Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 04/09/2020 | Report No: ESRSC01277
**BASIC INFORMATION**

**A. Basic Project Data**

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
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<tbody>
<tr>
<td>Marshall Islands</td>
<td>EAST ASIA AND PACIFIC</td>
<td>P171924</td>
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**Project Name**

RMI Education and Skills Strengthening Project

**Practice Area (Lead)**

Education

**Financing Instrument**

Investment Project Financing

**Estimated Appraisal Date**

8/5/2020

**Estimated Board Date**

12/2/2020

**Borrower(s)**

The Republic of the Marshall Islands

**Implementing Agency(ies)**

Ministry of Education

**Proposed Development Objective(s)**

To increase access to and quality of technical and vocational education and training (TVET) opportunities and improve labor market outcomes for Marshallese beneficiaries in RMI and abroad.

**Financing (in USD Million)**

<table>
<thead>
<tr>
<th>Amount</th>
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<tbody>
<tr>
<td>Total Project Cost</td>
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**B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?**

No

**C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]**

The project will support improvements in foundational skills acquired by high school students, the expanded access to and higher quality of technical and vocational skills education and training opportunities, the strengthening workforce planning and employment services, and reforms of the civil public services.

**D. Environmental and Social Overview**

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]
The Republic of the Marshall Islands (RMI) is one of the world’s smallest, most isolated, and vulnerable nations. The country consists of 29 atolls and five isolated islands (24 of which are inhabited) and has a total land mass of just 181 km² set in an area of over 1.9 million km² in the Pacific Ocean. The population of the RMI was estimated at 53,066 in 2016. The two largest urban centers, Majuro (the location of the nation’s capital) and Ebeye, have populations of 28,000 and 9,614, respectively. Migration from outer islands to the urban centers has intensified over the past 30 years for employment, access to public services and imported goods; now over 50% of the population live in Majuro. The fishing sector remains the main source of revenue, representing 18 percent of GDP in 2017. Infrastructure development, public administration and education were the main drivers of GDP growth in 2017. The Project beneficiaries are the Marshallese youth, the employees of the education sector and civil service more broadly and private sector employers in Majuro and abroad (mainly in the US).

Component 1 - Foundational skills and support to students from outer islands will support remedial instruction and specific support for outer island students to enroll and complete courses. This component may include building or upgrading student accommodation which may involve foreign workers and will require waste and materials management and good construction practices. The works will be on existing Ministry of Education leased land in Majuro, Ebeye, Jaluit and / or Wotje where the high schools and post-secondary educational facilities are located. The outer island students are vulnerable due to a lack of quality education on-island, low incomes to pay for travel and accommodation, and risks from privately boarding in the urban centers to attend school. Outer island students stay with relatives in conditions that are relatively precarious and not adequate for studying (poor nutrition and sleep, little space to study, need to continuously relocate to not overstays their welcome, and potential for domestic violence, etc.).

Component 2 - Strengthening and expanding access to technical and vocational skills development will fund the expansion of TVET courses and facilities at secondary and post-secondary levels. This may fund the construction or renovation of educational facilities and the procurement and maintenance of equipment, which may have waste or hazardous materials to manage. Sub component 2.2 may include subsidies to the wages of graduates, which will be subject to labor and working conditions assessment.

Component 3 - Strengthening the institutions for workforce development and the civil service will fund a number of technical advisory services some relating to revising human resource planning and recruitment, remuneration, performance management and other factors of managing the public sector workforce. This component will also be subject to labor and working conditions assessment.

Component 4 - Project implementation support will include recruiting staff to manage and implement the project. Other aspects of project administration, including environmental and social risk management support provided by the Central Implementation Unit.

D. 2. Borrower’s Institutional Capacity
The implementation agency is the Ministry of Education. The exact structure of the Project Implementation Unit will be confirmed during Project preparation and appraisal, but is expected to include (i) one overall project manager, most likely reporting directly to the Minister and being responsible for the overall management of the Project; and (ii) two project coordinators embedded in the two focal agencies – the National Training Council and the Public School System – who will be responsible to support and coordinate the implementation of the set of activities falling under the responsibility of the two agencies.
The Ministry of Education is an implementing agency with the existing World Bank-funded RMI Multi-sectoral Early Childhood Development Project (P166800), but there are no staff that have had training in World Bank operational policies or ESF so capacity is currently low.

At the national level, the Government of RMI Division of International Development and Assistance (DIDA) is familiar with Bank policies and ESF from the preparation and implementation of previous projects. DIDA has set up a Central Implementation Unit (CIU) for World Bank projects. This Unit has a full time, experienced, Environmental Safeguards Specialist, a local Environmental Safeguards Advisor and is currently recruiting an international, experienced Social Safeguards Advisor. This Unit is providing support across the portfolio and will also support the PIU for this project. This will include support to appoint E&S consultants, review of documentation and ongoing support during project implementation. This capacity and capability is considered adequate to support the integration of environmental and social risk management into the RMI Education and Skills Strengthening Project. RMI has experience with the ESF through the preparation of a Programmatic Preparation Advance and the Digital RMI Project. Formal ESF training has been provided to DIDA and CIU and ongoing direct support will be provided to the CIU and Ministry of Education to ensure the requirements of the ESF are satisfied.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)  Moderate

Environmental Risk Rating  Moderate

The environmental risks are minor and relate primarily to managing construction impacts during renovations and new buildings, and managing the water use, waste water and solid waste from the upgraded facilities. Risks also relate to resource use and waste that may come from vocational training. The risks relating to non physical works is considered low. A project ESMP will be prepared and include tools to identify and manage these risks using Good International Industry Practice. A moderate risk rating is proposed primarily because the project is not complex and/or large, does not involve activities that have a high potential for harming people or the environment, and is located away from environmentally or socially sensitive areas. The moderate risk rating will be validated/tested during project preparation given the project applies to some smaller islands (Wotje and Jaluit) where waste management and sourcing sustainable building materials and aggregates are more challenging.

Social Risk Rating  Moderate

The Project will have overwhelming social and economic benefits, lifting the educational outcomes of young Marshallese to effectively engage and contribute to the workforce in RMI and abroad. Secondary benefits may be the reduction in the need to import skilled and semi-skilled workers. Vulnerable outer island communities and gender gaps in participation and outcomes will be a specific focus of Project design. The risks to the community and workers during construction relate to health and safety, particularly if work will be done during school semesters. These types of risks can be managed through effective codes of practice, training of workers and good supervision and oversight of mitigation measures. The risks relating to non physical works is considered low. Stakeholder engagement will be intensive to ensure that the beneficiaries are engaged in the identification of issues in the sector and benefits that this Project will bring. A moderate risk rating is proposed primarily because the project is not complex and/or large, does not involve activities that have a high potential for harming people.
The risk of sexual exploitation and abuse/sexual harassment (SEA/SH) is assessed as moderate, due to the potential for work forces to be resident in remote small islands, on school grounds and the underlying risks in RMI. Worker behavior can be informed by appropriate training and code of conduct and good oversight/supervision. Work can be planned to avoid school semesters where possible. SEA/SH service providers are available in RMI and will be consulted during project preparation. The moderate risk rating will be tested/validated during project preparation, particularly to focus on integrating the mitigation of social harm and maximizing benefits into Project design.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The screening of risks and impacts is based on school site visits, land due diligence assessments in RMI, previous social assessments in RMI and FSM relating to the difficulties of outer island students to attend school and have safe and secure accommodation and previous labor management procedures prepared for RMI. ESS1 applies primarily to the renovation of buildings, construction of new buildings and the installation and use of equipment and curricula for TVET. The environmental risks are moderate and relate primarily to managing the source of sustainable building materials such as aggregates, and managing the safe removal of waste. Risks relating to ongoing water use, wastewater treatment, and waste management are not known and will be assessed during the preparation of the ESMP. A single ESMP is considered adequate as the risks are easily identifiable, are likely to be similar across all sites, and standard construction mitigation measures are readily identifiable. The risks to the community and workers during construction relate to health and safety of active construction sites and of foreign temporary work forces residing in small communities; these risks relate in particular to students if construction will occur during school semesters. These types of risks can be managed through effective codes of practice, training of workers and good supervision and oversight of mitigation measures. A project ESMP will be prepared and include these tools. The Project is anticipated to produce social and economic benefits through strengthening of TVET opportunities and teacher capacity. The project will improve educational opportunities for vulnerable outer island youth by providing additional housing options, reduction in gender discrimination through improved access and facilities, and bring improvements in education attendance and outcomes. Furthermore, the outcomes are anticipated to be a more skilled workforce and more opportunities for people to lift themselves out of poverty, either working in RMI or abroad. A Environmental and Social Management Plan (ESMP), Environment and Social Commitment Plan (ESCP), stakeholder engagement plan (SEP) and labor management procedures (LMP) will be prepared prior to appraisal. The ESMP will include land access procedures if necessary. Issues associated with vulnerability and exclusion will principally be addressed in Project design but if necessary, the ESCP will also include relevant measures to ensure access for all.

Areas where “Use of Borrower Framework” is being considered:

Although the anticipated impacts are low, the Borrower’s E&S Framework will not be relied upon because of a number of gaps in the legislation and capacity to meet World Bank Standards.

ESS10 Stakeholder Engagement and Information Disclosure
The key stakeholders are Marshallese youth and their families, the education sector, civil service more broadly and the private sector employers in RMI. Stakeholder engagement is critical in the development of the Project to understand the opportunities and risks relating to the proposed components. Stakeholder engagement activities will be undertaken as part of the preparation of the ESMP, and throughout the life of the Project. Consultations will be carried out in English and Marshallese and in culturally appropriate formats. Where necessary, consultations may be gendered to identify specific education issues relating to gender and SEA/SH. Face to face consultation has been difficult recently due to domestic travel restrictions to prevent the spread of dengue fever and corona virus disease. Alternative consultation, feedback and disclosure methods using social media and other technology may be used if necessary, targeted at the communication needs of beneficiaries and stakeholders and using existing communication methods used by the Ministry of Education as much as possible. Consultation summaries will be detailed in the ESMP. A SEP, including grievance mechanism, will be prepared prior to appraisal and operational by project effectiveness.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

ESS2 is relevant to several aspects of the Project. The Project will require contractors to construct new buildings or renovate existing buildings. The workforce may be Marshallese or foreign, depending on the size of the contracts and nature of the building projects. There is no expectation of community workers. The Project will fund strengthening of workforce planning in the RMI public service, which may include changes updates to human resources planning processes, recruitment and selection processes, remuneration frameworks, performance management framework, learning and development. The Project may also subsidize the wages of graduates as part of an incentive scheme for employers to take on those who have yet to gain work experience. Elements of ESS2 may be relevant to these activities.

An assessment of labor rights and laws as well as occupational health and safety legislation and implementation arrangements will be undertaken during project preparation. The Labor Management Procedures (LMP) will be prepared based on the assessment. It is proposed that the LMP be included in a specific section of the ESMP and will describe the findings of the ESA, national labor policies and practices, the types of project workers that are likely to be involved, the procedures to apply ESS2, any specific requirements relating to employment matters under the strengthening of the workforce development of the civil service and/or from the subsidies to graduates, and a grievance mechanism. ESS2 requirements will be mandated for building contractors through the project ESMP, bid documents, contracts, and supervised by the CIU Safeguards Team. The Contractor will be required to perform site specific risk assessments and prepare and implement occupational health and safety risk registers and management plans and provide all relevant personal protective equipment and other equipment to maintain a safe work place. OSH will be assessed during preparation, including consideration of issues within WBG EHS general guidelines for Occupational Health and Safety and Construction and Decommissioning. Mitigation measures will be included in the ESMP as necessary.

ESS3 Resource Efficiency and Pollution Prevention and Management
ESS3 is relevant to the project. Aggregates will be required for construction purposes. There are no identified sustainable local sources of aggregates in RMI; sand and rock are mined from foreshore areas. Therefore sustainable sources of aggregates will be assessed during the preparation of the ESMP. Building waste will be produced and, due to a lack of sanitary landfills in RMI, will need to be recycled or reused locally or exported for recycling or sanitary disposal. Hazardous waste will also be considered and appropriate mitigation included in the ESMP. During operation the TVET facilities may create waste on an ongoing basis and some of this may require specific management (e.g. hazardous waste). It is not yet known what the source of water will be or how wastewater will be treated during operation of the accommodation and TVET facilities; all important aspects of resource efficiency and pollution prevention and management in atoll environments. The relevance of ESS3 will be reassessed during the preparation of a ESMP which will provide relevant mitigation measures for construction and operational phases for aggregates, water, wastewater and waste management and focus on specificities of sites when needed (e.g. waste management for smaller islands (Wotje and Jaluit) that do not have landfill capacity). The scale of construction works is small; the Contractor may be international or national. If national, the capacity to prepare and implement Construction ESMP may be low. Therefore the ESMP will provide site-specific mitigation measures that will need to be implemented during the construction phase and specific guidance for bid documents and for Contractors to follow, commensurate to the scale of impacts. Pending the outcome of the environmental and social assessment the content of Construction ESMP will cover: aggregate sources, transportation and storage; materials transportation and storage; waste management; water management; hazardous materials management. Separate sub-plans will not be necessary for the scale of works. For the operational phase the ESMP will provide detailed mitigation measures for building design to address potential impacts relating to water use, waste water treatment and disposal and ongoing waste management from buildings.

ESS4 Community Health and Safety

ESS4 is relevant to the Project. The risks to community health and safety from construction activities are considered to be minor and manageable. Works will be contained within school precincts and the public can easily be excluded; specific mitigation will be put in place to ensure student safety in the event that construction work needs to take place in term time. Such risks will be assessed during the preparation of the ESMP.

Contractors may bring in workers from overseas and while the numbers are not expected to be significant they may be resident for some time on small islands (Jaluit, Wotje) and working in close proximity to school children (depending on the timing of works). The ESMP will include an assessment of a range of issues in RMI relating to imported labor, gender, child labor, demand for sex workers, and trafficking and will identify suitable management measures and mitigation will be defined by the ESMP to be prepared. There may be gender, disability, health and safety aspects of renovations, new buildings, TVET training and facilities that need to be integrated into design, procurement, provision of safety equipment, teacher training and the curricula. Health and safety aspects of building and renovation design will include structural integrity and safety, life and fire safety and traffic safety in accordance with World Bank Group EHS Guidelines. Further, the opportunities to promote teacher and student safety through additional guidance will be considered. This may include counselling services, awareness raising or protocols for care of students.
ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

ESS5 is relevant for the project. Land will be required to construct new accommodation and TVET facilities. The scale or extent of physical works is not yet known and could range from small scale renovations to 1 or 2 storey extensions/new builds depending on need. Buildings or renovations will be school or tertiary education precincts on Government-leased land. The ESMP will include screening of the land access opportunities and issues and whether a land access instrument is required. Experience on previous projects in RMI has shown that Government-leased land is generally available for new activities that are consistent with the existing lease, and should be prioritised for the project. Where private land is required, land leases or easements should be obtained. Voluntary arrangements would be prioritised over involuntary acquisition. Management of works, including timing, segregation from non work sites and any temporary displacement will be managed under ESS1 and appropriate mitigation will be included in the ESMP.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

No biodiversity risks or impacts have been identified through screening. Buildings or renovations will be within school or tertiary education precincts on Government-leased land. These areas are highly modified and do not have any natural values. Technical advisory relates to improving the education sector and TVET outcomes, with no specific relevance to biodiversity conservation and sustainable management of living natural resources. Relevance of this ESS will be further assessed during Project preparation of the ESMP.

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

The majority of people in RMI are Marshallese and will be the overwhelming beneficiaries of the project. The preparation of the ESMP and project consultations will be conducted in accordance with ESS7 and the cultural needs of the people.

ESS8 Cultural Heritage

ESS8 is relevant to the project. Buildings or renovations will be within school or tertiary education precincts on Government-leased land. These precincts may include cultural heritage structures or artifacts such as churches, chapels, graves or World War II relics. The ESMP will identify any relevant mitigation measures to identify cultural heritage sites during the concept design phase and avoid or mitigate impacts on cultural heritage, including consultation. It will identify any key sites as necessary, and the implementation of chance find procedures. Technical advisory relates to improving the education sector and TVET outcomes, with no specific relevance to tangible or intangible heritage.

ESS9 Financial Intermediaries

This standard is not relevant to the project, as no financial intermediaries will be involved in the operations.
C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways  No

OP 7.60 Projects in Disputed Areas  No

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered?  No

Financing Partners
No financing partners are proposed.

B. Proposed Measures, Actions and Timing (Borrower’s commitments)

Actions to be completed prior to Bank Board Approval:
An ESMP which will include land access process if necessary, Labor Management Procedures and a Stakeholder Engagement Plan.

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):
Implementation of the safeguard instruments and Stakeholder Engagement Plan throughout the project, both for technical assistance and physical investments. The preparation of contractor’s bid documents to include the ESMP and requirements of the Bank’s Environmental and Social Standards (in particular ESS1, ESS2, ESS3, ESS4 and ESS10).

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS  01-Nov-2020

IV. CONTACT POINTS

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Borrower:  The Republic of the Marshall Islands

Implementing Agency(ies)
Implementing Agency:  Ministry of Education
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VI. APPROVAL

Task Team Leader(s): Marie-Helene Cloutier
Practice Manager (ENR/Social) Ann Jeannette Glauber Recommended on 06-Apr-2020 at 01:48:3 EDT
Safeguards Advisor ESSA Peter Leonard (SAESSA) Cleared on 09-Apr-2020 at 15:36:3 EDT