmingly positive referendum. It is a landlocked country and has an estimated population of 8.2 m people and an area of 619,745 sq. km. Administratively, Southern Sudan is sub-divided into 10 States (Central Equatoria, Eastern Equatoria (CES), Jonglei, Unity, Upper Nile, Western Equatoria, Lakes, N. Bahr El Ghazal, Warrap, and Western Bahr El Ghazal States). Since South Sudan is located near the Equator in the tropics, much of its landscape consists of tropical rainforest and its protected national parks are home to a plethora of migrating wildlife. South Sudan also has extensive swamp and grassland regions.

The White Nile, a main tributary of the Nile River passes through the country (Figure 4.1). The highest point in South Sudan is Kinyeti at 10,456 feet (3,187 m) and it is located on its far southern border with Uganda. The climate of South Sudan varies but it is mainly tropical. Juba, the capital and largest city in South Sudan, has average yearly high temperature of 94.1°F (34.5°C) and an average yearly low temperature of 70.9°F (21.6°C). The most rainfall in South Sudan is between the months of April and October and the average yearly total for rainfall is 37.54 inches (953.7 mm).
Although South Sudan lies within the tropics, the climate ranges from arid in the north to tropical wet-and-dry in the far southwest. Temperatures do not vary greatly with the season at any location; the most significant climatic variables are rainfall and the length of the dry season. From January to March, the country is considered to be in the dry season. By early April, it enters the rainy season, bringing heavy rains and thunderstorms. Yambio, close to the border with Zaire, has a nine-month rainy season (April-December) and receives an average of 1,142 millimetres of rain each year. Temperatures are highest at the end of the dry season when cloudless skies and dry air allow them to soar. The far south, however, with only a short dry season, has uniformly high temperatures throughout the year.

The country’s soils can be divided into two categories: the clay soils of the central region, and the laterite soils of the south. Less extensive and widely separated, but of major economic importance, is a third group consisting of alluvial soils found along the lower reaches of the White Nile and Blue Nile rivers.

South Sudan is drained by the Nile and its main tributary, the White Nile (Al Bahr al Abyad). The White Nile flows north from central Africa, draining Lake Victoria and the highland regions of Uganda, Rwanda, and Burundi. At Bor, the great swamp of the Nile, As Sudd begins. The river has no well-defined channel here; the water flows slowly through a labyrinth of small spillways and lakes choked with papyrus and reeds. The White Nile has several substantial tributaries that drain southern Sudan.
According to Harrison’s and Jackson’s (1958) classification, South Sudan is savannah woodland (high and low rainfall), flood region, mountainous zone, and semi-desert. From a national perspective, the protected areas conserve a substantial portion of the terrestrial areas of South Sudan (10.4%), which is well above the African average (estimated at 9%), and protect an exceptionally high diversity of animals, habitats, and birds. The protected areas provide protection to a variety of habitats and species and their management will guard against any future soil degradation, deforestation, habitat fragmentation, and species loss. As such, they are an important source of carbon sequestration, watershed protection and biodiversity conservation with two endemic mammal species (Nile lechwe, estimated at 4,300 and white-eared kob, estimated at 800,000). An estimated 4,000 Shoebills (out of a global population estimated at between 5,000 and 8,000 individuals) are within South Sudan Sudd, with the main threats being habitat destruction, disturbance, and hunting.

Out of the 22 Important Bird Areas (IBAs) in the Sudan, South Sudan comprises several including Boma, the Sudd, Southern and Bandingilo. The Leer and Panyikang counties comprise parts of the Sudd where hundreds of species of birds, out of which 12 are endangered such as the Shoebill and Black crowned crane, dwell here or use the area as an important stepping stone on their migration. Key large mammals of the forests and some woodland savannah areas include Waterbuck (Kobus defasa), Bushbuck, oribi, duiker, Uganda kob (Kobus kob), warthog (Phacocoerus ethiopicus), hartebeest (Alcelaphus sp.), giant eland (Tragelaphus derbianus), buffalo (Syncerus caffer), and various species of primates including the Black and White colobus monkey. A rich diversity of avifauna, reptiles, amphibians, and invertebrates also occurs here. However, the high levels of illegal hunting have decimated most of the wild life populations in these areas.

South Sudan also ranks among the best timber wood exporting countries to the international market. Some of the states with best Teak and natural trees for timbers are Western Equatoria and Central Equatorial states. In Central Equatoria some of the existing Teak plantations are at Kegulu, the other oldest planted forest reserves are Kawale, Lijo, Loka West and Nuni. While Western Equatoria has its resources, Mvuba trees at Zamoi. However, several factors have contributed to the degradation of forest resources in Sudan leading to over-exploitation of the natural forests resulting in high rates of deforestation and forest conversion to waste land (Gafaar, A 2011).

### 3.2 Socio-Economic Environment of South Sudan

According to the disputed results of the 2007 Population and Housing Census of Sudan, South Sudan has a total population of 8,260,490 with an average household size of 6.3. South Sudan has a slightly higher male population (about 52%) versus females (about 48%). In terms of ethnic composition, there are many ethnic groups in South Sudan of which the Dinka, Nuer, Murle, Mundari, Toposa in Kapoeta and Boya are the main agro-pastoralist groups. The table below shows the population statistics of the 2008 population census and 2017 projection for the project areas.
Figure 4.2 demonstrates that the following states are relatively densely populated in terms of distribution of population across the ten states: Jonglei (16.1%), Central Equatoria (13.5%), Warrap (12%), Upper Nile (11.6%) and Eastern Equatoria (11%). In contrast, Northern Bahr-El-Ghazal (8.7%), Unity (7.1%), Lakes (8.1%) and Western Equatoria (7.3%) are moderately populated. On the other hand, Western Bahr-El-Ghazal (4.7%) is the sparsely populated State.

![Bar Graph of South Sudan Population per State](image)

**Figure 4-2: Distribution of Population by South Sudan States**
(Source: Population and Housing Census of Sudan, 2007)

South Sudan remains one of the least developed countries in the world. High levels of vulnerability arising from two decades of civil wars have forced a sizeable proportion of the population to rely on humanitarian relief assistance to meet their livelihood needs. The Gross National Income per capita is estimated to be less than $90 per year. Key education and health indicators are among the lowest in the world. Infrastructure is virtually non-existent, and a public administration system has to be developed almost from scratch. Low levels of income and purchasing power, together with disruption associated with conflict and very limited infrastructure, have constrained economic activity and market development. The incidence of poverty has also worsened, from 44.7% in 2011 to more than 57.2% in 2015, with a corresponding increase in the depth of poverty (WB, 2015).

Inadequate transport infrastructure poses a major problem for movement of people and commodities within and between states. Although efforts have been made to rehabilitate some of the main trunk roads, the conditions of most of the main roads, especially in the wet season, hinder transportation of goods particularly perishable products. High transportation cost is a disincentive to farmers in potential surplus production areas from expanding production. However, the situation of various socio-economic infrastructure and the livelihoods conditions of the people of South Sudan have substantially changed since the signing of the Comprehensive Peace Agreement (CPA) in January 2005.

The livelihood system in South Sudan is predominately subsistence small-holder agriculture, among which about 12-15% of the population depends on fishing for their livelihoods (UNDP, 2012). Employment opportunities both in the public and private sector are few but are
increasing due to urbanization. Petty trading also provides a source of income for many households in the rural towns and around market centres. Livestock production also provides an important livelihood base for large groups of people but is hampered by disease and environmental degradation. The road network is poor and many areas of the country are not accessible by road, particularly in the wet season, which provides a major obstacle for marketing and commercialization of agricultural production. Poverty escalates during the dry season and in most parts of the country periods of 3-6 months per year of food deficit is common. During these periods, most families move around for income generation, i.e. selling of charcoal, doing casual labour etc.

4. Policy and Legal Framework

This ESMF has been prepared to fully comply with environmental legislations and procedures in South Sudan and international treaties, as well as with the World Bank and UNOPS environmental and social safeguard policies. It is based on a Social Assessment that has been conducted for this purpose.

4.1 World Bank Safeguard Policies

Given the nature and limited scale of the proposed project, the environmental assessment category is assigned to be category B-partial assessment. Of the three components, only activities under Component 1 – Public Works – are likely to have potential negative environmental and social impacts. As such, the project has triggered five World Bank safeguards policies - Environmental Assessment (OP/BP 4.01), Pest Management (OP 4.09), Physical Cultural Resources (OP/BP4.11), Indigenous Peoples (OP/BP 4.10), and Safety of Dams (OP 4.37). Social issues include (a) resource-poor farmers’ inability to access extension services and inputs, (b) inappropriate technology and thus poor adoption, (c) inadequate access and control of production functions for women, and (d) communal conflicts over resource distribution in some areas of South Sudan.

As part of the ESMF process, proposed project activities under public works will be designed at the local level to ensure that they are screened for potential impacts and that they comply with the requirements set out under World Bank safeguard policies.

Environmental Assessment (OP 4.01): Environmental Assessment (EA) is used in the World Bank to identify, avoid, and mitigate the potential negative environmental impacts associated with Bank lending operations. The purpose of the EA is to improve decision making by ensuring that project options under consideration are sound and sustainable, and that potentially affected people have been properly consulted. OP 4.01 is applicable to this project, which has been assessed as an Environmental Category “B”, as it has potential adverse environmental impacts which are minor, site-specific, and easily mitigated.
Natural Habitats (OP 4.04): there are bound to be critical habitats in some of the locations selected as implementation areas. However, SSSNP activities by design will not be implemented in protected areas and is not envisaged to target natural habitats ecosystems such as wetlands (swamps, and marshes), and forests. The ESMF provides communities and extension teams with the appropriate checklist tools, resource sheets and planning methods to identify any potential impacts of project activities on natural habitats, reserves, or protected areas, and to develop appropriate mitigation measures to minimize or avoid damage or compensate for it. Those activities that are not addressed by the ESMF, which may have impacts on natural habitats, will be identified using the screening and review procedures (see annex 3).

Pest Management (OP 4.09): certain public works activities related to soil and water conservation and land productivity measures undertaken by SSSNP beneficiaries may require pest management strategies. Where appropriate, the MAFS will make resources available to beneficiaries to: (i) adopt Soil and Land Management (SLM) practices and technologies to mitigate land degradation and achieve greater productivity of crops, trees and livestock; and (ii) adopt sustainable alternative livelihood options to diversify and increase income and reduce the pressure on the natural resources. A number of activities, such as irrigation, may result in the introduction or expansion of pest management activities in certain areas (see Annex 4).

Indigenous Peoples (OP 4.10): A vast majority of the South Sudanese population meets the OP 4.10 criteria and therefore the policy is triggered for all the project beneficiaries who belong to different ethnic groups. Due to high volume of seasonal migration and internal displacement caused by economic activities and the recent conflict, respectively, it is difficult to determine at this stage the ethnic groups that are present and dominant in each of the counties, including those targeted by the project. Consequently, the element of Indigenous Peoples Plan (IPP) was included in the overall project design. Therefore, a separate IPP is not required.

Physical Cultural Resources (WB, OP 4.11): this policy addresses physical cultural resources, which are defined as 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. Physical cultural resources may be located in urban or rural settings, and may be above or below ground, or under water. Their cultural interest may be at the local, provincial or national level, or within the international community. Chance Find Procedure shall be followed to safeguard physical cultural resources (See Annex 1).

Involuntary Resettlement (WB, OP 4.12): This policy (OP/BP 4.12) covers direct economic and social impacts caused by involuntary taking of land. Involuntary resettlement may cause severe hardship, impoverishment and environmental damage unless appropriate measures are taken. This policy has not been triggered. Extensive consultations using a community-based approach will ensure that sub-projects will only be implemented on public lands free of individual or collective, non-government use OR land donated voluntarily for the project, according to Voluntary Land Donation Guidelines. This encompasses, among others: (i) the need of participatory identification of subproject siting, (ii) donors’ awareness of a refusal option, (iii)
the project's proactive assurance to avoid any material, institutional, and/or social pressure; with special, material consideration and support for vulnerable households, (iv) donated land must not exceed the area required to maintain the donor's livelihood or that of his/her household; (v) verification of the process by witnesses; and (vi) for all lands, including collectively used land, donation can only occur with the explicit, written consent of individuals using or occupying the land. As individual land ownership and respective land titling is not widely established, the Project will consider any household using lands prior to disclosed subproject commencement as having legitimate rights and such rights have to be donated freely to the project according to the above provisions, if noted land is considered necessary for subproject implementation. The project will ensure respective documentation and for any suggested subproject in contradiction with the above provisions, such subprojects will be considered unsuitable for project support.

Safety of Dams (WB, OP 4.37): this policy covers the responsibility of the owner of a dam to take all measures required for the safety of the dam. This policy is triggered as the project may support the construction of small scale dykes. However, the project only plans and has budgeted for very small water pans, which do not pose a significant risk. Small-scale dykes will be constructed from natural materials for the purposes of flood control. They are expected to average 3-5 meters, and will be screened to assure that they are less than 15 meters. Water harvesting infrastructure will be excluded from financing. There will be no reliance on existing dams for agricultural activities. All of the above will be ensured through application of a screening process of each potential sub-project. Generic measures for the design, construction, and maintenance of small dams are included in Annex 9 of this ESMF.

4.2 UN Safeguard Policies

The EMSF further follows the UN Common Approach to Environmental and Social Standards in UN Programming, which has recently been developed by the United Nations Environment Management Group (EMG): Moving Towards a Common Approach to Environmental and Social Standards for UN Programming. The document is currently still in draft form, but is soon to be expected to function as a joint document serving all UN entities. The draft UN standards are by and large aligned to the World Bank safeguard policies.

Biodiversity, Ecosystems and Sustainable Natural Resource Management (Thematic Area 1): this policy aims to conserve biodiversity, promote sustainable management of natural resources, and ensure fair and equitable sharing of the benefits of resources. It calls to avoid activities that lead to adverse impacts on critical habitats. As mentioned above, the SSSNP is not envisaged to target natural habitats ecosystems such as wetlands (swamps, and marshes) and forests, and will identify any potential impacts of project activities on natural habitats, reserves, or protected areas. It will develop appropriate mitigation measures to minimize or avoid damage or compensate for it.

Pollution Prevention and Resource Efficiency (Thematic Area 8): this policy aims to avoid and minimize advert effects on human health, promote sustainable and efficient use of resources, and avoidance of hazardous and non-hazardous waste. As mentioned above, certain public
works activities related to soil and water conservation and land productivity measures undertaken by SSSNP beneficiaries may require pest management strategies (see Annex 4).

Indigenous Peoples (UN Thematic Area 6): this policy recognizes and promotes the rights of indigenous people including to their land and resources. As most of South Sudan's population exists of ‘ethnic groups, which is one of the definitions of ‘indigenous people’, this project will largely cover ‘indigenous peoples’. To mitigate any negative impacts on indigenous peoples, this project will implement meaningful consultation and participation, request free, prior and informed consent, support rights to lands, ensure culturally appropriate benefits, among other measures, as per policy.

4.3 GAP ANALYSIS NATIONAL LAW AND WB / UN SAFEGUARD POLICIES

Since attainment of Independence in July 2011, the Government of the Republic of South Sudan has adopted a new Constitution, as well as a number of policies and legislation related to environmental safeguards. At the same time, other laws and regulations are still being drafted, with the ultimate aim of enhancing sustainable socio-economic development. The policies and laws provide procedures to be followed in the planning and implementation of government activities in order to utilize resources and execute government programs to maximum benefit.

Transitional Constitution of the Republic of South Sudan of 2011: In line with the WB Safeguard Policies OP 4.01 and the UN Standards in Thematic Area 1, the Transitional Constitution of the Republic of South Sudan of 2011 includes numerous provisions that have a bearing on the environment. Article 41 (1) provides that the people of South Sudan shall have a right to a clean and healthy environment; (2) that every person shall have the Obligation to protect the environment for the benefit of present; and (3) that future generations shall have the right to inherit an environment protected for the benefit of present and future generations. Specific measures to ensure the objectives above include: Prevention of pollution and ecological degradation; Promotion of conservation; and Securing of ecologically sustainable development and use of natural resources while promoting rational economic and social development so as to protect the bio-diversity of South Sudan. Furthermore, Article 166 (6) expects local governments to involve communities in decision-making in the promotion of a safe and healthy environment.

The purpose of the South Sudan Draft Environmental and Protection Bill (2013) is to protect the environment and to promote ecologically sustainable development that improves the quality of life for both the present and future generations. In line with WB OP 4.01 and its requirement for an Environmental Assessment, Section 18 of the South Sudan Draft Environmental and Protection Bill introduces the requirement for Environmental Impact Assessments. An Environmental Impact Assessment (EIA) is defined as a systematic examination conducted to determine whether or not a project will have any adverse impact on the environment and prescribe mitigation measures. The objective of the EIA is to ensure that environmental considerations are explicitly addressed and incorporated into the development
decision-making process and to anticipate and avoid, minimize or offset the adverse significant biophysical, social and other relevant effects of development proposal, among others.

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

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

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

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

The Land Act requires the Government to consult local communities and consider their views in decisions about community land. The Act also gives pastoralists special protection: ‘No person shall without permission to carry out any activity on the communal grazing land which may prevent or restrict the residents of the traditional communities concerned from exercising their grazing rights’. WB OP 4.12 on involuntary resettlement is therefore in line with the South Sudan Land Law.
The National Land Policy of 2015: The principal aim of the draft National Land Policy (NLP) is to strengthen security of tenure for all citizens without discrimination. The policy emphasizes equitable access to land by all people through a variety of policies and strategies, including the retention of customary tenure systems which provide access to land as a social right in rural areas, and through land programs in urban areas that provide security of tenure to serviced land at reasonable cost. The policy recognises that provision of equitable and secure access to land, is an important component in poverty eradication. Recognizing that women are often denied the opportunity to enjoy land rights and access to land on an equal basis with men, the policy emphasizes the importance of initiating a legal reform and legal action on behalf of women who seek to exercise their land rights. Customary tenure arrangements require legal reform to breakdown existing barriers to women holding rights to land on the basis of equality with men. Specific priority is given to the rights of widows to inherit land and the rights of female-headed households to secure land on an equal basis with men. The policy also recognizes the need to ensure that refugees, IDPs and returnees have secure land rights for future peace and security of the country. The policy supports efforts that facilitate the transition from displacement to a “future of long-lasting peace and sustainable development”.

WB OP 4.12 on involuntary insettlement also pays particular attention to vulnerable groups, including women and children and those displaced. However, while WB OP 4.10 and the UN standards under Thematic Area 6, on Indigenous People, both require consultation methods that that give special attention to vulnerable groups, and aim to address gender and intergenerational issues that may exist, the South Sudan National Land Policy is more explicit by prescribing to legally redefine customary land tenure where it violates gender equality or other rights of vulnerable populations.

The South Sudan Forest Policy (2012) was formulated to broadly protect the roles forests play in the ecological stability of rivers, lakes, swamps and agricultural production systems. It also ensures that there are optimal benefits from forestry and agro-forestry activities for food security and to poverty alleviation among our rural communities. The policy integrates forest sector actions with rural development efforts to ensure that the rural population of South Sudan shall have access to basic needs such as sustainable household food security, shelter, wood fuel, safe clean water, sanitation and health facilities, primary education, good local governance, empowerment and self-reliance.

The Food and Agriculture Policy Framework (2007) of the Ministry of Agriculture, Forestry, Cooperatives and Rural Development emphasizes the need to transform agriculture from traditional/subsistence system to achieve food security through science-based, market oriented, competitive and profitable agricultural system without compromising the sustainability of the natural resources for generations to come. In order to achieve the above, it developed key strategic objectives that include: priority policies that quickly boosts agricultural production; Make available agricultural inputs, including credit facility, at affordable cost; Rehabilitate and expand rural infrastructure including feeder roads, markets; Develop and provide research and extension services, and market linkages.
The Wild Life Conservation and National Parks Act (section 5) recognizes that wildlife constitutes an important national natural wealth and heritage of the South Sudan, and thus needs to be conserved, protected and utilized for the benefit and enjoyment of all its people. Section 6 vests the administration and execution of the policy to the Secretariat headed by the Director General of the Secretariat of Wildlife Conservation, Environment Protection and Tourism. The Secretariat’s objectives and functions are as follows: Conservation, management and administration of parks, controlled areas and other protected game reserves; Development, in cooperation with other competent authorities, of Tourism based on wildlife in the South Sudan and the development of other forms of rational utilization of the wildlife and environment resources; Control of hunting, the management preservation, conservation and protection of wildlife and environmental resources and the control of trade in protected animals and trophies; Promotion of education and the dissemination of information about wildlife resources in the South Sudan, in cooperation with the competent authorities; Training of wildlife officers, non-commissioned officers and game Scouts and other personnel of the Secretariat; Development and carrying out of research on wildlife and environmental resources with a view of their optimum preservation, conservation, management and protection; Management and administration of zoological gardens; and The administration and enforcement of the provision of this Act and the attainment of its objectives. WB OP 4.04 and UN Standards under Thematic Area 1 on Biodiversity, Ecosystems and Sustainable Natural Resource Management are in line with this Act.

The Public Health (Water and Sanitation) Act (2008) emphasizes the prevention of pollution of air and water, and also encourages improvement in sanitation. Key provisions include the protection of the sanitation of environment; it encompasses the measure to address the pollution of water and air. The following are measures geared towards control of pollution of water: Measures to prevent pollution of water for consumption; Measures destined to prevent pollution of potable water; Anyone who offers the public water to drink or for human food, and which includes frozen food should ensure that the water conforms to the portability regulations; Management and disposal of hazardous wastes; and Storage of wastes on the premises of waste generators. The Public Health Act (2008) also provides need protect pollution of water through the enforcement of regulations and measures necessary to combat all elements of pollution and protect the natural level of the environment and public health. The WB OP 4.09 on Pest Management and the UN Standards on Pollution Prevention and Resource Efficiency (Thematic Area 8) are in line with this Act.

5. Description of Relevant Activities

Only Component 1 of the SSSNP (Public works) may be associated with direct environmental and social impacts, while questions of vulnerability will also be addressed for Component 2. Under Component 1, communities in consultation with the Boma Development Committees (BDC) select the public works activities with preference given to works that promote local economic opportunity and greater public benefits, such as movement of produce from farms to the market, improving productivity of land through flood control and increased surface
irrigation, storage facilities to reduce post-harvest losses, collection and proper disposal of solid waste and cleaning of drainage channels, and environmental sanitation activities in urban areas. A list of possible sub-projects includes:

<table>
<thead>
<tr>
<th>Categories of Public Works Activities</th>
<th>Specific Activities</th>
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<tbody>
<tr>
<td><strong>Community Access Roads</strong> (maintenance and/or rehabilitation only)</td>
<td>● Urban and rural community access roads</td>
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<tr>
<td></td>
<td>● Access roads to community farms/public facilities and other villages</td>
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<tr>
<td><strong>Waste and Sanitation Management</strong> (maintenance and/or rehabilitation only)</td>
<td>● Road-side drainage systems</td>
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<td></td>
<td>● Collection of waste from open drainage channels</td>
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<td></td>
<td>● General cleaning and landscaping of common areas</td>
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<tr>
<td><strong>Integrated Watershed Management</strong></td>
<td>● Soil and water conservation</td>
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<td></td>
<td>● Land productivity, soil fertility restoration</td>
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<td></td>
<td>● Nursery site establishment and management</td>
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<td></td>
<td>● Afforestation</td>
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<td></td>
<td>● Area closure/fencing using woodlots</td>
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<td></td>
<td>● Gully control</td>
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<td></td>
<td>● Small-scale dykes</td>
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<tr>
<td><strong>Small-scale Food Production</strong></td>
<td>● Small-scale group farming</td>
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<tr>
<td></td>
<td>● Rehabilitation and/or maintenance of small-scale irrigation schemes</td>
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<td></td>
<td>● Compost making</td>
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<tr>
<td><strong>Water Harvesting</strong> (maintenance and/or rehabilitation of existing developed water sources)</td>
<td>● Springs/surface water</td>
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<td></td>
<td>● Ponds</td>
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<tr>
<td></td>
<td>● Hand-dug wells</td>
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<tr>
<td><strong>Social Infrastructure</strong> (maintenance and/or rehabilitation only)</td>
<td>● School fences</td>
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<tr>
<td></td>
<td>● School classrooms</td>
</tr>
<tr>
<td></td>
<td>● Simple storage facilities</td>
</tr>
<tr>
<td></td>
<td>● Health facilities</td>
</tr>
<tr>
<td></td>
<td>● Community centers</td>
</tr>
</tbody>
</table>

Per the previous project, the average sub-project size is expected to be less than $30,000, we an average number of beneficiaries/laborers per sub-project of less than 200 citizens. The beneficiaries will include vulnerable individuals and communities who are mobilized and participate voluntarily in public works activities. The key stakeholders will include vulnerable individuals, communities, IPs, local government, and the relevant sector Ministries and departments (agriculture & forestry, water, environment, and wildlife, lands and communities).
6. Potential Environmental and Social Risks and Impacts

The public works activities will involve direct interventions in the biophysical and human environments. These impacts can occur at various stages of the project and can be positive or negative, temporary or permanent, and cumulative. On balance, it is assessed that the potential positive impacts of the project outweigh the negative impacts. In fact, the SSSNP has the potential to make a significant contribution to South Sudan’s efforts to protect and preserve the environment while reducing poverty in rural areas.

Among the expected positive impacts, the public works intervention is an important step in building skills and institutions that can encourage low-skill wage jobs in the future and create the basis for the future job creation in the private sector. In addition, the SSSNP contributes to strengthening both central and local government capacity to deliver social protection services and improve the conditions of the poorest, moving away from NGO-led implementation and delivery of social protection services to strong involvement of the government as the leading actor in designing and providing such services. Lastly, the SSSNP serves as a useful bridge between the humanitarian and development efforts and contributes to the graduation of the most vulnerable individuals and communities from aid dependency to self-sufficiency. The trickledown effect of the SSSNP is therefore expected to generate many positive social economic impacts to the vulnerable groups /beneficiaries. SSSNP activities shall also result in a multiplier effect on the local economy through development of entrepreneurial activities such as access to market outlets. Productive employment opportunities especially for women and female-headed households will increase as the public works component aims to have 50% of the beneficiaries be women.

6.1 Potential Negative Environmental Impacts

On the whole, SSSNP interventions will focus on implementation of specific activities that improve the long-term sustainability of the ecosystems. The environmental category of the proposed sub-projects will fall in Category B and the potential impacts are likely to be small and localized and can be easily mitigated by implementing the guidance under the ESSAF given lessons learnt from the SNSDP project. The anticipated potential negative impacts include:

**Increased Soils Erosion:** during the rehabilitation of roads, excavated areas will need to be assessed for potential soil erosion damage. Mitigation measures, as necessary, will be implemented to avoid the displacement of eroded soil into watercourses and onto adjoining areas, including the worksite. Arrangement to limit the area that is being excavated (murram barrow sites), including the use temporary storm water control devices and associated cut off drains/bunds to minimize sediment transport into watercourses shall in such cases be considered.

**Increased Surface Water Run Off/Flush Floods:** the rehabilitation and maintenance of roads is associated with potential impact of increased surface run off/flush floods due to drainage
channelled water alongside the road drainages. The use of temporary storm water control devices and associated cut off drains to minimize collection of water in the drainage channel shall be employed. The cut off drains will be re-directed away from peoples’ residences.

**Open Burrow Pits:** materials such as murram soils should ideally be sourced from existing burrow sites on land. However, it is likely that given the remote location of many of the project sites that materials may need to be sourced locally. Should materials for the project be sourced from a community, the IP will assess the site using the screening form to enlist the potential impacts. The Implementing Partner will liaise with State Ministry of Agriculture to ensure that a murram extraction permit is obtained, as required by law. Any such murram extraction/burrow sites that are opened shall be restored and/or rehabilitated at the end of the project.

**Open Shallow Wells:** shallow wells shall be established as part of cash for work in the hard to get water areas. These wells are very useful for providing water for domestic use and watering of animals. Experience shows that community members and IPs often leave these wells open. As such, they also pose a risk to small children, animals, and others who may fall in and be grievously harmed, or even killed. Therefore, all shallow wells that will be located within the community homesteads and or community grazing areas shall be covered and secured properly.

**Waste Disposal:** It is common practice in South Sudan to burn collected waste materials. This practice increases carbon dioxide in the atmosphere, which negatively affects the climate. In particular, large quantities of solid material waste such as plastics, which may accumulate as by-products of public works activities, should not be dumped in the open pit for burning. Sorting of wastes shall be encouraged as this enables the recyclable wastes to be identified and re-used and the non-recyclable wastes be disposed of safely. Following UNOPS requirements, it will be ensured that residual non-hazardous waste is not dispersed in unauthorized sites or openly in the environment. The incinerator, provided by the Implementing Partner (IP) as per the input requirements when needed, should be used to burn any substance with hazardous chemicals. Should there be liquid waste, such as unusable oil, as per UNOPS requirements, it cannot be dispersed on the environment. there shall be a need to liaise with the Ministry of Environment to dispose of all hazardous chemical wastes in accordance with this. Prior to collection and disposal by licensed waste handling contractor; waste oil shall be stored within a restricted bounded area or in a sealed /labelled container away from wind, sunlight and rain. Soil and other oil contaminated material shall be classified as hazardous waste and will be placed in the bounded area in clearly labelled containers.

**Pest Management:** It is important to note that certain public works activities related to soil and water conservation and land productivity measures undertaken by SSSNP beneficiaries may require pest management strategies. To the end, where appropriate, the MAFS will make resources available to beneficiaries to: (i) adopt Soil and Land Management (SLM) practices and technologies to mitigate land degradation and achieve greater productivity of crops, trees and livestock; and (ii) adopt sustainable alternative livelihood options to diversify and increase income and reduce the pressure on the natural resources. A number of activities, such as
irrigation, may result in the introduction or expansion of pest management activities in certain areas (see annex 4).

**Health and Safety Issues:** Health and safety risks include small harms such as cuts, falls, blisters etc. at work sites. The IPs shall observe general health and safety requirements as a minimum, including abiding by the World Bank’s Environmental Health and Safety Guidelines and the UN’s Community Health, Safety and Security guidelines (Thematic Area3), and abiding by a specially prepared Health and Safety Plan (based on a risk assessment of safety critical activities), as per UNOPS requirements. The IPs shall further provide medical support and First Aid Kit at all working areas and Personal Protective Equipment where appropriate.

In the long run, the improved surface will increase traffic speed and coupled with greater traffic volumes increases the potential for accident numbers and severity. IPs will determine the potential safety threats associated with public works activities and work with the Government to take appropriate measures, including; the installation of traffic calming devices and developing alternative footpaths for pedestrians, installations signage and increase community awareness of traffic hazards through education programs.

**Environmental Awareness:** In many institutions, there is poor and inadequate awareness and information dissemination on issues related to the environment. As a result, there is poor environmental management, requiring the development of an environmental awareness program to ensure that all staff members and the MAFS understand environmental conservation. As such, efforts aimed at raising awareness regarding the environmental impacts of SSSNP implementation will be an important way to build the Ministry’s capacity in ensuring adherence to the environmental legislation requirements, to be verified by the EA undertaken in the future. Such capacity building efforts will go a long way in ensuring the successful implementation of the project, as failure to undertake or adhere to the EIA & EA may lead to prosecution and stoppage of on-going projects by the Ministry of Environment.

**Protection of People, Property and Environment:** there is a small risk of people, property and the environment being damaged through harmful effects of mis-operation or failure of small dams. In order to mitigate risks, small dams will be screened to not exceed 15 meters in height. Furthermore, measures will be undertaken to control the discharge downstream of the dam, to restrict the likelihood of events that might lead to a loss of control over the stored volume and the spillway and other discharges, and to mitigate through onsite accident management and/or emergency planning the consequences of such events if they were to occur.

Anticipated negative environmental impacts and proposed mitigation measures:
<table>
<thead>
<tr>
<th>Environmental issue</th>
<th>Nature of impact</th>
<th>Area affected i.e. land, water, air, or socio/economic, flora and fauna</th>
<th>Activities for the impact</th>
<th>Proposed mitigation measures</th>
</tr>
</thead>
</table>
| Soil erosion             | Gullies, washing away soil, bare rock/Soils, silting, blocking channels and carrying away property | Land soils, water, air                                                  | Slashing, desilting drainage channels digging Road rehabilitation | Scour checks  
Where possible plant shrubs or grass or shed trees on road reserves, minimize clearing of vegetation with a hoe but slash  
Limit the area that is being excavated (murram barrow sites), including consideration of the use temporary storm water control devices and associated cut off drains/bunds to minimize sediment transport into watercourses |
| Surface Water Run Off/Flash Floods | Increased Surface Water Run Off/Flash Floods                                   | Road rehabilitation                                                     | Use of temporary storm water control devices and associated cut off drains to minimize collection of water in the drainage channel  
Off-drains will be re-directed away from peoples' residences as well as roads |
| Biodiversity             | Loss of biodiversity                                                             | Land, air and water                                                    | Slashing, desilting drainage channels digging, trampling             | Minimize clearing of vegetation with a hoe but slash, where possible plant grass and shrubs or ornamental plants on road reserves, sensitization |
| Littering of solid wastes| Bad smell, infections, ugly scenery, deterioration of land and water quality, blockage of pipes/drainage channels | Water, air, channels, road reserves, undeveloped plots,                | Slashing, desilting drainage channels digging.                      | Sorting; composting, reuse of bottles (packing water and drip irrigation), use light polythene as pothole filling material  
Engage QC on solid waste management and community sensitization |
<p>| Loss of asthetic         | Uncovered borrow pits and open                                                   | Water, air, channels, road reserves,                                   | Murram and stone extractio                                          | Restore borrow pits through land filling, planting of grass/shrubs and use of signage. |</p>
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<thead>
<tr>
<th>Environmental issue</th>
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<tbody>
<tr>
<td>beauty and lack of safety</td>
<td>shallow wells - contamination of water, breeding grounds for mosquitoes and likely accidents</td>
<td>undeveloped plots, n/quarrying</td>
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<td>Disruption of traffic low</td>
<td>Accidents which may lead to injuries, death, conflicts and loss of property.</td>
<td>Water, air, channels, road reserves, undeveloped plots, farms, schools, Health facilities</td>
<td>Cleaning of public places, working on farms and</td>
<td>Signage, sensitization, provide first Aid and training on First Aid</td>
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<tr>
<td>Use of chemicals</td>
<td>Accidents which may lead to injuries, death, conflicts and loss of property.</td>
<td>Water, air, channels, road reserves</td>
<td>Cleaning of public places, working on farms and</td>
<td>Integrated management of chemicals</td>
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<tr>
<td>Health and Safety issues</td>
<td>Cut, falls, blisters, communicable diseases</td>
<td>Public works</td>
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<td>observe general health and safety requirements as a minimum</td>
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<td>provide medical support and First Aid Kit at all working areas and Personal Protective Equipment where appropriate</td>
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<td>Damage to people, property and environment</td>
<td>Breakage of small-scale man-made dykes</td>
<td>Land, water</td>
<td>Small dams/dykes</td>
<td>Small dams will be screened to not exceed 15 meters in height</td>
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<td>control the release damaging discharges downstream of the dam</td>
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<tr>
<td>Environment issue</td>
<td>Nature of impact</td>
<td>Area affected, i.e. land, water, air, or socio/economic, flora and fauna</td>
<td>Activities for the impact</td>
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<td>Restrict the likelihood of events that might lead to a loss of control over the stored volume and the spillway and other discharges</td>
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<td>Onsite accident management and/or emergency planning the consequences of such events if they were to occur.</td>
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### 6.2 Potential Social and Economic Issues

**Occupational Safety and Health:** through the improper use of PPE and human error, injuries, loss of man hours, infections, and increased medical bills can occur. It will therefore be crucial to provide appropriate PPE, as well as continuous reminders on how to use PPE, how to use signage, and to provide continuous and strong supervision.

**Social Ills:** There are a significant number of social ills related risks, most of all beneficiary exclusion, which can lead to conflict; the obtaining of money under false pretense from beneficiaries by leaders; delayed payments leading to complaints and conflict; the destruction of property (such as crops) through slashing desilting of drainage channels; as well as issues of sexual harassment, GBV, rape including rape through impacts of the projects on gender dynamics and roles inside the household, but also through the large gathering of workers that can endanger the women of the locality. Most of these risks can be mitigated through clear communication of beneficiary selection and other project approaches and strategies, in locally appropriate ways; as well as through clear communication and implementation of a refined GRM.

**Encroachment on private and public land:** The opening up/rehabilitation of rural feeder and urban roads, rehabilitation of school fences, and the establishment of compost sites may lead to encroachment or trespassing on privately used land. Such subprojects will only be feasible if land can be donated voluntarily as outlined above. Public works activities may also lead to chance archaeological or cultural finds, which beneficiaries or community members may want to appropriate for themselves. In such a case, a Chance Find Procedure shall be followed. Greater detail on this issue is provided in Chapter 3 (3.2.5) as well as in the annex.

**Land conflicts:** Small-scale farming and agriculture activities and hand-dug wells will require land that is possible claimed or owned by someone. However, given the communal ownership of the land tenure system in South Sudan, where local landlords and chiefs have the final say on
voluntary land acquisition for community activities, the beneficiaries/community will consult with the landlords and chiefs for the allocation of the land for the activities as well as for consent of all households currently using the land. It is furthermore not planned to take individual land for agricultural purposes, as they will be implemented on communal land, allocated by the chiefs and for which consent by all current land users has been obtained. Furthermore, for the voluntary granting of the land, UNOPS will require a lands consent document provided by the community and signed by the landlords and chiefs. This approach has been successful in the previous project and will be strengthened by the new operations, ensuring consent of all stakeholders, including individual user households.

**Equity Issues:** In irrigation schemes, equity issues may occur over decisions on where water should travel down, who will receive water first and who will receive it last. With regards to water harvesting and hand-dug wells, questions may arise who will benefit from access to water. New access to water can create unwanted beneficiaries, where some benefit from charging for water. This will be avoided by implementing water projects on communal land, allocated by the Chief. The water will be accessible by all community members who live permanently or temporarily in the catchment of the well; i.e. arrangements will also be made with pastoralists who pass through the area regularly.

**Elite capture:** The project runs risk of undeserving beneficiaries as a result of influence by powerful members of society, which can lead to intra-communal and inter-communal conflict. Given the high conflict potential in most areas of South Sudan, elite capture of funds inserted through external programs are a significant risk. This can be mitigated through solid conflict analysis and political economy analysis of each location that is newly selected for project implementation, through clear beneficiary selection guidelines that are communication in appropriate ways to different social groups (including illiterate populations etc.); and well-communicated GRM that circumvent reporting lines through local elites. Equally, all land donated will require consent by all user households.

**Increased number of people coming into the area: spread of communicable and waterborne diseases:** All public work activities will entail bringing together many people from different Bomas, which may enhance the spread of communicable diseases. In order to counter the various types of communicable and waterborne diseases, community members will be educated over the importance of washing their hands before eating food, drinking of clean and safe water, and practicing of personal hygiene on and off site. Community members will also be sensitized over HIV/AIDS preventive measures (i.e. use of condoms, including female condoms), safer sex education, and the need to treat any sexually transmitted infections in early stages as well as the need of undertaking HIV testing and counselling.

It is important to note that the project does not encourage migration of people from one area to another, which helps minimizing the influx of people who may be infected with communicable diseases, and thereby reduces the chance of cases of new diseases within the project area. In addition to communicable diseases, opening up of urban drainage channels and burrow pits, as well as digging hand dug wells may also lead to increased cases of waterborne diseases. In an effort to mitigate possibilities of waterborne diseases, murram sites will be
restored, all shallow and hand dug wells be covered and stagnant water within construction sites will be meticulously drained.

### Anticipated Social issues and proposed mitigation measures

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<thead>
<tr>
<th>Social Issue</th>
<th>Nature of Impacts</th>
<th>Area affected</th>
<th>Activities for the impact</th>
<th>Proposed mitigation measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Occupational safety and health</td>
<td>Injuries, loss of man hours, infections, increased medical bills</td>
<td>socio-economic</td>
<td>Improper use or lack of PPE and human error</td>
<td>Provide appropriate PPE, Continuous reminder to use PPE, use of signage, continuous supervision</td>
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<td>Communicate and implement GRM</td>
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<td>Social ills</td>
<td>Beneficiary exclusion leading to conflict</td>
<td>socio-economic</td>
<td>Beneficiary, subprojects selection and implementation</td>
<td>Education of the public on selection criteria</td>
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<td>Implementation of transparent selection</td>
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<td>Location-appropriate communication of selection criteria and reasons for selection addressing different social groups (including women, illiterate populations etc...)</td>
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<td>Implementation and communication of GRM</td>
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<td>Obtaining money by false pretense from beneficiaries by leaders (Leaders taking advantage of the beneficiaries and promising favors with payment economic)</td>
<td>socio-economic</td>
<td>Beneficiary selection and work days computation</td>
<td>Education of the public on selection criteria</td>
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<td>Loss of tools</td>
<td>socio-economic</td>
<td>Storage of tools and beneficiary selection</td>
<td>Successful communication of clear guidelines</td>
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<td>Consistent and effective supervision</td>
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<td>Issue</td>
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<td>Description</td>
<td>Mitigation Measures</td>
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<tr>
<td>Destruction of property like crops</td>
<td>Socio-economic</td>
<td>Slashing desilting of drainage channels and desilting</td>
<td>Minimize or avoid unless with explicit permission in writing</td>
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<td>Implementation and communication of GRM</td>
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<td>Sexual harassment, GBV including rape</td>
<td>Socio-economic</td>
<td>Sharing of tasks, people gathered for public works</td>
<td>Adherence to ethical code of conduct</td>
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<td>Strong communication of zero tolerance to sexual violence</td>
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<td>Communication and implementation of GRM with specific inclusion of anonymous reporting</td>
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<td>Linkage to functioning justice authorities or institutions for redress</td>
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<td>Domestic sexual harassment and GBV</td>
<td>socio-economic</td>
<td>Utilization of money earned from the project, time women may spend outside of HH away from their usual duties can lead to domestic conflict</td>
<td>Boma-level awareness raising of potential of domestic conflicts</td>
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<td>Training of Boma representatives to respond to domestic issues in a non-gender biased manner</td>
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<td>Linkage to functioning justice authorities or institutions for redress</td>
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<td>Loss of motivation</td>
<td>socio-economic</td>
<td>Appeals committee sittings and supervision by QCs</td>
<td>Quarter counsels be counseled and if possible explore ways of motivation / incentives</td>
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<td>Implementation and communication of GRM</td>
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<td>Delayed payment leading to complaints and conflict</td>
<td>socio-economic</td>
<td>payment</td>
<td>Timely payment and appropriate communication of payment mechanisms</td>
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<td>Transparency of payment based on local means of communication</td>
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<td>Communicate and implement GRM</td>
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<td>Category</td>
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<tr>
<td>Submission of reports to PIU/Alpha Bank and World Bank</td>
<td>Proper acquisition of land following voluntary land donation guidelines including consent of all land user households</td>
<td>Consultations of beneficiaries and communities with landlords, land users, and chiefs for the allocation of land</td>
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<td>Signing of lands consent document following voluntary granting of land by all land users</td>
<td>Communication in locally appropriate ways how land is acquired</td>
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<tr>
<td>Encroachment on private land</td>
<td>Road reserves, peoples’ plots</td>
<td>Road works, cleaning of public places and farming.</td>
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<td>Proper acquisition of land following voluntary land donation guidelines including consent of all land user households</td>
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<td>Grievances and conflicts</td>
<td>Road reserves, peoples’ plots</td>
<td>Road works, cleaning of public places and farming.</td>
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<td>Water usage</td>
<td>Water reserves, peoples’ plots</td>
<td>Road works, cleaning of public places and farming.</td>
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<tr>
<td>Equity issues</td>
<td>Water reserves, peoples’ plots</td>
<td>Road works, cleaning of public places and farming.</td>
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<td>Signing of lands consent document following voluntary granting of land by all land users</td>
<td>Communication in locally appropriate ways how land is acquired</td>
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<td></td>
<td>Communicate and implement GRM</td>
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<tr>
<td>Elite capture</td>
<td>Undeserving beneficiaries as a result of influence by powerful members of society</td>
<td>Selection of beneficiar</td>
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</tbody>
</table>
of people coming into the area

| GBV including rape | Socio-economic | Group work | Adherence to ethical code of conduct
| Strong communication of zero tolerance to sexual violence |
| Communication and implementation of GRM with specific inclusion of anonymous reporting |
| Linkage to functioning justice authorities or institutions for redress |

Disruption of people’s culture

| Indigenous people | Search for employment | Sensitization and use of clear selection criteria. |

7. **Steps in the Screening Process**

**Step 1. Sub-project Type Assignment**
The first step of sub-project screening is to determine within which of the menu of public works activities the sub-project sits:

- maintenance and/or rehabilitation of community access roads,
- maintenance and/or rehabilitation of waste and sanitation management;
- integrated watershed management;
- small-scale food production;
- maintenance and/or rehabilitation of existing developed water sources; and
- maintenance and/or rehabilitation of school fences, school classrooms, simple storage facilities, health facilities, and community centers.

If the sub-project is not one of sub-projects types, it cannot be funded by this project.

**Step 2. Eligibility (Negative List)**
The second step is to determine if the subproject is eligible for financing under the Project. The sub-project will be reviewed to assess if the subproject is likely to have any of the following attributes contained in the Negative List in Annex 2. If any of the negative list attributes are part of the sub-project design, the sub-project will be rejected from funding.

**Step 3. Assignment of Generic EMP:**
According to the sub-project type assigned above, the sub-project will apply the relevant generic EMP.
7.1 SUB-PROJECT SAFEGUARDS MANAGEMENT

Within one week of receiving a draft subproject proposal, the Environmental Safeguards Specialist will prepare and sign a screening form (Template in Annex 1.) indicating if the ESMF is applicable to the subproject and if the subproject triggers any of the attributes in the negative list. The screening form will indicate the subproject type assignment. The Environmental Safeguards Specialist will pass on the signed screening form to the Program Manager and the relevant local UNOPS sub-project manager for further processing.

7.2 SUB-PROJECT IMPLEMENTATION

Annex 3 contains annotated outlines for generic EMPs. Generic EMPs identify and summarize expected subproject type environmental and social risks and impacts and present measures to mitigate them, including monitoring and reporting requirements, and supervision of the agreed mitigation measures.

The Environmental Safeguards Specialist will organize consultations with Project affected groups and local NGOs on the environmental and social aspects of subprojects and take into consideration the views of stakeholders. The purpose of the consultations will be to: (i) inform them about the activities to be undertaken, their timetable and possible impacts, and; (ii) document and address their concerns. The ESSO will initiate these consultations as early as possible and will provide relevant material before consultation, in both a form and a language that are understandable and accessible to the groups being consulted. The Environmental Safeguards Specialist will ensure that sub-project documentation includes consultation summaries, indicating who was consulted, where and when, what concerns were expressed, and how these concerns were addressed. The records of consultations will be kept in the Project Office.

The consultation process will take in account the sociocultural context of South Sudan. Consultations can take the form of focus groups or discussions with elders/community leaders. As necessary, the Environmental Safeguards Specialist will organize separate consultations for women to ensure that any special concerns and needs are taken into account during the preparation of the safeguard instruments. Given the ongoing conflict, the Environmental Safeguards Specialist will also ensure that the individuals consulted are not exposed to risks as part of their participation in subproject consultations, for example by avoiding large meetings, and not disclosing personal information/photos. Consultations might take the form of individual interviews and/or meetings carried out in safe places using limited questionnaires. For subprojects under the CERC, the Environmental Safeguards Specialist will ensure that a rapid social assessment is done as part of the CERC safeguards assessment if the screening process identifies that vulnerable groups might be affected by the subproject or that the subproject might create or exacerbate social conflicts.

In addition, subprojects should regularly consult with project-affected persons and communities throughout subproject implementation, as necessary, to address safeguards-related issues that affect them.
8. MONITORING PLAN

8.1 REGULAR MONITORING AND INSPECTION FOR COMPLIANCE

Two strategies are used to build a simple system for monitoring of environmental and social impacts. First, the MAFS Secretariat, County Assistant Commissioners for public works, and other stakeholders will consider the environmental and social criteria that require measurement, with consideration of ESMPs used by sub-projects. Second, using this list of criteria, a set of indicators will be integrated into recording forms to be used in a participatory approach to environmental monitoring and evaluation.

The GRM will further help track complaints and effectiveness of interventions, including those with environmental and social impacts. Moreover, a Management Information System will be developed, which in addition to collected necessary information on beneficiaries and projects to track progress, will also include a module to record complaints and the ways in which they were addressed. Community Score Cards and other accountability tools will also be utilized to track and evaluate effectiveness of interventions.

The goals of monitoring will be to measure the success rate of the MAFS activities and projects, determine whether interventions have handles negative impacts, and whether further interventions are required or monitoring is to be extended in some areas.

Monitoring indicators will depend on specific activity contexts. Monitoring and surveillance will therefore take place on a “sample” basis. It is not recommended to collect large amounts of data, but rather to base monitoring on observations by MAFS/M&E officers and stakeholders to determine trends of the indicators.

Selected indicators include:

➢ Number and percentage of affected households consulted during the planning stage;
➢ Number of beneficiaries/households participating in implementation of micro-projects
➢ Levels of decision-making of affected people;
➢ Levels of understanding of activity impacts and mitigation;
➢ Effectiveness of local authorities to make decisions
➢ Frequency and quality of meetings;
➢ Percentage of women, youth, and disadvantaged/marginalized groups involved in discussions;
➢ Number of complaints received;
➢ Number of accidents/incidents related to the projects; and
➢ Number of social conflicts and/or communal tensions.

8.2 QUARTERLY AND ANNUAL MONITORING AND REPORTING
UNOPS is responsible for the overall M&E arrangement of the proposed SSSNP. It produces bi-annual and annual reports, which will be shared with all stakeholders, including relevant Government ministries. Most importantly, overall M&E reporting from UNOPS to the World Bank will take place. UNOPS strengthens the M&E tools and framework put in place by the SNSDP to monitor and measure the results of the proposed project. This is further strengthened with the support of the World Bank technical experts, including support expected to be undertaken by the Poverty Global Practice to strengthen targeting and M&E mechanisms across all the projects in the South Sudan portfolio.

The potential for a third party monitor to support parts the monitoring functions will be explored. This relates to options of having a Third-Party Monitor, particularly in assessing the functionalities of the payment system and the GRM, as well as roll-out of the beneficiary satisfaction survey, to provide assurance and robust check of implementation progress. This will be augmented by GIS-based real time data monitoring, which will be scaled up across all the locations, learning from the experience and lessons of the GIS monitoring pilot in Juba. UNOPS staff will be trained on this monitoring tool, accordingly. Sufficient funds have accordingly been included in the project budget for M&E activities under Component 3.

In line with the Joint UN Monitoring and Reporting Guidelines of Environmental and Social Risks and Impacts, the SSSNP will follow a quarterly reporting cycle. Adequate institutional arrangements, systems and resources will be put in place to monitor the EMSF. Monitoring results can lead to corrective action.

Brief quarterly reports and an annual environment and social progress report will be completed for the SSSNP. The environment and social sections will be part of the overall project reports. Information about the sub-projects and VLDs will be presented as sections of the quarterly progress report. The format for completion of the environmental and social sections of the quarterly reports is set out below. The quarterly reports will be submitted within 6 weeks after the end of quarter.

Quarterly reports provide brief updates on environmental and social issues in sub-projects, to flag possible challenges and allow for immediate adjustments and assistance in the implementation of the ESMP. Furthermore, sub-project EMPs and VLD documentation will be subject to post-review by the World Bank.

The objectives of annual reviews of ESMF implementation are: (a) to assess the project performance in complying with ESMF procedures, learn lessons, and improve future performance; and (b) assess the occurrence of, and potential for, cumulative impacts due to project funded activities. In addition, data from the GRM will be considered. These reports will be the main source of information for the World Bank supervision missions, UNOPS and national and state authorities, as needed.
Annual Environmental and Social Progress Report Format:

<table>
<thead>
<tr>
<th>Objective</th>
<th>Suggested Content</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community Sub-Projects Approved</td>
<td></td>
</tr>
<tr>
<td>Key Environmental and Social issues identified from screening</td>
<td></td>
</tr>
<tr>
<td>Mitigation actions undertaken</td>
<td></td>
</tr>
<tr>
<td>Capacity Building Implemented</td>
<td>Training sessions held, venues, attendance</td>
</tr>
<tr>
<td>Results of Sub-Project EMPs</td>
<td>e.g. including – Unanticipated negative environmental or social impacts; Accidents or Incidents that occurred and corrective actions; Complaints or grievances received/resolved; Conflicts recorded/resolved</td>
</tr>
<tr>
<td>Non-compliances with generic EsMPs and corrective actions</td>
<td></td>
</tr>
<tr>
<td>Collaboration with NGOs and Govt. line agencies</td>
<td></td>
</tr>
<tr>
<td>Conclusions</td>
<td></td>
</tr>
</tbody>
</table>

As indicated above, the above reporting template will be incorporated into the quarterly progress report.

### 8.3 Emergency Reporting

In case of any serious environmental or social incident (includes, but not limited to, fatalities or GBV/SEA incidents directly related to the project), UNOPS will report within 24 hours to the World Bank, followed by a root cause analyses and related corrective actions after that.

### 9. Roles and Responsibilities

The institutional arrangements and coordinating mechanisms of the SSSNP reflect the way in which the government in South Sudan is structured, including structures at the National, State, County, Payam and Boma levels. While UNOPS will be the recipient and lead organisation, it will work very closely with key Government Ministries such as the Ministry of Agriculture and Food Security (MAFS), Ministry of Gender, Child and Social Welfare, and the Ministry of Finance and Labour.
UNOPS was involved in the predecessor project to SSSNP. Through this experience, it has deepened its understanding and strengthened its implementation capacity of safety net interventions, particularly regarding community mobilization, targeting, implementation of public works, identifying and addressing grievances etc., which can be leveraged for a quick and smooth implementation of the proposed SSSNP. It has also gained familiarity with the World Bank's fiduciary and safeguards rules and procedures, which are an added advantage in ensuring accountability and smooth implementation. UNOPS will be implementing SSSNP directly using UNOPS-contracted personnel.

An Environmental and Social Safeguards Specialist (ESSS) will be recruited to spearhead the implementation of the ESMF. The ESSS will be part of the Management team at the SSSNP Secretariat and its role will be to coordinate on all environment and social safeguards issues in all field locations. In addition, the Project will deploy Environment and Social Safeguards Officers at the state level to coordinate environmental and social issues under the guidance of the national safeguards specialist. Their tasks will include:

- Contributing to and facilitating the active involvement of environmental and social stakeholder representatives in the national level;
- Ensuring that the outcomes of consultative meetings reflect the opinions and aspirations of all interest groups especially marginalized and/or disadvantaged groups (e.g. indigenous peoples, HIV orphans, etc.);
- Identifying environmental and social needs and priorities (e.g. within the design and implementation of SSSNP activities; for training/awareness raising; or for technical support activities); and
- Documenting the environmental and social dimensions of forum discussions.

UNOPS will implement the proposed project as guided by a Project Operations Manual. This includes a conflict-sensitive community mobilization and targeting process, for example a Community Engagement and Capacity Building plan; robust GRM (to ensure the project is inclusive and protected from elite capture); GBV guidance for labor intensive public works; technical specification for project activities; social and environmental safeguards mitigations; M&E mechanism; and detailed implementation and institutional arrangements. To guarantee timely and objective treatment of those who might have a grievance, the appeals system under the GRM will be strengthened, and its roles and responsibilities are also cleared detailed in the POM.

UNOPS collaborates closely with relevant ministries to ensure successful implementation and M&E. At the national level, a National Advisory Committee (NAC) comprised of Undersecretaries of the relevant ministries will be established to provide policy and strategic guidance and coordination. In addition, a National Technical Committee comprised of the relevant Director Generals and Directors will be formed to provide technical support in implementation of the proposed project. At the local levels, the current structures established under the SNSDP – the core county team, Payam Development Committee, Boma Development Committee, and Appeals Committees – continues to support daily implementation and coordination. At all levels, the corresponding staff of the UNOPS will engage closely with
the government structures to ensure coordination and collaboration in implementation of the proposed project. It is important to note here that in the most conflict-affected and difficult to access areas, these local level structures may be constituted differently based on the existing structures and systems on the ground.
## Capacity Building and Sensitization Plan

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Issues for engagement</th>
<th>Method of engagement</th>
<th>Stakeholders/ Target population and area</th>
<th>Responsible person</th>
<th>Time frame</th>
<th>Budget</th>
</tr>
</thead>
</table>
| a) Ensure compliance to the group norms and ethics  
   b) Instill discipline among beneficiaries  
   c) Avoid cases of violence  
   d) Ensure group cohesion. | Group norms | Meeting; Plenary discussion with questions and answer | Beneficiaries at work | Group leaders | Every morning before start of work | $50,000.00  |
| a) Enhance awareness and knowledge on grievance structures and how it works.  
   b) Avoid cases of violence  
   c) Minimize escalation of grievances  
   d) Provide platform for all to air their grievances. | Grievance redress mechanism/ Zero tolerance to violence  
   Grievance redress mechanism(GRM)/ Zero tolerance to violence | Meeting; Plenary discussion with questions and answer | Beneficiaries at place of work | Community Mobilizer/IP/ PIU | Weekly | $96,618.57  |
| Grievance redress mechanism/ Zero tolerance to violence | Meeting; Plenary discussion with questions and answer | Appeals Committee at their respective offices | Community Mobilizers with support from PIU | Twice a month |
| Grievance redress mechanism/ Zero tolerance to violence | Meeting; Plenary discussion with questions and answer | Local Government leaders | IP/PIU | Twice a month |
| a) Ensure compliance to implementation of ESMF | Environmental and Social Risks and how they are addressed | Focus group Discussions, site visits and interviews. | Beneficiaries, IP, Local Government | IP with support from PIU | Twice a month | $466,184.59 |
| b) Ensure there is no harm to the environment and people. | | | | | |
| c) Enhance knowledge and awareness on environment. | | | | | |

| a) Clear understanding of project modalities | Effective communication | Panel discussions and field visits | IPs | PIU | Monthly | $11,000.00 |
| b) Improve on community relations with IP. | | | | | |

| a) Enhance knowledge and awareness on payment protocols. | Payment protocols and cash utilization | Meetings, plenary discussion with question and answer | Beneficiaries at work | IP with support from PIU and Alpha Bank | Weekly | $11,000.00 |
| b) Raise awareness on utilization of cash. | Payment protocols and cash utilization | Meetings, plenary discussion with question and answer | Local Government at the Counties | PIU | Monthly | $11,000.00 |
| c) Keep people informed on payment processes and schedules. | Payment protocols and cash utilization | Meetings, | IP | PIU and Alpha Bank. | Monthly | $11,000.00 |
| d) Mentor IPs on how to handle beneficiaries during payments | | | | | |

<p>| a) Dispel misconceptions on Biometric machines | Selection and Registration of Beneficiaries/Biometric system | Meetings, plenary discussion with question and answer | Beneficiaries | IP | Monthly | $5,000.00 |
| b) Raise awareness on reasons for exclusion | | | | | |</p>
<table>
<thead>
<tr>
<th>Raise awareness on a wide range of issues</th>
<th>Project benefits and modalities of implementation</th>
<th>Radio talk show</th>
<th>General public</th>
<th>PIU</th>
<th>Monthly</th>
<th>$11,000.00</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fact Sheets/Policy briefs</td>
<td>Local Governments and opinion leaders</td>
<td>IP/PIU</td>
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<tr>
<td>Bulletins</td>
<td>Local Governments and opinion leaders</td>
<td>PIU</td>
<td></td>
<td></td>
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<tr>
<td>Articles in print media.</td>
<td>General public</td>
<td>PIU</td>
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</table>
10. **GRIEVANCE REDRESS MECHANISM (GRM)**

World Bank research has shown that it is key to give stakeholders a voice, address grievances as early as possible, that there is no 'one size fits all', and that no reported grievances does not mean that no grievance exists (World Bank, RAI KN 19). This is why tailored grievance redress mechanisms are crucial for most projects. Grievance redress mechanisms (GRM) refer to institutions, instruments, methods and processes by which a resolution to a grievance is sought and provided. The GRMs provide an effective avenue for expressing concerns and providing redress for communities. Grievances and disputes may arise at several stages of project planning and implementation or may be a result of conflicts between groups affected by the project.

Through the previous project, a grievance redress mechanism has been implemented, with structures that start from the group level to the Quarter councils, Payams and community support teams at county levels. It has provided the beneficiaries a platform for airing their views and has helped reducing grievances that would have otherwise escalated given the large number of people involved and the high levels of vulnerability and ethnic tension.

However, during consultations there was a general feeling of helplessness among the beneficiaries with regards to channelling grievances and their complaints for redress through the appeals committee (APC). A section of beneficiaries felt not helped by the appeals committee. Beneficiaries complained about lack of action on their issues. Also, the distance to the appeals committee offices to report their grievances was considered a key hindrance to accessing redress.

Recommendations to strengthen the GRM therefore include:

- Engage a consultant to provide enhancement of the Grievance Redress Mechanism
- In order for APC to function, provide lunch and transport every month;
- Enable the APC to sit every month and if necessary move to the communities instead of communities always looking for them;
- Provide APCs with skills of handling cases;
- Having engagements of only women groups in order to ensure that they freely express themselves;
- Establishment of focal points within beneficiary communities to identify and respond to issues of gender-based violence (GBV) and other issues; trained by UNOPS so as to ensure that they are fully equipped to execute their duties.
- Provide toll free lines at UNOPS for beneficiaries to report any grievances;
- MIS to include mechanisms to do monthly analysis of GRM (% of grievances received, resolved, referred and pending);
➢ A forum at state level, e.g. a task force or an already existing technical committee that is given the mandate to handle grievances;
➢ On a quarterly basis provide transport and lunch for field visits; The equivalent of the Social Protection Unit in the Ministry of Gender, Child and Social Welfare (MGCSW) which has been established, staffed and equipped;
➢ UNOPS shall have functional Memorandum of Understanding with the states and counties in which they operate;
➢ The MoUs should stipulate the undertakings of the state and UNOPS;
➢ Among the undertakings of the states is the provision of security and enabling environment for the staff of UNOPS;
➢ There should be a mechanism to monitor the compliance to the MoUs by the National Government.

The GRM for the SSSNP will therefore be re-designed and set up in accordance with the above recommendations prior to sub-project activities. Throughout the project lifecycle, a continuing enhancement based on lessons learned by the GRM will be implemented.

Generic elements of a GRM should contain the following:

Given the country context, the project design, and lessons learnt, some general principles for the re-design of GRM emerge. For example, the provision of multiple grievance channels allows an aggrieved party to select the most efficient institution, accessibility and timely response of APCs is crucial, circumvent partial stakeholders, ability to bypass channels that are not responsive. Furthermore, the GRM be rapid, confidential, independent, transparent, and protect witnesses and complainants.

For the first stage of the GRM value chain, it will be important to provide sufficient information on project modalities through awareness campaigns, as well as access to technical assistance for those who are aggrieved to help them understand whether their grievance is appropriate and provide advice on the adequate address. Information campaigns will be launched via radio or video in order to respond to high illiteracy rates. Following that, a grievance report will address different institutions, and means of reporting will be oral, via letters, drop boxes or a phone call. Once the grievance is received, it has to be acknowledged by the respective institution and a decision has to be taken whether it is to be processed locally or not. It then needs to be investigated by the adequate institution; a decision on sanctions and punishments to be taken; and an appeals mechanism provided. Feedback of the investigation and its results to the complainant are key in order to stop a grievance.
## Diagram of Feedback and Grievance Redress Mechanisms

<table>
<thead>
<tr>
<th>Step of GRM</th>
<th>Function</th>
<th>Actors</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Assess and Clarify</strong></td>
<td>Mechanism available to help aggrieved person assess if grievance is warranted.</td>
<td><strong>For Project Beneficiaries:</strong>&lt;br&gt;- Elected focal person / secretary of appeals committee&lt;br&gt;- The Secretary APCs should ask if the complainant has already complained directly to the implicated committee or institution and if not should encourage the complainant to do so before lodging the grievance with the QAC&lt;br&gt;- Clear communication / information provided by the SSSNP</td>
<td>Prerequisite is a thorough information campaign for communities and Project Staff on modalities of project, project priorities and budgets.</td>
</tr>
<tr>
<td><strong>Reporting</strong></td>
<td>Depending on the type of grievance and the person aggrieved – institutions receive reports of grievances.</td>
<td>• Most grievances and complaints will be received and recorded by the elected focal person/ secretary of the appeals committee;&lt;br&gt;• If other members of the QAC are approached by community members they should ask the member to make sure they direct their grievance to the focal person to ensure that it is recorded properly. However, if there are good reasons not to report to the focal person, the grievance should be reported to the State level project team or UNOPS project management team (PMT).&lt;br&gt;• Any GBV or sexual harassment complaints should be directly reported to the SSSNP Project Manager or the UNOPS Country Director without disclosure of confidential, private information of the survivor or details on the case which could lead to the identification of the survivor. A specific telephone hotline will be put in place for this purpose, administered by UNOPS Country Office HR person. Further details on GBV see below.</td>
<td>By being able to report directly to the State Level project team or the PIU, a complainant has the option to choose between alternative addresses.&lt;br&gt;Grievances that relate to government, but not directly to the project can be passed to the respective government office with copy to the project (SSSNP PMT).&lt;br&gt;The telephone number for the GBV hotline will be adequately distributed at the local level, with a focus on reaching the most vulnerable populations and all women.</td>
</tr>
<tr>
<td>Acknowledge and Follow-Up</td>
<td>• Complaints and grievances can be submitted in writing or if the complainant cannot write he or she can make it orally. If it is done orally, the focal person must record this complaint in writing and read it back out to person lodging the complaint or grievance.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Complaints from Govt. or Project Staff:</td>
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<td></td>
<td></td>
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<tr>
<td>PMT or UNOPS Country Director</td>
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<tr>
<td>Grievance mechanisms will be introduced through awareness campaigns in the beginning of project implementation, and posters in the communities will provide access information throughout the life span of the project.</td>
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</table>

| | Rapid acknowledgement and follow-up are important in order to prevent conflicts. The officer who received the grievance has to decide where it should be handled. Some grievances should be solved locally, while others must not. |
| • The Appeal Committee will meet either periodically or as required to discuss and decide how to address the complaints and grievances received. At the meeting, the focal person must present the grievance to the Committee for review and action; |
| • At the meeting, the focal person must present the grievance to the Committee for review and action. The appeal committee must check whether the complaint is a perception only or whether there is a case of real unfairness and inconsistency in the implementation of the project and decide on the authority to which the appeal should be directed for redress; |
| • Depending on the type of grievance, it will be directed to the appropriate channels. For example, while transparency issues, elite capture issues, or issues of beneficiary exclusion should be handled by the project, the committee should also involve local leaders to handle possible conflict in the community. |
| • If the committee assesses the grievance cannot be resolved at the Quarter Council level, the APC must forward the case to the BDC, and MCT and seek solution. |
| • Local solutions can be found for: |
| Grievances reported that relate to community dynamics outside project procedures, should not simply be passed back. Complainant may have deliberately circumvented ‘traditional’ conflict resolution institutions. If conflict management is required to address the grievance, project structures (committees and PMT) should cooperate with neutral personalities facilitate the formation of a ‘Special Baraza’ (group of neutral and respected individuals that will manage the conflict). Special Barazas have the advantage that grievances are solved locally where possible, using local structures, but still circumventing those social structures that may be part of the grievance. They can be given |
| Verify, Investigate and Act | - Intra community disputes over project sites or decision-making processes;  
- local disputes that do not concern violations of project;  
- disputes that arise after project completion.  
- **Non-local redress:** (where project staff or local government officers are involved, or where accusations of fraud and corruption are made)  
- **NUOPS PMT:** Grievances reported to focal point are registered and forwarded to the committee for investigation;  
- **Government:** Grievances regarding the government and not the project should go through government channels;  
- **Powers to recommend punishment.** Members should be selected on an ad hoc basis to avoid individuals manipulating the members.  
- The Appeals Committee will be supported in meeting space, transport and food costs by the project.  

| Monitor and Feedback | - **Grievance reports, case logs and investigation results are registered and filed:**  
- **Filing of Data:**  
  - **Focal person / appeals committee** forward their data on grievances to the UNOPS PMT;  

| | - **Investigation officers of the appeals committee have to act rapidly and have the capacity to set sanctions and punishments:**  
- **Investigations are described, logged, and filed with the results / outcomes of the case:**  
- **Complaints are treated confidentially. Complainants and witnesses are protected:**  
- **Decisions are transmitted in a transparent manner:**  
- **The target time for responses to grievances should not exceed 48 hours:** |
filed by the respective officers.

Feedback is provided to the complainant and all aggrieved parties against every complaint received, in order to inform on the results of the investigation and show that the grievances were handled.

Data on grievances should be used to refine project/processes.

- **The M&E Officer** in the PMT will file the case; cases relevant to possible alterations of project design/implementation will be forwarded by the M&E Officer to the relevant programme office with copy to the Project Manager;
- **The M&E Assistant** will flag key issues that require project adjustment with the Project Management Team.
- **The Project Management Team** will hold meetings when required to discuss alterations to project design, based on the M&E Assistance analysis of the grievance reports. Adjustments will be undertaken in a timely manner.
- **Government**: Data on government related grievances that has been passed to government is shared with the respective Ministry.
- **SGBV cases** reported through the hotline will be treated with confidentiality directly by PMT and the UNOPS Country Project Manager and will be filed at the UNOPS Country Office by the HR Officer, as well as by the PMT.
- **Feedback**: Depending on the confidentiality of the case, results can be posted on project notice boards, or can be transmitted through the local project staff or other adequate means – with copy to the relevant government Ministry.
11. REFERENCES


Websites
ANNEX 1: ARCHAEOLOGICAL CHANCE FIND PROCEDURE

This procedure was developed in accordance with the mandate of the Ministry of Youth, Culture and Sports (Directorate of Archives and Antiquities) of protecting and preserving both tangible and intangible cultural heritage records of South Sudan and the requirements of the World Bank Guidelines – Operational Policy (O.P) 4.11 (Cultural Heritage) of August 1999.

This procedure is included as a standard provision in the implementation of SNSDP Public Works contracts to ensure the protection of cultural heritage (Archaeological and Historical Sites). All Implementing Partners will be required to observe this procedure as documented hereafter.

Excavation in sites of known archaeological interest should be avoided. Where this is unavoidable, prior discussions must be held with the concerned officers from the Ministry of Youth, Culture & Sports in order to undertake pre-construction excavation or assign an archaeologist to log discoveries as construction proceeds. Where historical remains, antiquity or any other object of cultural or archaeological importance are unexpectedly discovered during construction in an area not previously known for its archaeological interest, the following procedures should be applied:

➢ Stop construction activities;
➢ Delineate the discovered site area;
➢ Secure the site to prevent any damage or loss of removable objects. In case of removable antiquities or sensitive remains, a full-time guard should be present until the responsible authority takes over;
➢ Notify the responsible foreman/archaeologist, who in turn should notify the responsible authorities, the concerned officers from the Directorate of Archives and Antiquities and local authorities (within less than 24 hours);
➢ Responsible authorities are in charge of protecting and preserving the site before deciding on the proper procedures to be carried out;
➢ An evaluation of the finding will be performed by the concerned officers from the Ministry of Youth, Culture & Sports in the Directorate of Archives and Antiquities. The significance and importance of the findings will be assessed according to various criteria relevant to cultural heritage including aesthetic, historic, scientific or research, social and economic values;
➢ Decision on how to handle the finding will be reached based on the above assessment and could include changes in the project layout (in case of finding an irrevocable remain of cultural or archaeological importance), conservation, preservation, restoration or salvage;
➢ Implementation of the authority decision concerning the management of the finding;
➢ Construction work could resume only when permission is given from the concerned officers from the Ministry of Youth, Culture & Sports after the decision concerning the safeguard of the heritage is fully executed;
In case of delay incurred in direct relation to archaeological findings not stipulated in the contract (and affecting the overall schedule of works), the contractor may apply for an extension of time. However, the contractor will not be entitled for any kind of compensation or claim other than what is directly related to the execution of the archaeological findings works and protections.
ANNEX 2: SUBPROJECT SCREENING TEMPLATE

Subproject name
Subproject location
Subproject Type and Assignment of Generic EMP
Has the subproject been checked against the Negative List (yes/no)?
Field Visit (yes/no; include date)
Observations/comments
Signature of Environmental Safeguards Specialist
Signature of Program Manager

FOLLOW THE STEPS BELOW

Step 1. Applicability
Is the subproject likely to have direct or indirect environmental or social impacts?
Yes Continue to Step 2
No Go to bottom of page and sign the screening form

Step 2. Sub-project Type Assignment
Determine within which of the menu of public works activities the sub-project sits:
- maintenance and/or rehabilitation of community access roads,
- maintenance and/or rehabilitation of waste and sanitation management;
- integrated watershed management;
- small-scale food production;
- maintenance and/or rehabilitation of existing developed water sources; and
- maintenance and/or rehabilitation of school fences, school classrooms, simple storage facilities, health facilities, and community centers.
If the sub-project is not one of sub-projects types, it cannot be funded by this project.

Step 3. Eligibility (Negative List)
The third step is to determine if the subproject is eligible for financing under the Project. The sub-project will be reviewed to assess if the subproject is likely to have any of the following attributes contained in the Negative List in Annex 3. If any of the negative list attributes are part of the sub-project design, the sub-project will be rejected from funding.

Step 4. Assignment of Generic EMP:
According to the sub-project type assigned above, the sub-project will apply the relevant generic EMP.
ANNEX 3: NEGATIVE CHECKLIST FOR SUB-PROJECTS

Screen the subproject been screened against the list of ineligible activities (negative list) below.

The negative list includes activities not eligible for financing under the SSSMP as follows:

- If the subproject is likely to have significant adverse environmental impacts that are sensitive, diverse, or unprecedented (see Bank OP 4.01, paragraph 8, item (a) on Category A designation);
- Conversion or degradation of natural habitats (see Bank OP 4.04);
- Impact on forest health and/or safety and/or that aim to bring about changes in the management, protection, or utilization of natural forests or plantations, whether they are publicly, privately, or communally owned (see Bank OP 4.36);
- Dam construction or dam rehabilitation (see Bank OP 4.37);
- Production or trade in wood or other forestry products from unmanaged forests;
- Production or activities involving harmful or exploitative forms of forced labor / harmful child labor;
- Production or trade in any product or activity deemed illegal under SS laws or regulations or international conventions and agreements;
- Production or trade in weapons and munitions;
- Gambling, casinos and equivalent enterprises;
- Trade in wildlife or wildlife products regulated under CITES;
- Production or trade in radioactive materials;
- Production or trade in or use of unbonded asbestos fibers;
- Production or trade in products containing PCBs;
- Production, trade, storage, or transport of significant volumes of hazardous chemicals, or commercial scale usage of hazardous chemicals;
- Production or trade in pharmaceuticals subject to international phase outs or bans;
- Production or trade in pesticides / herbicides subject to international phase outs or bans (see JESSRP Pest Management Plan for more details);
- Production or trade in ozone depleting substances subject to international phase out.

If YES to any one or more of the above, this subproject cannot be finance.
**ANNEX 4: SUB-PROJECT EMP CONTENT**

Mitigation Measures for Maintenance and/or Rehabilitation of Community Access Roads:

<table>
<thead>
<tr>
<th>Key issues to consider</th>
<th>Mitigation measures</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Conservation area</td>
<td>No animal killing</td>
<td></td>
</tr>
<tr>
<td></td>
<td>No land occupation</td>
<td></td>
</tr>
<tr>
<td></td>
<td>No forest cutting</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Solid waste Management</td>
<td></td>
</tr>
<tr>
<td>Flooding area</td>
<td>Provide adequate drainage system</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Include appropriate measure to accommodate flood</td>
<td></td>
</tr>
<tr>
<td>Community area</td>
<td>Accident prevention</td>
<td></td>
</tr>
<tr>
<td>Land property</td>
<td>Minute of meeting on conflict resolution and attached the land donation consent form</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Cultural area, history etc...</td>
<td></td>
</tr>
</tbody>
</table>

**Construction phase**

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Borrow pit</td>
<td>Select the suitable site</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Avoid new open the borrow pit</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Back fill instructed by Engineer</td>
<td></td>
</tr>
<tr>
<td>Erosion risk</td>
<td>Design/provide adequate slope protection</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Provide maintenance procedure</td>
<td></td>
</tr>
<tr>
<td>Solid waste</td>
<td>Provide appropriate waste collection and disposal</td>
<td></td>
</tr>
<tr>
<td>Waste Oil</td>
<td>Do not allow to drain into soil and river</td>
<td></td>
</tr>
</tbody>
</table>
Materials will be stored in safe place.

<table>
<thead>
<tr>
<th>Storage of construction materials</th>
<th>Operation phase</th>
</tr>
</thead>
</table>

Public health, road safety, and other social negative impacts in the village

- Consult community and develop mitigations

- Install measures to control speed limit (sign, bumper, etc), education campaign

- Control speed limit, plant appropriate trees, surfacing

- Awareness training in cooperation with the Police Office

Mitigation and/or Rehabilitation of Existing Developed Water Sources:

<table>
<thead>
<tr>
<th>Key issues to consider</th>
<th>Mitigation measures</th>
<th>Remarks</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Location</th>
</tr>
</thead>
</table>

- and property
  - Minutes of meeting on conflict resolution and land donation consent form attached

- Protected area
  - Approved by concern sector

- Flooding area
  - Detail study and proper design

- Water source protection source
  - Set up regulation and principle

- Community zone
  - Establish the water user regulation

- Close to borrow waste, pit/quarry, disposal sites
  - Borrow waste

  - Water testing
### Construction

<table>
<thead>
<tr>
<th>Solid generation waste</th>
<th>Provide appropriate waste collection and disposal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Waste Oil</td>
<td>Do not allow to drain into soil and river</td>
</tr>
<tr>
<td>Storage of construction material</td>
<td>Storage in proper area; toxic wastes and materials will be stored in safe place</td>
</tr>
</tbody>
</table>

### Operation

<table>
<thead>
<tr>
<th>Possible contamination of water</th>
<th>Establish measure to protect quantity and quality of water sources. Fencing water tape</th>
</tr>
</thead>
</table>

Mitigation Measures for Integrated Watershed Management:

<table>
<thead>
<tr>
<th>Key Issues to consider</th>
<th>Mitigation measures</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Location</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Downstream Impacts</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact water user</td>
<td>Community Consultation (resolution)</td>
<td></td>
</tr>
<tr>
<td>Fertilizer</td>
<td>Data from community</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Introduction to community</td>
<td></td>
</tr>
<tr>
<td>Erosion</td>
<td>Proper design</td>
<td></td>
</tr>
<tr>
<td>Block fish passage</td>
<td>Consultation with community</td>
<td></td>
</tr>
<tr>
<td><strong>Upstream impacts</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>----------------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Safety at reservoir area</td>
<td>Install the protected sign</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Construction phase</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Borrow pit</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Erosion location</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Solid waste</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Sed oil</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Operation</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Potential increase use of pesticide</td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

Mitigation Measures for Maintenance and/or Rehabilitation of School Fences, School Classrooms, Simple Storage Facilities, Health Facilities, and Community Centers:

<table>
<thead>
<tr>
<th><strong>Key issues to consider</strong></th>
<th><strong>Mitigation measures</strong></th>
<th><strong>Remarks</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Land ownership</td>
<td>Land donation consent form</td>
<td></td>
</tr>
<tr>
<td>Water system</td>
<td>Detail study and proper design</td>
<td></td>
</tr>
<tr>
<td>Drainage system</td>
<td>Proper design</td>
<td></td>
</tr>
</tbody>
</table>
### Construction

<table>
<thead>
<tr>
<th>Waste materials</th>
<th>Provide appropriate waste collection and disposal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Safety</td>
<td>Provide training</td>
</tr>
</tbody>
</table>

### Operation

<table>
<thead>
<tr>
<th>Waste management</th>
<th>Set up committee</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Allocate suitable area for waste</td>
</tr>
<tr>
<td></td>
<td>Separate recyclable waste</td>
</tr>
<tr>
<td></td>
<td>Set up rules and regulations</td>
</tr>
<tr>
<td>Water system,</td>
<td>Detail study and proper design to protect</td>
</tr>
<tr>
<td>drainage system</td>
<td>rivers and underground water</td>
</tr>
</tbody>
</table>

### Mitigation Measures for Maintenance and/or Rehabilitation of waste and sanitation management

<table>
<thead>
<tr>
<th>Key issues to consider</th>
<th>Mitigation measures</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cross-contamination during the construction between the water pipelines and waste</td>
<td>Adequate training of the staff to perform the maintenance.</td>
<td></td>
</tr>
<tr>
<td>water collectors.</td>
<td>Keep collectors as far away as possible form the water supply pipelines.</td>
<td></td>
</tr>
<tr>
<td>Lack of maintenance and unhygienic conditions can lead people to avoid the use of latrines</td>
<td>Educational campaigns to elucidate the community regarding the health hazards associated with non-use of latrines and open defecation</td>
<td></td>
</tr>
</tbody>
</table>
Emergence of new informal deposition points

- Implement public awareness campaigns about the implications of waste on public health and the CMM’s solid waste management system.
- Implement public awareness campaigns on the implications of waste on public health and appropriate waste disposal.

Mitigation Measures for Small Scale Food Production:

<table>
<thead>
<tr>
<th>Key issues to consider</th>
<th>Mitigation measures</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Seed</td>
<td>Selection of seed with lowest agro-chemical input requirements to achieve high yields</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Selection of seed with minimal level of pest and disease vulnerability. Rigorous sanitation facilities and procedures for imported seed</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Rigorous sanitation facilities and procedures for exported seed</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Wherever possible, extension service to promote sustainable agricultural practices including IPM, minimum tillage, contour ploughing, crop rotations, and green manure</td>
<td></td>
</tr>
<tr>
<td>Fertilizers</td>
<td>Selection of best fertilizers for crop and prevailing soil conditions</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Application levels as per recommended by manufacturer and extension service</td>
<td></td>
</tr>
<tr>
<td>Farm Implements</td>
<td>Implements suitable for minimal tillage</td>
<td></td>
</tr>
<tr>
<td>Land preparation</td>
<td>Contour ploughing, minimum tillage, grassed waterways, etc...</td>
<td></td>
</tr>
<tr>
<td>Other features</td>
<td></td>
<td></td>
</tr>
<tr>
<td>-------------------------------------------------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Not to be located in environmentally sensitive areas</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Avoid use of sensitive water sources</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Effective effluent management system in place</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Effective disposal of solid wastes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Safety features in place</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
ANNEX 5: INTEGRATED PEST MANAGEMENT

Given that certain public works activities related to soil and water conservation and land productivity measures undertaken by SSSNP beneficiaries may require pest management strategies, this ESMF includes a brief discussion on Integrated Pest Management (IPM) as decision-making process for the selection, implementation, and evaluation of pest management practices. Integrated Pest Management (IPM) refers to a mix of farmer-driven, ecologically based pest control practices that seeks to reduce reliance on synthetic chemical pesticides. It involves (a) managing pests (keeping them below economically damaging levels) rather than seeking to eradicate them; (b) relying, to the extent possible, on non-chemical measures to keep pest populations low; and (c) selecting and applying pesticides, when they have to be used, in a way that minimises adverse effects on beneficial organisms, humans, and the environment.

IPM techniques can be separated into two major groups: i) Relatively straightforward replacements for chemicals, and ii) Supporting measures.

Chemical replacement includes:

➢ Biological control: the introduction of insects, mites, micro-organisms that prey on or parasitize harmful species.
➢ Bio-pesticides: these have a pathogenic micro-organism as the active ingredient, for example a bacterium, fungus or a virus.
➢ Botanicals: botanical pesticides contain plant extracts that have biocidal properties (i.e. Neem).
➢ Semi-chemicals: chemicals (especially pheromones) are used to stimulate particular behaviours or interactions between individual insects so as to control pests.

Choosing appropriate measures is not straightforward and requires significant understanding of the interactions between environment, crop, pest, and predator. The scientific basis for farmer decision making in biological control depends on detailed knowledge of the life histories of pests and their natural enemies, crop ecology, and interactions within the agro-ecosystem. Supporting measures include traditional methods of pest control as used in subsistence farming systems: cultural control (e.g., intercropping), habitat manipulation (e.g., creating diversity), mechanical and physical control, natural biological systems and host plant resistance. Farmer participation and learning are therefore essential in ensuring proper pest management practices.

The basic requirements for implementing IPM in the SSSNP sites include understanding the biology and economics of the pest and the system in which the pest exists, monitoring the pests and natural controls, and establishing their economic or aesthetic injury thresholds. IPM can be achieved by selecting an appropriate strategy of cultural, mechanical, biological, and/or chemical prevention or control techniques, as briefly described below:

Cultural Practices: These include habitat modification and adapting operating procedures so that pest damage is reduced and natural control is enhanced. It involves sanitation or cleaning.
of sources of pest infestation, choosing plant varieties that are resistant to pest injury, adjusting planting time, fertilization, tillage, and harvesting operations to have the most beneficial effect for the pest management situation.

**Biological Controls:** These are predators, parasites, and diseases that attack pests. Measures should be taken to conserve naturally occurring populations of these biological controls. In some situations where naturally occurring biological controls are not effective, they can be introduced from outside sources.

**Chemical Control:** This involves selecting a pesticide with the lowest toxicity to humans and non-target organisms (including biological controls) and using it in such a way to prevent or minimize undesirable environmental effects. The lowest effective amount of pesticide is applied, using appropriate and carefully calibrated equipment. In many cases, use of pesticides cannot be entirely eliminated. However, use of pesticides must be controlled so as to reduce or eliminate social and environmental impacts. A comprehensive IPM should support a pesticide management plan that is designed to ensure that pesticides are procured, handled, stored, applied and disposed in such a manner that protects life and the environment. The plan shall consider the entire life cycle of the pesticides. Hence the SNSDP activities and operations must observe the following:

a) All pesticides must be purchased from registered pesticides dealers.

b) Pesticides must be purchased strictly according to the requirements to avoid over-stocking. A follow up system for the procurement, transportation, receipt and custody of pesticides must be established.

c) Movement or transportation of pesticides from suppliers must conform to FAO guidelines: Pesticides must not be mixed up with other items, particularly food items. They should be in well confined containers.

d) Pesticides shall be stored in a dedicated and centralized warehouse or storage facility, separately from agricultural produce and other items. All pesticides must always be under lock and key and under the custody of a very responsible person. Storage of pesticides in farmers’ houses must be prohibited. Warehouses must be protected from sources of fire. Access to the warehouses must be restricted to responsible and authorized persons.

All pesticide mixing containers and spraying equipment must be washed and cleaned in a safeguarded central point. All containers must be disposed of in an environmentally acceptable manner.

IPM strategies will comprise of soil pests, weeds, field and post- harvest pests, and pest diseases management. Use of certified seeds or seed dressing will protect crop from soil borne pests. Weed control could either be manual or use of appropriate herbicides, for example, pre- and post-germination herbicides. However, extreme care is needed in the use of herbicides, as wrong or uninformed use is likely to cause total loss of crops or pollution of water and soil. As a rule, beneficiaries should observe strict surveillance of their crop and observe high levels of crop hygiene as a first step to manage the pests and diseases in the
field, as appropriate. These include removal and destruction of affected plants and then preventive control of the identified problem. Post-harvest pests are managed even before harvesting by cleaning the stores and destroying the residues from previous harvest. Use of recommended pesticides on the harvested crop before storage contributes immensely to the preservation of the harvested crop against attacks by pests.
Findings from Consultations and Lessons Learnt

- Ethnic conflicts still exist among tribes like Murle, Dinka, Nuer etc. against each other. The conflict is characterized by child abductions, cattle raiding, fighting leading to loss of life, property and displacement of people.
- Hunger and starvation still persists and wages earned are used for basic needs like food, clothes, medical care and school fees sometimes but cannot have surplus for investment.
- Poor sanitation in the community, only a few latrines are available. The rest of people use open places, which makes the situation worse during rainy seasons.
- Low morale of Workers as Government salaries are too small and delay, hence absenteeism and late coming at work.
- Lack of irrigation infrastructure to carry out farming during dry seasons. Hunger still persists.
- Land belongs to communities as the Land Act has not been approved and this makes making decisions on land matters complicated.
- Inaccessibility to health services due to both physical and non-physical factors. The physical barriers include flooding and poor roads. The non-physical factors include ethnic conflicts and political conflicts that persist.
- High levels of vulnerability through conflicts.
- Orphans and widows in the communities who cannot meet daily basic needs.
- High disease burden among people that include (Malaria, typhoid, Hepatitis B, HIV/AIDS, TB, and Cholera) malnutrition in children and this is worsened by food and nutrition insecurity.
- High cases of GBV. Women consulted reported high cases of gender-based violence that involve early marriages (mostly done to get bride price), polygamous marriages leading to family and child neglect, beating of women by men, rape cases, abduction, kidnapping of women for marriage.
- Natural disasters like drought, floods affect agriculture and movement of people.
- The project implementers to undertake awareness about a number of issues such as drought that was a result of climate change. It was reported that the effect of climate change was not being understood by some communities which resulted in the killing of traditional rainmakers in such communities.
- Engagement of the youth in the project areas into other sustainable income generating activities will help to reduce on the practice of charcoal burning because this practice is looked at as the easiest way of generating income for the unemployed youths.
- Continued sensitization of the farmers about the need to use improved seeds that produce high yields.
- Carryout sensitization and awareness on gender-based violence and early marriages.
Proposed Recommendations to Strengthen GRM

▪ In order for APC to do this function, provide lunch and transport every month.
▪ Enable the APC to sit every month and if necessary move to the communities instead of communities always looking for them.
▪ Provide APCs with skills of handling cases;
▪ Having engagements of only women groups in order to ensure that they freely express themselves
▪ Establishment of focal points within beneficiary communities to identify and respond to issues of gender-based violence (GBV) and other issues.
▪ Provide toll free lines at UNOPS for beneficiaries to report any grievances
▪ MIS to include mechanisms to do monthly analysis of GRM (%ge of grievances received, resolved, referred and pending).
• A forum at state level; This can be a task force or an already existing technical committee that should be given the mandate to handle SNSDP including GRM
▪ On a quarterly basis provide transport and lunch for field visits; The equivalent of the Social Protection Unit in the Ministry of Gender, Child and Social Welfare (MGCSW) which has been established, staffed and equipped.
▪ The Implementing partners should have functional memorandum of understanding with the states and counties in which they operate.
▪ The MoUs should stipulate the undertakings of the state and implementing partners.
▪ Among the undertakings of the states will be to provide security and enabling environment for the staff of the IP.
▪ There should be a mechanism to monitor the compliance to the MoUs by the National Government.
ANNEX 7: VOLUNTARY LAND DONATION GUIDELINE

As individual land ownership and respective land titling is not widely established, the Project will consider any household using lands prior to disclosed subproject commencement as having legitimate land use rights and such rights have to be donated freely to the project according to the above provisions, if noted land is considered necessary for subproject implementation. Thus, in the following paragraphs “owner” refers to the owner of land-use-rights.

Voluntary land donations should only be authorized for subprojects if they can clearly document (a) Informed Consent and (b) Power of Choice. Procedures must be put into place to ensure that the donation is indeed voluntary, that the donor is the legitimate owner of land-use-rights on such lands, and that the donor is fully informed of the purpose of the donation and of the implications of donating the property. If the land is donated on a conditional basis, the terms and conditions for the temporary use of the property must be clearly documented. Land acquisitions on a “willing buyer/willing seller” basis should also be properly documented in order to ensure that fair compensation has been paid and to avoid future conflicts over land due to lack of transparency.

Voluntary land donation is strictly defined in international practice as the ceding of a property by an owner who is: a) fully informed; and b) can exercise free will, i.e., can refuse to sell or to donate. “Fully informed” means that the owner has complete information regarding the proposed activity and its impacts, its land requirements and its alternate activity sites, as well as his or her rights to compensation. The owner has also been provided with sufficient time to consider his or her disposition of the property, and the owner has knowingly rejected the right to renge on his or her initial decision. “Free will” means that the owner can reject the possibility of giving up his or her land, because: a) there are viable alternatives available (such as rerouting of a water main if an owner refuses access to his or property), or b) where no viable alternatives are available, the donation will be to his or her benefit (such as a road rehabilitation project that will also benefit the owner of a small piece of land to be donated for the road works).

The following basic provisions must be complied with:

- Land to be donated must be identified by the community through a participatory approach
- Impacts of proposed activities on donated land must be fully explained to the donor
- The potential donor is aware that refusal is an option, and that right of refusal is specified in the donation document the donor will sign
- The act of donation is undertaken without coercion, manipulation, or any form of pressure on the part of public or traditional authorities
- The donor may request monetary or non-monetary benefits or incentives as a condition for donation
- The proportion of land that may be donated cannot exceed the area required to maintain the donor’s livelihood or that of his/her household
- Donation of land cannot occur if it requires any household relocation
- For community or collective land, donation can only occur with the consent of individuals using or occupying the land; land donations by chiefs or other communal authorities is not sufficient.
- Verification must be obtained from each person donating land (either through proper documentation or through confirmation by at least two witnesses)
- The implementing agency establishes that the land to be donated is free of encumbrances or encroachment and registers the donated land in an official land registry
- Any donated land that is not used for its agreed purpose is returned to the donor.

Each instance of voluntary land donation in a PW sub-project must be documented. This requires written notification indicating the location and amount of land that is sought and its intended use for the subproject, and requires a formal statement of donation, establishing informed consent and signed by each owner or user involved. Taxes to be paid by the land donator for registration of the land transfer, if applicable, should be covered in full by the implementation agency. The implementation agency maintains a record with documentation for each instance of land donation. The documentation is made available for review in any grievance that may arise, and is provided to the World Bank upon request.

The project must specify means by which land donors (and, potentially, persons whose use or occupancy was not recognized in the transfer of land) may raise grievances, and measures to ensure consideration of, and timely response to, grievances raised. The grievance process includes participation of reviewers not directly affiliated with the project implementing agency. Grievances may be referred to customary conflict mediation arrangements where they are not directly affiliated with traditional leaders who are a party to the donation process. Alternatively, grievances may be referred to grievance mechanisms established for project purposes. The grievance process imposes no cost upon those raising grievances, and participation in the grievance process does not preclude pursuit of legal remedies under the laws of the country.

It is possible to distinguish between “pure” donations without any compensation or support given to the person affected, vis-à-vis “partial” donations which involve some monetary or non-monetary benefits or incentives provided to the affected person. Both can be broadly classified as “voluntary donations” in the sense that the transfer of assets is done without involving the payment of compensation at replacement value. The Project will apply the “partial” donation approach for vulnerable households, to avoid that even small donations lead to livelihood impacts and provide additional support to ensure no impact of the land donation. Voluntary land donation may be allowed even if no viable alternative exists, as long as the donation is to the benefit of the donor (such as a road rehabilitation project that will also benefit the owner of a small piece of land to be donated for the road works); always conditional to the application of the above noted provisions.

All family members (including spouses) must be aware of the donation, in order to minimize the risks of women users of the land to be donated being passed over in decision-making on land donation and the risks of cross-generational conflicts. Individuals using or occupying community or collective lands must also be aware of the donation to minimize risks of settlers or migrants being passed over in decision-making on land donation. The prior assessment of a sub-project shall also take into consideration temporary users of lands and/or eventual access issues for them,
including to water sources and in such case ensure agreement on the PW subproject with such groups (e.g. pastoralists).

The Project Operation Manual will establish a respective form, which will be established together with the World Bank and translated into local languages, so that a dual-language form will be used.
The following agreement has been made on............... day of..................
between ............................................., resident of ............................................(the
Use Right Owner or short Owner) and ..............................................................(the Recipient).

1. That the Owner holds the transferable right of the land/structure/other asset located at
................................................................................................................................................................

2. That the Owner testifies that the land/structure is not subject to other claims.

3. That the Owner hereby grants to the Recipient this asset for the construction and development of
..............................................................................................................................for the benefit of the villagers and the public at large.

4. That the Owner will not claim any compensation against the grant of this asset.

5. That the Recipient agrees to accept this grant of asset for the purposes mentioned.

6. That the Recipient shall construct and develop the ..........................................and take all possible precautions to
avoid damage to adjacent land/structure/other assets.

7. That both parties agree that the.......................................so constructed/developed shall be public premises.

8. That the process and the outcome of this transaction is in line with the SSSNP’s Voluntary Land Donation
Guideline as annexed to this agreement and made aware of to the Owner.

9. That the provisions of this agreement will come into force from the date of signing of this deed.

_____________________________  ______________________________
Signature of the Owner          Signature of the Recipient

Witnesses:
1. ______________________________________________
2. ______________________________________________
(Signature, name and address)
ANNEX 9: SAFETY GUIDELINES FOR SMALL DAMS

1. Introduction

The overarching dam safety objective is to protect people, property and the environment from the harmful effects of mis-operation or failure of dams and reservoirs. To ensure that dams and reservoirs are operated and that activities are conducted so as to achieve the highest standards of safety that can reasonably be achieved, measures have to be taken to achieve the following three fundamental safety objectives:

- To control the release of damaging discharges downstream of the dam,
- To restrict the likelihood of events that might lead to a loss of control over the stored volume and the spillway and other discharges,
- To mitigate through onsite accident management and/or emergency planning the consequences of such events if they were to occur.

These fundamental safety objectives apply to dam and activities in all stages over the lifetime of a dam, including planning, design, manufacturing, construction, commissioning and operation, as well as decommissioning and closure.

2. Planning of Small Dams

There are some fundamental principles which should be applied through the investigation, design, construction and commissioning stages to achieve an adequate level of safety. The principles are:

i. the competence and experience of the community and public workers relative to the nature and dam hazard category of the dam, must be appropriate in all areas;
ii. there must be a cooperative and trusting relationship between the community as owners and technical advisers, and the designers must be given full control over decision-making in critical areas;
iii. UNOPS must apply the appropriate level of funding for investigations, design and construction to reduce the chances of critically important issues (particularly related to foundations) being not sufficiently well assessed or under-protected;
iv. the designer/technical adviser has a duty not to compromise unduly due to financial pressures from the community, or public workers;
v. continuity of key technical advice should be maintained throughout all stages of the dam from development, through design, construction and commissioning, to reduce chances of critical points of design philosophy and intent being misinterpreted during construction or commissioning.
Dam site investigation

Selecting the Dam Site: When choosing the location and size, the community should consider what would happen if the dam failed suddenly and whether it would result in loss of life, injury to persons or livestock, damage to houses, buildings, roads,. The community must ensure to avoid locating the dam where run-off from houses, dairies or septic systems can pollute the water.

Considerations at Investigation Stage

Technical Consideration: Site selection and site investigations are critical components to the success or failure of a dam. Regarding the technical considerations, the following important aspects should be considered:

a. The catchment is the area of land from which run-off is to be collected. If it is the main source of water supply, make sure that it can yield enough water to maintain both, the supply in the dam and the required releases over all periods of intended use. The catchment area however should not be too large, as it will then require a big and expensive overflow system (or spillway) to safely pass excess run-off from heavy rainfall without overtopping the dam.

b. Topographical features such as slope, width and height of dam, as well as reservoir capacity will influence construction costs.

c. Conducting site tests to establish the material properties for the embankment and foundation.

d. A good location for a spillway that will effectively handle runoff and minimize erosion.

e. Watershed activities that can affect the water quality or quantity of runoff.

Environmental Considerations: Dams with their associated reservoirs can have substantial environmental effects and they must comply with the country’s environmental legislations and the World Bank Safety of Dam Operational Policy (OP/BP. 4.37). It should be recognized at the outset that dam developments have effects extending beyond the immediate confines of the dam and inundated areas. For example;

a. Reservoir slope stability may become a dam safety issue due to the risk of overtopping caused by large volumes of reservoir water being displaced by slope failures.
b. Sitting of the dam/reservoir must take into consideration the faulting activity which may cause breaching of the dam

c. Groundwater level changes may affect stability and land use around the reservoir margins and possibly adjacent to the downstream river, because of changed water levels.

d. Trapping of sediments in the reservoir can result in loss of reservoir storage.

e. Flora/fauna effects may occur in storage basin, downstream, and in passage around and through the dam.

f. Minimum flow maintenance downstream of the dam to ensure the survival of flora and fauna, and to reduce causes of stream bed deterioration.

g. Social development/changes to downstream use given the changed flood situation.

**Dam Design**

*Embankment dams Design:* The single most common cause of earthen dam failures is overtopping of the embankment. An undersized spillway will lead to overtopping; therefore, spillway design is critical to reservoirs. The spillway must be located such that discharge will not erode or undermine the toe of the dam. If the banks of the spillway are made of erosive material, provision must be made for their protection. Consideration must be given to the hazard to human life and potential property damage that may result from the failure of the dam or excessive flow rates through the spillway. Further consideration must be given to the likelihood of downstream development that may result in an elevation of the hazard classification.

*Extreme Events:* Strong earthquakes, storm/flood activity and failure of upstream dams can be considered extreme events. The risk of failure from these events is minimized by using engineering design standards and relevant guidelines incorporating adequate margins of safety. Emergency preparedness set up well in advance is the only available measure of reducing the impact when a dam failure is about to happen.

*Sedimentation:* The effective life of many small dams is reduced by excessive siltation – some small dams silt up after only a few years. This issue is poorly covered in the many small dam design manuals that are available, as they mostly focus on the civil engineering design and construction aspects. Appropriate methods/tools should be chosen to predict, and where possible reduce, siltation rates in small dams.
3. Construction of a Dam

The quality of construction is all-important to dam safety. As far as construction is concerned, the following requirements are necessary from the dam safety viewpoint:

• the public workers must be suitably experienced and committed to achieving the standards of work specified;
• the level of supervision of the works, quality assurance procedures and designer continuity, must be appropriate to the scale and complexity of the dam;
• the community must recognize that inherent uncertainties may remain after design investigations and only be revealed during construction, and have funding in place to deal with costs arising from additional requirements identified during construction;
• any area identified in the design process as requiring confirmation by the designer during construction, must be totally under the designer’s control, and no design change, however small, shall be made without the designer’s review and formal approval;
• a suitably detailed design report and drawings showing the as-built structure of all components of the dam and foundation shall be developed as an on-going and integral part of the public works supervision process, and be prepared after completion of each component so that there is a reliable record to refer to at all times in the future.

Therefore, the community should ensure all the above mentioned requirements are fulfilled and complied.

Selecting the public workers

The use of unexperienced workers and/or inadequate supervision can develop into an expensive liability. Nothing can take the place of a reputable public works, using appropriate equipment and working under supervision of an experienced engineer.

Construction Supervision

Construction supervision is an important phase of dam construction. Supervision is meant to ensure that the design factors and specification requirements have been included in the final product.

If foundation preparation, material selection, outlet/spillway installation and embankment compaction are not properly carried out then the safety of the dam will be compromised. So, for all small dam types (both earthen and rock fill) expected to be constructed, all the dam safety requirements applicable should be considered accordingly.

4. Safety Surveillance

Purpose of Regular Inspection: The purpose of a dam safety surveillance program is to avoid failure of the dam, by giving early warning of any kind of symptom of trouble as early as possible. It is the most economical and effective means the community has of maximizing the long-term
safety and survival of the dam. Its primary purpose is to monitor the condition and performance of the dam and its surroundings.

**Frequency of Inspections:** The frequency of inspection required for an effective program of surveillance depends on a variety of factors including:

- Size or capacity of the dam;
- Condition of the dam; and
- Potential for damage resulting from failure of the dam (represented by the hazard category).

Adoption of the inspection frequency for a dam is the responsibility of the community, though professional advice should be sought for large dams or those categorized under significant and high hazard dams.

**Special Inspections:** Special inspections will be required after unusual events such as, major floods, rapid drawdown or volcanic activity. Special inspections should enable the community to become aware of faults before partial or total failure occurs. Times when inspections are recommended are:

- before a predicted major rainstorm (check embankment, spillway and outlet pipe);
- during and after severe rainstorms (check embankment, spillway and outlet pipe);
- after any earthquake, whether directly felt on the owner's property or reported by local news media (check all aspects of the dam).

Inspections should be made during and after construction and also during and immediately after the first filling of the storage.

**Dealing with Problems:** A systematic program of safety surveillance should maximize the likelihood that any developing conditions likely to cause failure would be found before it is too late. Surveillance will also help early detection of problems before they become major repair bills. As identified earlier typical problems (many of which are treatable if found early enough) are most likely to fall into one of the following categories: seepage/leakage; erosion; cracking; deformation/movement; concrete structure defects; and spillway blockage.

**Instrumentation and Monitoring:** Instrumentation at a dam furnishes data to determine if the completed structure is functioning as intended, provides a continuing surveillance of the structure, and is an indicator of developments which may endanger its safety. Typical items instrumented or monitored include:

- profiles and condition, deformations, seepages or damp areas (visual)
- reservoir water levels which relate to dam loads and flood behavior
- local rainfall which relates to background seepages
- drainage and distinguishable seepages which relate to control of leakage water flow
- Clarity of seepage flow which relates to potential erosion of embankment or foundation material.
- water pressures within the dam and foundations which relate to structural behavior
- movement or deformation of the dam surface and internal structure which relates to structural behavior
- stresses within the dam which relate to structural behavior
• seismic acceleration which relates to structural behavior

5. Operation and Maintenance of Dams

Effective and ongoing operation, maintenance and surveillance procedures are essential to ensure the continued viability and safety of a dam and its structures. Poor operation, maintenance and surveillance will invariably result in abnormal deterioration, reduced life expectancy and possibility of failure. The proper operation, maintenance and surveillance of a dam provide protection for the owner and the general public. Furthermore, the cost of good operation, maintenance and surveillance procedures is small compared with the cost and consequences of a dam failure which could include major repairs, loss of life, property damage and litigation.

Because many small dams fail through lack of maintenance, it is prudent to have a definite and systematic maintenance plan.

The maintenance plan should be decided upon when the construction work on the dam is completed, and it will affect the life of the storage if not maintained properly. A good plan should include the practices to be used, as well as the approximate time of the year when they are applicable.
ANNEX 10: SOUTH SUDAN SAFETY NET PROJECT (SSSNP) SECURITY MANAGEMENT PLAN

1. Introduction

The purpose of the Security Management Plan is to set out the ways in which UNOPS will ensure security protection and duty of care to staff, implementing partners and other parties involved in the implementation of the proposed South Sudan Safety Net Project (SSSNP). While the detailed plan is not publicly disclosed in order to ensure the security of project personnel as well as local communities, this Executive Summary provides the broader picture of the security arrangements of the SSSNP.

2. Project Components

The SSSNP aims to provide temporary income opportunities to selected poor and vulnerable households and to strengthen safety net delivery tools in the Republic of South Sudan. It is financed through a US$ 40 million IDA\(^6\) grant with three components, to be implemented over a 2.5 years period. The components are: (i) Labor Intensive Public Works “Plus”; (ii) Direct Income Support; and (iii) Strengthening Safety Net Delivery Tools and Project Management. The project will target 65,000 new beneficiary households. It will be implemented in two categories of locations, inter alia: (a) the seven existing counties where a previous World Bank-funded safety net project, namely the Safety Net and Skills Development Project (SNSDP), was operational, and (b) three new counties in the most conflict-affected former opposition areas. Two-thirds of the total new beneficiary households will be in the existing SNSDP counties and communities, while one-third will be in the new areas.

Component 1: Labor Intensive Public Works “Plus”: Broadly, this component finances: (a) cash transfers for the beneficiary households participating in labor intensive public works activities; (b) equipment, materials and skilled labor to ensure public works of reasonable quality; and (c) provision of complementary support under the “plus” approach to strengthen household capacity to more efficiently use the cash received for the family’s well-being. Specifically, “plus” support will include (a) provision of financial skills messages, (b) Water, Sanitation and Hygiene (WASH) awareness, and (c) early childhood development and nutrition messages. These activities will be mandatory for all beneficiary households under this component.

Component 2: Direct Income Support: This component provides direct income support to eligible poor and vulnerable households who lack able-bodied members in their households and are therefore unable to participate in labor intensive public works activities, and also do not have alternate sources of income. Households will be encouraged, but not mandated, to participate in relevant complementary activities under the “plus” intervention.

Component 3: Strengthening Safety Net Delivery Tools and Project Management: This component strengthens safety net delivery and operational tools. These will include: (a) fully

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\(^6\) International Development Association.
functional MIS and biometric tools to strengthen reporting and oversight and ensure data security and protection; (b) robust payment mechanism for accurate and timely payments with compliance assurances; and (c) enhanced GRM to better address grievances and social risks, promote transparency and reinforce cohesion. Further, this component will enhance local government and community capacity, with a focus on ensuring women’s effective participation. It will also support project implementation and management.

3. Identification of Types of Workers and Project-Affected Parties

The Security Plan will be administered for different types of project workers and project-affected parties which are categorized into three groups as outlined in the following:

**Direct workers:** People employed directly by UNOPS to work specifically in relation to the project. This category includes personnel in the Project Management Unit (PMU) at the Head Office in Juba, and field personnel directly contracted by UNOPS in field teams, which is based at ten selected project sites across the three greater regions of South Sudan. Under the SSSNP, the majority of project activities on the ground are undertaken by UNOPS direct workers, except two activities which include: (i) transfer of payments to beneficiary households and (ii) third party monitoring. Field team members will be South Sudanese nationals, and where possible, recruited from the communities in which activities are implemented.

**Contracted workers:** People engaged through contractors and sub-contractors or primary supply workers. Under the SSSNP, the only contractors anticipated are for the cash payments (private financial service providers) and for the third party monitoring activities, per above.

**Community workers and other project-affected parties:** People engaged by the project to lead the community-based project interventions and people affected by the project. These include members of the county/municipality core teams, *payam/block development committees, bomal/quarter council development committees, appeals committees, community supervision teams and cash recipients.*

4. Overview of UNOPS Security Approach

UNOPS falls under the UN Security Management System (UNSMS). The UNSMS operates under a ‘Framework of Accountability for the United Nations Security Management System’ that provides guidance for the various security actors and mechanisms in a country. The Designated Official (DO) is the highest ranking official in a given area. He/she is supported by a Security Management Team (SMT), which is usually constituted by the heads of all UN agencies and UN Security Personnel. The UNSMS policies and procedures apply universally to all UN personnel, regardless of contract type or whether they are local or international, and across all areas in a country. Thus, all of the UNSMS policies and procedures apply equally to all SSSNP implementation locations.
As most project workers under the SSSNP will be **direct workers**, the large majority of the project workers will be covered by the UNSMS policies and procedures. Not covered by UNSMS policies and procedures are **contracted workers**, such as will be required to undertake cash transfer payments to beneficiaries and third party monitoring, and is expected to be limited in nature. However, for these **contracted workers**, similar security requirements to the UNSMS policies and procedures will be required from the respective companies. This will be ensured through integrating the requirements in the procurement and bidding processes, as well as through monitoring and supervision of the implementation of contractors’ security measures.

Regarding **community workers and other project affected parties**, there may be security risks that relate to their role in the project. For example, community workers could be subject to attacks because of their association with the project. Such dynamics will be included in the site-specific risk assessments. These risk assessments will aim to understand community fractures and pre-existing conflict potential and will make recommendations that will allow the project activity to avoid further fostering such tensions. Overall, the focus will be on establishing close and inclusive relations and regular consultations with local communities to better understand potential security risks, such as unresolved grievances, early on and counter them through context appropriate measures. Further, increasing transparency through stakeholder engagement and increased information dissemination through locally appropriate means will help to avoid elite capture and decrease conflict potential. The signing of codes of conduct that spell out appropriate behavior and make workers commit to not further entrenching possible communal tensions will be another security mitigation measure. The established Grievance Redress Mechanism (GRM) is an additional layer of engagement, as it allows aggrieved parties to express their grievance, and allows the project management to identify and address potential tensions in the community early on.

For residual risks related to violence and crime, commensurate security-sensitive procedures will be implemented, ensuring the right balance between the needs of local communities and respective residual security risks in the decision to commence and/or continue to implement subprojects. Nonetheless, in some extreme cases, decisions may need to be taken to stop project implementation as to not pose further security risks on the local community.

### 5. Institutional Arrangements and Decision-Making Processes

The UNOPS Country Director (CD) for South Sudan bears the overall responsibility for security risks and risk mitigation. The CD takes final decisions on security-related issues – including in relation to UNOPS projects – while the UN Department for Safety and Security (UNDSS) acts in an advisory capacity. The SSSNP PMU is embedded in the UNOPS Country Office in Juba in South Sudan. It is headed by a Project Manager, who will regularly discuss security assessments, arrangements and risk mitigation measures with the relevant security personnel. Final decisions on project-related matters, though, rest with the CD, based on advice from UNOPS and UNDSS security personnel.

The UNOPS CD will be in close contact with the World Bank through the World Bank Task Team Leader (TTL) of the SSSNP, who will be kept informed on any changes in security assessments, security status, decisions on the selection of project activity areas, as well as the suspension of activities due to security risks, as appropriate. The World Bank will reserve the right to weigh in
on UN security risk decisions and can request the suspension of project activities in respective areas in South Sudan.

6. **Minimum Conditions for Implementation**

Minimum conditions will apply for implementation of project activities in specific counties/municipalities, payams/blocks and bomas/quarter councils. These criteria include that full access to all areas in a county is possible for direct and contracted staff; that agreements have been entered with local government representatives in view of guarantees of safety for direct and contracted workers as well as community workers and project-affected parties; and that communities selected for the implementation of activities ensure the safety and security of direct and contracted workers as well as community workers within the range of their control.

In order to avoid militarizing development activities, deterioration of a security situation to the extent of requiring UN force protection to operate safely, particularly in terms of delivery of cash, will be considered as one of the thresholds for suspending activities in an area until the situation is assessed to have stabilized enough to allow for normal operation. Should this occur, UN force protection will only be used to evacuate and provide passage for direct workers through high risk to operational areas with low security risk. Only in very specific circumstances can the CD request from the SRSG/UNDSS for UN Force Protection to assist with providing passage for contracted workers.

7. **Protection Measures for Direct Workers, Contracted Workers and Community Workers and Project-Affected Parties**

The ‘Saving Lives Together’ (SLT) framework is a voluntary initiative that responds to the fact that UN entities, international NGOs and International Organizations face similar security challenges in a given environment. UNOPS will have full duty of care of all direct workers, i.e. UNOPS personnel on the project.

In regards to workers of contracted entities (i.e. the financial service providers & third party monitors), categorized as contracted workers, SLT principles will be included in the procurement and bidding process to either encourage contractors to become members of the SLT and adhere to its principles, or ensure that they have in place security measures for their staff and assets complying with the SLT measures. Thus, while the ‘duty of care’ will continue to be the responsibility of each contractor, the selection process of contractors will ensure that all contracted organizations comply with the standards of the SLT, including in regards to internal security risk management procedures, contingency planning, and emergency response arrangements. These will be legally binding in the respective contracts, and the implementation will be subject to monitoring and supervision by the SSSNP PMU.

With a view to the risks to community workers and Project Affected Parties, UNOPS will consider the suspension of project activities should security risks are assessed to have escalated to a point that makes continued implementation unfeasible. If project activities expose community workers and project-affected parties to higher risks, the UNOPS Project Manager and/or CD will decide on the suspension of activities.
The project aims to build strong ownership and commitment by communities to ensure safe, accountable and effective implementation of project activities, working closely through community chiefs, elders, and other influential individuals. This acts as a social deterrent for violence within communities, which is reinforced by the chiefs and elders. This was a key lesson from the previous project activities. As such, significant support will be provided to ensuring community mobilization/sensitization, community buy-in, and community capacity building – as per the community engagement and capacity building plan, which is under preparation to standardize and make coherent mobilization and communication approaches across project locations and uphold them to an agreed standard.

Summarizing, specific protection measures for the three categories of workers of this project include:

**Protection Measures for Direct Workers:** A variety of protection measures are undertaken, as appropriate, for direct workers. These include: Pre-deployment training, including the ‘Safe and Secure Approaches in Field Environments’ (SSAFE) and BSAFE; Malicious Acts Insurance Policy (MAIP) and personal coverage; Communication Equipment, i.e. VHF/HF, Satellite and GSM Phones, Dish/WiFi Internet; Residential Security Measures and travel security clearance; Security Clearances/SRM Compliant travel; UN Force Protection and Armed Escort in cases of an imminent, non-protracted threat of physical harm and/or demobilization.

**Protection Measures for Contracted Workers:** For contractors who are not covered under the UNSMS policies and procedures, the SSSNP PMU will ensure that all risk mitigation measures – trainings, insurances, residential measures and security communication equipment – will be integrated as part of the requirements in the procurement/bidding process. These will be included in the procurement and bidding process and will be subject to monitoring and supervision during project implementation. Within the bidding documents, contractors will also be required to hold sub-contractors to the same standards, as appropriate.

**Protection Measures for Community Workers and Project Affected Parties:** In order to protect community members from potential security risks related to the project, i.e. cash transfers, the PMU and the UNOPS CD can take decisions on the suspension of project activities in a given area where risks are classified high or above. Site-specific risk assessments undertaken before project entry into a community and, if required, repeated on a regular basis, will support this decision-making process. Furthermore, given general high levels of risk in South Sudan related to cash transfers, selected payment service providers will be requested to take requisite action to ensure security at payment sites during the cash distribution.

8. Monitoring and Compliance Inspections

The SSSNP PMU will be responsible for compliance with the Security Management Plan for the SSSNP and will monitor the full implementation of the Security Management Plan throughout the
project duration. As such, the PMU safeguards staff will monitor and supervise UNOPS personnel in all areas of implementation on a regular basis. The PMU safeguards staff will further guide and monitor bidding processes of all contractors to ensure that contractors are fully compliant with all security risk mitigation measures and have budgeted accordingly.

9. **Crisis and Emergency Management Plan for All Workers**

Emergency response plans will be put in place for all workers, they include responses to major security incidents; medical emergencies (casualty and fatality); relocation and evacuation; road traffic accidents; arrests of workers; and hostage incident management.