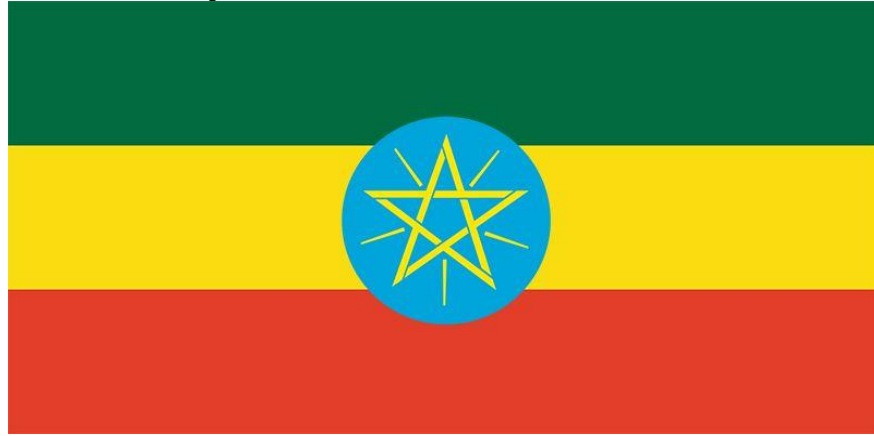


**Federal Democratic Republic of Ethiopia  
Ministry of Labor and Skill (MoLS)**



**Final**

**Environmental and Social Management Framework(ESMF)**

**For  
Ethiopia Education and Skills for Employability  
(EASE) Project  
(P177881)**

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ADDIS ABABA**

# Environmental & Social Management Framework (ESMF)

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## Environmental & Social Management Framework (ESMF)

### Abbreviations and Acronyms

CEDAW	Convention on the Elimination of all Forms of Discrimination Against Women
CESMP	Contractor’s Environmental and Social Management Plan
CoC	Code of Conduct
CPF	Country Partnership Framework
CSO	Civil Society Organization
EASE	Ethiopia Education and Skills for Employability
E&S	Environmental & Social
EHS	Environment, Health and Safety
EHSG	Environmental Health and Safety Guidelines
EIA	Environmental Impact Assessment
ESCP	Environmental and Social Commitment Plan
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESF	Environmental and Social Framework
ESIA	Environment and Social Impact Assessment
ESS	Environmental and Social Standards
FPIC	Free, Prior and Informed Consent
GBV	Gender-Based Violence
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
HIV/AIDS	Human Immunodeficiency Virus / Acquired Immune Deficiency Syndrome
IDA	International Development Association
IDP	Internal displaced people
ILO	International Labor Organization
LMP	Labor Management Plan
M&E	Monitoring and Evaluation
MoLS	Ministry of Labor and Skills
NGO	Non-Governmental Organization
NPAJC	National Plan of Action for Jobs Creation
DU	Delivery Unit
OHS	Occupational Health and Safety
PAD	Project Appraisal Document
PDO	Project Development Objective
PITS	Project Implementation Unit
PMU	Project Management Unit
POM	Project Operations Manual
PPE	Personal Protective Equipment
PSEA	Prevention of Sexual Exploitation and Abuse
PTC	polytechnic colleges
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SIP	Strategic Investment Plan
SMIS	Skills Management Information System
SMP	Security Management Plan

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SRA	Security Risk Assessment
STI	Sexually Transmitted Infection
TA	Technical Assistance
TOR	Terms of Reference
TOT	Training of Trainers
TVET	Technical and Vocational Education and Training
WB	World Bank

## **Executive Summary**

The Project, Ethiopia Education and Skills for Employability (EASE), aims to improve employment outcomes of the technical and vocation education and training (TVET) system of Ethiopia with a focus on women and marginalized groups. The Project will support the government's strategy of providing labor market-responsive short-term training to produce a competent workforce. It is fully aligned with the Government's approach of strengthening linkages with employers to reduce skills mismatch and ensure proficiency in soft, technical and ICT-based skill sets. It also complements the government's initiative to promote increased female participation in a broad range of training opportunities to enable more young women to gain decent jobs.

This ESMF has been developed as the E&S instrument for assessing, managing and monitoring E&S risks and impacts of the project given that the full nature, scope and geographical locations were not exactly known at the time of preparing the ESMF. The ESMF establishes the screening processes and tools as well as exclusion criteria for specific sub-projects - to be directly implemented by the Project Implementation Units (PITs) in assessing the risks and impacts of the sub-projects or activity. This will facilitate the recommendation of appropriate mitigation and monitoring measures for each sub-project.

The Project includes the following components: 1. Strengthening public polytechnics for improved labor market outcomes, 2. Skills for Jobs; 3. System strengthening.

The environmental risks and impacts have been categorized as moderate. They include pollution due to generation of noise, dusts, solid and liquid wastes and associated disposal issues (which could result in air, soil and water pollution), fire hazards, and inefficient use of natural resources including energy, water and raw materials related to the civil works of rehabilitation and upgrading of learning/training institutions. Also, there are e-waste issues and related pollution of soil, water and air associated with provision of modern technologies; and occupational health and safety (OHS) concerns (injury/death, fire hazards) related to all components of the project. There are also potential community health and safety risks and impacts including exposure to project-related pollution, communicable diseases, traffic and road safety risks, and hazardous materials among others.

The social risks have been categorized as moderate. They include weak stakeholder consultation and participation/engagement due to the instability in the country; risk related to the vulnerable groups who will be trained not finding jobs in the intended sectors; and lack of a functional grievance mechanism to address grievances.

Furthermore, Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH) is a risk. The project targets rehabilitation and upgrading of polytechnic colleges as a result, there will be proximity between workers and students in the colleges to be rehabilitated and upgraded.

To assist in the mitigation of risks and impacts and to comply with the World Bank's Environmental and Social Framework and Ethiopian legislation, the recipient has prepared an Environmental and Social Commitment Plan (ESCP); an Environmental and Social Management

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Framework (ESMF) including Labor Management Procedures (LMP), a Stakeholder Engagement Plan (SEP), as well as a Security Risk Assessment and Management Plan (SRAMP).

The risks and impacts will be managed through the mitigation hierarchy approaches (avoid, minimize, mitigate, and compensate) included in this ESMF and subsequently in all sites-specific E&S management plans, during the implementation stage once the detailed characteristics of sub-project sites are confirmed. No irreversible adverse environmental impacts are foreseen since most of these risks and impacts are small in scale, localized, mostly site specific and easily manageable through these proposed mitigation measures.

The ESMF sets forth the basic principles and prerogatives the Project will be complying with during implementation once the physical footprints are known, including site-specific environmental and social (E&S) screening, the preparation of site-specific instruments. All environmental and social (E&S) instruments will be the subject of consultation with the beneficiaries and institutional stakeholders. All E&S instruments will be publicly disclosed both in-country and on the project website prior to the physical start of project or activity implementation.

The Project will be implemented under the leadership of the Ministry of Labor and Skills (MoLS). Established under the new government of the Federal Democratic Republic of Ethiopia in 2021, the Ministry is tasked with leading the jobs, labor and skills development sectors by bringing federal mandated institutions under its purview.

The main monitoring responsibilities and inspection activities will sit with the Delivery Unit (DU) at MoLS, which will administer the overall project-related E&S monitoring and implementation as laid out in this ESMF. The DU will have overall responsibility for the implementation of the E&S mitigation measures, as well as for monitoring for compliance. The Social Specialist and Environmental Specialist in the DU will handle all monitoring, inspection and reporting aspects. However, for Component 1 activities, the DU will oversee the PITs. The PITs will be responsible for day-to-day monitoring and inspection of E&S mitigation measures in relation to rehabilitation works. E&S-related monitoring will focus on compliance by its contractors, sub-contractors and suppliers. Monitoring will be conducted through site visits and the review or documentation.

A series of consultations were undertaken by MoLS and the World Bank with different stakeholders, including government counterparts during preparation. During this time, stakeholder consultations were undertaken with employers, public and private training institutions, and development partners to discuss key Project outlines. Further stakeholder consultations will be undertaken throughout project implementation and specifically around the planning and implementation of sub-projects. The modalities for these engagements are laid out in a separate Stakeholder Engagement Plan (SEP).

A grievance redress mechanism will be established in order to resolve concerns effectively and timely. The mechanism will be notified for the affected people and thus grievances will be actively managed and tracked to ensure that appropriate resolutions and actions are taken. The grievance procedure does not replace existing legal processes.

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Whenever misunderstandings and disputes arise between the principal parties (e.g. local government bodies and affected parties) involved in the resettlement and compensation process, the preferred means of settling disputes is through arbitration (Proclamation No.1161/2019).

The grievance procedure will be simple and administered as far as possible at the local levels to facilitate access, flexibility and ensure transparency. All the grievances will be managed through the Grievance Resolution Committees. Complaints will be received in writing or orally and will be filled in a Grievance Registration Form by the committee.

The total estimated costs for mainstreaming environment into the EASE project Component 1, 2 & 3 for the entire project period of five years is USD 1,750,000.00. The budget covers ESMF training, implementation, monitoring, carrying out due diligence and annual external environmental and social performance audits, procurement of consultants to provide ESMP preparation services, etc. The budget will be funded from EASE project. Costs related to the required mitigation measures for Component 1 2 & 3 subprojects are not set out in the budgets presented here. These will be assessed and internalized by beneficiary institutions as part of the overall subproject cost.

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### 1. Introduction

This Environmental and Social Management Framework (ESMF) is developed to support the environmental and social due diligence provisions for activities financed by the World Bank in the Ethiopia Education and Skills for Employability (EASE) Project. The project will support Ethiopian youth, especially women and marginalized groups, to attain relevant skills for employability. The Ministry of Labor and Skills (MoLS) will be implementing the Project activities.

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

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

### 2. Project Description

The **Project Development Objective** (PDO) is to improve employment outcomes of the TVET system of Ethiopia with a focus on women and marginalized groups. The Project consists of the following components:

**Component 1: Strengthening public polytechnic colleges for improved labor market outcomes:** This component will strengthen selected polytechnic colleges (PTC) to produce high-quality skilled graduates that meet the industry's needs in priority sectors of the economy. The PTCs have been selected following transparent criteria which consider geographical coverage and labor market relevance. At least one polytechnic has been selected in each region to ensure national coverage (see list of selected colleges in the table below). The PTCs submitted detailed proposals which were reviewed by an independent evaluation committee. The PTCs will develop strategic investment plans (SIP) in close collaboration with industry/employers to upgrade their institutes as comprehensive training hubs offering, in conjunction with surrounding industries, formal TVET alongside needs-based short duration reskilling and upskilling training programs that respond closely to market demand to enhance enrollment while improving the employability of trainees.

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The SIPs, which will provide a blueprint for upgrading the PTCS to Centers of Excellence, will be financed by the project.

The Strategic Investment Plans will focus on: Strengthening governance and management of the PTCs; Assessments and capacity development; Introducing training programs that meet the needs of the industry; Training of Trainers; Upgrading existing college facilities and equipment; Tracer studies Partnership agreements with industry. The SIPs will include specific activities that promote use of technology to improve the delivery of TVET programs. By combining technological tools such as virtual reality, augmented reality, and other immersive technologies, students can be provided hands-on and engaging experiences, and practical exercises that allow multiple repetitions without posing additional risks in various fields ranging from auto-mechanics, healthcare, welding, or any other technical or vocational field.

The project will support mainstreaming greening of TVETs through introducing occupations that directly impact environmental challenges such as wind turbine installations, solar panels, environmental sustainability, eco-tourism, renewable energy, waste management etc. Moreover, the project will introduce systematic revision, innovation and introduce digital elements of all curricula and qualifications so that it responds to greening of the TVET system. Interventions include innovative approaches to teaching and learning, equipping learners with skills like critical thinking, problem-solving, adaptability and collaboration and introducing new ways of delivering TVET such as learner-centered approaches and pedagogical innovations such as project-based learning.

The project will also incentivize polytechnics to increase their share of female students and graduates through various interventions included expanding their course selection, facilitation of female graduates, outreach to local secondary schools and developing and implementing plans for addressing gender-based violence in polytechnics.

**Component 2 will support short-term skills programs through a competitive and performance-based financing model that links payments to the employment outcomes of participants.** This component will promote establishment of new training programs or expansion of existing programs for in-demand skills that demonstrate potential for high employment outcomes. Programs to be supported will cater to the needs of the local economies and deliver relevant foundational skills, soft-skills, green skills, digital skills, and entrepreneurship skills, in addition to sector-specific technical skills. Private, public and not-for-profit NGOs—will be able to submit proposals to apply for support from this component. Training providers will be competitively selected and will be paid following a performance-based model, on the basis of milestones achieved and verified—including the employment outcomes of program graduates. Approximately 100,000 employed and unemployed youth in the age group 15-29 years old including Grade 12 or lower education, with priority for women (at least 55 percent), will benefit from wider access to certified short-term skills training programs through this component. In addition, rural, IDP, PWD and conflict-affected populations will be targeted.

**Component 3: System Strengthening:** This component will address the information, coordination, and capacity deficits in the TVET system that make it less dynamic in responding to the evolving technical skill needs in the economy. The recent establishment of MoLS, which brings

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under its umbrella the mandates for Labor, Employment, and Skills, provides an opportunity to effectively bring together key players to ensure a cohesive approach to addressing skills for jobs. The main challenge to realizing this promise are lack of information among actors, inadequate mechanisms for coordination, limitation in capacity, and weak incentives for engagement. The Project will address these issues through the following three subcomponents:

***Sub-component 3.1. Information for decision-making:*** Create a system aggregating existing data collection systems to enable skills analysis and forecasting systems to close the gaps between skills supplied by the TVET system and those demanded by employers. The project will support MoLS build capacity and systems for regular skills demand analysis and forecasting in key sectors and overseas job markets and generate information to assess the performance of the training system. Creating a skills management information system (SMIS) would integrate the available skills supply and demand information for decision-making at the local, woreda, and regional levels to the national level, including overseas markets. The SMIS would create a unifying language to assess the labor market for the priority sectors to quantify demand for training programs and map jobs and skills across the priority sectors to assess current and forecast future skills demand and identify mismatch. It would also enable targeting and profiling mechanisms to ensure the participation of women, rural and urban unemployed, persons with disabilities, and IDPs. As part of the SMIS, the Project will conduct tracer studies to set the baseline for employment outcomes of TVET institutions across the country.

***Sub-component 3.2. Strengthened system coordination:*** Establish formal coordination mechanisms to ensure alignment of the skills supply and demand for improved employment outcomes. This project will support MoLS in establishing formal coordination mechanisms that bring together employers, the public sector (e.g., Ministry of Education, Ministry of Industry), and training institutions to ensure that skill demand and supply are aligned. The projects aim to establish skills development and planning coordination mechanisms. Such mechanisms would resolve fragmented decision-making amongst the different public and private actors to improve capacity, increase labor productivity, continuously adjust to changes in market demands and trends, and build an enabling skills ecosystem.

***Subcomponent 3.3 Strengthened system capacity for policymaking:*** Address challenges with the lack of a skills policy framework and governance to integrate employers and jobseekers and bring coherence between relevant stakeholders. This project will support MoLS in creating an enabling policy environment for sustained reforms in the skills development sector. Also, the need to have clear institutional arrangements with defined roles and responsibilities, updated industry-led occupational and assessment standards for training and certification to meet the skill demands in the priority sectors, and incorporated incentives for industry and private sector engagement. Ensure inclusiveness of disadvantaged and marginalized groups (women, unemployed rural and urban, persons with disabilities, IDPs, returnees, refugees and host communities, and immigrating regions, etc.) linked to skills training and employment through greater industry involvement for skills certification. The Project will support the new TVET policy reform through the formulation and implementation by building the capacity of the ministry, regions, and woredas to ensure a resilient, adaptive, inclusive, and sustainable skills ecosystem.

The Table below presents indicative lists of the activities and their technical complexity.

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**Table 1 Indicative list of subprojects**

Subcomponent	Activity	Technical Complexity
<b>Component 1: Strengthening public polytechnic colleges for improved labor market</b>		
	Developments of Strategic Investment Plan (SIP)	Low
	Assessments and capacity development	Low
	Introducing training programs that meet the needs of the industry, Training of Trainers (ToT)	Low
	Upgrading existing college facilities and equipment	Medium
	Tracer studies	Low
	Development of partnership agreements with industry	Low
	Introducing occupations that directly impact environmental challenges such as wind turbine installations, solar panels, environmental sustainability, eco-tourism, renewable energy, waste management etc.	Low
	Introduce systematic revision, innovation and digital elements of all curricula and qualifications	Low
<b>Component 2: Skills for Jobs</b>		
	Provision of large-scale short-term training to unemployed youth	Low
	Performance-based contracting of public and private training providers industry-certified market-demanded short term (up to 12 months) skills programs, relevant for wage employment and self-employment	Low
	Development of occupational skills, testing and certification standards	Low
	Provision of full/partial fee subsidy and stipends to about 4000 students	Low
<b>Component 3: System Strengthening</b>		
<i>Information for decision-making</i>	Creating a skills management information system And conducting tracer studies	Low
<i>Strengthened system coordination</i>	Establishing formal coordination mechanisms that bring together employers, the public sector (e.g., Ministry of Education, Ministry of Industry), and training institutions	Low

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<i>Strengthened system capacity for policymaking</i>	Preparation of policy framework and governance, building the capacity of the ministry, regions, and woredas	Low
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### Project Beneficiaries and Geographical Locations

For Component 1, a series of public polytechnic colleges have been selected, including in the following regions: Addis Ababa, Afar, Amhara, Benishangul Gumuz, Dire Dawa, Gambela, Harare, Oromia, Sidama, SNNP, Southwest and Tigray please see table 1 the actual location of Polytechnic college. Component 2 and Component 3 activities may be implemented across the country, with no particular location selected yet. A significant number of activities will take place in the country's capital, Addis Ababa.

## 3. Policy, Legal and Administrative Framework

### 3.1 Ethiopia Legal Framework

The 1995 Constitution of Ethiopia stipulates to consider all the environmental and social impacts while implementing any development projects. Article 43 stipulates the Right to Development, Article 44 stipulates Environmental Rights, and Article 92 stipulates Environmental Objectives. Furthermore, Article 29 defines the Right to Thought, Opinion and Expression; and Article 35 the Rights of Women; Article 36 the Right of Children; and Article 41 the Economic, Social and Cultural Rights.

**Environmental Policy of Ethiopia: 1997:** The Policy has 10 sectoral and 10 cross-sectoral components one of which addresses “Human Settlements, Urban Environment and Environmental Health”, and was based on the findings and recommendations of the National Conservation Strategy of Ethiopia. The policy document contains elements that emphasize the importance of mainstreaming socio-ecological dimensions in development programs and projects. The purpose of the Environmental Policy of Ethiopia is to improve and enhance the health and quality of life of all Ethiopians through promoting sustainable social and economic development. This shall be achieved through sound management and use of resources and the environment as a whole so as to meet the needs of the present generation without compromising the ability of future generations to meet their own needs. With the intention of having sustainable environmental management, the Environmental Policy of Ethiopia encourages the creation of organizational and institutional frameworks from federal to community levels. The Environmental Policy of Ethiopia provides a number of guiding principles that require adherence to principles of sustainable development; in particular, the need to ensure that Environmental Impact Assessment: considers impacts on human and natural environments; provides for early consideration of environmental impacts in projects and programs design; recognizes public consultation; includes mitigation and contingency plans; provides for auditing and monitoring; and is a legally binding requirement. The Policy is relevant for the Project, as the Project will have environmental impacts through its public works.

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**Biodiversity Conservation and Research Policy: 1998:** The Policy provides policy guidance towards the effective conservation, rational development and sustainable utilization of the country's biodiversity. The policy objectives accentuate public participation in biodiversity conservation, development and utilization, and also ensure that communities share from the benefit accrued from the utilization of the genetic resources and their traditional knowledge. The policy consists of comprehensive provisions on the conservation and sustainable utilization of biodiversity, and it underlines the requirements for implementers to adopt during planning and operational phase of projects and for those projects engaged in biological resource utilization to follow ESIA procedures. Besides the Policy, the National Biodiversity Strategy and Action Plan provides guidance towards the effective conservation, rational development and sustainable utilization of the country's biodiversity. It also encourages and supports public participation in the conservation, development and use of biological resources. The Policy is relevant for the Project, as the Project may have impacts on biodiversity through its public works.

**Construction industry policy: 2012:** The National Construction Industry Policy considers the fact that the realization of the objectives and goals of the development priority sectors such as education, health, water, agriculture, manufacturing, tourism, mining, energy, construction, land and good governance relies on the availability of reliable, strong and competitive local construction industry, which is capable of delivering quality services to its stakeholders. The policy provides guidance and enabling conditions on the increased involvement of the local construction industry in construction activities. Since the Project will undertake construction activities, the Policy is relevant.

**National Occupational Safety and Health (OSH) Policy and Strategy:** Ethiopia has legal frameworks on OHS. The Constitution (1995) under Article 42/2 stated the Rights of Labor as "workers right for healthy and safe work environment" Proclamation No. 4/1995. There are also different legal frameworks on OHS which include: The National Occupational Health Policy and Strategy, Occupational Health and Safety Directive (2008), Occupational Health and Safety Policy and Procedures Manual, and On Work Occupational Health and Safety Control Manual for Inspectors (2017/18) which will apply to the EASE project. OHS promotion is also included as a priority in the National Health Policy Statement (1993). Ministry of Labor and Skill (MOLS) and its regional counterparts are responsible for OHS at Federal and Regional levels. MOLSD has OHS & Working Environment Department responsible for OHS responsibilities. Each administrative region has an OHS department within the Labor and Skill development Bureau with the responsibilities of inspection service. The Policy and Strategy is relevant, as the Project will be implementing public works.

**National Policy of Women: 1993:** With the announcement of the National Policy of Women in 1993 and the promulgation of the new Constitution in 1995, the Ethiopian Government declared its commitment to the equitable socio-economic development of women. The National Policy on Ethiopian Women aims to institutionalize the political, economic and social rights of women by creating appropriate structures in government offices and institutions so that public policies and interventions become gender-responsive in order to ensure equitable development for all Ethiopians.

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**The Labor proclamation no 1156/2019** provided women with a special attention. This proclamation is aware of the fact that women are marginalized historically and hence genuine equality will not be maintained only by the principle of non-discrimination on the basis of sex rather women should also be given with a special treatment, affirmative action. In 2005, the Women's Affairs Ministry was established to coordinate women's activities and translate the policy objectives. In 2006, the Ministry of Women's Affairs issued the National Plan of Action for Gender Equality (NAPGE) for the period 2006 – 2010. Its goal is "to contribute to the attainment of equality between men and women in social, political and economic development".

### **3.2 World Bank Standards and Key Gaps with National Framework**

The below Table lists the relevant World Bank Environmental and Social Standards for this Projects and briefly explains why they are relevant. It further includes a gap analysis between the relevant ESS and the Ethiopian legal framework.

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*Table 2. Gap analysis between World Bank ESSs and National legislations, and recommendations*

ESS	National Law or Policy	Gap	Measures to bridge the gap
<p>Objectives of ESS 1 are:</p> <p>To identify, evaluate and manage the environmental and social risks and impacts of the project in a manner consistent with the ESSs.</p>	<p>The Federal EIA Proclamation No. 299/2002 and related regional EIA regulations mandatorily requires a project proponent to undertake an EIA. The Federal EIA procedural guideline (2003) classifies projects into Schedule I, II and III to facilitate the undertaking of EIA proportionate to the risks and impacts of each project. The EIA proclamation and regulations seek all direct, indirect and cumulative impacts likely to occur during project life cycle are considered in the assessment. The stated legislation and regulation also require stakeholder and community consultations to be carried as part of the EIA process. The preparation of an ESMP based on mitigation hierarchy and monitoring plan is also required by the EIA proclamation and associated guidelines.</p>	<p>Requirements of the EIA proclamation and regional regulations do not explicitly seek for consideration of risks and impacts associated with primary suppliers as defined by the ESF.</p> <p>Apart from the presence of effluent standards for specified industrial sectors, the EIA proclamation is not complemented by a guideline similar to EHS and do not require its use.</p>	<p>E&amp;S requirements for “primary suppliers” shall be addressed as part of the present ESMF process when and if it occurs</p> <p>The application and use of EHS guidelines as appropriate to sub-projects is required by the present ESMF.</p>
<p>ESS2: Labor and Working Conditions</p> <p>The Objectives of ESS 2 are: To promote safety and health at work; To promote the fair treatment, non-discrimination and equal opportunity of project workers; To protect project workers, including vulnerable workers such as women, people with disabilities, children migrant workers, contracted workers, community workers and primary supply workers, as appropriate; To prevent the use of all forms of forced labor and child labor; To support the principles of freedom of association and collective bargaining of project workers in a</p>	<p>The former Labor Proclamation No.377/2003 is repealed and substituted by the new Proclamation 1156/2019. The new legislation remains to be the labor legislation applied invariably all over the Country without customization to regional contexts. The labor law is applied to govern all aspects of employment relations based on a contract of employment that exists between a worker and an employer. The legislation covers the contract of employment defining the rules and conditions of employment, nondiscrimination, equal opportunity for women workers, the right to form trade unions (workers organizations),</p>	<p>All the rules of the labor law are applicable to employment relations based on a contract of employment that exists between a worker and an employer.</p> <p>The labor law is not applicable to community workers as it is not based on employment relations between worker and employer.</p>	<p>The ESMF adopts the provisions of both the labor law and ESS 2 in its Labor Management Procedures. Where gaps exist, ESS2 will apply.</p>

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<p>manner consistent with national law; To provide project workers with accessible means to raise workplace concerns.</p> <p>The ESS is relevant since the Project will be implementing public works.</p>	<p>working conditions of young labor setting the minimum age for child labor to be 15 and working conditions, and arbitration/conciliation mechanism to handle grievances and disputes of workers in relation to employment.</p> <p>The labor law also covers occupational safety, health and work environment aspects.</p> <p>The labor law largely fulfills the requirements of ESS 2.</p> <p>Proclamation No. 568/2008 Rights to employment for Persons with Disabilities makes null and void any law, practice, custom, attitude and other discriminatory situations that limit equal opportunities for persons with disabilities.</p>	<p>As most workers of sub-projects are likely to be contracted through formal employment process, there are major gaps between ESS 2 and the labor law</p>	
<p>ESS3 Resource Efficiency and Pollution Prevention</p> <p>The Objectives of ESS 3 are: To promote the sustainable use of resources, including energy, water and raw materials; To avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities; To avoid or minimize project-related emissions of short and long-lived climate pollutants; To avoid or minimize generation of hazardous and non-hazardous waste.</p> <p>This standard is relevant, since the Project will be implementing public works that may cause pollution</p>	<p>The requirements of ESS3 are largely fulfilled by the following national legislations and International Conventions. These include:</p> <p>The Pollution Control Proclamation no. 300/2002 which sets the binding provisions for prevention and control of pollution addresses management of hazardous waste; chemicals and radioactive materials, management of non-hazardous municipal waste, and sets the provisions for issuing environmental standards including for air, water and various effluents. The proclamation is complemented by effluent standards for certain industrial sectors.</p>	<p>Detailed guidelines to support efficient use of resources like water and energy are not sufficiently available.</p>	<p>The application of relevant sections of the General EHS and sector-specific EHS guideline will apply when appropriate.</p> <p>The application of measures and actions developed to assess and manage sub-project specific risks and impacts are outlined in the ESMF and subsequent sub-project ESMPs.</p>

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<p>ESS4: Community Health, Safety and Security</p> <p>The Objectives of ESS 4 are: To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life-cycle from both routine and non-routine circumstances; To avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials; To have in place effective measures to address emergency events; To ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities.</p> <p>This ESS is relevant, since the Project will be implementing public works that may impact community, health and safety.</p>	<p>Building Proclamation No. 624/2009 and Public Health Proclamation No.200/2000 contain certain provisions that partly address the issues of community safety in the areas of building designs and community exposure to health risks.</p> <p>Other regulations such as prevention of industrial pollution require industrial facilities to prepare emergency response systems.</p> <p>In general, some aspects of the ESS 4 are either fully or partially addressed across the existing sector legislations and regulations.</p>	<p>There are gaps in fully addressing the community health, safety and security aspects as defined in the ESF.</p>	<p>The application of relevant sections of the General EHS and sector-specific EHS guidelines will apply.</p> <p>Measures and actions developed to assess and manage subproject-specific community health and safety risks and impacts as outlined in the ESMF and subsequent subproject ESMPs and C-ESMPs.</p>
<p>ESS6: Biodiversity Conservation and Sustainable Management of Living Natural resources.</p> <p>The Objectives of ESS 6 are: To protect and conserve biodiversity and habitats; To apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity; To promote the sustainable management of living natural resources; To support livelihoods of local communities, including Indigenous Peoples, and inclusive economic development, through the adoption of practices that integrate conservation needs and development priorities.</p>	<p>The Federal EIA Proclamation no.299/2002 has defined the terms “Environment” and “Impact” broadly to include all forms of habitats, biodiversity, heritage and ecosystems. "Environment" means the totality of all materials whether in their natural state or modified or changed by human; their external spaces and the interactions which affect their quality or quantity and the welfare of human or other living beings, including but not restricted to, land atmosphere, whether and climate, water, living things, sound, odor, taste, social factors and aesthetics. "Impact" means any change to the environment or to its component that may affect human health or safety, flora, fauna, soil, air, water, climate, natural or cultural heritage, other physical structure, or in general,</p>	<p>The requirements of ESS6 are broadly addressed through the EIA process.</p> <p>ESS6 categorizes habitats in three main group, namely <i>Natural</i>, <i>Modified</i>, and <i>Critical</i> habitats, and provides conditions where projects will not be implemented in these habitats. In the national policies, strategies, and legislations, ecosystems are defined considering altitudes, specific flora, and fauna presence.</p>	<p>The application of EES6 to bridge the gap and categorize habitats and requirements for projects to be implemented in these habitats.</p> <p>Measures and actions developed to assess and manage subproject specific biodiversity risks and impacts as outlined in the ESMF and subsequent sub-project ESMPs.</p>

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<p>The ESS is relevant due to the Project’s public works that may have impacts on biodiversity.</p>	<p>subsequently alter environmental, social, economic or cultural conditions.</p> <p>The impact of a project shall be assessed on the basis of the size, location, nature, cumulative effect with other concurrent impacts or phenomena, trans regional effect, duration, reversibility or irreversibility or other related effects of the project. The EIA report is required to contain information on the characteristics and duration of all the estimated direct or indirect, positive or negative impacts, as well as measures proposed to eliminate, minimize, or mitigate negative impacts.</p>	<p>EA for projects implemented in these ecosystems are broadly addressed through the general EIA process rather than specific ecosystem requirements.</p>	
<p>ESS7: Indigenous Peoples/Sub-Saharan Historically Underserved Traditional Local Communities (IPSAHUTLC)</p> <p>The Objectives of ESS 7 are: To ensure that the development process fosters full respect for the human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods of IPSAHUTLC; To avoid adverse impacts of projects on IPSAHUTLC, or when avoidance is not possible, to minimize, mitigate and/or compensate for such impacts; To promote sustainable development benefits and opportunities for IPSAHUTLC in a manner that is accessible, culturally appropriate and inclusive; To improve project design and promote local support by establishing and maintaining an ongoing relationship based on meaningful consultation with the IPSAHUTLC affected by a project throughout the project’s life-cycle; To obtain the Free, Prior, and Informed Consent (FPIC) of affected</p>		<p>There are gaps in the definition of Indigenous Peoples between the national system and ESS7</p>	<p>A Social Assessment has defined groups in Ethiopia that come under ESS7 (see SA)</p>

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<p>IPSAHUTLC in the three circumstances described in this ESS; To recognize, respect and preserve the culture, knowledge and practices of IPSAHUTLC, and to provide them with an opportunity to adapt to changing conditions in a manner and in a timeframe acceptable to them.</p> <p>The Project may cover areas with people identified as IPSAHUTLC.</p>			
<p>ESS8: Cultural Heritage</p> <p>The Objectives of ESS 8 are: To protect tangible and intangible cultural heritage from the adverse impacts of project activities and support its preservation; To address cultural heritage as an integral aspect of sustainable development; To promote meaningful consultation with stakeholders regarding cultural heritage; To promote the equitable sharing of benefits from the use of cultural heritage.</p> <p>The public works planned under the Project may lead to Chance Finds.</p>	<p>As described above in ESS6 the term “Impact” is defined broadly by the EIA proclamation. The definition reflects the kind of adverse impacts a project proponent is required to assess which includes any change to the environment or to its component that may affect flora, fauna, natural or cultural heritage, or in general, subsequently alter environmental, social, economic or cultural conditions. Thus, the Federal proclamation on EIA has provisions by which it considers the issues of cultural resources.</p> <p>Article 41 of Proclamation No. 209/2000 on research and conservation of cultural heritage also contains the measures that should be taken during chance finding of heritages.</p>	<p>Though natural and cultural heritage is required to be included during the EIA process, the preparation of a Cultural Heritage Management Plan (CHMP) as indicated in the ESF is not required by the national EIA law.</p>	<p>The application of ESS8 requirement for a CHMP is advisable when appropriate.</p>
<p>ESS10: Stakeholder Engagement and Information Disclosure</p> <p>The Objectives of ESS 10 are: To establish a systematic approach to stakeholder engagement that will help borrowers to identify stakeholders and build and maintain a constructive relationship with them, project-affected parties.; To assess the level of stakeholder interest and support for the project and to enable stakeholders’ views to be considered in project</p>	<p>Article 15 of the EIA Proclamation requires public participation / consultation during EIA study process and public disclosure of EIA reports.</p> <p>Current practice also shows public consultations are carried during EIA studies and minutes of consultation produced. Incorporation of the views and concerns of stakeholders into the EIA report usually carried out.</p>	<p>The stakeholder and public consultations requirement are focused on initial EIA study phase and do not continue through the project lifecycle as required by ESS10. Thus, preparation of the SEP is not required by the EIA proclamation.</p>	<p>The application of ESS10 requirement for a SEP is advisable to continue engagement of stakeholders during project implementation and beyond when appropriate.</p>

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<p>design and environmental and social performance; To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them; To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format; To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow borrowers to respond to and manage such grievances.</p>		<p>Establishing GRM to address public concerns is also not required by the EIA proclamation.</p>	
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### 4. Environmental and Social Risk Classification

The environmental and social risk classification for the project is *Moderate*. The project's environmental risk rating is moderate at this stage. The potential environmental risks and impacts are mainly associated with funding for the rehabilitation and upgrading of competitively selected polytechnics to strengthen training programs in priority sectors and procurement and use of modern e-learning technologies/equipment under Component 1. Accordingly, the potential environmental risks and impacts include pollution due to potential generation of noise, dusts, solid and liquid wastes and associated disposal issues (which could result in air, soil and water pollution), fire hazards, and inefficient use of natural resources including energy, water and raw materials related to the civil works of rehabilitation and upgrading of learning/training institutions. Also, there are e-waste issues and related pollution of soil, water and air associated with provision of modern technologies; and occupational health and safety (OHS) concerns (injury/death, fire hazards) related to all components of the project. There are also potential community health and safety risks and impacts including exposure to project-related pollution, communicable diseases, traffic and road safety risks, and hazardous materials among others.

Though the project will not have any physical works under Components 2 and 3, any environmental and OHS considerations related to the activities of both components will be managed through the incorporation of aspects of the ESF/ESSs, WBG General EHS Guidelines and GoE's policies and laws in terms of reference (TOR) and the review of draft outputs accordingly in a manner acceptable to the Bank and the GoE. Overall, the potential environmental risks and impacts of the project are site-specific, mostly temporary, reversible, and mitigated through the application of the WB ESF/ESSs and GoE's requirements throughout the project period.

MoLS was established very recently, and its institutional capacity including required capacity building and training for managing the E&S risks and impacts of the project may need to be supported.

The social risk rating of the Project is *moderate*. The social risks of the Project are related to the potential risk of inadequate inclusion of vulnerable or marginalized populations and Historically Underserved Peoples, Persons with Disabilities (PWD), Internally Displaced People (IDPs), etc., including training and/or employment opportunities. Given the Project's objective to work with women and girls, there is potential risk of SEA or SH of women and/or girls in the TVETs, small businesses or small-scale civil works. The Project contains minimal construction works, primarily rehabilitation of existing facilities and there will be no land acquisition or displacement impacts are anticipated. Other anticipated adverse social impacts may relate to weak stakeholder consultation and participation/engagement due to the instability in the country, lack of a functional grievance mechanism, potential risks for the workforce related to labor and working conditions and community health and safety aspects and limited experience of MoLS in environmental and social risk managements, particularly in regard to ESF requirements. The project implementation will cover all regions of Ethiopia,

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including Emerging Regions such as Somali, Afar, Benishangul- Gumuz, Gambella and pastoralists in parts of Oromiya and SNNPR that are recognized as Historically Underserved Peoples (HUP), that fulfill the definition for ESS 7- Indigenous People. As a nationwide project, its activities will be implemented in polytechnics located in regions prone to instability and conflict such as Tigray, Amhara, Benishagul-Gumuz, Gambella and parts of Oromiya. Hence, the current instability and political situation in the country will have a strong impact on the project implementation. Taking into account the potential social risks, the project has to establish clear targeting criteria for the identification of beneficiaries. Thus, proper screening and selection of beneficiaries will be conducted during project implementation.

The Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH) risk rating is *Substantial*: The project targets rehabilitation and upgrading of polytechnic colleges. As a result, there will be proximity between workers and students in the colleges to be rehabilitated and upgraded. Generally, in Ethiopia GBV, in particular SEA/SH in and around colleges is a concern as it adversely affects girls’ and boys’ attendance and learning outcomes. Hence, the project will escalate the SEA/SH among students in colleges particularly on girls and vulnerable children.

The preliminary GBV risk assessment established the risks of SEA/SH associated with the context in the project area is rated as *Substantial*. Key risks reflect the general vulnerability of target population, an increase in different forms of GBV in colleges and schools, including physical and sexual violence; increased risks of sexual exploitation and abuse by teachers; interruption of schooling and increases in early marriage. Given the vulnerability of the target population, the project will adopt a robust approach to SEA/SH risk management corresponding with the Substantial risk level. A SEA/SH Risk Assessment and SEA/SH Response Action Plan have been prepared.

*Table 3. Potential E&S Risks and Impacts and Mitigation Measures*

Component and Subcomponent	Activities	Potential Risks and Impacts	Mitigation Measures
<b>Component 1: Strengthening public polytechnic colleges for improved labor market</b>	Developments of Strategic Investment Plan (SIP)	<i>Environmental Risks:</i>  Noise and vibration linked to machinery (ESS4 and ESS2)	Select equipment with lower sound power levels
	Assessments and capacity development		Install suitable mufflers on engine exhausts and compressor components in cases where the service provider uses generators  Provide fit to work PPEs (ear plug/earmuffs) for all workers involved in the areas with elevated noise levels  Install acoustic enclosures and/or use vegetation as sound buffer for equipment casing radiating noise i.e. generator

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<p>Introducing training programs that meet the needs of the industry, Training of Trainers (ToT)</p> <p>Upgrading existing college facilities and equipment</p> <p>Tracer studies</p> <p>Development of partnership agreements with industry</p> <p>Introducing occupations that directly impact environmental challenges such as wind turbine installations, solar panels, environmental sustainability, eco-tourism, renewable energy, waste management etc.</p> <p>Introduce systematic revision, innovation and digital elements of all curricula and qualifications</p>		<p>The contractor should use equipment that is/are in good working condition and periodically maintained</p>
	Occupational Health and Safety risks (injury, death, fire hazards) (ESS2)	<p>Train workers appropriately on OHS risks, hazards and safe handling of equipment and procedures, based on EHS Guidelines on OHS<sup>1</sup></p> <p>Provide appropriate PPE, continuous reminders to use PPE, use of signage and continuous supervision, based on EHS Guidelines on OHS</p> <p>Communicate and implement workers' GRM</p> <p>Develop and implement C-ESMP including OHS</p>
	Inadequate PPE (ESS 2)	<p>Provide appropriate PPE, continuous reminders to use PPE, use of signage and continuous supervision of availability and use of PPE, based on EHS Guidelines on OHS</p> <p>Communicate and implement GRM/workers' GRM</p>
	Lack of understanding of EHS risks and impacts and of mitigation measures leads to accidents and health impacts (ESS2)	<p>Assess capacity of construction company on EHS/OHS</p> <p>Train workers on EHS/OHS through toolbox talks</p>
	Air pollution through dust and emissions (ESS3)	<p>High level maintenance of the vehicles to reduce the vibrations</p> <p>Selecting equipment with lower sound power levels</p> <p>Installing suitable mufflers on engine exhausts and compressor components</p> <p>Equipment casing</p> <p>Planning activities in consultation with local communities so that activities with the greatest potential to generate noise are planned during periods of the day that will result in least disturbance</p>
	Soil and water contamination and degradation of water bodies caused by discharge of waste (ESS3)	<p>Untreated waste effluents from the construction sites shall not be released into drinking water sources, cultivation fields, irrigation channels or critical habitats.</p> <p>GRM in place</p>
	Pollution of local surface water sources (ESS3)	<p>Ensure that design of the facility and appropriate construction planning and construction activities do not cause any soil erosion or degradation.</p>

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			Spoils and excess soil if generated will be disposed of appropriately. Borrow areas will be dressed to minimize safety hazards and soil erosion
		Generation of domestic waste (ESS3)	Institute good housekeeping and operating practices Evaluation of waste production processes and identification of potentially recyclable materials Enable appropriate collection of domestic waste and disposal at predetermined location.
		Generation of construction waste (cement mixing areas, metal, wood and paint residues, diesel and other residues) (ESS3)	Implement Waste Management Plan (see Annex 3)  Contractor to prepare C-ESMP  Employ technologies that are least polluting and technically feasible  Recycling of waste effluents will be carried out as far as possible and practical  It will be ensured that the wastes are not released into any drinking water source, cultivation fields or critical habitat  Waste effluents will be not be released into irrigation channels – based on EHS Guidelines on Wastewater and Ambient Water Quality  All wastewater discharges are to meet applicable country laws/regulations and WB Environmental, Health and Safety Guidelines (EHSGs) (General and sector-specific)
		Cutting of trees for use as construction material (ESS6)	Avoid the destruction of plants and minimize the clearance of vegetal coverage
		Use of limited or sensitively located local construction material, such as aggregate and timber (ESS3 and ESS6)	Ensure re-vegetation after completion of construction
		TA may pose downstream environmental risks, such as fostering of conflict among students, lack of environmental protection and waste management, etc... (ESS3)	Include all relevant E&S provisions into every Request for Proposals or TOR, and in every contract
		Vehicular traffic during facility rehabilitation and operation may potentially cause congestion on the local routes, generate noise, and pose safety hazards for the local	Prepare traffic management plan, based on EHS Guidelines on Traffic Safety  Hold Community consultations before the construction

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	population, particularly for children and elderly people (ESS4)	<p>Safety signage will be erected at appropriate places</p> <p>Safe driving practices will be promoted among the drivers, including training to drivers, limiting of max. speed</p> <p>Publicize hotline numbers for GRM</p> <p>GRM will be put in place</p>
	Exposure to asbestos and led-based paint (ESS2 and ESS3)	<p>Include experienced contractor (licensed) for asbestos removal</p> <p>Ensure that removal works do not result in unacceptable risks for workers and community</p> <p>After removal works, ensure validation of area by licensed individual before allow workers or community to enter</p> <p>Site workers to follow instructions of PM and wear appropriate PPE</p> <p>Isolate the area and limit access until area declared safe</p> <p>Dispose asbestos in lawful locations</p>
	Injuries from use of the facilities (ESS4)	<p>Ensure design of facilities is appropriate</p> <p>Install safety signage where applicable</p>
	Risks associated with hiring security personnel (ESS4)	Implement the SRAMP
	E-Waste generation (ESS3)	<p>Implement a safe disposal procedure for broken, end of life solar panels (to be installed on top of certain infrastructures)</p> <p>Prepare and implement subproject specific E-Waste Management Plan</p>
	Fire Hazards (ESS4)	<p>Identify fire risks and ignition sources</p> <p>Install measures needed to limit fast fire and smoke development. These issues include:</p> <ul style="list-style-type: none"> <li>• Fuel load and control of combustibles</li> <li>• Ignition sources</li> <li>• Interior finish flame spread characteristics</li> <li>• Interior finish smoke production characteristics</li> <li>• Human acts, and housekeeping and maintenance</li> <li>• Life and fire safety design criteria for all existing buildings should incorporate all local building codes and fire department regulations.</li> </ul> <p>Install detection and alarm systems</p>

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		Inefficient use of natural resources including energy, water and raw materials (ESS3)	Implement measures for efficient consumption of energy, wwater and raw materials Prepare reosource efficiency plan for construction and for operational phases
		Exposure to infectious diseases (ESS4)	Provide awareness to local communities through stakeholder engagement  Community awareness on STDs  Disclose to communities local workforce content requirement  Maximize the use of local suppliers (for food, water, services etc.)  Follow hygiene prescriptions for infectious disease
		Construction and structural safety risks (ESS4)	Ensure infrastructure rehabilitated is designed and modelled on the Safe School Standards, including provision of adequate potable water and sanitation in schools for children and teachers
		Generation of wastewater during operational phase (ESS3)	Waste effluents will be not be released into irrigation channels – based on EHS Guidelines on Wastewater and Ambient Water Quality
		Poor ambient air quality within classrooms (ESS4)	Ensure indoor air quality (IAQ) is in compliance with WHO guidelines
		Safety risks to students, teachers and facility administration staff due to man-made disasters (fire, explosions, inadequate structural or related safety of buildings, etc.) (ESS4)	Ensure infrastructure rehabilitated is designed and modelled on the Safe School Standards
		Risks from natural hazards (flooding and lack of water due to droughts) during operation	Ensure trucking of water during times of drought  Prepare a flood response plan for operations
		<b>Social Risks:</b>  Lack of understanding of risks and impacts of sub-projects through limited experience with ESF (ESS1)	Screen each subproject prior to implementation
		Violations of labor and working conditions (ESS2)	Ensure Project GRM are accessible  Introduce transparent procedures for hiring and advertise job opportunities widely  Provide workers' GRM

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	<p>Risk of Child labor (ESS2)</p> <p>Risk of Forced Labor (ESS2)</p>	<p>Comply with minimum age set for all types of work (in compliance with national laws and ESS2) and document age of workers upon hiring</p> <p>Verify age of workers with communities where required</p> <p>Conduct a track record search of the contractors at the bidding process (record of health and safety violations, fines, consult public documents related to workers' rights violations, GBV/SEA/SH issues etc.)</p>
	<p>Risks of labor influx (ESS2 and ESS4)</p>	<p>Set up local workforce minimum content for the contractors</p> <p>Disclose to communities local workforce content requirement</p> <p>Investigate possibility of providing training to local communities on general jobs during the planning phase</p> <p>Maximize the use of local suppliers (for food, water, services etc.)</p>
	<p>SEA/SH for project workers, project-affected persons and during operational phases (ESS2 and ESS4)</p>	<p>Provide awareness session</p> <p>Every worker to sign Code of Conduct (CoC)</p> <p>Provide training on CoC</p>
	<p>Bias in the selection of institutions and trainees/beneficiaries (ESS4)</p>	<p>Transparency and communication/public disclosure of beneficiary selection criteria (SEP)</p> <p>Communicate and implement GRM</p>
	<p>Discriminatory practices in accessing project services and benefits (ESS4)</p>	<p>Transparency and communication/public disclosure of beneficiary selection criteria (SEP)</p> <p>Communicate and implement GRM</p>
	<p>Ethnic tensions among project workers and between project workers and communities (ESS4)</p>	<p>Transparency and communication of beneficiary selection criteria (SEP)</p> <p>Communicate and implement GRM</p> <p>Enforce CoC at workplace</p>
	<p>Violent attacks and conflict (ESS4)</p>	<p>Conduct local social and conflict assessment prior to engagement</p> <p>Implement SRAMP</p>

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		Lack of involvement of Historically Underserved People (ESS7)	Implement SEP Establish clear criteria for identification of beneficiaries Ensure GRM are available for Historically Underserved People
		Lack of adequate budgets for O&M (ESS4)	Assess available O&M budget prior to commencement of work
		Destruction of cultural heritage through chance finds (ESS8)	Implement chance find procedures (see Annex 2)
		Lack of a functional to grievance redress mechanisms (ESS10)	Implement GRM Implement Workers' GRM
		Inadequate inclusion of vulnerable groups in project activities especially training and/or employment opportunities (ESS10)	Implement SEP
<b>Component 2: Skills for Jobs</b>	Provision of large-scale short-term training to unemployed youth	<b>Environmental Risks:</b> TA may pose downstream environmental risks, such as lack of environmental protection and waste management, etc... (ESS3)	Include all relevant E&S provisions into every Request for Proposals or TOR, and in every contract
	Performance-based contracting of both public and private training providers industry-certified market-demanded short term (up to 12 months) skills programs, relevant for wage employment and self-employment	<b>Social Risks:</b> SEA/SH for project workers, project-affected persons and during operational phases (ESS2 and ESS4)	Provide awareness session Every worker to sign Code of Conduct (CoC) Provide training on CoC
		Bias and corruption in the selection of institutions and trainees/beneficiaries (ESS4)	Transparency and communication/public disclosure of beneficiary selection criteria (SEP) Communicate and implement GRM
		Discriminatory practices in accessing project services, and benefits (ESS4)	Transparency and communication/public disclosure of beneficiary selection criteria (SEP)
		Lack of access to grievance redress mechanisms (ESS10)	Communicate and implement GRM Implement GRM Implement Workers' GRM
		Inadequate stakeholder engagement (ESS10)	Implement SEP

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	Provision of full/partial fee subsidy and stipends to about 4000 students		
<b>Component 3: System Strengthening</b>	Creating a skills management information system And conducting tracer studies	<b>Environmental Risks:</b> TA may pose downstream environmental risks, such as lack of environmental protection and waste management, etc... (ESS3)	Include all relevant E&S provisions into every Request for Proposals or TOR, and in every contract
	Establishing formal coordination mechanisms that bring together employers, the public sector (e.g., Ministry of Education, Ministry of Industry), and training institutions	<b>Social Risks:</b> Lack of understanding of risks and impacts of sub-projects (ESS1)	Screen each subproject prior to implementation
		SEA/SI for project workers and project-affected persons (ESS2 and ESS4)	Provide awareness session Every worker to sign Code of Conduct (CoC) Provide training on CoC
	Preparation of policy framework and governance, building the capacity of the ministry, regions, and woredas	Lack of access to grievance redress mechanisms (ESS10)	Implement GRM Implement Workers' GRM
		Exclusion of vulnerable groups in project activities and consultations (ESS10)	Implement SEP Identify minority, marginalized and disadvantaged communities in project sphere of influence. Establish and maintain continuous liaison with the communities including marginalised groups to sensitize them on the project objectives and design. Use innovative communication means to reach the communities with information on the project. Establish GRM structures in the communities and sensitize the communities on the project GRM
		Violent attacks and conflict (ESS4)	Conduct local social and conflict assessment prior to engagement Implement SRAMP
		Inadequate stakeholder engagement due to ongoing conflict (ESS10)	Implement SEP

## 5. Procedures and Implementation Arrangements

### Environmental and Social Risk Management Procedures

The environmental and social risk management procedures will be implemented through the Project's subproject selection process. In summary, the procedures aim to do the following:

Table 4 Project Cycle and Management Procedures

Project Stage	E&S Stage	E&S Management Procedures
<b>[a. Assessment and Analysis:</b> Subproject identification	Screening	<ul style="list-style-type: none"> <li>▪ During subproject identification, ensure subproject eligibility by referring to the <i>Exclusion List in table</i> below.</li> <li>▪ For all activities, use the <i>Screening Form in Annex 1</i> to identify and assess potential environmental and social risks and impacts, and identify the appropriate mitigation measures for the subproject.</li> <li>- Identify the documentation, permits, and clearances required under the government's Environmental Regulation.</li> </ul>
<b>b. Formulation and Planning:</b> Planning for subproject activities, including human and budgetary resources and monitoring measures	Planning	<ul style="list-style-type: none"> <li>- Based on <i>Screening Form</i> adopt and/or prepare relevant environmental and social procedures and plans.</li> <li>- For activities requiring Environmental and Social Management Plans (ESMPs), submit the first 5 ESMPs for prior review and no objection by the World Bank prior to initiating bidding processes (for subprojects involving bidding processes) and/or launching activities (for subproject activities not subject to bidding).</li> <li>- Ensure that the contents of the ESMPs are shared with relevant stakeholders in an accessible manner and consultations are held with the affected communities in accordance with the SEP.</li> <li>- Complete all documentation, permits, and clearances required under the government's Environmental Regulation.</li> <li>- Train staff responsible for implementation and monitoring of plans.</li> <li>- Incorporate relevant environmental and social procedures and plans into contractor bidding documents; train contractors on relevant procedures and plans.</li> </ul>
<b>c. Implementation and Monitoring:</b> Implementation support and	Implementation	<ul style="list-style-type: none"> <li>- Ensure implementation of plans through site visits, regular reporting from the field, and other planned monitoring.</li> <li>- Track grievances/beneficiary feedback.</li> <li>- Continue awareness raising and/or training for</li> </ul>

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continuous monitoring for projects		relevant staff, volunteers, contractors, communities.
<b>d. Review and Evaluation:</b> Qualitative, quantitative, and/or participatory data collection on a sample basis	Completion	<ul style="list-style-type: none"> <li>- Assess whether plans have been effectively implemented.</li> <li>- Ensure that physical sites are properly restored.</li> </ul>

### Subproject Assessment and Analysis – E&S Screening

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

Subprojects to be excluded from financing include the following:

1. Activities classified as ‘high’ and ‘substantial’ risk
2. Activities that may cause long term, permanent and/or irreversible (e.g. loss of major natural habitat) impacts
3. Activities that have high probability of causing serious Health and safety adverse effects to human health and/or the environment
4. Activities that may have significant adverse social impacts and may give rise to significant conflict
5. Activities that may affect lands or rights of indigenous people or other vulnerable minorities,
6. Activities that may involve permanent resettlement or land acquisition
7. Activities that may have risk/impact on cultural heritage, these and other excluded activities set out in the ESMF of the Project.

As a second step, the PITS will use the *E&S Screening Form in Annex 1* to identify and assess relevant environmental and social risks specific to the activities and identify the appropriate mitigation measures. The *Screening Form* lists the various mitigation measures and plans that may be relevant for the specific activities (such as the Environmental and Social Codes of Practice, the Environmental and Social Management Plan, the Labor Management Procedures, Chance Find Procedures, etc.)

The PITS will also identify the documentation, permits, and clearances required under the government’s Environmental Regulation.

### Subproject Formulation and Planning – E&S Planning

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Based on the process above and the Screening Form, the PITS will adopt the necessary environmental and social management measures already included in the Annexes of this ESMF (such as the LMP, etc.) or develop relevant site-specific environmental and social management plans.

If site-specific ESMPs are necessary, the PITS will prepare these ESMPs and other applicable documents as needed. The PITS will provide approval and compile ESMPs and other applicable forms. The contents of the ESMPs will be shared with relevant stakeholders in an accessible manner, and consultations will be held with the affected communities on the environmental and social risks and mitigation measures. If certain subprojects or contracts are being initiated at the same time or within a certain location, an overall ESMP covering multiple subprojects or contracts can be prepared. Some moderate risk subprojects may also benefit from the preparation of a site-specific environmental and social assessment prior to the preparation of an ESMP.

The first five ESMPs will also be submitted to the World Bank for prior review and no objection. After this first 5, the World Bank and the PITS will reassess whether prior review is needed for further ESMPs or a certain category of ESMPs (for example, for activities exceeding a certain budget, for certain types of activities).

The PITS will also complete the documentation, permits and clearances required under the government's Environmental Regulation before any project activities begin.

At this stage, staff who will be working on the various subproject activities should be trained in the environmental and social management plans relevant to the activities they work on. The PITS should provide such training to field staff.

The PITS should also ensure that all selected contractors, subcontractors, and vendors understand and incorporate environmental and social mitigation measures relevant to them as standard operating procedures for civil works. The [responsible party in the implementing agency] should provide training to selected contractors to ensure that they understand and incorporate environmental and social mitigation measures; and plan for cascading training to be delivered by contractors to subcontractors and vendors. The PITS should further ensure that the entities or communities responsible for ongoing operation and maintenance of the investment have received training on operations stage environmental and social management measures as applicable.

### **Implementation and Monitoring – E&S Implementation**

During implementation, the PITS will conduct regular monitoring visits. Describe the mechanisms, responsible parties, and the frequency for project supervision. Consider whether mobile devices can be used for monitoring of projects with numerous subproject locations. If there are contractors implementing subproject activities, the contractors will be responsible for implementing the mitigation measures in the E&S risk management documents, with PITS oversight.

## **Environmental & Social Management Framework (ESMF)**

The responsible parties working to implement the project will ensure that monitoring practices include the environmental and social risks identified in the ESMF and will monitor the implementation of E&S risk management mitigation plans as part of regular project monitoring.

At a minimum, the reporting will include (i) the overall implementation of E&S risk management instruments and measures, (ii) any environmental or social issues arising as a result of project activities and how these issues will be remedied or mitigated, including timelines, (iii) Occupational Health and Safety performance (including incidents and accidents), (iv) community health and safety, (v) stakeholder engagement updates, in line with the SEP, (vi) public notification and communications, (vii) progress on the implementation and completion of project works, and (viii) summary of grievances/beneficiary feedback received, actions taken, and complaints closed out, in line with the SEP. Reports from the local levels will be submitted to the [responsible party in the implementing agency] at the national level, where they will be aggregated and submitted to the World Bank on a quarterly [or biannual] basis.

Throughout the Project implementation stage, the PITS will continue to provide training and awareness raising to relevant stakeholders, such as staff, selected contractors, and communities, to support the implementation of the environmental and social risk management mitigation measures. An initial list of training needs is proposed below.

The PITS will also track grievances/beneficiary feedback (in line with the SEP) during project implementation to use as a monitoring tool for implementation of project activities and environmental and social mitigation measures.

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

### **Review and Evaluation – E&S Completion**

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

### **Technical Assistance Activities**

## Environmental & Social Management Framework (ESMF)

The PITS will ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with Terms of Reference acceptable to the Bank, that are consistent with the ESSs. They will also ensure that the outputs of such activities comply with the Terms of Reference.

### Implementation Arrangements

The Project will be implemented by MoLS. Established in 2021, MoLS is tasked with leading the jobs, labor and skills development sectors under the respective State Ministers, by bringing federally mandated institutions under its purview. Public polytechnics, other than the Federal TVET Institute and the College of Agriculture and Tourism Training Institute, are managed by their respective regional TVET bureaus.

Guidance for project implementation. The PSC will comprise of all three State Ministers of MoLS, representatives from Industry (Chambers of Commerce), Ministry of Finance, Ministry of Education, Ethiopian Disaster Risk Management Commission selected regional TVET bureaus, private sector training provider representatives and select PTC principals. The PSC will provide strategic direction and guidance on high-level risk management and decision-making on project objectives. This inclusive body will be crucial for promoting dialogue, consensus-building, and joint decision-making on key aspects of the TVET system. The PSC will also provide a platform for collaboration, management, troubleshooting and technical support for implementation of the Project.

MoLS will establish a Delivery Unit (DU) within MoLS that will be responsible for coordinating implementation of the components. The DU will coordinate implementation, build capacity of Ministry teams for implementation, facilitate support for compliance with environment and social requirements for the Project, collect and compile data from the project results framework, and manage communications for the Project. Project Implementation Teams (PITs) will be established for each of the PTCs. These PITs will comprise of a Coordinator, Financial Management (FM), Procurement and Social and Environment Specialists and other technical staff as needed.

The table below summarizes the roles and responsibilities regarding the implementation arrangements for **environmental and social management**.

*Table 5 Implementation Arrangements*

Level/ Responsible Party	Roles and Responsibilities
National	<ul style="list-style-type: none"> <li>- Provide support, oversight, and quality control to field staff working on environmental and social risk management.</li> <li>- Collect, review, and provide quality assurance and approval to Screening Forms and ESMPs as relevant. Keep documentation of all progress.</li> <li>- Oversee overall implementation and monitoring of environmental and social mitigation and management activities, compile progress reports from local levels/subprojects, and report to the World Bank on a quarterly [or biannual] basis.</li> </ul>

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	<ul style="list-style-type: none"> <li>- Train central and field staff and contractors who will be responsible for implementing the ESMF.</li> <li>- If contracting is managed centrally, ensure that all bidding and contract documents include all relevant E&amp;S management provisions per screening forms, ESMPs.</li> </ul>
Regional/local field staff	<ul style="list-style-type: none"> <li>- Ensure project activities do not fall under the Negative List. Fill out Screening Forms for relevant subproject activities and submit forms to the national level.</li> <li>- If relevant, complete site-specific ESMPs for subproject activities and submit forms to the national level.</li> <li>- Oversee daily implementation and monitoring of environmental and social mitigation measures, and report progress and performance to the national level on a monthly basis.</li> <li>- Provide training to local contractors and communities on relevant environmental and social mitigation measures, roles, and responsibilities.</li> <li>- If contracting is managed regionally, ensure that all bidding and contract documents include all relevant E&amp;S management provisions per screening forms, ESMPs.</li> </ul>
Local contractors	<ul style="list-style-type: none"> <li>- Comply with the Project's environmental and social mitigation and management measures as specified in ESMPs, and contract documents, as well as national and local legislation.</li> <li>- Take all necessary measures to protect the health and safety of workers and community members, and avoid, minimize, or mitigate any environmental harm resulting from project activities.</li> </ul>

## Environmental & Social Management Framework (ESMF)

### Capacity Development and Training Schedule

Capacity building and training will be provided to the DU/PITS and their E&S staff, and contractors and their project workers; and staff of the TVETs, to ensure the project is implemented in compliance with the ESCP and this ESMF.

Trainings will be based on the results of a capacity assessment that will be undertaken in advance. The PCU/ PITS will administer the capacity assessment of its contractors.

**Table 6. Capacity development and training plan**

Objectives	Issues for engagement	Method of engagement	Stakeholders/target population and area	Responsible entity	Time frame	Budget in USD
WB ESF	ESF	Training	DU staff	WB	At commencement of activities	WB staff time
Stakeholder mapping and engagement	SEP	Meeting	DU and PITS staff Contractors TVET staff	DU	Prior to commencement of sub-projects	E&S Specialists staff time Meeting costs
The ESMF and specific aspects of environmental and social assessment including preparation of E&S instruments such as ESMPs, SEA/SH Prevention and Response Action Plans, SRAMP	ESMF and E&S processes	Training	DU and PITS staff Contractors TVETs	DU	Prior to commencement of sub-projects	E&S Specialists staff time Meeting costs
OHS issues (such as OHS measures in rehabilitation works)	OHS risk management	Meeting at sub-project site	DU and PITS staff especially E&S staff, contractors and workers	PITS	Prior to construction works	E&S Specialists staff time Meeting costs Staff travel costs
GRM	GRM	Meeting: Plenary discussion	Contractors TVET Communities	PITS	Continuous	E&S Specialists staff time

## Environmental & Social Management Framework (ESMF)

		with questions and answers, information materials, website				Meeting costs Staff travel costs
SEA/SH Prevention and Response Action Plan	GBV risks	Meetings at site	Contractors, Workers - TVET staff	DU / PITS	Prior to commencement of sub-projects	GBV Specialists staff time Meeting costs Staff travel
Specific aspects of environmental and social assessment	E&S Risks	Focus group discussions, site visits and interviews	PITS TVETs Contractors	PITS	At commencement of sub-project	E&S Specialists Meeting costs Staff travel
Community Health & Safety	E&S risks	Meetings	Community members at site locations	PITS	Throughout engagement	E&S Specialists Meeting costs Staff travel
Proper use of Personal Protective Equipment (PPE)	OHS	Meetings	Project workers	PITS / DU	Throughout works	E&S Specialists Meeting costs Staff travel

### Resources and Budget

The below table presents the estimated costs for the implementation of the ESMF. It excludes costs for the implementation of the SEP and the SRAMP.

Table 7. Estimated Costs of ESMF implementation

	Required Resources	USD
<b>E&amp;S Risk Management Unit / PCU – Monitoring of E&amp;S</b>		
1.	Human Resources:	
	1 Social Specialist (100%)	Incl. in PCU staff costs
	1 Environmental Specialist (100%)	Incl. in PCU staff costs

## Environmental & Social Management Framework (ESMF)

2.	Logistics / Travel for monitoring and supervision	200,000
<b>TVET level PITS risk management</b>		
3.	Human Resources:	
	1 x Social Specialist (100%)	Incl. in PITS staff costs
	1 x Environmental Specialist (100%)	Incl. in PITS staff costs
4.	Logistics / Travel for monitoring and supervision x XX	50,000
<b>Grievance Redress Mechanism</b>		
5.	Outreach material	50,000
6.	Travel costs	100,000
7.	Meeting costs	50,000
<b>Implementation E&amp;S of Risk Mitigation Measures</b>		
8.	Preparation of ESMPs	100,000
9.	Contractor E&S staff	Incl. in contractor budget
10.	Risk Mitigation Measures (estimates based on other project implementation)	500,000
11.	Trainings and Capacity Building	200,000
12.	SEA/SH Action Plan implementation	500,000
	<b>TOTAL</b>	<b>1,750,000</b>

## 6. Stakeholder Engagement

A series of consultations were undertaken by MOLS and the World Bank with different stakeholders, including government counterparts. Consultations were held between May-June 2022. During this time, stakeholder consultation were undertaken with employers, public and private training institutions, and development partners (see Annex 4 for a list of stakeholders) to discuss key Project outlines.

It was discussed that the Project should have an emphasis on system strengthening and should prioritize skills development for youth, Internally Displaced Persons (IDPs), Persons with Disabilities (PWDs), and other marginalized youth in Ethiopia. Stakeholders from polytechnics and TVET institutions agreed that improving the quality and relevance of TVET in partnership with the industry is critical to meeting the needs of the market and enhancing employability of the trainees. Stakeholders agreed that a competitive process will be used to select polytechnics across the country that will receive support. The selection would focus on equitable distribution of polytechnics and ensure inclusion of institutions in conflict-affected areas. Priority will be given to proposals that focus on creating strong linkages with employers, offering training in green skills, addressing training needs and employability of women and vulnerable groups, and strengthening soft skills among others. During initial discussions, it was suggested that the criteria should include aspects related to the government's priority sectors, emerging regions, the zoning exercise, green TVET and the capacity of the institutions. There was also a discussion on using weighted criteria to emphasize these priorities. There was agreement that an independent evaluation committee, comprising sector experts, employers and government officials, will evaluate proposals and select the polytechnics. Consultations further allowed identifying some of the current efforts by

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polytechnics and TVET institutions on improving inclusion with respect to gender, people with disabilities, refugees, and IDPs as well as climate-change adaptation and mitigation. Discussions with stakeholders further revealed the need to create a system that aggregates existing data sources and identify additional sources that can close the data gap on both the demand and supply of skills in Ethiopia. A skills analysis and forecasting system will be necessary to close the gaps between skills supplied by the TVET system and those demanded by the employers.

A further round of stakeholder consultations was undertaken in January 2023 in Addis Ababa. During the consultations it was agreed that the Project will prioritize skills development for women, IDPs, PWDs and other marginalized youth in Ethiopia. The proposed project will take a holistic approach to skills provision by addressing labor market skills requirements for foundational skills, soft skills and entrepreneurship skills in addition to technical skills.

Discussions with government counterparts confirmed the need to assess the existing Labor Management Information System to enhance, develop, or strengthen features and sub-component(s) to support skills demand analysis and forecasting. There was also agreement on the need to develop a skills module as part of the system. Furthermore, the importance of considering a special proposal window and targets for IDPs and PWDs was discussed.

Between November 2022 and January 2023, Focus Group Discussions (FGDs) were held with the Gender Directorate at MOLS on gender-related issues in regard to the Project. Results of the FGDs included that the leadership/management of the TVETs requires training in gender equality issues; career fairs at High Schools should be promoted again; the reputation of TVET needs to be improved; TVETs require vocational counselors to study the labor market and tracer studies to provide info on marketable opportunities, and help students choose their career; students require financial support; male students need to stop bullying female students in class (e.g., "you can't do this"); and TVETs require daycare facilities.

Representatives from MOLS indicated that there is an understanding that STEM can be hard for women, esp. heavy-duty mechanics, commercial vehicle driving – “male-dominated fields”. This can be overcome by changing this norm through setting a goal of increasing female enrollment in selected “male-dominated” fields from 5 percent to 30 percent. The main constraints for women are that they come with pre-conceived preferences of course choices -- IT, secretarial science; they are influenced by family and friends that discourage them from joining hard sciences; and during course selection, given limited time to decide, students do not have a chance to process info provided during orientation, to think and re-think. Most of the time they do not get the information needed for courses available and opportunities after. Actions that could be taken to overcome these concerns include: raise awareness. Provide info about “male-dominated” sectors and opportunities; invited families to colleges and take them to workshops – to see that other girls do mechanics; and instead of a one-day orientation and registration, make it a one-week orientation. Consultations also revealed that workplace harassment is a big issue as well – female students complain about this.

In January 2023 roundtables were organized at Polytechnics in some of the selected Project regions, including staff and students. Overall challenges that were named were the quality of

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training provided; the fact that there are no major industries or employers in the region and the machines and equipment are in poor state; the industry expects insurance from colleges during cooperative training for equipment damage; and there is limited participation of employers in the cooperative schemes.

A stakeholder consultation meeting was convened on 08 June - 21 June 2023 by selecting seven representative Polytechnic Colleges (PTC) among twenty two PTCs. The main issues covered during the consultation meeting were existing solid waste management, liquid waste management, OHS as well as E&S risk management capacities in the project implementing institutions, proposed institutional arrangements for project E&S management and flow of reporting, status and experience of conflict management, the role of the regional labor and skills bureaus, and receiving concerns, views and opinions of the stakeholders regarding any potential E&S risks of the proposed project.

Some participants expressed that there is need to learn from similar projects managed at the federal level, such as the East African Skills For Transformation and Regional Integration Project (EASTRIP). In EASTRIP projects, E&S specialists are assigned at federal level to support project implementation in all regions of beneficiary PTCs. Under such arrangements, the E&S staff at the PTC level conducts the E&S screening process, follow up and implements the monitoring activities.

Participants emphasized again the need to learn from other similar federal-managed projects implemented by the MoLS. It was stressed that the focal persons to be assigned at federal level will have to work in arranging with the polytechnic college level offices to work a grievance redress mechanism for the project to receive complaints. It was noted that the PTC focal persons should take the lead role in handling and addressing the complaints in collaboration with the woreda complaint handling offices.

During the stakeholder consultation meeting issues related with solid waste management and liquid waste management of the visited PTCs were also discussed. Some of the college representative said that these issues are of their concern and that the colleges are provided training for the past five years ago. Stakeholders indicated that there is a well-established organizational set-up to follow up and control the proper solid waste collection at the workshops, class rooms, offices and at the campuses. There is a program to create awareness on the principles of waste segregation into degradable organic and non-degradable materials, and for storing and recycling for reuse of the waste. Plastic materials are reused for different purpose by trainers and pieces of metallic materials are sold to scavengers. The remaining degraded solid waste materials are collected and transported by the municipality to a final disposal area. Some colleges burn them at the college campus.

Regarding liquid waste management, PTC staff indicated that there are no sewer networks in the college for liquid waste conveyance nor does a properly design treatment or disposal system for septic tank sludge exists. The onsite sanitation facilities of the colleges are emptied by vacuum truck and openly disposed in the peripheries of the towns on farmlands. The rented vacuum truck is used for dislodging domestic waste from septic tanks. In addition, the old vacuum truck is not

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able to meet the demand for toilet-emptying from residents. The colleges empty the waste once a year or once in two years.

The stakeholders also discussed issues related to OHS, child labour, and GBV. The participants explained that the visited polytechnic college enforces OHS at the workshops, offices and projects through the application of appropriate mechanisms. One of the PTC's motto is safety first. Trainers emphasize the use of personal protective equipment (PPE). For projects involving construction-related works, the PTCs have the experience in including OHS and Child labor prevention articles in the construction contract agreements and in enforcing those through supervision by the contractor at site level and relevant staff. It was also stated that OHS issues are usually included in the ESMPs of specific projects. GBV is usually addressed. It was explained by the participants that they prepare a Gender Action Plan for the colleges and its implementation is monitored by the gender focal persons assigned by the college.

The other issue discussed was in regard to institutional arrangements and E&S reporting mechanisms. The participants expressed that the PTC PITs in the EASE Project should send the E&S performance and monitoring reports to the MOLS DU, which will consolidate it and send to the the World Bank.

The stakeholders also shared experiences by discussing conflict sources related to training programs and management. Participants expressed that conflicts often emerge when trainees are selected for a course and most of trainees are focus to choose soft skills rather than hard skills. The college always made balance to distribute the trainees in soft skills and of hard skill course on the base of the interese of trainees and some times enforces the student to join to the hards skills program. This is a sources of conflict in the colleges. Such conflicts are usually managed by convincing the trainees, by involving school communities and other stakeholders in the conflict resolution process.

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## Annex 1: Environmental and Social Screening Report

The objective of this E&S screening is to assist in the evaluation of planned rehabilitation of infrastructure and equipment provision. The form is designed to place information in the hands of implementers and reviewers so that impacts and their mitigation measures, if any, can be identified and/or that requirements for further environmental impact assessment be determined.

The form contains information that will allow reviewers to determine the characterization of the prevailing local bio-physical and social environment with the aim to assess the potential impacts of the activities on this environment.

The form is completed by the respective PITS in coordination with engineers and E&S staff, after field visit and consultations with local authorities and community or TVETs in the respective subproject sites.

### IDENTIFICATION OF THE SUB-PROJECT

Name \_\_\_\_\_ of \_\_\_\_\_ sub-project \_\_\_\_\_  
Name of the region/community in which the subproject takes place \_\_\_\_\_  
Executing \_\_\_\_\_ agency \_\_\_\_\_

Name, job title, and contact details of the person responsible for filling out this form:

Name: \_\_\_\_\_  
Job title: \_\_\_\_\_  
Telephone numbers: \_\_\_\_\_  
E-mail address: \_\_\_\_\_  
Date: \_\_\_\_\_  
Signature: \_\_\_\_\_

### PART A: BRIEF OVERVIEW OF THE PROPOSED ACTIVITIES

Please provide information on the type and scale of the activity

\_\_\_\_\_  
\_\_\_\_\_

Describe how the rehabilitation activities will be carried out, including support/activities and resources required to operate it e.g. roads, disposal site, water supply, energy requirement, human resource etc.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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*Table 8. E&S Screening Table*

### PART B: QUESTIONNAIRE

	Yes	No	Additional comments
<b>ESS2: Occupational health hazards</b>			
Will the works require large number (e.g., more than 100) of staff and laborers from outside the local area?			
Will the infrastructure works require a worker's camp? If "Yes", how many workers are expected to occupy the camp?			
Are the works activities prone to hazards, risks and could result in accidents and injuries to workers during construction or operation?			
<b>ESS3: Noise and Dust Pollution during Construction and Operations</b>			
Will the operating noise level of the new/rehabilitated infrastructure exceed the allowable noise limits?			
Will the operation result in emission of significant amounts of dust?			
<b>ESS3: Contamination and Pollution Hazards</b>			
Is there a possibility that the works will lead to any contamination and pollution?			
<b>ESS3: Degradation and/or depletion of resources during construction and operation</b>			
Will the operation involve use of considerable amounts of natural resources (construction materials, trees) or may lead to their depletion or degradation at points of source?			
<b>ESS3: Solid and/or Liquid Wastes and/or Hazardous Wastes</b>			
Will the works generate solid or liquid wastes? (including human excreta/sewage, asbestos) If "Yes", does the sub-project include a plan for their adequate collection and disposal, particularly for asbestos?			
Is there any indication of the presence of asbestos (for infrastructures to be rehabilitated)?			
<b>ESS4: Beneficiary Selection and Social Dynamics</b>			
Could the subproject lead to discrimination of certain societal groups?			

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Could the subproject lead to conflicts between local groups			
Is the sub-project located in a conflict area?			
Could the beneficiary selection be contested?			
<b>ESS5 and ESS6: Block of access and routes or disrupt normal operations in the general area</b>			
Will the works interfere with or block access, routes etc. or traffic routing and flows?			
<b>ESS5: Resettlement and/or land Acquisition</b>			
Will the rehabilitation of the infrastructures works or any other project activities result in the permanent or temporary loss of crops, fruit trees, infra-structure (such as granaries, outside toilets and kitchens, livestock shed etc.), and/or business infrastructure (such as permanent stalls).			
<b>ESS6: Natural habitats, Environmentally sensitive areas or threatened species</b>			
Based upon visual inspection or available literature, are there areas of possible geologic or soil instability (prone to: soil erosion, landslide, subsidence, earthquake etc.)?			
Based upon visual inspection or available literature, are there areas prone to floods, poorly drained, low-lying, or in a depression or block run-off water.			
Could natural hazards (droughts and floods) exacerbate risk during project contraction of operation			
Are there any natural habitats, environmentally sensitive areas or threatened species that could be significantly converted/adversely affected due to the rehabilitation of infrastructures works?			
Is the subproject area (or components of it) located within/adjacent to any protected areas designated by government (national park, national reserve, world heritage site etc.)?			
Is the site considered to be habitats of endangered/threatened or endemic species for which protection is required?			
there a possibility that, due to construction and rehabilitation works, any river or lake ecology will be adversely affected? (including natural			

## Environmental & Social Management Framework (ESMF)

springs)			
Could the works affect the rights and welfare of people and their level of dependence upon or interaction with natural forests?			
<b>ESS8: Historical, archaeological or cultural heritage site</b>			
Could the works alter any historical, archaeological, cultural heritage traditional (sacred, ritual area) site or require excavation near same?			
<b>ESS10: Stakeholder engagement</b>			
Has input from community members and those who may be affected by the works or any other project activities been sought?			
Has the subproject received overall stakeholder support including from vulnerable individuals and marginalized groups?			
Has the stakeholder engagement process considered vulnerable individuals and marginalized groups?			

### **PART D: MITIGATION MEASURES, DETERMINATION OF E&S INSTRUMENT**

For all “Yes” responses, describe briefly the measures taken to this effect. Once the E&S Screening Form is completed it is analyzed by the E&S Specialists at the PITS and the PCU.

Based on the answers provided, the risk rating of the sub-project (High, Substantial, Moderate or Low) will be assessed - according to the WB Environmental and Social Policy for Investment Project Financing, dispositions for *projects involving multiple small subprojects*.

## **Annex 2: Cultural and Chance Find Procedures**

**Research and Conservation of Cultural Heritage (Proc. № 209/2000)** stipulates the requirements for chance finds. Article 41, which states that, "Any person who discovers any cultural heritage in the course of excavation connected with mining, explorations, building works, road construction or other similar activities shall report to the Authority and protect and keep same intact until the Authority takes delivery thereof". The Authority shall take all appropriate measures to examine, take delivery and register the cultural heritage discovered. Where the Authority fails to take appropriate measures within 6 months, the person that discovered the cultural heritage may be released from the responsibility by submitting a written notification with a full description of the situation to the Regional Government Official.

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's ESS 8 (To protect cultural heritage from the impacts of project activities and support its preservation, to address cultural heritage as an integral aspect of sustainable development, to promote meaningful consultation with stakeholders regarding cultural heritage and to promote the equitable sharing of benefits from the cultural heritage).

Unexpected encounters with cultural heritage during sub-project implementation will require the PCU to take up the issue with the woreda Office of Tourism & Culture, the procedure depending on the nature of the find.

The contractor is responsible for familiarizing itself with the following "Chance Finds Procedures", in case culturally valuable materials are uncovered during excavation:

- ❖ Stop work immediately following the discovery of any materials with possible archaeological, historical, paleontological, graves, or other cultural value, announce findings to project manager and notify relevant authorities;
- ❖ Protect artifacts as well as possible using plastic covers, and implement measures to stabilize the area, if necessary, to properly protect artifacts;
- ❖ Prevent and penalize any unauthorized access to the artifacts'
- ❖ Restart construction works only upon the authorization of the relevant authorities.

This procedure is included as a standard provision in the implementation of Public Works contracts to ensure the protection of cultural heritage (Archaeological and Historical Sites). The PITS, as well as contractors will be required to observe this procedure as documented hereafter.

### **Annex 3: Waste Management Plan**

Below Table lists generic waste management measures. A detailed Waste Management Plan can only be prepared once the specific site and rehabilitation design are known. The site-specific Waste Management Plans should include the handling of construction-related waste, including potential hazardous waste (asbestos where it exists in buildings) and operational phase waste. The below listed mitigation measures should be included in the site- or subproject-specific Waste Management Plans. The WMPs will follow WBG EHSs' requirements on waste management and GIIP as far as feasible

The site-specific Waste Management Plans should establish a hierarchy that considers prevention, reduction, reuse, recovery, recycling, removal and finally disposal of wastes. The generation of waste materials should be avoided or minimized as possible. Where waste generation cannot be avoided but has been minimized, waste should be recovered and reused. Where it cannot be recovered or reused, it should be treated, destroyed or disposed of in an environmentally sound manner.

The expected waste during the rehabilitation largely consists of non-hazardous waste and includes water pollution through rehabilitation activities; potential oil pollution; pollution from workmanship; and construction waste. Potential hazardous waste can occur where infrastructure to be rehabilitated contains asbestos. In these cases, measures for handling asbestos must be followed. The TA and capacity building activities may be responsible for some waste production downstream, which cannot be foreseen at this point.

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*Table 9. Generic Waste Management Plan*

Risk or impact	Mitigation measures	Indicators	Responsibility	Monitoring	Frequency of monitoring
<b>Construction Phase</b>					
Groundwater pollution	<p>Disposal of construction debris to avoid water pollution according to GIIP</p> <p>Handling, storage and disposal of oil and oil wastes according to GIIP</p> <p>Disposal of wastewater /sewerage at Contractor’s camps according to GIIP</p>	<p># of grievances filed in regard to groundwater pollution</p> <p>% of debris that is disposed properly</p> <p># of oil spills and leakages reported</p>	Contractor	DU/PITS	Monthly
Oil pollution	<p>Storage, handling and disposal of oil and oil wastes according to GIIP</p> <p>Maintain vehicles and equipment</p> <p>Maintenance of construction vehicles should be carried out in the Contractor’s camp or at appropriate location</p>	<p># of oil spills and leakages reported</p> <p># of vehicle maintenance logs available</p> <p># of vehicles with appropriate maintenance</p> <p># of vehicles maintained in the camp</p>	Contractor	DU/PITS	Monthly
Workmanship	Provide proper sanitation facilities on site and in workers’ camp	<p># of sanitation facilities on site</p> <p># of sanitation facilities in camp</p>	Contractor	DU/PITS	Monthly
Construction waste	<p>Disposal of construction wastes including oil, solid wastes and debris according to GIIP</p> <p>Final deposition will be on authorized sites and in line with GIIP as possible</p>	<p># of grievances filed in regard to construction waste</p> <p># of procurement measures installed</p>	Contractor	DU/PITS	Monthly

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	<p>Substitute raw materials or inputs with less hazardous or toxic materials, or with those where processing generates lower waste volumes</p> <p>Institute procurement measures that recognize opportunities to return usable materials such as containers and which prevents waste and debris over ordering of materials</p>				
Demobilization	<p>Clean-up site after rehabilitation</p> <p>Remove all debris</p> <p>Remove to original condition</p>	<p># of sites clean up after rehabilitation</p> <p># of sites with all debris removed in an appropriate manner</p> <p># of sites that have been returned to their original condition</p>	Contractor	DU/PITS	After subproject is finalized
OHS	<p>Train workers appropriately on OHS risks, hazards and safe handling of equipment and procedures, based on EHS Guidelines on OHS<sup>2</sup></p> <p>Provide appropriate PPE, continuous reminders to use PPE, use of signage and continuous supervision, based on EHS Guidelines on OHS</p> <p>Communicate and implement workers' GRM</p>	<p># of trainings conducted for workers</p> <p># of workers issued with appropriate PPE</p> <p># of workers grievances filed and responded to</p>	Contractor / PITS	DU/PITS	Throughout subproject implementation

### Environmental & Social Management Framework (ESMF)

	<p>Develop and implement C-ESMP including OHS</p> <p>Implement Labor Management Procedures (LMP)</p> <p>Include OHS requirements into bids and contracts</p> <p>Contractor bid and contract to include various OHS requirements</p>	<p>% of C-ESMPs that include OHS measures</p> <p>% of bidding documents that include OHS requirements</p>			
Community Safety	<p>Disposal of solid and sanitary waste at camps according to GIIP</p> <p>Design and locate pit latrines prudently</p> <p>Have communal ablution facilities</p>	<p>% of camps with appropriate solid and sanitary waste disposal</p> <p># of pit latrines available</p>	Contractor	DU/PITS	Monthly
<p>Asbestos – Hazardous waste existing in infrastructure to be rehabilitated</p> <p>There is a high risk of exposure to asbestos from the demolition works which can have negative impacts on human health and the environment including soil and air contamination.</p>	<p>According to WB ESS3 and WB EHS guidelines, all projects with risk of hazardous material contamination must comply with existing requirements of hazardous waste including national legislation and international conventions and where such are absent, then GIIP alternatives will be adopted to ensure the hazardous material is managed and disposed of in an environmentally sound and safe manner.</p> <p>The level of risk associated with asbestos must be assessed by a competent contractor with experience in handling asbestos.</p>	# of cases of asbestos removal where all guidelines have been followed	Contractor	DU/PITS	Monthly

## Environmental & Social Management Framework (ESMF)

	<p>From the risk assessment depending on the condition of the asbestos material, a hazardous material management plan must be prepared outlining how the asbestos will be managed at the site, transported and disposed of. The plan must contain; procedures for handling asbestos in case of accidental exposure at the site, training of site workers on how to respond to a hazard exposure, documentation of available PPE to site workers, site emergency exits in case of an emergency and it should also outline OHS management procedures as well as compliance audit procedures.</p> <p>The local public authorities should provide infrastructure to handle hazardous waste and if no public infrastructure is available, the service can be sought from a local private company. If there are no alternatives then the asbestos can be disposed of in a landfill site that has been properly engineered to contain the waste in isolation from the external environment.</p>				
<b>Operations Phase</b>					
Waste production of the institution that was rehabilitated	Institute procurement measures that recognize opportunities to return usable materials such as containers and which prevents waste and debris over-ordering of materials	<p># of institutions that have waste management plan in place</p> <p># of waste management plans at institutions that characterize waste according to composition, source etc...</p>	Administration of institution	MOLSA	Quarterly

## Environmental & Social Management Framework (ESMF)

	<p>Characterize waste according to composition, source, types of wastes produced, generation rates, or according to local regulatory requirements.</p> <p>Identify expected waste generation, pollution prevention opportunities, and necessary treatment, storage, and disposal infrastructure</p> <p>Collection of data and information about the process and waste streams in existing facilities, including characterization of waste streams by type, quantities, and potential use/disposition</p> <p>Establishment of priorities based on a risk analysis that takes into account the potential EHS risks during the waste cycle and the availability of infrastructure to manage the waste in an environmentally sound manner</p> <p>Definition of opportunities for source reduction, as well as reuse and recycling</p> <p>Definition of procedures and operational controls for onsite storage and final disposal</p> <p>Establishing recycling objectives and formal tracking of waste generation and recycling rates</p>	<p># of institutions that collect data and information about the process and waste streams in the facility</p> <p># of institutions considering recycling of waste</p> <p># of institutions that have trained their employees</p> <p># of E-Waste Management Plans per site</p>			
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## Environmental & Social Management Framework (ESMF)

	Providing training and incentives to employees in order to meet objectives				
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## **Environmental & Social Management Framework (ESMF)**

### **E-Waste Management Plan**

Possible waste streams that may be generated during project implementation and the operational phase of TVETs may include electronic wastes, next to construction waste and other waste streams. The focus of this plan is on electronic waste or E-waste. This E-waste management plan should be implemented throughout the project's lifecycle to protect the environment, biodiversity, and habitats, safeguard the health of the local communities, and comply with The World Bank Environment, Safety and Health Guidelines (ESHG), Environmental and Social Standards (ESS), and Good International Industry Practice (GIIP).

Waste electric and electronic equipment (WEEE) is referred to as e-waste or electronic waste and it is defined as any end-of-life or end-of-use piece of “equipment which is dependent on electrical currents or electromagnetic fields in order to work properly”. It covers a broad range of electronic devices, ranging from large household appliances, information technology and telecommunications equipment, lighting equipment, medical devices, monitoring and control instruments, automatic dispensers, and consumer electronics, such as electrical and electronic tools, toys, leisure and sports equipment, and mobile phones to computers. Components of electric and electronic equipment (EEE), such as batteries, electric cables from end-of-life vehicles (ELVs), printed circuit boards (PCBs), plastic casings, cathode-ray tubes (CRTs), activated glass, and lead capacitors are also classified as e-waste. Possible WEEE to be covered by this project may include computers, scanners, printers, servers, copiers, electric cables, cell phones, backup generators, etc. E-waste contains materials that, if mishandled, can be hazardous to human health and the environment, but, most importantly, also materials that are valuable and scarce.

E-waste is one of the fastest growing waste streams worldwide, growing at a rate of 3–5% per year simply because of the market demand. The market demand for production of EEE is continuously increasing, but the life span/replacement interval of such products continues to decline in the course of technological evolution. The proper treatment of e-waste avoids negative impacts and yields many benefits. E-waste, if not properly treated, can have negative impacts, both on human health and on the environment. However, sustainable treatment of e-waste avoids these negative impacts.

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

## Environmental & Social Management Framework (ESMF)

**Table 10. E-Waste Management/Disposal Plan**

Issue: Procurement and Provision of Electronic Devices (computers, printers, servers, cables etc)			
Impact	Mitigation	Monitoring	Responsibility
<p><b>Air Pollution through improper disposal</b></p> <p>Which leads to release of toxic, hazardous, and carcinogenic gaseous.</p> <p><b>Human Health</b></p> <p>Electrical and electronic equipment contain different hazardous materials, which are harmful to human health. For instance, bio-accumulative toxins (PBTs) are harmful to human health and have been associated with cancer, nerve damage and reproductive disorders. Chronic exposure to arsenic can cause lung cancer and can often be fatal. Also, exposure to barium can lead to brain swelling, muscle weakness, damage to the heart, liver, and spleen.</p> <p><b>Pollution of water bodies</b></p> <p>Electrical and electronic equipment contain different hazardous materials, which are harmful to human health and the environment including ground</p>	<p>Procure Electronic devices from credible manufactures to avoid purchasing second hand, refurbished or obsolete devices with a short shelf life or already categorized as E-Waste. If possible, select sources offering repair and take back schemes. Ensure insurance coverage and electronic physical protective devices are fitted.</p> <p>Reuse and recycle all E-waste where applicable and possible.</p> <p>Establish E-Waste collection points in all project sites, including collection bins/receptacles.</p> <p>Conduct awareness and sensitization targeting the users of the electronic devices to ensure that they engage in best practice for E-waste management.</p>	<p>Warranty and take back schemes for Electronic Devices purchased.</p> <p>Credibility of manufacturers supplying the electronic devices</p> <p>Availability of E-waste receptacles in each project site.</p> <p>Number of awareness and training conducted for users of electronic devices on E-waste</p> <p>E-waste certificates of disposal using licensed hazardous waste contractors and licensed hazardous waste landfills/disposal facilities.</p>	<p>DU and MOLSA</p>

## Environmental & Social Management Framework (ESMF)

<p>and surface water if not disposed of carefully.</p>			
<p><b>Pollution of land resources including landfills</b></p> <p>Electrical and electronic equipment contain different hazardous materials, which are harmful to human health and the environment including soil if not disposed of carefully.</p>	<p>Procure Electronic devices from credible manufactures to avoid purchasing second hand, refurbished or obsolete devices with a short shelf life or already categorized as E-Waste. If possible, select sources offering repair and take back schemes. Ensure insurance coverage and electronic physical protective devices are fitted.</p> <p>Reuse or Recycle all E-waste.</p> <p>Establish E-Waste Collection Centres in all project sites, including collection bins/receptacles.</p> <p>Use licensed hazardous waste contractors and licensed hazardous waste landfill sites/disposal facilities.</p> <p>Create and maintain records of all E-waste items for disposal, securely store and prepare for shipment correctly.</p> <p>Conduct awareness and sensitization targeting the users of</p>	<p>Warranty and take back schemes for Electronic Devices purchased.</p> <p>Credibility of manufacturers supplying the electronic devices.</p> <p>Availability of E-waste receptacles in each project site.</p> <p>Number of awareness and training conducted for users of electronic devices on E-waste</p> <p>E-waste certificates of disposal using licensed hazardous waste contractors and licensed hazardous waste landfills/disposal facilities.</p>	<p>PCU and MOLSA</p>

## Environmental & Social Management Framework (ESMF)

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

## Environmental & Social Management Framework (ESMF)

	they engage in best practice for E-waste management.		
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### Annex 4: Labor Management Procedures

The objectives of the Labor Management Procedures (LMP) are to:

- a) Identify the different types of project workers that are likely to be involved in the project
- b) Identify, analyze and evaluate the labor related risks and impacts for project activities
- c) Set out procedures to meet the requirements of ESS2, ESS4 and applicable national legislation.

The LMP will be applied in line with the requirements of national laws, the provisions of ESS2 and other applicable ESSs, ESS4 in particular.

#### Labor Requirements

The LMP will be administered to different types of project workers as follows:

**(a) Direct Workers:** According to the EES2, a “direct worker” is a worker with whom the Borrower has a direct contractual relationship and specific control over the work, working conditions, and treatment of the project worker. The worker is employed or engaged by the Borrower, paid directly by the Borrower, and subject to the Borrower’s day-to-day instruction and control. For the EASE Project, the direct workers include the Project Manager and project staff who will be assigned to work for this project under MoLS and PTCs. However, it is difficult to estimate the exact number of direct workers who will be engaged. Direct workers will also include independent consultants, who are specialized in certain disciplines (such as training including GBV, supervision, and environment and social safeguards, etc.). Terms and conditions of these workers are guided by Federal Civil Servants proclamation no. 1064/2017 at federal level and by the Civil Service Proclamations of their respective regional states.

**(b) Contracted Workers:** Contracted workers will be hired for renovation and procurement of PTC facilities. Each contractor might need the engagement of subcontractors. The subcontractors' workforce will also be considered contracted workers. At this time, it is difficult to estimate the number of contract workers that will be engaged in the project, as the number of contractors and subcontractors required for the set of project activities. The contractors will qualify to bid as per the World Bank’s procurement procedures and guidelines, which include environmental, social, Health and safety performance declaration. Further, the project will also procure professional services (consultants) to undertake specific activities like baseline study, midterm evaluation, terminal evaluation, financial audit, procurement audit, environmental and social audit, gender assessment, etc. The short-term consultants are guided by written contractual agreement between the project and the consultancy firm.

**(c) Primary Supply Workers:** The project is anticipated to engage suppliers for the Poly Technical College (PTC) works on a rolling basis for the purpose of works in (i) Strengthening public polytechnic colleges for improved labor market outcomes, (ii) Skills for Jobs and (iii) System Strengthening of the Poly Technical Colleges.

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The LMP will apply to project workers including those recruited full time, part-time, and temporary. The project scope does not include employment of migrant workers or community workers as per the definition in ESS2.

### **Timing of Labor Requirements**

It is expected that the rehabilitation phase of the public facilities will take four to five years. All semiskilled, skilled, and unskilled labor during the rehabilitation will be recruited from the local area based on the availability. Rehabilitation sub-projects, and therefore the requirement for these contracted workers will last approximately 4-6 months at a time. All direct project workers are required continuously throughout the project implementation while experts from relevant other implementing partners will be involved intermittently as required. In addition, the duration of engagement of consultants/contractors varies with the tasks to be covered e.g. For example, they will be required approximately six months for capacity building exercises and training, surveys, three months for midterm evaluations, four months for final evaluation, and two months for financial audits.

### **Labor Risk Assessment**

The main types of activities for contracted workers and supply workers will relate to the implementation of TA and training as well as rehabilitation work of the institutions. Other types of activities for contracted workers will be the delivery of services. Supply workers will be involved in regard to activities where equipment for institutions is prepared or material for rehabilitation/construction is procured. The table below draws from the anticipated labor requirements analysis to highlight and analyze the potential labor related risks and impacts in view of the general baseline settings of the project areas.

## Environmental & Social Management Framework (ESMF)

*Table 11. Labor Risk Identification and Analysis*

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Risk Mitigation Measures
Labor practices are not in accordance with national laws and international standards / ESS2	In reality, laws and standards may not be implemented by employers.	Practices are defined in this LMP. The Project will ensure management of contractors to maintain the highest standards of labor practice.
Workers' lack of understanding of their labor rights	Given the level of illiteracy, it is likely that some workers may not fully understand their labor rights.	<p>Project workers will be provided with information and documentation that is clear and understandable regarding their terms and conditions of employment.</p> <p>The information and documentation will set out their rights under national labor and employment law (which will include any applicable collective agreements), including their rights related to hours of work, wages, overtime, compensation, and benefits, as well as those arising from the requirements of ESS2. This information and documentation will be provided at the beginning of the working relationship, and when any material changes, to the terms or conditions of employment occur.</p>
Labor disputes over contracts	Given the generally high conflict potential in the Project areas, it is possible that disputes about contracts will emerge.	The Project will enforce workers' GRM in line with ESS2, as well as general project GRM as per ESS10.
Lack of access to workers' grievance mechanism	Workers may not have adequate access to a grievance mechanism in order to claim their rights	The Project will ensure a workers' grievance mechanism is in place and sensitization of all workers on this mechanism is undertaken
Underpayment of contracted workers or supply workers	Since Ethiopia has no statutory minimum wage, there is a risk that local contractors and sub-contractors underpay the contracted or supply workers.	Project to set minimum wage and to pay workers what they were contracted for (see above for definition), and ensure management of contractors and implementing partners to be accountable on it.
Poor working conditions: unsafe work environment	Due to the weakness of formal justice institutions, employees' working conditions may be poor.	Supervision of contractor labor management practices will be essential under the Project. A contractor checklist will be used that will allow checks on the applicable safety measures in place (see Annex 12)

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Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Risk Mitigation Measures
		<p>Contractors will sign CoCs to commit to safe work environments.</p> <p>Implementation of workers’ GRM as a feedback system to flag out poor working conditions and address them.</p>
Injuries at the workplace / OHS risks	Given that PPE may be scarce for contracted workers, and health and safety regulations may not exist or be enforced.	<p>Contractor occupational risk assessments and mitigation plans will be devised and implemented by the contractor. The contractor will further train workers on OHS risks, hazards and safe handling of equipment and procedures, based on WBG EHS Guidelines on OHS. The PITS will ensure through monitoring that all workers are provided with and able to use appropriate PPE at all times. Incidents and accidents will be reported and documented by the contractor to the PITS. An emergency preparedness plan will be prepared by the contractor and remedies for injuries/fatalities/disabilities provided by the employer.</p> <p>GRM/workers’ GRM will be communicated and implemented. Sub-project specific ESMPs will include OHS. Contractor bids and contracts will include OHS requirements based on the World Bank EHS Guidelines.</p>
Child labor utilization	The general minimum age for work in Ethiopia has recently been raised to 15.	The minimum age of 18 will be enforced in recruitment and in daily staff team talks by contractors. DU/PITS will also supervise this through the Contractor Management Checklist. The age of workers will be verified upon hiring. A track record search will be conducted of the contractors at the bidding process (record of health and safety violations, fines, consult public documents related to workers’ rights violations, SEA/SH issues etc.)

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Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Risk Mitigation Measures
		Awareness raising will be provided by the project team to communities/suppliers to discourage engagement in child labor.
Forced Labor	Forced labor takes place in Ethiopia, hence there is a risk that forced labor will be deployed under the project.	Contractors' obligations will be spelled out in their respective contracts and the PNCU/PITS will monitor full compliance.
GBV/SEA/SH	There is a high incidence of sexual harassment of female workers by male workers, and discrimination in recruitment and employment of women generally.	Contractors are compelled to safeguard the interests of women at the workplace. This includes gender parity at the workspace; prohibiting SEA/SH toward female workers by other project workers by having all workers sign a CoC prohibiting such; by providing appropriate sanitation facilities at workplace and appropriate PPE for women.
Risks of discrimination and exclusion of vulnerable/disadvantaged groups	Workers may face discrimination during recruitment and while at work. There might be discrimination of workers based on their identity, physical ability or disability, political affiliation, HIV/AIDS, religion, and gender; discrimination can also happen in relation to provision of compensations, benefits and other opportunities such as access to training, job assignment, promotions; application of disciplinary measures and penalties; termination of employment or retirement, working conditions and terms of employment; discriminations may arise due to favoritism, nepotism and corruption.	Nondiscrimination working environment for all workers/employee through posting the country labor law and ESS 2 in local language, obey obligations of the vulnerable groups, create supportive environment in terms of expressing the grievance/ complain related any issues
Risks of restrictions on worker's organization	An employer may interfere and restrict workers from forming worker's organization or joining other similar organization for collective rights negotiations, to express grievances, to enable collective voicing on conditions of work, benefits, protection of rights, etc....	Provide managerial support during the formation of the workers association/organization

## Environmental & Social Management Framework (ESMF)

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Risk Mitigation Measures
Labor influx and GBV	Contracted workers may be brought into communities to conduct construction works. Population movement due to labor influx may result in SEA/SH cases, and the spread of communicable diseases	<p>DU/PITS and all contractors will implement the Labor Influx Management Procedure (provided in this LMP); contractors are called upon to recruit as many workers locally as possible; a SEA/SH Prevention and Response Action Plan has been prepared and will be implemented, it includes the signing of CoCs by all workers.</p> <p>A local workforce minimum content for the contractors will be set up and disclosed to communities. At construction sites, the minimum expected local workforce is 50%. The Project will aim to maximize the use of local suppliers (for food, water, services etc.).</p>
Traffic risks and road safety	Construction activities can cause traffic risks through heavy vehicles and moving of heavy machinery and jeopardize road safety for drivers.	<p>The project will implement training and licensing of industrial vehicle operators in the safe operation of specialized vehicles; ensure drivers undergo medical surveillance; establish rights of way, site speed limits, vehicle inspection requirements, operating rules and procedures; include traffic and road safety into the daily toolbox talks; emphasize safety aspects among drivers; improve driving skills of drivers; adopt limits for trip duration, e.g. 8 hours at a time; arrange driver rosters to avoid tiredness; preassign routes by construction vehicles (project management, contractor, and traffic authorities) before construction starts.</p> <p>Regular maintenance of vehicles and use of manufacturer approved parts to minimize potentially serious accidents caused by equipment malfunction.</p>
Lack of safety and security for project workers	Given the fragility in the country, there is a risk of security for all project workers	A Security Risk Assessment and Management Plan (SRAMP) has been prepared and will be adopted.

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### **Ethiopian Labor Legislation: Terms and Conditions**

The following terms and conditions apply for workers as per the Ethiopia Labor Laws:

- Labor Proclamation No. 377/2003
- Federal Civil Servants Proclamation 1064/2017
- Labor Proclamation No.1156/20193 (does not replace, Labor Proclamation No. 377/2003, but complements).
- Proclamation No. 632/2009, Employment Exchange Service Proclamation
- Proclamation No. 568/2008, Right to Employment of Persons with Disability

In case of variations between the national legislation, regulations, and the World Bank ESSs, the more stringent provision will prevail.

For direct workers who are civil servants, the terms and conditions of civil servants are guided by the national civil service regulations and other labor and employment legislation. Other Project officers are guided by the terms and conditions of their contractual agreements.

The Labor Proclamation No. 1156/2019 secures durable industrial peace, sustainable productivity, and competitiveness that will contribute to the overall development of the country. The Proclamation has introduced new concepts. It has also modified some of the existing provisions which were unclear, and therefore prone to interpretations. Ethiopia has reformulated the existing labor law (Proclamation 377/2003) to attain the below-stated objectives and under and in conformity with the international conventions and other legal commitments to which the country is a party.

#### **The major objectives of the proclamation are:**

- To ensure that worker-employer relations are governed by the basic principles of rights and obligations;
- To lay down a working system that guarantees the rights of workers and employers to freely establish their respective associations and to engage, through their duly authorized representatives, in social dialogue and collective bargaining, as well as to draw up procedures for the expeditious settlement of labor disputes, which arise between them;
- To create a favorable environment for investment and achievement of national economic goals without scarifying fundamental workplace rights by laying down well-considered labor administration; and determine the duties and responsibilities of governmental organs entrusted with the power to monitor labor conditions; occupational health and safety; and environmental protection together with bilateral and tripartite social dialogue mechanisms; political, economic and social policies of the Country.

#### **Minimum Age for Employment and Prohibition of Child and Forced Labor**

A worker who has attained a minimum age of 15 years is capable of being employed under the new labor law of Ethiopia; while the minimum age for Hazardous Work is set as 18 years. Moreover, the definition of young workers has been amended to include workers between 15 and 18 years of age. It is prohibited to assign young workers to work, which on account of its nature or due to the condition in which it is carried out endangers their lives or health. The MoLS may prescribe the list of activities prohibited for young workers which shall include in particular:

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Work in the transport of passengers and goods by road, railway, air, and internal waterways, docksides and warehouses involving heavy weightlifting, pulling or pushing, or any other related type of labor;

- Work connected with electric power generation plants, transformers, or transmission lines;
- Underground work such as mines and quarries;
- Work in sewers and tunnel excavation.

The above-stated prohibition shall not apply to work performed by young workers in fulfillment of course requirements in vocational schools that are approved and inspected by the Competent Authority.

Forced Labor is prohibited under the Constitution of Ethiopia and is a punishable offense under the Criminal Code 5. If a person compels another by intimidation, violence, fraud, or any other unlawful means to accept particular employment or particular conditions of employment is punishable, upon complaint, with simple imprisonment at least three (3) months, or fine.

The anti-trafficking legislation also prohibits trafficking in persons for exploitation at the pretext of domestic or overseas employment. The definition for exploitation includes labor exploitation, forced labor, or servitude. It is a punishable offense with rigorous imprisonment ranging from 15 to 25 years and with a fine from 150,000 to 300,000 Eth. Birr.

The Project will apply the following process, before the employment or engagement of an applicant for work on the project, to verify the person's age. The PCU/PITS will ensure that each contractor/subcontractor provides the PCU/PITS with written confirmation that each worker they employ or engage with the project is at least the minimum age of 18 years. Where there is reasonable doubt as to the age of the applicant, requesting and reviewing available documents to verify age (such as a birth certificate, national identification card, medical or school record, or other document or community verification demonstrating age).

If a person under the minimum age of 18 years is discovered working concerning the project, the PCU/PITS will take measures to terminate the employment or engagement of that person in a responsible manner, considering the best interest of that person.

To ensure that the best interests of the child under 18 years are considered, the DU/PITS will undertake, and ensure that all contractors/ subcontractors, private sector, cooperative also undertake, remediation within a reasonable period agreeable to the World Bank. The remediation activities could include, among other options:

Enrolling the child in a vocational training/apprenticeship program, but which does not interfere with the child's completion of compulsory school attendance under national law.

Employment of a member of the child's family, who is at least 18 years of age, by the primary supplier, contractor, or subcontractor for project-related or other work.

### **Provisions Related to Women**

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The new proclamation recognizes further benefits addressing the special needs of women including provisions related to maternity leave, sexual harassment, and violence. A provision acknowledging affirmative action to women is also included. Accordingly, women candidates who score equal points with men will have the right to priority in competitions for employment, promotion, and related opportunities.

The new labor Proclamation of Ethiopia, 1156/2019, articles 87 and 88 state provisions on the working conditions of women.

Women shall not be discriminated against in all respects based on their sex. Without prejudice to the generality of this provision, priority shall be given to women if they get equal results with men when competing for employment, promotion, or any other benefit.

It is prohibited to assign women to works that may be listed by the Ministry of Labor and Skill Development to be particularly dangerous to women or hazardous to their health.

No pregnant woman shall be assigned to night work between 10 p.m. and 6 a.m. or be assigned overtime work.

She shall be transferred to another place of work if her job is hazardous to her health or the fetus as ascertained by a physician.

### **Leave**

Proclamation 1156/2019, Article 76-86 amended the provisions of different leaves including the number of days under the Labor Proclamation 377/2003. Every worker is entitled for annual leave after completing one year of continuous service with full pay as follows:

Rest: Workers are entitled to a weekly rest period consisting of not less than twenty-four non-interrupted hours in the course of each period of seven days. The weekly rest period shall be calculated to include the period from 6 a.m. to the next 6 a.m. Where the nature of the work or the service performed by the employee is such that the weekly rest cannot fall on a Sunday another day maybe made a weekly rest day as a substitute.

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

Annual leave: every worker is entitled for sixteen (16) working days of annual leave for the first year of service; where, plus one working day for every additional two years' service. Sub article (5) states that, Where the length of service of a worker is below one year, the worker shall be entitled to an annual leave proportional to the length of his service.

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Sick leave: a worker should complete six months for sick leave entitlement of up to six months within a year. However, should notify the employer the next day from absence from work. The worker should present a sick leave certificate from issued by a duly recognized medical facility. The worker will be paid (i) first one month, with payment of 100% of his/her wages; (ii) for the next two months, with payment of 50% of his/her wage; and (iii) for the next three months, without pay.

Family events: workers are entitled for leave with pay for events such as marriage, paternity leave, maximum of two rounds of leave for exceptional and serious events.

Union members: a worker representing a union will be entitled for leave in cases in labor disputes, negotiating collective agreements, attending union meetings, participating in seminars or training courses.

### **Sexual Harassment and Violence**

The new law obviates the need for interpretation of sexual harassment and sexual violence by providing definitions. It also provides prohibitions and punishment specific to the acts. The commission of either or both of the two acts at workplaces either by the employee or employer may be used as grounds of termination of an employment contract without notice by the employer or the employee respectively. Additionally, an employee who resigns on the ground of SH or violence is entitled to severance pay as well as compensation amounting to 90 times the daily rate of the last week of service of the employee. As per the definition of the new proclamation:

Sexual Harassment means to persuade or convince another through utterances, signs, or any other manner, to submit for sexual favor without his/her consent.

Sexual Violence means sexual harassment accompanied by force or an attempt thereof.

### **Wages**

Per the Labor Proclamation, wages mean the regular payment to which the worker is entitled in return for the performance of the work that he/she performs under a contract of employment. Wages are independent of overtime premium, allowances, bonuses, commissions, service charges received from the customers, and other incentives paid for additional work. Wages are only paid for the work done by the worker except in case of interruption on the employer's behalf which makes it impossible to work (i.e. interruption in the supply of tools and raw materials).

The Labor Proclamation requires employers to pay wages in cash on a working day at the workplace unless otherwise agreed. In case, date of payment (where already decided) falls on a weekly rest day or public holiday, the wages are paid on the preceding working day. Wages are paid directly to the worker or the person authorized by the worker. Wages may be paid in kind but may not exceed the market value in the area of the payment in kind and no case may exceed 30% of the wages paid in cash.

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An employer is under the obligation to pay the worker wages and other emoluments per this law or the collective agreement. Wages are to be paid at such intervals as required under the national law, collective agreement, or employment contract.

As per Proc. No. 1156/ 2019, a Regulation of the Council of Ministers shall determine the powers and responsibilities of a Wage Board which shall comprise representatives of the Government, employees, and trade unions together with other stakeholders that will periodically revise minimum wages based on studies which take into account the country's economic development, labor market, and other considerations.

Generally, the employer is not allowed to make deductions from wages except where it is provided by the law or collective agreement or work rules or per court order or a written agreement with the worker. The amount of deduction must not exceed one-third of the monthly wages of the worker. An employer must keep a record of payment in a register specifying the gross pay and method of calculation of wages; other variable remunerations; the amount and type of deduction; and the net pay unless there is a special arrangement on which the signature of the worker is affixed. This register must be easily accessible to all the workers and the entries are explained to the worker on request.

Workers who are paid monthly shall incur no reduction, in their wages on account of having not worked on public holiday. A worker shall be paid his hourly wages multiplied by two for each hour of work on a public holiday.

### **Hours of Work**

*Arrangement of Weekly Hours of Work:* Hours of work shall spread equally over the working days of a week, provided, however, where the nature of the work so requires, hours of work in any one of the working days may be shortened and the difference be distributed over the remaining days of the week without extending the daily limits of eight hours by more than two hours.

*Averaging of Normal Hours of Work:* Where the circumstances in which the work has to be carried out are such that normal hours of work cannot be distributed evenly over the individual week, normal hours of work may be calculated as an average over a period longer than one week, provided, however, that the average number of hours over a period shall not exceed eight hours per day or forty-eight hours per week. The labor law defined that normal hours of work for young workers shall not exceed seven hours a day and it is also prohibited to employ young workers on night work between 10 pm and 6 am and overtime work, weekly rest day or on public holidays.

### **OHS Legislation**

Ethiopia has a legal framework on OHS. The Constitution (1995) under Article 42/2 stated the Rights of Labor as "workers right for healthy and safe work environment" Proclamation No. 4/1995. There are also different legal frameworks on OHS which include: the National Occupational Health Policy and Strategy, Occupational Health and Safety Directive (2008), Occupational Health and Safety Policy and Procedures Manual, and On Work Occupational Health and Safety Control Manual for Inspectors (2017/18) which will apply to this project. OHS

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promotion is also included as a priority in the National Health Policy Statement (1993). Ministry of Labor and Skills (MOLS) and its regional counterparts are responsible for OHS at Federal and Regional levels. MOLS has OHS & Working Environment Department responsible for OHS responsibilities. Each administrative region has an OHS department within the Labor and Skill development office with the responsibilities of inspection service.

In the new Labor Proclamation of Ethiopia (Proc. No. 1156/2019), Occupational Safety, Health, and Working Environment the following are indicated under Obligations of an Employer and an employee respectively.

An employer shall take the necessary measure to safeguard adequately the health and safety of the workers; it shall in particular:

- Comply with the occupational health and safety requirements provided for in this Proclamation;
- Take appropriate steps to ensure that workers are properly instructed and notified concerning the hazards of their respective occupations, and assign safety officer; and establish an occupational health and safety committee;
- Provide workers with protective equipment, clothing, and other materials and instruct them of their use;
- Register employment accidents and occupational diseases and report same to the labor inspection service;
- Arrange, according to the nature of the work, at his own expense for the medical examination of newly employed workers and those workers engaged in hazardous work, as may be necessary except HIV/AIDS Unless and otherwise, the country has the obligation of an international treaty to do so;
- Ensure that the workplace and premises of the undertaking do not pose threats to the health and safety of workers;
- Take appropriate precautions to ensure that all the processes of work in the undertaking shall not be a source or cause of physical, chemical, biological, ergonomic, and psychological hazards to the health and safety of the workers.
- Implement the instructions given by the Competent Authority following this Proclamation.

As obligation any worker shall:

- Co-operate in the formulation of work rules to safeguard the workers' health and safety, and implement same;
- Inform forthwith to the employer any defect related to the appliances used and incidents of injury to health and safety of workers that he is aware of in the undertaking;
- Report to the employer any situation which he may have reason to believe could present a hazard and which he cannot prevent on his own, and any incident of injury to health which arises in the course of or in connection with work;
- Make proper use of all safety devices and other appliances furnished for the protection of his health and safety or the protection of the health and safety of others;
- Observe all health and safety instructions issued by the employer or by the Competent Authority It is prohibited for any worker to:
- Interfere with, remove, displace, damage, or destroy any safety devices or other appliances furnished for his protection or the protection of others.

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The World Bank ESS2 stipulates the compliance with the World Bank Environmental, Health and Safety Guidelines (EHSG).

### **Obstruct any method or process adopted to minimize occupational hazards.**

The Labor proclamation gives the power for Regional Bureaus to determine standards and measures for the safety and health of workers and follow up on their implementation. It is also indicated that regional bureaus must collect, compile and disseminate information on the safety and health of workers.

It is unlawful for an employer to (a) impede the worker in any manner in the exercise of his rights or take any measure against him because he exercises his right; (b) discriminate against female workers, in matters of remuneration, on the ground of their sex; (c) terminate a contract of employment contrary to the provisions of the Labor Proclamation No. 1156/2019; (d) coerce any worker by force or in any other manner to join or not to join or to cease to be a member of a trade union or to vote for or against any given candidate in elections for trade union offices; (e) require any worker to execute any work which is hazardous to his life; (f) discriminate between workers based on nationality, sex, religion, political outlook or any other conditions.

Therefore, during project activities implementation, the following activities need to be performed: (a) identification of OHS risks at the project design stage; (b) provision of PPEs and health, safety, and security arrangements; (c) arrangement of temporary residence and clean drinking water; and make available food at an affordable cost for workers in areas where there are no hotel/restaurants around the project sites; (d) training at regular intervals to workers to enhance their skills.

### **Benefits in the Case of Employment Injuries**

Where a worker sustains employment injury, the employer shall cover the following expenses, among others, include:

- General and specialized medical and surgical care;
- Hospital and pharmaceutical care;
- Any necessary prosthetic or orthopedic appliances
- A worker who has sustained employment injury shall be entitled to:
- Periodical payment while he is temporarily disabled;
- Disablement pension or gratuity or compensation where he sustains permanent disablement;
- Survivors' pension or compensation to his dependent when he dies.

### **The World Bank Environmental and Social Standards: ESS 2**

ESS 2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. The objectives are as follows:

## **Environmental & Social Management Framework (ESMF)**

- To promote safety and health at work
- To promote the fair treatment, non-discrimination and equal opportunity of project workers
- To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate
- To prevent the use of all forms of forced Labor and child Labor.
- To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law
- To provide project workers with accessible means to raise workplace concerns

### **The World Bank Environmental and Social Standards: ESS 4**

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

- To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life cycle
- To promote quality and safety, and considerations relating to climate change, in the design and construction of infrastructure
- To avoid or minimize community exposure to project-related traffic and road safety risks
- To have in place effective measures to address emergency events
- To ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to project affected community

### **Terms and Conditions**

The project will depend on the various laws; such as, (i) Labor Proclamation No. 42/1993 (replaced by Labor Proclamation No. 377/2003), (ii) Labor Proclamation No. 377/2003, (iii) labor Proclamation No.1156/2019 (complements (do not replace, Labor Proclamation No. 377/2003), (iv) Proclamation No. 632/2009, Employment Exchange Service Proclamation, (v) Proclamation No. 568/2008, Right to Employment of Persons with Disability. Further, Ethiopia is a signatory to the international UN conventions and has ratified the major international human rights instruments. Ethiopia has also ratified the following ILO conventions:

- Forced Labor Convention No. 29/1930;
- Freedom of Association and Protection of the Right to Organize Convention, No. 87/1948;
- Employment Service Convention, No. 88/1948;
- Right to Organize and Collective Bargaining Convention, No. 98/1949;
- Abolition of Forced Labor Convention, No.105/1957;
- Minimum Age Convention No. 138/1973;
- Occupational Safety and Health Convention, No. 156/1981;
- Termination of Employment Convention, No. 158/1982;
- The Rights of the Child Convention, 1989; and
- The Worst Forms of Child Labor Convention No. 182/1999.

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Hence, the terms of condition follow stringent international requirements where the gaps of the national law are filled by WB requirements and ILO convention. The terms of the condition include the name and legal domicile of the employer; the worker's name; the worker's job title; the date employment began; where the employment is not permanent, the anticipated duration of the contract; the place of work or, where the work is mobile, the main location; benefit packages; hours of work, rest breaks, leave entitlements and other related matters; rules relating to overtime and overtime compensation; the pension and other welfare arrangements applicable to the worker; the length of notice that the worker can expect to give and receive on termination of employment; the disciplinary procedures that apply to the worker, including details of representation available to the worker and any appeals mechanism; and details of grievance procedures, including the person to whom grievances should be addressed.

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

The WB ESS2 states that the minimum age of employment is 14 years while the newly revised Ethiopian Labor Law has extended the minimum year of employment to 15 years. However, both WB and Ethiopian law prohibits the engagement of children under 18 years of age in works that have hazardous nature. The Project will not allow employment under the age of 18.

The other gap between the WB ESF and Ethiopian law is the fact that the national law does not indicate that it prohibits an employer to retaliate against a worker or reporting a dangerous work situation or removing himself/herself from a dangerous work situation. ESS2 of the World Bank ESF provides that project workers will not be retaliated against or otherwise subject to reprisal or negative action for reporting a dangerous work situation or removing/themselves from a dangerous work situation. The PCU will ensure that all project workers, including those engaged by contractors, will have the right to report and remove themselves from dangerous work situations without being subject to reprisal or negative action. This and other provisions of the LMP will be part of the awareness-raising and training sessions of the project.

### **Institutional Arrangements**

Given the categories of project workers (direct workers, contracted workers, primary supply workers), this section lays out the operational arrangements amongst the various institutions that will implement the Project and ensures the smooth implementation of the LMP. The requirements of the LMP apply to all categories of project workers and where there is a special emphasis for a particular category of workers, this will be highlighted within the applicable section of the LMP.

The requirements of the LMP as applicable to the direct workers will be the responsibilities of the DU and PITS. The DU/PITS will, however, have an oversight role through direct reporting arrangements on the requirements of the LMP in particular and other ESMF requirements in general. The DU/PITS have the responsibility to ensure LMP implementation at the interface with its respective contractors and sub-contractors and oversee the LMP implementation at all levels. The PITS has the mandate to ensure that all the procedures for primary supply workers are observed. ESS2 applies a proportionality approach to oversight responsibility towards suppliers.

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That being said it is important that the project ensures minimum conditions in cases like quarries, or camp service suppliers, or any activities ongoing within rehabilitation sites.

The approach to the implementation of this LMP is that all the provisions of the LMP are applied to all project workers. In some cases, special mention for a particular category of project worker is required.

Within the DU/PITS, the Social Specialist will be the main responsible person for overseeing the implementation of the LMP for all workers. The Social Specialist will oversee contractors and ensure that contractors comply with this LMP, including in regard to OHS. The Social Specialist will further monitor that the contractor is providing a workers' grievance redress mechanism and conducting all required trainings of the workers. Where the Social Specialist identifies that the contractor does not have the capacity to implement training for workers, he or she will provide the training directly. The Social Specialist will also request all signed CoCs from the contractor and monitor that 100% of workers have signed the document.

Contractors are expected to include a health and safety manager into the workforce, which will be the person responsible for the training of workers, the implementation of all OHS measures and the engagement with potential sub-contractors on these issues. It is expected that the contractor will have a human resources function that will assist with the signing of the CoCs and with the implementation of these LMP.

### **Monitoring and Supervision**

The performance monitoring of this LMP will follow the same institutional arrangement as the monitoring and supervision of the ESMF. Detailed mechanisms are laid out above in the monitoring section of the ESMF. In general, the DU/PITS will be responsible for the monitoring of the implementation of the LMP. In particular, the Social Specialists in the DU/PITS will ensure that the LMP is fully implemented.

The DU/PITS Social Specialists will undertake supervision missions and spot checks as per schedule laid out above. Through the initial activity- or site-specific screening process, the Social Specialists will be aware of potential labor-related risks and impacts of activities and will develop a monitoring schedule around these.

Non-compliance of the LMP will be reported to the Project Coordinator and will be taken up in the regular E&S reporting.

### **Workers' Grievances Redress Mechanism**

According to Ethiopian Labor Proclamation No. 1156/ 2019, Workers' GRM for addressing and managing workers and employment-related conflicts or a complaint as well as Gender-Based Violence (GBV) is mandatory, as well as under ESS2. Labor Proclamation No. 1156/ 2019, Chapter 3, Article 141, has also introduced that employers and workers or their respective associations may use social dialogue to prevent and resolve labor disputes amicably. Article 141, chapter 3.

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The Project will provide for a grievance mechanism for all direct workers and contracted workers (and, where relevant, their organizations) to raise workplace concerns. Such workers will be informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against reprisal for its use. Measures will be put in place to make the grievance mechanism easily accessible to all such project workers. The objective of the Workers' Grievance Redress Mechanism (Workers' GRM) is to settle the grievance between an employer and employee or between employees bilaterally before resorting to formal dispute resolution, except in cases where the grievance constitutes a criminal offense that requires notifying law enforcement. The Workers' GRM are in accordance with the provisions of ESS2 and apply to all direct, contracted and supply workers.

Assess and Clarify. Workers will be informed of this grievance mechanism at the time of recruitment and the measures put in place to protect them from any reprisal for its use. Contractors induct the employee on the applicable workers' grievance redress mechanism. Induct all project workers to be aware of their rights. All records of induction shall be kept and made available for inspection by the DU/PITS.

Workers will further receive easily accessible information on the contractual details, as well as CoCs included. They can further request clarifications on any contractual issues from the employer at any time during the deployment. The provided information will allow the worker to assess whether her or his concern is valid and should be taken up with the employer.

The DU/PITS shall contract only contractors with registered CoC or who sign an undertaking to comply with the provisions of the Labor Act for contracted workers.

Intake, Acknowledge and Follow-Up. In case of a perceived violation, the aggrieved employee must capture and present the details of the grievance to the person they report to or the supervisor's superior in case of conflict of interest. The supervisor or the supervisor's superior will acknowledge the reception of the reported grievance to the employee.

In case of risk of retaliation, the employee may immediately escalate to the court system. The project can provide assistance with referrals to legal aid organizations. If confidentiality is requested, the PITS will ensure it to avoid any risk of retaliation, including in its follow-up actions.

Verify, Investigate and Act. The supervisor or the supervisor's superior will verify the details and seek to address the matter within the shortest time (up to 48 hours). They will escalate the matter if not resolved within 48 hours if a resolution is not found.

Where no resolution is found, the employee can escalate the matter to the sector specific institutions or courts who will resolve the matter between employer and employee. The Supreme Court's decision is final, where it has exercised lawful jurisdiction.

Where the formal courts are not accessible, do not exist in an area, or cannot render a judgment, the matter shall be reported to and handled by the DU/PITS, for example through the Project GRM. The PITS, in this case, will accommodate a fair agreement between the worker and the contractor.

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Monitor, Evaluate and Feedback. The contractor shall keep records of all proceedings of grievance redress that are within their jurisdiction and furnish PITS as part of the periodic progress reporting. The PITS will provide analytical synthesis reports on a quarterly basis to the PITS, which include the number, status and nature of grievances to the PITS. These reports will form the basis of all regular reports to the World Bank.

The PITS will further provide an excel sheet summary of the feedback and grievances reported, which will be linked to the Project's Management Information System (MIS) and to the Results Framework. It will further maintain a documented record of stakeholder engagements, including a description of the stakeholders consulted and a summary of the feedback/grievances received during community consultations.

For grievances related to sexual nature, please refer to the above GRM and the SEA/SH Action Plan.

### **Sample Code of Conduct**

The Code of Conduct should be written in plain language and signed by each worker to indicate that they have:

Received a copy of the code;

Had the code explained to them?

Acknowledged that adherence to this Code of Conduct is a condition of employment; and

Understood that violations of the Code can result in serious consequences, up to and including dismissal, or referral to legal authorities.

To Be Signed by All Employees, Sub-contractors, Engineer, and Any Personnel thereof

I, \_\_\_\_\_ agree that in the course of my association with the Employer, I must:

- treat children and women with respect regardless of race, color, gender, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status;
- not use language or behavior towards children and women that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
- not engage children under the age of 18 in any form of sexual intercourse or sexual activity (other than in the context of legal unions that took place between parties under the laws of the country), including paying for sexual services or acts;
- Not engage sexually with any woman, in a situation, without mutual consent
- Wherever possible, ensure that another adult is present when working in the proximity of children;
- Not invite unaccompanied children into my place of residence, unless they are at immediate risk of injury or in physical danger;
- Not invite women into my place of residence if this is not acceptable by the code of ethics of the company;
- Not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible;

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- Use any computers, mobile phones, video cameras, cameras or social media appropriately, and never to exploit or harass children or access child exploitation material through any media;
- Not use physical punishment on children and women;
- Not hire children for domestic or other labor which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury;
- Comply with code of ethics of the company and all relevant local legislation, including labor laws in relation to child labor and behavior;
- Immediately report concerns or allegations of child and women exploitation and abuse and policy non-compliance in accordance with appropriate procedures;
- Immediately disclose all charges, convictions and other outcomes of an offence, which occurred before or occurs during my association with the Employer that relate to child exploitation and abuse.
- When photographing or filming a child or using children's images for work-related purposes, I must:
  - Assess and endeavor to comply with local traditions or restrictions for reproducing personal images before photographing or filming a child;
  - Obtain informed consent from the child and parent or guardian of the child before photographing or filming a child. As part of this I must explain how the photograph or film will be used;
  - Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive;
  - Ensure images are honest representations of the context and the facts;
  - Ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form;

I understand that the onus is on me, as a person associated with the Employer, to use common sense and avoid actions or behaviors that could be construed as child exploitation and abuse.

Signed:

Date: