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MYANMAR COMMUNITY RESILIENCE PROJECT

ENVIRONMENTAL AND SOCIAL MANAGEMENT
FRAMEWORK

DRAFT FOR CONSULTATIONS

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Abbreviations and Acronyms

CBT	Cash-based Transfer
CEM	Community Engagement Mechanism
CFM	Community Feedback Mechanism
CP	Cooperating Partners
EAO	Ethnic Armed Organizations
E&S	Environmental and Social
ESMF	Environmental and Social Management Framework
FAO	Food and Agriculture Organisation
GBV	Gender-based violence
GM	Grievance Mechanism
IDPs	Internally Displaced Persons
IYCF	Infant and Young Child Feeding
MAF	Myanmar Armed Forces
MCRP	Myanmar Community Resilience Project
OHS	Occupational Health and Safety
PLW/G	Pregnant and Lactating Women and Girls
PSEA	Protection from Sexual Exploitation and Abuse
SEA/SH	Sexual Exploitation and Abuse
SNF	Specialized Nutritious Foods
SOP	Standard Operating Procedures
UN	United Nations
UNICEF	United Nations Children’s Fund
UXO	Unexploded Ordnance
WFP	World Food Programme

Executive Summary

Under the Myanmar Community Resilience Project (MCRP), the World Bank will be supporting World Food Programme’s (WFP’s) proposed interventions within the scope of its life-saving food and nutrition assistance to conflict-affected populations in Chin, Rakhine, Kachin and Shan states in Myanmar. The objective of the MCRP is to maintain and build resilience of vulnerable populations to enable their future development.

WFP interventions under the Project will support targeted relief and nutrition assistance through food transfers and cash-based transfers to populations affected by crisis, as well as provision of specialized nutritious foods to pregnant and lactating women and adolescent girls and children under 5 in Chin, Rakhine, Kachin and Shan States.

This Environmental and Social Management Framework (ESMF) has been prepared to identify the potential environmental and social risks and impacts of proposed Project activities and propose suitable mitigation measures to manage these risks and impacts. It maps out the general WFP and World Bank policies applicable for the Project, and describes the principles, approaches, implementation arrangements, and environmental and social mitigation measures to be followed.

The potential environmental and social risks for project activities are identified as:

- Potential exclusion of disadvantaged or vulnerable households;
- Potential exclusion of ethnic minorities due to access challenges or language barriers;
- Risks to project workers (including health and safety risks, security risks, child labor or forced labor, COVID-19 risks, and sexual exploitation and abuse risks);
- Risks to community members (including safety and security risks, discrimination or exclusion, COVID 19 risks, and sexual exploitation and abuse risks);
- Solid waste management risks from inappropriate disposal of food packaging;
- Food safety risks that may stem from improper storage, transport or distribution of food assistance; and
- Potential for insufficient stakeholder engagement and grievance management.

These risks will be managed and mitigated through the application of:

- The project's operational design for targeting and selection of communities and beneficiaries;
- WFP policies and operational practices (including the Environmental Policy, the Protection and Accountability Policy, the Food Storage Manual, and Standard Operating Procedures on COVID-19, protection for sexual exploitation and abuse, and community engagement mechanisms);
- The measures included in this ESMF and the Annexes to this ESMF (including simplified Labor Management Procedures, Landmine Procedures, and a Safety and Security Approach); and
- The Stakeholder Engagement Plan prepared for this project.

Implementation Arrangements. The project will support an extension of WFP's current programs in Rakhine, Kachin, Chin, and Shan states. WFP will both implement directly and work closely with and through a strong pool of local and international NGOs in implementing and monitoring its program. At WFP, the project will be overseen by the Deputy Country Director (Programme) and will be directly managed by the Head of Programme (both based in Nay Pyi Taw). Cooperating partners (CPs) will act as an implementing partner for some of the activities. The CPs will be mobilized to support WFP in assessing, distributing, and monitoring activities of the project. WFP will retain responsibility and technical oversight of CPs work. Agreements with CPs will include the requirement to comply with the environmental and social mitigation measures outlined in this ESMF. Local contractors, such as transportation companies, will be required to comply with the Project's environmental and social risk management measures, including the national laws and regulations and the ESMF.

Monitoring. WFP's monitoring activities are guided by WFP's Standard Operating Procedures for monitoring and tailored tools for distribution and post-distribution monitoring. WFP conducts monthly distribution monitoring focusing on distribution output and process, in addition to three rounds of detailed post-distribution monitoring which focus on the outcomes of WFP operations. WFP teams 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 measures as part of regular project monitoring.

A separate **Stakeholder Engagement Plan (SEP)** has been prepared for the Project, based on WFP's Community Engagement Mechanism Standard Operating Procedures for Myanmar and the World Bank's Environmental and Social Standard 10 on Stakeholder Engagement. Under its Standard Operating Procedures for its Community Engagement Mechanism WFP already has an operational and accessible community feedback mechanism/grievance mechanism, which has various culturally appropriate means for stakeholders to raise feedback. This grievance mechanism will also be used for the World Bank supported project activities to receive and facilitate resolution of concerns and grievances. The grievance mechanism is also equipped to receive, register and facilitate the resolution of sexual exploitation and abuse complaints, in accordance with the WFP

Standard Operating Procedures on sexual exploitation and abuse. WFP has a team of trained focal points to ensure referral of survivors to relevant service providers in a safe, confidential and survivor-centered manner.

1. Introduction and Objective

Under the **Myanmar Community Resilience Project (MCRP)**, the World Bank will be supporting World Food Programme's (WFP's) proposed interventions within the scope of its **life-saving food and nutrition assistance to conflict-affected populations in Chin, Rakhine, Kachin and Shan states in Myanmar**. The objective of the MCRP is to maintain and build resilience of vulnerable populations to enable their future development. This Environmental and Social Management Framework (ESMF) covers the interventions supported by the Project that will be implemented by WFP.

WFP interventions under the Project will support targeted relief and nutrition assistance through cash-based transfers, and in-kind or mixed modalities to conflict-affected persons in Chin, Rakhine, Kachin and Shan States for up to 6 months. While the activities and the general geographic areas for implementation have been determined at project preparation, the exact targeting locations and activities will be determined during project implementation based on community needs and evolving country context. Therefore, this ESMF has been prepared to identify the potential environmental and social risks and impacts of proposed Project activities and propose suitable mitigation measures to manage these risks and impacts. It maps out the general WFP and World Bank policies applicable for the Project, and describes the principles, approaches, implementation arrangements and environmental and social mitigation measures to be followed.

The ESMF ensures that timely measures are in place in order to:

- Avoid or minimize any harm to human health and security
- Avoid, minimize, mitigate, or compensate for any environmental negative impacts as a result of the interventions by projects
- Avoid, minimize, and mitigate the risks in a COVID-19 setting
- Enhance positive environmental and social outcomes
- Ensure compliance with Myanmar legislations, as well as with the World Bank's Environmental and Social Framework (ESF) and WFP's Policies

The methodology for the development of the ESMF is based on the long-standing WFP presence in Myanmar, a review of literature available on Myanmar, consultations with WFP field teams and experts, a review of field needs assessments, as well as of relevant institutional and policy frameworks. It includes information gathered during the regular consultations WFP staff conducts in the intervention areas for several years, seeking community understanding and support by the local population, as well as developing a solid awareness of wider contextual variables, environmental ones included.

2. Project Description

The objective of this intervention is to ensure conflict-affected populations in Chin, Rakhine, Kachin and Shan States have access to sufficient, nutritious and safe food. This is in alignment with WFP's Myanmar Country Strategy and the following strategic outcomes: Crisis-affected people in food-insecure areas meet their food and nutrition needs all year round; and children under 5 in Myanmar have improved nutrition in line with national

targets by 2022. The proposed activities are fully supportive of and will directly and indirectly contribute to the goals of the Myanmar Sustainable Development Plan (2018-2030).

As described in the MCRP Project Appraisal Document, the overall project has four components:

- Component 1. Protect and Promote Human Capital**
- Component 2. Improving Nutrition of Vulnerable Groups**
- Component 3. Supporting Sustainable Livelihoods**
- Component 4. Ensuring Access to Basic Services and Infrastructure**

WFP will be implementing Component 1.2 and Component 2 under the MCRP.

The two main components that will be implemented by the WFP are described in more detail below:

Component 1.2: Emergency Relief Assistance: Provide unconditional food transfers and/or cash-based transfers (CBTs) to populations affected by crisis

The World Bank supported activities will target internally displaced people (IDPs) and other vulnerable persons in Chin, Rakhine, Kachin and Shan States with cash transfers and/or a basic food basket consisting of rice, pulses, cooking oil and salt. Most of these vulnerable, food-insecure women, men, girls, boys, the elderly and persons with disabilities are reliant on WFP's life-saving assistance given the lack of livelihood opportunities, movement restrictions and security concerns. Exact locations will be decided closer to implementation to ensure the most vulnerable are targeted.

Component 2: Nutrition: Provide specialized nutritious foods for prevention of acute malnutrition among pregnant and lactating women and adolescent girls (PLW/Gs), and children under 5

The World Bank supported activities will provide at-risk children under five and PLW/Gs with specialized nutritious foods (SNFs) to prevent acute malnutrition in Rakhine state. SNFs are Fortified Blended Foods to ensure that the nutritional status of girls, boys and women is protected and improved, contributing to the reduction of morbidity, mortality and nutritional vulnerability among the most at-risk groups.

WFP nutrition interventions are undertaken in collaboration with UNICEF's prevention and treatment of acute malnutrition wherever possible. To complement the provision of SNFs, WFP will also provide cooperating partners with technical support that promotes optimal Infant and Young Child Feeding (IYCF) practices through nutrition promotion sessions and counselling to caregivers (with children 6-59 months) and PLW/Gs. Exact locations will be decided closer to implementation to ensure the most vulnerable are targeted.

WFP will directly implement Component 1.2 activities in Northern and Central Rakhine State, and in Kyaukme and Hsipaw townships in Shan State. All other geographic areas to be covered under Component 1.2 will be implemented through cooperating partners (CPs) such as Save the Children, Plan International, World Vision, and others. Component 2 will be implemented through CPs such as Save the Children, Action Contre La Faim, and the Myanmar Health Assistant Association.

3. Environmental and Social Policies and Legal Frameworks

3.1 Myanmar Legal Framework

Myanmar national legislation relevant to environmental and social risks management for the WFP project activities are summarized below. While project activities will not be implemented by Myanmar governmental authorities, WFP will ensure that its activities are in compliance with relevant national laws.

Table 1. Myanmar Legal Framework

Law	Description
Environmental Conservation Law, 2012	The Law provides the Ministry of Natural Resources and Environmental Conservation the mandate to implement environmental conservation policies, prescribe environmental quality standards and management tools for hazardous and nonhazardous waste. In addition, the law outlines the procedures for conducting environmental and social assessments. Specifically, the different components of the Law are addressed under the Environmental Conservation Rules (2014) and the EIA Procedures (2015).
National Environmental Policy, 2019	The policy provides environmental protection and sustainable development guidance for government entities, civil societies, private sector, and development partners. The guidance is based on three strategic areas: Clean environment and healthy and functioning ecosystems; sustainable economic and social development; and mainstreaming of environmental protection and management.
Climate Change Policy, 2019	The policy envisions a Myanmar that is climate-resilient and a low carbon emissions society, sustainable, prosperous, and inclusive for the present and future generations. In order to do so the policy prioritizes six primary actions: Food and water security; healthy ecosystems; low carbon and resilient growth; resilient urban and rural settlements; human wellbeing; and knowledge, awareness and research.
Occupational Health and Safety Law, 2019	The safety and health measures expected for every industry and workplace is provided by the law. These measures are mainly administrative stipulations related to occupations health and safety protection.
Ethnic Rights Protection Law, 2015	The law provides definitions of ethnic groups and role and responsibility of the Ministry of Ethnic Affairs to promote sustainable socio-economic development by guaranteeing the national races (e.g. ethnic races) accessibility to study their own languages, literature, fine arts, culture, customs and traditions.

The Government of Myanmar, with support from various development partners and civil society, has made important progress on management of some aspects of risk management in development projects. The 2012 Environmental Conservation Law reflects good international standards. There is also ongoing work to develop environmental impact assessment guidelines, health impact assessment guidelines, public participation guidelines; and Child Labor Law. Under EIA Procedures (2015), the Ministry of Natural Resources and

Environmental Conservation has a mandate to review and monitor environmental and social impacts and mitigation measures of development projects. The 2015 EIA Procedures reflect good international practice and set out roles and responsibilities, but Ministry of Natural Resources and Environmental Conservation is overburdened due to shortage of financial and human resources.

Key missing elements for effective environmental and social risk management include a practice of identification of people vulnerable to development projects, clear and enforced regulations on labor and working conditions, improved contractor management for pollution management and management of

community health impacts, a unified land acquisition law, a shared understanding of ethnic minority rights, and a practice of inclusive and accessible stakeholder engagement.

3.2 WFP Policies and Framework

WFP policies on environmental and social risk management that are applicable for project activities are summarized below.

Table 2. WFP Environmental and Social Policies

Policy	Description
Environmental Policy	<p>The policy builds on lessons learned from experience and seeks to resolve a gap in WFP's policy framework by systematically integrating environmental considerations into the organization's work to address hunger. The policy focuses on mechanisms for identifying, avoiding, addressing and managing environmental risks in WFP's interventions, while also recognizing that WFP's food assistance activities can generate environmental benefits. the policy will support WFP in: i) progressively enhancing the environmental sustainability of activities and operations; ii) protecting the environment; iii) increasing resource efficiency and minimizing its carbon footprint; iv) aligning its actions with good international practice and global standards for environmental sustainability; and v) strengthening the capacity of partners to plan and implement environmentally sound activities for food security and nutrition.</p> <p>The policy commits WFP to developing planning and implementation tools, which are outlined in separate guidance documents: Environmental standards that lay out essential protection measures and minimum expectations; a screening and categorization process for identifying and managing environmental risks; and an environmental management system consistent with the international standard ISO 14001.</p>
WFP Food Storage Manual	<p>This Manual outlines the measures to be implemented by WFP to ensure that all needed steps are taken during the procurement, transport, handling, storage and distribution of food aid, so that the food aid reaches the beneficiaries in good and acceptable condition. It contains detailed guidance on handling and storage of food aids commodities; storage structure selection and design; taking into account moisture, humidity and temperature in</p>

	<p>food storage; effects of climate in storage and transportation; transportation and handling; packaging; inspection and sampling; and pest management.</p>
<p>WFP Protection and Accountability Policy & Protection Guidance Manual</p>	<p>The Policy fosters the integration of protection and accountability across a range of functions critical to WFP operations so as to ensure that food assistance is safe, appropriate and received in a dignified manner. Protection is understood as activities that aim to prevent, reduce, mitigate and respond to the risks and consequences of violence, coercion, deprivation and abuse for persons, groups and communities.</p> <p>The Guidance Manual translates how the Policy should be applied in operations. Under its Accountability to Affected Populations commitment, WFP commits to accessible information provision, consultations, and functioning complaints and feedback mechanisms. The Guidance Manual requires vulnerability analysis in all operations through various steps, including extensive stakeholder engagement. The Manual also identifies key protection and accountability risks for different types of WFP activities and proposes standard mitigation measures for these.</p>
<p>WFP People Policy</p>	<p>The people policy presents WFP's vision for its future workforce as one in which diverse, committed, skilled and high-performing teams selected on merit, operating in a healthy and inclusive work environment and living WFP's values, working with partners to save and change the lives of those WFP serves. The policy includes commitments to an inclusive and accessible work environment, non-discrimination, and no tolerance for sexual exploitation and abuse, sexual harassment, and abuse.</p>
<p>Protection from Harassment, Sexual Harassment, Abuse of Authority and Discrimination</p>	<p>This specific Human Resources Circular commits to a zero-tolerance approach to abusive conduct, defined as including:</p> <p>“Discrimination” is any unfair treatment or arbitrary distinction in the workplace, based on a person’s race, sex, gender, religion, belief, nationality, ethnic origin, sexual orientation, disability, age, language, social origin, or other status; “Harassment” is any improper conduct that might reasonably be expected or be perceived to cause offense or humiliation to another person; and “Sexual harassment” is any unwelcome sexual advance, verbal or physical conduct of a sexual nature, be it an act of sexual violence⁶ or any other behaviour of a sexual nature, that might reasonably cause offense or humiliation to another person.</p> <p>The Circular includes commitments and requirements for protecting all employees from abusive conduct and to ensure that all employees are aware of their roles and responsibilities in maintaining a workplace free of any form of abusive conduct. This Circular also describes mechanisms meant to ensure the responsibilities of WFP as an employer and of each WFP employee, of promoting safe and harmonious workplace environments, and taking action when alerted to potential abusive conduct.</p>
<p>Standard Operating Procedures on Protection from Sexual</p>	<p>The Standard Operating Procedures outline the details of how WFP staff in Myanmar will manage sexual exploitation and abuse (SEA) risks. It includes organizational responsibilities, measures for raising awareness among staff/partners/contractors/communities, mitigation measures, SEA complaint management and reporting, and referral pathways.</p>

Exploitation and Abuse in Myanmar	
WFP Gender Policy	The Policy recognizes that a world with zero hunger can only be achieved when everyone has equal opportunities, equal access to resources and equal voice in decisions that shape their households, communities and societies. The goal of the Gender Policy is to enable WFP to integrate gender equality and women’s empowerment into all of its work and activities, to ensure that the different needs of women, men, girls and boys are met. The policy with its three objectives builds on WFP’s many successes in the field and promotes i) equitable access to and control over food security and nutrition; ii) address the root causes of gender inequalities that affect food security and nutrition; iii) advance the economic empowerment of women and girls in food security and nutrition.
Standard Operating Procedures in the Context of the Covid-19 Outbreak	This Standard Operational Procedure provides guidance to personnel operating on behalf of the WFP in areas where COVID-19 is known or suspected to be prevalent and requiring working in close proximity with individuals suspected to be carrying the Corona virus. All WFP staff and Cooperating Partners (CP) are responsible for complying with all aspects of this standing instruction and ensuring that any individual demonstrating potential symptoms of COVID-19 are identified and isolated, with appropriate follow up.
Community Engagement Mechanism in Myanmar – Standard Operating Procedures	The Standard Operating Procedures outline the details of how community engagement activities will be conducted by WFP staff in Myanmar throughout the project cycle. It includes stakeholder identification and assessment activities, communication and outreach mechanisms, implementation and monitoring, grievance intake forms, grievance staffing and management, and referral pathways for SEA and abuse grievances.

3.3 World Bank Policies and Framework

The World Bank’s environmental and social policies applicable to project activities are summarized below.

Table 3. World Bank Environmental and Social Standards Relevant for Project Activities

E&S Standard	Description
1. Assessment and Management of Environmental and Social Risks and Impacts	<p>Sets out the implementing agency’s responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with a project supported by the Bank, in order to achieve environmental and social outcomes consistent with the Environmental and Social Standards.</p> <p>ESS1 is relevant for the project because project activities are expected to pose substantial environmental and social risks due to the current political and conflict context in Myanmar, and the emergency approach taken by the implementing agencies.</p>

<p>2. Labor and Working Conditions</p>	<ul style="list-style-type: none"> - Promotes safety and health at work; - Promotes the fair treatment, non-discrimination and equal opportunity of project workers; - Protects project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and subproject workers, contracted workers, community workers and primary supply workers, as appropriate; - Prevents the use of all forms of forced labor and child labor; - Support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law; - Provides project workers with accessible means to raise workplace concerns. <p>ESS2 is relevant for the project because there are certain labor risks for project workers. Labor related risks include (i) security risks to project workers including landmines, (ii) traffic and road safety issues, (iii) inadequate terms and conditions of employment.</p>
<p>3. Resource Efficiency and Pollution Prevention and Management</p>	<ul style="list-style-type: none"> - Promotes the sustainable use of resources, including energy, water and raw materials; - Avoids or minimizes adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities; - Avoids or minimizes project-related emissions of short and long-lived climate pollutants; - Avoids or minimizes generation of hazardous and non-hazardous waste; - Minimizes and manages the risks and impacts associated with pesticide use. <p>ESS3 is relevant because the project investment and activities will apply measures for efficient usage of resources (energy, water and raw materials) that are consistent with the Environmental, Health and Safety Guidelines (EHSGs).</p>
<p>4. Community Health and Safety</p>	<ul style="list-style-type: none"> - Anticipates and avoids adverse impacts on the health and safety of project-affected communities during the project life cycle from both routine and non-routine circumstances; - Promotes quality and safety, and considerations relating to climate change, in the design and construction of infrastructure; - Avoids or minimizes community exposure to project-related traffic and road safety risks, diseases and hazardous materials; - Puts in place effective measures to address emergency events; - Ensures that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities. <p>ESS4 is relevant because the project may have some manageable and localized impacts to community health and safety as a result from project activities, such as community exposure to health issues such as water-borne and vector-borne diseases through inadequate and solid waste management practices; risks of COVID-19 transmission; and sexual exploitation and abuse/sexual harassments risks.</p>
<p>7. Indigenous Peoples/Sub-Saharan</p>	<p>Applies to distinct social and cultural groups possessing the following characteristics in varying degrees: (a) Self-identification; and (b) Collective attachment to geographically distinct habitats; and</p>

<p>African Historically Underserved Traditional Local Communities</p>	<p>(c) Customary cultural, economic, social, or political institutions that are distinct or separate from those of the mainstream society or culture; and (d) A distinct language or dialect. The Standard aims to ensure full respect for the human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods of Indigenous Peoples; avoid adverse impacts of projects on Indigenous Peoples; and to promote sustainable development benefits</p> <p>and opportunities for Indigenous Peoples</p> <p>ESS7 is relevant for the project because indigenous people who meet the criteria of ESS7 are present in the project areas. There may be risks that ethnic minorities do not have equal and culturally appropriate access to benefits and may not be adequately consulted in decision making.</p>
<p>10. Stakeholder Engagement and Information Disclosure</p>	<p>Recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. The Standard applies to all projects supported by the Bank. The implementing agency will engage with stakeholders as an integral part of the project’s environmental and social assessment and project design and implementation, and establish an accessible grievance mechanism.</p> <p>ESS10 is relevant for all projects given the need to engage with beneficiaries and stakeholders on development activities that affect their lives.</p>

4. Environmental and Social Context

This section outlines the humanitarian, social and environmental context relevant for the Project activities.

4.1 Humanitarian and Social Context

Nearly a year since the military takeover on 1 February 2021, there is growing evidence of a deepening humanitarian crisis and economic displacement, with a high risk of increased food insecurity and malnutrition, rapidly unfolding in Myanmar. Joint assessments by WFP, FAO and UNICEF in 2021 estimate that in 2022, a total of 13.2 million people or 24 percent of the population are now either severely or moderately food-insecure, of which 1.2 million are severely food-insecure¹.

Unless emergency food assistance is provided, an estimated 3.5 million moderately food-insecure people are at critical risk of falling into severe food insecurity due to insufficient food consumption, use of crisis or emergency coping strategies and/or economical vulnerability. Ongoing and intensifying clashes between the Myanmar military (Tatmadaw), ethnic armed organizations (EAO) and newly formed local militias are causing a sharp increase in the displacement of vulnerable populations. Since 1 February 2021, at least 606,000 people have been

¹ Myanmar Humanitarian Needs Overview 2022.

displaced due to conflict. This is in addition to an existing population of 336,000 people² living in situations of protracted displacement in Rakhine, Kachin, Shan, Chin and Kayin states.

The volatile security situation, disruptions to essential public services, and rising food and fuel prices are exacerbating pre-existing vulnerabilities and complicating humanitarian efforts countrywide. Since February 2021, the average retail price of a basic food basket was up by 32 percent³. The overall volatile context, conflict and displacement, and transportation challenges are causing rising prices and declining stock. The effects are felt particularly by those with intersecting vulnerabilities, including women and adolescent girls who are displaced, are heads of their household, or who have a disability.

Adding to the challenges, in 2021 Myanmar faced a third wave of COVID-19 outbreak which had a devastating impact. The high transmission of COVID-19 variants, low vaccination rates, and a crippled health care system will continue to take a heavy socio-economic toll, particularly on those whose livelihoods and freedom of movement have already been disrupted due to conflict, disaster and/or the pandemic.

Humanitarian access, which was already challenging before the military takeover on 1 February 2021, remains constrained due to security concerns and administrative procedures. These challenges include the ongoing requirement in all conflict-affected areas for monthly travel authorisations for movement of people and cargo, and other layers of approvals, which hinders the timely delivery of humanitarian assistance. Fortunately, WFP has been able to navigate and negotiate with relative success particularly since late 2021. However, access barriers also exist for affected people to reach WFP assistance, particularly those who have fled from violence and conflict and are afraid of coming out of hiding in remote forest and mountain terrain.

In **Rakhine**, complex humanitarian challenges persist. Although levels of conflict between the Myanmar Armed Forces (MAF) and ethnic armed group the Arakan Army have declined significantly since November 2020, the overall security situation remains fragile. Since 2012, WFP has been providing monthly emergency relief assistance to the internally displaced persons (IDPs) in Rakhine State and chairs the Rakhine Food Security Cluster.

In **Kachin** and **Shan** states, the security situation has significantly deteriorated since early 2021, with renewed and increasing armed conflicts having a heavy impact on an already fragile humanitarian situation in existing and new conflict-affected areas. WFP and its cooperating partners aim to deliver assistance to people from IDP camps and conflict-affected villages in Kachin State. In addition to its own relief assistance, WFP, in its capacity as the Chair of the Kachin Food Security Cluster (as well as the Cash Working Group), will continue to lead the coordination for food assistance overall, including for temporary displacements. In Shan State, IDPs and vulnerable people from host communities will be targeted for emergency relief assistance.

In **Chin**, WFP will continue its assistance to beneficiaries in Paletwa township who are affected by the continued tensions between the MAF and Arakan Army.

WFP remains responsive to the changing context in each state, enabling an effective response to reach the most vulnerable communities. WFP continues to coordinate with a variety of actors for effective humanitarian response.

² Myanmar Humanitarian Needs Overview 2021.

³ WFP Market Price Update, March 2022.

4.2 Climate and Environment Context

Myanmar is prone to natural disasters, including in areas already affected by conflict. In the 2019 Notre Dame–Global Adaptation Index, Myanmar is classified as having high vulnerability to the effects of climate change but also low readiness to adapt to the changes. In addition, the 2021 Global Climate Risk Index reported that Myanmar was among the countries most affected by extreme weather events from 2000 to 2019. Key vulnerabilities include:

- Livelihoods and national income highly depend on climate-sensitive sectors, such as agriculture and forestry.
- Coastlines are projected to retreat by 10 kilometers (km) in the event of a 0.5m sea-level rise, which would further increase human density in low-lying regions that are already facing economic vulnerability due to cyclones and storm surges.
- Most vulnerable communities are located in high-risk areas where the key livelihoods, such as agriculture, are greatly susceptible to climate change impacts.
- The World Health Organization (WHO) projects that by 2070 an annual average of 18 million people will be affected by sea level rise-induced floods.

Climactic Conditions. Most parts of Myanmar lie in the monsoon region of Asia between the Tropic of Cancer and the Equator. Generally, Myanmar has three distinct seasons, namely winter or northeast monsoon season (November – February), summer or hot season (March -Mid May) and a rainy or southwest monsoon season (Mid May – October). In March and April, the highest day temperature of 100 ° F (37.8 °C) and above occur in Central and Lower Myanmar areas. According to Koppen-Gelger Climate Classification (1968-2010), there are seven generalized climate zones in Myanmar. Its coastal regions receive over 5,000 mm (196.9 in) of rain annually. The Delta region gets approximately 2,500 mm (98.4 in) of rainfall. Meanwhile average annual rainfall in the Dry Zone in central Myanmar is less than 1,000 mm (39.4 in). The North of Myanmar is the coolest part of the country with snow-capped mountains of the Himalaya mountain ranges. The average temperature in this region is 21 °C (70 °F) while coastal and delta regions have maximum temperature of 32 °C (89.6 °F).

Water Resources. Myanmar possesses a wide range of water resources including natural lakes and ponds, ground water, rivers, and streams. Myanmar is rich in water resources and the catchment area of Myanmar's rivers comprises about 737,800 km². Potential water resources volume is about 1082 km³ for surface water and 495 km³ for groundwater. Myanmar is endowed with tremendous inland water resources in the form of rivers, streams, and springs. The Ayeyarwady River is the longest river which originates in the northern part of the country and flows into the Andaman Sea. As it flows throughout the country, farmers, fishermen and local people mainly depend on it for their livelihoods. The Chindwin River, with headwaters in the northwestern hills, is the main tributary of the Ayeyarwady. The Sittaung River starts in hills southeast of Mandalay, and the Thanlwin River, the last undammed river in Myanmar, races through deep gorges in the Shan Plateau. The Kaladan River is formed by tributaries discharging from the Arakan Mountains.

Soil Quality. Because of the wide range of climate and soil forming parent rocks, soil types in Myanmar are considerably varied. At a national level, the government has not conducted surveys of soil quality. However, international organizations/institutes are conducting studies mainly focused on dry zone areas with the objective of furthering agricultural improvement in these areas. Myanmar mainly contains the soil types: Ferralsol, Cambisol and Gleysol which are suitable to grow rice, corns, rubber, and mango trees. Almost one fourth of the country is formed with Ferralsol soil which support the abundant forest growth in Rakhine and Taninthari, and

suitable for rubber, coconut, and oil palm plantations in hilly regions of Myanmar. The Cambisol soil is mostly found in hilly and mountainous regions; Shan, Myitkyina and Northern Myanmar which promote the growth of dense forest areas in Myanmar. The soils in Myanmar are low in organic matter and nitrogen while in some regions have high phosphate and potash which are good for crops and paddy.

Food storage. Given its long years of providing assistance in Myanmar, WFP operates one or more food storage warehouses in the states and regions it operates. WFP uses regular third-party monitoring for inspection of these warehouses to ensure their compliance with the WFP [Food Storage Manual](#). The inspection covers inventory, food quality, perimeter controls/fencing, cleanliness, ventilation, lighting, and fire prevention measures/extinguishers. Similarly, contracts for transportation service providers for food aid cover the minimum requirements the transportation fleet need to have in order to ensure food safety in accordance with the WFP [Food Storage Manual](#).

4.3 Ethnic Minorities Context

Myanmar is one of the most ethnically diverse countries in Asia. The 2008 Constitution recognizes 135 distinct ethnic groups as “national races” in which there are eight major ethnic groups: Kachin, Kayar, Kayin, Chin, Bamar, Mon, Rakhine and Shan. These 135 groups are legalized based on the origin of 135 languages and races by British Colonial Census 1931. The largest national race is the Bamar that makes up approximately two-thirds of the Myanmar population. Other national races or ethnic groups/minorities account for approximately one third of the population and live mainly within the administrative boundaries of seven States. Myanmar’s ethnic States occupy around 57 per cent of the total land area along most of the country’s international borders. Ethnic groups, who satisfy the criteria under World Bank’s ESS7 on Indigenous People’s, reside in the states and region that will be targeted by project activities. Based on ESS7, free, prior and informed consent (FPIC) will not be required under the project as there will be no (a) adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation; (b) relocation of members of ethnic minority groups required or (c) significant impacts to cultural heritage that is material to the identity and/or cultural, ceremonial, or spiritual aspects of the affected people. While FPIC is not required, WFP will aim to hold culturally appropriate and gender sensitive free, prior and informed consultations with ethnic minorities.

The states and regions targeted for support by the project (Shan, Kachin, Chin, and Rakhine states) were characterized by poor socio-economic indicators before the current political unrest and pandemic (2017 Myanmar Living Conditions Survey, World Bank). This was especially the case for the conflict affected border areas border areas of Kachin, Rakhine and Shan states, with Rakhine having the worst access to basic sanitation, while Shan state was characterized by the highest percentage of people 15 years or older reporting being illiterate. Of those townships considered to be conflict-affected before the coup, 77 percent fall in the bottom half of the multi-dimensional disadvantage index recently developed by the World Bank and the Ministry of Labor, Immigration, and Population. Since the February 2021 coup, armed conflicts have intensified in Rakhine, Kachin, Shan, and Chin states. In addition to the direct casualties and fatalities, the intensification of these conflicts will significantly worsen the socio-economic situation through displacing populations, preventing access to livelihood activities and essential public services, as well as the destruction of physical capital and social capital (in the form of social networks and relationships of trust). The worsening situation due to the COVID-19 and intensifying

conflict will impact socio-economic well-being nationally, with an additional 3.4 million expected to require food aid (on top of the 2.8 million already requiring it), and an additional 12 million people being pushed into poverty.

5. Potential Environmental and Social Risks and Mitigation Measures

The project will support delivery of food transfers or CBTs to vulnerable populations in Chin, Rakhine, Kachin and Shan states under Component 1.2; and delivery of SNFs to children under five and PLW/Gs in Rakhine state, along with training on proper nutrition, under Component 2. Most of these vulnerable, food-insecure women, men, girls, boys, the elderly and persons with disabilities are reliant on WFP's life-saving assistance given the lack of livelihood opportunities, movement restrictions and security concerns. The project will contribute to positive social outcomes for these populations and contribute to the reduction of morbidity, mortality and nutritional vulnerability among the most at-risk groups.

In addition, when communities experience multiple severe shocks, vulnerable communities often adopt unsustainable coping measures, such as reducing food intake, selling land or assets, or over-consuming natural resources in an unsustainable manner. Project activities aim to prevent the use of such negative coping strategies by vulnerable households by ensuring that they have access to sufficient, nutritious and safe food.

The potential negative risks and mitigation measures are summarized in the table below. Risks will be mitigated by operational and engagement mechanisms that are already part of the project design, and by the application of this ESMF and the Stakeholder Engagement Plan (SEP) prepared for the project.

Table 4. Key E&S Risks and Mitigation Measures

Key Risks	Mitigation Measures
<p>Exclusion: The targeting and beneficiary selection for these activities carries risks that certain communities, ethnic minorities, or vulnerable households may be excluded from project benefits.</p>	<p>Ensuring that its activities and benefits reach the most vulnerable and in-need households is at the core of WFP operations, as outlined in the <u>WFP Protection and Accountability Policy</u>, and its <u>Protection Guidance Manual</u>. Based on these:</p> <ul style="list-style-type: none"> - In identifying subproject activities and beneficiaries, WFP conducts inclusive and accessible consultations with development partners, NGOs, religious and community leaders, and community-based organizations, as well as participatory protection assessments and vulnerability analysis. - WFP provides transparent information on project activities, benefits, eligibility criteria to communities, through accessible channels, trusted intermediaries, in relevant ethnic languages. - WFP proactively identifies, consults with and reaches out to disadvantaged and vulnerable groups and households (through surveys, consultations or other means as appropriate), and includes specific measures to address the potential obstacles to access for disadvantaged and vulnerable groups. - WFP ensures that its grievance mechanism (GM)/community feedback mechanism (CFM) is accessible to disadvantaged and vulnerable groups through raising awareness among these groups and in relevant ethnic languages, providing different intake channels etc. <p>Specifically, for project activities, WFP will use either a status-based criteria approach (such as all IDPs in a given settlement or all children between 6 months and 5 years of age) or a vulnerability or needs-based approach for targeted communities living outside of IDP camps who are food insecure. In those areas where vulnerability or needs is the basis for targeting, a blanket eligibility approach is used to cover all households in a given village tract. Augmented support is provided to the most-vulnerable IDP households that include: single-headed households, households headed by persons with disabilities, elderly headed households, women without family members, etc.</p> <p>Exclusion risks will be managed through:</p> <ul style="list-style-type: none"> • The project’s operational design, and • Stakeholder Engagement Plan (SEP).

<p>Exclusion, specific to ethnic minorities: The targeting and beneficiary selection for these activities carries risks that ethnic minorities who fall under the definition of ESS7 may be excluded from project benefits.</p>	<p>Ensuring that its activities and benefits reach all eligible beneficiaries without discrimination is at the core WFP operations, as outlined in the <u>WFP Protection and Accountability Policy</u>, and its <u>Protection Guidance Manual</u>. Based on these, the operational design for the project, and existing practices:</p> <ul style="list-style-type: none"> - In identifying subproject activities and beneficiaries, WFP conducts inclusive, accessible, culturally appropriate and gender-sensitive consultations with ethnic communities, as well as with NGOs, religious and community leaders, and community-based organizations representing ethnic minorities. These consultations take into the specific obstacles that may be faced by ethnic minorities such as, access challenges, language barriers, discrimination, intimidation, and travel restrictions. - These consultations enable ethnic groups to provide input to the design of project activities and priorities, as well as provide feedback on implementation of project activities, benefits and risks to ethnic group communities, with the objective of obtaining broad community support for project activities. - WFP provides transparent information on project activities, benefits, eligibility criteria to ethnic minority communities, through accessible and culturally appropriate channels, trusted intermediaries, in relevant ethnic languages. - WFP proactively identifies, consults with and reaches out to ethnic minority groups (through surveys, consultations or other means as appropriate), and includes specific culturally appropriate measures to address the potential obstacles to access for them in delivery of food and cash assistance. - WFP ensures that its grievance mechanism (GM)/community feedback mechanism (CFM) is accessible to ethnic groups and culturally appropriate for them to bring forward grievances, through raising awareness among these groups in relevant ethnic languages, providing different intake channels etc. - WFP and CPs employ staff and volunteers from among the ethnic groups and who speak relevant ethnic languages, as needed and feasible. For CP staff and volunteers who are from outside the ethnic communities, provide awareness raising on culturally appropriate behavior, issues related to ethnicity, religion and marginalization.
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	<p>- Monitoring of project activities (including possibly qualitative monitoring or beneficiary assessments) take into account societal dynamics and ethnic groups.</p> <p>Exclusion risks will be managed through:</p> <ul style="list-style-type: none"> • The project’s operational design, and • Stakeholder Engagement Plan (SEP).
<p>Risks to project workers: Risks to project workers (direct workers hired by WFP, contracted workers, or supply chain workers) may include, health/safety/security risks, discrimination, child labor or forced labor, COVID-19 risks, and SEA risks.</p>	<p>WFP’s <u>People Policy</u>, <u>Protection from Harassment, Sexual Harassment, Abuse of Authority and Discrimination</u>, and its <u>Standard Operating Procedures on Protection from SEA</u> address how to manage these risks.</p> <p>Based on these, for all project workers under the project activities, WFP, the CPs and contractors will apply the following:</p> <ul style="list-style-type: none"> - There will be clear terms and conditions for no discrimination with respect to any aspects of the employment relationship, such as: Recruitment and hiring; compensation (including wages and benefits; working conditions and terms of employment; access to training; job assignment; promotion; termination of employment or retirement; or disciplinary practices. - Harassment, intimidation and/or exploitation will be prevented or addressed appropriately. - Vulnerable project workers will be provided with special protection. - WFP will provide job / employment contracts with clear terms and conditions including rights related to hours of work, wages, overtime, compensation and benefits, annual holiday and sick leave, maternity leave and family leave. The WFP procedures on protection from SEA will be applicable for all project workers. - WFP will ensure compliance with its procedures on protection from SEA, including providing training/awareness raising, and ensuring that its GM/CFM can respond to SEA incidents. - WFP will ensure compliance with relevant occupational health and safety procedures, traffic and fleet safety procedures, and COVID-19 procedures, including that the workers are properly trained in application of the standards that are relevant to the work. - WFP and CPs will ensure no person under the age of 18 shall be employed. - Workers shall be recruited voluntarily, and no worker is forced or coerced into work. - WFP will supervise and monitor to ensure compliance with the above requirements.

	<p>- All workers will be made aware of the worker grievance mechanism available under the WFP Human Resources Policy, as well as of the project GM/CFM, to which they can submit work-related complaints.</p> <p>The above mitigation measures, as well as procedures to ensure that contractors, CPs and primary suppliers also implement necessary labor risk management measures, are outlined in more detail in Annex 1. Labor Management Measures.</p> <p>Risks to project workers will be managed through the application of the:</p> <ul style="list-style-type: none"> • LMP (annexed), • <u>WFP Standard Operating Procedures on COVID-19 (annexed),</u> • Landmine Procedures (annexed), • Safety and Security Approach (annexed), • SEP, • <u>WFP’s People Policy and Standard Operating Procedures on Protection from SEA.</u>
<p>Solid waste management: Inappropriate disposal of food packaging may result in waste disposal sites generating water-borne or vector-borne diseases.</p>	<p>WFP’s <u>Environmental Policy</u> outlines its commitment to reducing unmanaged waste related to its activities based on the mitigation hierarchy. WFP works to reduce packaging that could create unmanaged waste in the first instance. Then WFP follows waste management guidelines and provides training to staff on these issues.</p> <p>Based on its <u>Environmental Policy</u> and its existing practices, WFP will follow the below solid waste management procedures:</p> <ul style="list-style-type: none"> - Procure food aid commodities with an aim to minimize packaging; minimize the potential for unmanaged waste; and minimize the type of packaging materials that may have adverse impacts on the environment, and on community health and safety, to the extent technically and financially feasible. - During transportation, storage and distribution processes, collect all solid waste generated, establish a short term covered storage area on site, and store all solid waste, including food packaging, at these storage area sites. Upon completion of distribution in communities and with relevant frequency in storage warehouses, remove waste from the storage area sites and dispose of waste in relevant off-site facilities designated by local township authorities.

	<p>- For possible solid waste generated after distribution (food packaging that will be discarded later), raise community awareness on where and how to dispose of such packaging, to the extent possible in designated covered storage areas in communities or in IDP camps.</p> <p>Risks regarding solid waste will be managed through the application of the:</p> <ul style="list-style-type: none"> • Environmental Health and Safety Guidelines • WFP Environmental Policy • The solid waste management procedures contained in this section.
<p>Food safety: Improper procurement, storage, transport and distribution of food may result in negative health and safety impacts (including pest related diseases).</p>	<p>WFP's Food Storage Manual address how to manage food safety risks during the procuring, storing, transportation and distribution of food aid. Based on these:</p> <ul style="list-style-type: none"> - WFP conducts due diligence during the procurement process and the vendor selection that the food commodities to be received will be delivered in good condition and quality control is performed during intake. - For storage, WFP selects storage facilities and locations based on surveying the relevant characteristics outlined in the Food Storage Manual, considering factors such as 19quality of construction, state of repairs, road access, and sustainability, WFP regularly inspects these warehouse storage facilities for perimeter fencing, cleanliness, ventilation, lighting and fire prevention. - WFP assesses the effects of moisture, humidity and temperature in food storage warehouses and for transportation and take appropriate mitigation and management measures to ensure that food quality and safety are not impacted by these factors. WFP regularly monitors its warehouse storage facilities for temperature, moisture and humidity given the particular inventory of food items stored and employs a third party to regularly inspect warehouses for food quality. Similar minimum measures for food safety are included in the contracts of transportation services providers and inspected regularly. The Food Manual has detailed guidance for different types of transportation, from shipping containers to middle distance transportation trucks to short distance food delivery trucks. - For pest management, for each warehouse, WFP conducts a site-specific pest (insect and rodent) assessment, prepares a pest control regime, procures and utilizes relevant insect and rodent control

	<p>equipment, as well as procures and applies relevant pest management measures. Regular food storage warehouse inspections included inspection of the implementation of the pest control regime.</p> <p>Risks regarding food safety will be managed through the application of the:</p> <ul style="list-style-type: none"> • <u>WFP Food Storage Manual, and</u> • <u>The measures outlined in this section.</u>
<p>Risks to community members: Risks to community members may include safety/security risks in collecting assistance, discrimination/exclusion, COVID-19 risks, and SEA risks.</p>	<p><u>WFP’s Protection and Accountability Policy</u>, its <u>Protection Guidance Manual</u> and <u>Standard Operating Procedures on Protection from SEA</u> address how to assess and manage risks to community members. Based on these:</p> <ul style="list-style-type: none"> - For project activities, WFP conducts “protection analysis” to assess how existing risks, such as safety, security, SEA risks, are relevant to WFP’s operations, and how WFP activities may create additional risks for project beneficiaries. This analysis also identifies and assesses risks for disadvantaged and vulnerable groups. This analysis is done through inclusive and accessible consultations with development partners, NGOs, religious and community leaders, and community-based organizations, as well as participatory protection assessments. - Based on this analysis, WFP develops mitigation measures that are integrated into project activity design and implementation. These may include, but are not limited to, the mitigation measures below. - WFP provides transparent information on project activities, benefits, eligibility criteria to communities, through accessible channels, trusted intermediaries, in relevant ethnic languages. This includes information, awareness raising and training on the GM/CFM, on protection from SEA, and COVID-19. - WFP proactively identifies, consults with and reaches out to disadvantaged and vulnerable groups and households, and includes specific measures to address disproportionate negative impacts on disadvantaged and vulnerable groups. - WFP ensures that its grievance mechanism GM/ CFM is accessible to all through raising awareness among these groups and in relevant ethnic languages, providing different intake channels. - WFP will ensure compliance with the its procedures on protection from SEA, including providing training/awareness raising. WFP will ensure that the GM/CFM has special processes (respecting sensitivity

	<p>and confidentiality) for intaking, managing and referring SEA/SH grievances Designated WFP staff are trained on how to manage SEA incidents.</p> <p>Community health and safety risks will be managed through:</p> <ul style="list-style-type: none"> • The project’s operational design, • SEP, • <u>WFP Standard Operating Procedures on COVID-19 (annexed), and</u> • <u>Standard Operating Procedures on Protection from SEA.</u>
<p>COVID-19 risks: Travel to IDP camps, remote areas or assistance distribution points by project workers or community members may increase potential for transmission of COVID-19.</p>	<p>WFP has <u>Standard Operating Procedures on COVID-19</u> to manage increased risk of COVID-19 transmission to project workers and community members as a result of project activities. Based on these:</p> <ul style="list-style-type: none"> - WFP provides training on COVID-19 prevention to all WFP employees, volunteers, and other project workers (including employees or volunteers of CPs - WFP raise awareness on COVID-19 prevention among beneficiary communities. - WFP takes relevant COVID-19 precautions at its food and cash delivery distribution points, such as appropriate distancing of collection points, hand washing stations etc. These are outlined in the <u>WFP Standard Operating Procedures on COVID-19</u> in Annex 2. <p>COVID-19 risks will be managed through the application of the:</p> <ul style="list-style-type: none"> • LMP (annexed), and • <u>WFP Standard Operating Procedures on COVID-19 (annexed).</u>
<p>Lack of stakeholder engagement / grievance management: Community members may have difficulty in accessing information about project activities and benefits, or raising grievances and submitting feedback.</p>	<p>Ensuring that its activities and benefits reach the most vulnerable and in-need households is at the core WFP operations, as outlined in the <u>WFP Protection and Accountability Policy</u>, and its <u>Protection Guidance Manual</u>.</p> <ul style="list-style-type: none"> - In identifying subproject activities and beneficiaries, WFP conducts inclusive and accessible consultations with development partners, NGOs, religious and community leaders, and community-based organizations, as well as participatory protection assessments and vulnerability analysis. - WFP provides transparent information on project activities, benefits, eligibility criteria to communities, through accessible channels, trusted intermediaries, in relevant ethnic languages.



	<p>- WFP proactively identifies, consult with and reaches out to disadvantaged and vulnerable groups and households (through surveys, consultations or other means as appropriate), and includes specific measures to address the potential obstacles to access for disadvantaged and vulnerable groups.</p> <p>- WFP ensure that its GM/CFM is accessible to disadvantaged and vulnerable groups through raising awareness among these groups and in relevant ethnic languages, providing different intake channels etc.</p> <p>- WFP monitors the GM/CFM to ensure adaptive management.</p> <p>Stakeholder engagement and grievance risks will be managed through:</p> <ul style="list-style-type: none">• The project’s operational design, and• SEP.
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6. Procedures and Implementation Arrangements

6.1 Risk Management Procedures

The environmental and social risk management procedures will be implemented through the Project’s assessment, planning and implementation stages, as described below.

Table 5. Project Cycle and E&S Management Procedures

WFP Project Stage	E&S Stage	E&S Management Procedures
1. Protection Analysis: WFP participatory assessments for selection of activities/beneficiaries	Screening	- Screen all project activities to ensure that they do not fall under the Exclusion List in Table 6 below.
2. Planning: Planning for activities, including human and budgetary resources and monitoring measures.	Planning	<ul style="list-style-type: none"> - Based on the activities, adopt, plan for and budget for the implementation of the ESMF (including the LMP), the SEP and the <u>WFP Food Storage Manual</u>. - Train WFP and CP staff and volunteers responsible for implementation of environmental and social risk management. - Incorporate relevant environmental and social measures into CP and contractor legal documents; train selected contractors.
3. Implementation & Monitoring: WFP implementation support and continuous monitoring for projects.	Implementation	<ul style="list-style-type: none"> - Ensure implementation of relevant measures through site visits, regular reporting from the field and other planned monitoring. - Track grievances/community feedback. - Continue awareness raising and training for relevant staff, volunteers, contractors, communities.

More detail for each stage is provided below.

1. Protection Analysis – E&S Screening

At this stage, WFP conducts protection analysis through engagement with communities, other relevant stakeholders and authorities to identify and prioritize activities to be implemented under different Components.

At this stage, WFP should screen all proposed activities to ensure that all proposed activities are within the boundaries of the Project’s eligible activities, and they are not considered as activities listed on the E&S Exclusion List in Table 6 below. The Screening should be done at the State/Region level to ensure higher familiarity with the local context, environment and communities.

Table 6. Exclusion List

- Weapons, including but not limited to mines, guns, ammunition and explosives
- Support of production of any hazardous good, including alcohol, tobacco, arms, and controlled substances
- Any construction activities
- Purchase or use of any pesticides, insecticides, herbicides and other dangerous chemicals
- Any activity likely to generate solid or liquid waste that could adversely impact soils, vegetation, rivers, streams or groundwater
- Any activity likely to cause significant negative impacts to air and / or water quality
- Any activity that will involve the use of international waterways
- Any activity to require clearance of mangroves, trees or other natural vegetation
- Activities that have potential to cause any significant loss or degradation of critical natural habitats whether directly or indirectly or which would lead to adverse impacts on natural habitats
- Activities of changing forest land into agricultural land or logging activities in primary forests
- Activities that have potential to cause significant impact on any ecosystems of importance, especially those supporting rare, threatened or endangered species of flora and fauna
- Any activity affecting physical cultural heritage such as graves, temples, pagodas, churches, historical relics, archeological sites, and other cultural structures
- Activities that cause or lead to forced labor or child abuse, child labour exploitation or human trafficking or subprojects that employ or engage children, over the minimum age of 15 and under the age of 18, in connection with the project in a manner that is likely to be hazardous or interfere with the child’s education or be harmful to the child’s health or physical, mental, spiritual, moral or social development
- Any activity on land that has disputed ownership or tenure rights
- Any activity that will cause physical relocation of households or will require the use of eminent domain
- Any activity on land that is considered dangerous due to security hazards or the presence of unexploded ordnance or mines

2. Planning – E&S Planning

At this stage, as part of activity planning, WFP should ensure that necessary measures included in the ESMF, LMP, SEP and its [Food Storage Manual](#) are part of the activity planning, allocation of human and budgetary resources, and monitoring. For example, if CPs or contractors need to be trained on the ESMF, when and how will this take place, who will conduct the training, what kind of budget will be required etc. This is the

stage where the measures in the ESMF, LMP, SEP and the Food Storage Manual should be integrated into the general operating procedures for all activities.

At this stage, WFP and CP staff and volunteers who will be working on the various activities should be trained on the environmental and social management measures in the ESMF and the SEP. WFP staff at the national level should plan for and provide such training to the state and region levels, with a plan for the E&S Focal Points at the state and region levels to cascade the training to lower levels.

WFP should also ensure that all selected CPs and contractors understand and incorporate environmental and social mitigation measures relevant to them as standard operating procedures. WFP should provide awareness raising and training to selected CPs and contractors to ensure that they understand and incorporate environmental and social mitigation measures.

3. Implementation and Monitoring – E&S Implementation

WFP's monitoring activities are guided by WFP's Standard Operating Procedures for monitoring and tailored tools for distribution and post-distribution monitoring. WFP conducts monthly distribution monitoring focusing on distribution output and process, in addition to three rounds of detailed post-distribution monitoring which focus on the outcomes of WFP operations. Since 2020, WFP post-distribution monitoring surveys are conducted via remote phone surveys due to COVID-19 restrictions. The surveys collect information on WFP's core indicators including food security proxy indicators to understand the impact of WFP assistance on households' food and nutrition security outcomes. The information collected supports township-level geographic targeting and the identification of food-insecure households. All collected data and associated analysis are disaggregated at the lowest possible geographic levels and include gender, age, and protection-sensitive analysis as a standard practice. This organizational system will support the specific monitoring and evaluation of the project. In addition, WFP uses the services of a third-party to conduct inspections at its food storage warehouses, covering perimeter fencing and security; cleanliness; ventilation and temperature; fire prevention; food quality; and implementation of relevant pest management measures.

WFP teams 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 measures as part of regular project monitoring.

At a minimum, the reporting will include: (i) the overall implementation of E&S risk management measures, (ii) any environmental or social issues arising as a result of project works and how these issues will be remedied or mitigated, (iii) occupational health and safety performance of contractors (including incidents and accidents), (iv) community consultation updates, and (v) summary of grievances/community feedback received, actions taken and complaints closed out. Reports from the state/region level will be submitted to the national level, where they will be aggregated and submitted to the World Bank on a quarterly basis.

Throughout the Project implementation stage, WFP will continue to provide awareness raising and training to relevant stakeholders, such as WFP and CP staff and volunteers, contractors, and communities, to support the implementation of the environmental and social risk management measures. An initial list of training is proposed below, in Section 6.3.

WFP will also track grievances/community feedback during project implementation to use as a monitoring tool for implementation of project activities and environmental and social mitigation measures.

6.2 Implementation Arrangements

WFP is the largest operational humanitarian organization in Myanmar, providing life-saving food assistance and livelihoods support to over 2.5 million displaced and other vulnerable populations in conflict-affected areas in Myanmar in 2021, based on its Country Strategic Plan (2018–2022). With more than 290 staff, WFP currently operates from its Country Office in the capital Nay Pyi Taw, a support office in Yangon, and eight field offices strategically located across the country. WFP co-leads the Food Security Cluster, the Cash Working Group, Co-Chairs the Accountability to Affected Populations/Community Engagement Working Group, and actively participates in protection, gender and other coordination fora.

The project will support an extension of WFP's current programs in Rakhine, Kachin, Chin, and Shan states. WFP will both implement directly and work closely with and through a strong pool of local and international NGOs in implementing and monitoring its program. WFP will directly implement Component 1.2 activities in Northern and Central Rakhine State, and in Kyaukme and Hsipaw townships in Shan State. All other geographic areas to be covered under Component 1.2 will be implemented through CPs such as Save the Children, Plan International, World Vision, and others. Component 2 will be implemented through cooperating partners such as Save the Children, Action Contre La Faim, and the Myanmar Health Assistant Association.

At WFP, the project will be overseen by the Deputy Country Director (Programme) and will be directly managed by the Head of Programme (both based in Nay Pyi Daw). At the national level, the Head of Research, Assessment and Monitoring will be responsible for monitoring and evaluation; the Head of Protection, Gender and Accountability to Affected Peoples will be responsible for community engagement, grievances and feedback management; and the Head of Programme and Head of Supply Chain Unit will be responsible for the implementation of the [Food Storage Manual](#). At the States and Region level, WFP has area and field offices in Rakhine, Kachin, Shan and Magway (responsible for Chin State) from which the specific activities under the project will be managed. These field offices will have functional E&S Focal Points at the State and Region level responsible for the implementation of the ESMF and the Food Storage Manual. This responsibility may be given to the already assigned CFM Focal Points.

Cooperating partners (CPs) will act as an implementing partners for some of the activities under Component 1.2 and all of the activities under Component 2. CPs have deep knowledge of the country's socio-cultural landscape and immediacy of interfacing with its communities. CPs' networks allow them access to hard-to-reach areas in a timely fashion that makes it possible for WFP to be one of the first responders to large-scale humanitarian needs in the country. The CPs will be mobilized to support WFP in assessing, distributing, and monitoring activities of the project. CPs are identified through an expression of interest and selected after a capacity assessment and evaluation process that ensures due diligence in the process. The assessment considers a range of capacities including gender, protection, accountability to affected populations, and protection from SEA.

WFP retains responsibility and technical oversight of CPs work. As noted in the Procedures section above, CP staff and volunteers will be trained by WFP staff to ensure that they understand and follow the environmental and social management measures under the Project.

Local contractors, such as transportation companies, will be required to comply with the Project’s environmental and social risk management measures, including the national laws and regulations, the ESMF as a whole, and specifically the LMP and the Food Storage Manual. This will be specified in the contractor’s agreements. Contractors will be expected to disseminate and create awareness within their workforce of environmental and social risk management **compliance** and undertake any staff training necessary for their effective implementation. WFP and CPs will provide awareness raising and training for the contractors on the contents of this ESMF and the Food Storage Manual.

The Table 7 below summarizes the roles and responsibilities regarding the implementation arrangements for environmental and social management.

Table 7. Implementation Arrangements

Level / Responsible Party	Roles and Responsibilities
WFP National Level: ESS Advisor Head of Research, Assessment and Monitoring Head of Protection, Gender and Accountability to Affected People	<ul style="list-style-type: none"> - Provide support, oversight and quality control to the E&S focal points in the field offices working on environmental and social risk management. - Oversee overall implementation and monitoring of environmental and social mitigation activities, compile progress reports from the States and Regions, and report to the World Bank on a quarterly basis. - Provide training to E&S focal points at the State and Region level who will be responsible for implementing the ESMF.
WFP State and Region Field Office Level: E&S Focal Points	<ul style="list-style-type: none"> - Ensure project activities do not fall under the Negative List under Section 6.1 of the ESMF. - Oversee daily implementation and monitoring of environmental and social mitigation measures, and report progress and performance to the WFP National level on a quarterly basis. - Provide training to CP staff and volunteers and local contractors on relevant environmental and social mitigation measures, roles and responsibilities.
CP Staff and Volunteers	<ul style="list-style-type: none"> - Comply with the Project’s environmental and social mitigation measures, as well as local legislation. - Provide awareness raising and training for the contractors on the contents of this ESMF, as needed.
Local Contractors	<ul style="list-style-type: none"> - Comply with the Project’s environmental and social mitigation measures, as well as local legislation. - Take all necessary measures to protect the health and safety of workers and community members, and avoid, minimize or mitigate any environmental harm resulting from project activities.

	- Report serious incidents or accidents (such as fatalities or incidents involving SEA/SH) to WFP E&S Focal Points within 48 hours.
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The World Bank will provide training, technical support and implementation support to the WFP in the implementation of this ESMF. During quarterly implementation support visits, it will review monitoring reports and progress on implementation of environmental and social risk mitigation measures.

6.3 Proposed Training and Capacity Building

Successful implementation of the Project will depend among others on the effective implementation of the environmental and social risk management measures outlined in this ESMF. Training and capacity building will be necessary for the key stakeholders in order to ensure effective implementation ESMF and the SEP. An initial training and capacity building plan is outlined in Table 14 below. To the extent possible, modules on environmental and social risk management should be integrated into trainings about the WFP project cycle and operational procedures. Given the need to raise awareness and train project workers and stakeholders at many levels and access limitations due to conflict, a cascading model of training is proposed where many trainees then provide trainers at a lower level.

Table 8. Proposed Training and Capacity Building

Level	Trainers	Trainees	Training Topics / Themes
National Level	World Bank	ESS Advisor Head of Research, Assessment and Monitoring Head of Protection, Gender and Accountability to Affected Populations Other relevant WFP Operational Staff Relevant CP Staff	- World Bank Environmental and Social Standards, as relevant for the project activities - ESMF, LMP, SEP measures and approach - E&S monitoring and reporting - Incident and accident reporting
State/Region Level	Trained national level WFP staff	State/region level E&S Focal Points Other relevant WFP Operational Staff Relevant CP Operational Staff	- ESMF, LMP, SEP measures and approach - E&S monitoring and reporting - Incident and accident reporting -Grievance/community feedback management
Township / Activity Site Level	State/region level E&S Focal Points	Relevant CP Staff Contractors	- Application of SEP and the grievance/beneficiary feedback mechanism

			- Application of LMP, including worker Code of Conduct, incident reporting, SEA/SH, COVID-19 mitigation
Community Level	State/region level E&S Focal Points Other relevant WFP Operational Staff Relevant CP Operational Staff	Community members	- Community health and safety issues - Worker Code of Conduct - SEA/SH issues, prevention, measures - COVID-19 mitigation - Grievance redress

6.4 Estimated Budget

The ESMF implementation costs will primarily be included in the project programming costs, since WFP already implements and budgets for extensive stakeholder engagement activities and participatory assessments for project activities and targeting; grievance mechanisms; training and capacity development WFP and staff and volunteers; monitoring site visits etc.

The following are estimated additional cost items for the implementation for the ESMF:

Table 9. ESMF Implementation Budget – Costs Additional to Standard Programming Costs

Activity	Potential Cost (USD)
Training on ESMF for implementing partners (additional training for CP staff) (2 trainings per 4 states/regions, 2000USD per training)	16,000
Training to contractors (1 training per 4 states/regions, 1000USD per training)	4,000
TOTAL	20,000

7. Stakeholder Engagement, Disclosure and Consultations

7.1 Stakeholder Engagement and Grievance Mechanism

A separate Stakeholder Engagement Plan (SEP) has been prepared for the Project, based on WFP's Community Engagement Mechanism (CEM) Standard Operating Procedures for Myanmar and the World Bank's Environmental and Social Standard 10 on Stakeholder Engagement. An overview of WFP's approach to stakeholder engagement and grievance management is provided below. More details can be found in the SEP.

WFP's commitments on accountability to affected people are mainstreamed across the operation and there is a system of focal points from each office to implement a CEM, which encompasses information provision to beneficiaries, beneficiary engagement and participation, and feedback and complaints. To sensitize beneficiaries about the CEM and information about WFP's programmes, various communication tools are used including banners, loudspeakers with recorded audio messages in local languages, on-site help desks, decentralized helplines to ensure the use of local languages, and other avenues such as SMS, messaging apps, email and suggestion boxes.

The CEM is implemented with a comprehensive Standard Operating Procedure, use of a customer relationship management database SugarCRM, a mobile data collection tool MoDA, and there is a live dashboard in Tableau. The CEM has been expanding annually which reflects its relevance and the expanding awareness and trust in it – in 2018 there were approximately 1,100 cases, in 2019 approximately 2,100 cases, in 2020 approximately 6,500 cases and in 2021 there are over 8,500 cases. For the first time in 2021 there are more women than men raising cases. The CEM is an important tool to identify programming adjustments and improvements and to disseminate messages to beneficiaries on WFP's programmatic shifts, including changes in ration size and distribution cycles, messages on protection from sexual exploitation and abuse (PSEA) and helpline services.

WFP has a team of focal points for protection from sexual exploitation and abuse (PSEA) in each office and a Standard Operating Procedure on PSEA which includes risk analysis, awareness raising for staff, partners, contractors and beneficiaries, participation in interagency meetings on PSEA, complaints handling and survivor assistance. WFP has mandatory online training in PSEA and provides annual staff refresher sessions and training of focal points. The CEM is able to be used as the vehicle for PSEA complaints, with CEM focal points being trained in handling sensitive cases including protection referrals where appropriate, assignment of high priority status and referral to Headquarters for investigation and response.

This ESMF, as well as the SEP and the Environmental and Social Commitment Plan (ESCP) that have been prepared for this project, have been disclosed on the WFP website and shared with relevant stakeholders as part of an invitation for consultations on [DATE].

The following have attended the consultations held on [DATE] or provided feedback on the documents:

LIST

The feedback provided can be summarized by the below points and has been incorporated into the ESMF, SEP and ESCP: **Summary of key points raised will be included after consultations.**

I. Annex 1. Simplified Labor Management Procedures

In accordance with the requirements of World Bank's Environmental and Social Standard 2 (ESS2) on Labor and Working Conditions, simplified LMP have been developed for the project. The LMP set out the ways in which WFP will manage all project workers in relation to the associated risks and impacts. The objectives of the LMP are to: Identify the different types of project workers that are likely to be involved in the project; identify, analyze and evaluate the labor-related risks and impacts for project activities; provide procedures to meet the requirements of ESS 2 on Labor and Working Conditions, ESS 4 on Community Health and Safety, WFP's People Policy, WFP's Circular on Protection from Harassment, Sexual Harassment, Abuse of Authority and Discrimination and applicable Myanmar legislation.

The Labor Management Procedures apply to all project workers, irrespective of contracts being full-time, part-time, temporary or casual. The types of workers that will be included in the project are listed below:

- **Direct workers** – workers employed directly by WFP to work specifically in relation to the project.
- **Contracted workers** – people engaged through third parties to perform work related to the core functions of the project, regardless of location. Employees of CPs contractors are included in this category.
- **Primary supply workers** – people engaged by WFP, CPs or contractors as primary suppliers.

Labor Risks

The following potential labor risks are identified under the project:

- Violation of worker's rights: Terms and conditions of employment of workers may not be consistent with Myanmar legislation, WFP Human Resources Policy, or World Bank standards
- Violation of worker's rights: Non-discrimination and equal opportunity of workers may not be consistent with Myanmar WFP Human Resources Policy, or World Bank standards
- Use of child labor or forced labor
- Unsafe work environment and poor working conditions
- Workplace injuries and accidents, particularly when operating transportation equipment
- Road safety
- Sexual exploitation and abuse (SEA/SH) risks for workers
- SEA/SH risks for community members, from workers from outside the project areas
- Conflicts between workers and communities
- Transmission of COVID-19 among workers or nearby communities, especially if workers are not hired locally and arrive to civil works locations from elsewhere
- Transmission of COVID-19 among community members, especially if COVID-19 specific precautions are not in place at distribution sites

Relevant Myanmar Labor Legislation

The **2008 Constitution** states that discrimination by the union against any citizen is prohibited on grounds of race, birth, religion, official position, status, culture, gender, and wealth; however, this is not always consistent in the legal framework.

Labor Organization Law (2011) give workers the right to organize into associations and conduct collective bargaining with employers.

While laws on child labor are not entirely consistent in the legal framework, the minimum working age for children is 14 years in factories and shops. For those under 18 years, night work and hazardous work are prohibited, and other specific requirements apply. **The 2008 Constitution** states that forced labor is prohibited, except for prison labor, labor required by the union government in states of emergency and humanitarian crisis, and labor under compulsory military service. The **Penal Code (1974)** and the **Anti-Trafficking in Persons Act (2005)** state that coercing anyone into forced labor, slavery, servitude, and debt-bondage is an act punishable by law. No person under the age of 18 or forced labor, under any circumstance, will be allowed to work in the Myanmar COVID-19 Emergency Response Project.

Standards for occupational health and safety are scattered across various laws that govern fire and building safety, workspace safety, air and heating, lighting, sanitation, dangerous substances, dangerous operations, and women workers' rights. However, the new

The Settlement of Labor Disputes Law (2012) provides the basis for workplace dispute resolution, where workers can take grievances to the Workplace

Coordinating Committee and appeal for arbitration at the state/region level.

There are a number of other laws and regulations that relate to labor to an extent, including the Payment of Wages Act (2016) and Minimum Wages Act and Rules (2013). Myanmar has also ratified a number of ILO labor-related conventions, including on forced labor, freedom of association and child labor; however, other key conventions, such as on equal remuneration and discrimination, have not been ratified.

Occupational Safety and Health Law (2019) promotes safe and secure working environments for labors and workers. This will be the first legal health and safety standards in the country and will be designed in accordance with international and regional standards and compatible to the nation's situation.

Any work beyond a 44-hour workweek constitutes overtime in Myanmar and requires overtime payment. Depending on sectors, overtime cannot exceed 16 to 20 hours. Working on public holidays qualifies for overtime. Among the laws, there are standards for paid medical leave, 14 weeks of maternal leave, and 3 weeks of paternal leave.

General Applicable Procedures

WFP, CPs and contractors will apply the following guidelines when dealing with workers:

- There will be no discrimination with respect to any aspects of the employment relationship, such as: Recruitment and hiring; compensation (including wages and benefits; working conditions and terms of employment; access to training; job assignment; promotion; termination of employment or retirement; or disciplinary practices
- Harassment, intimidation and/or exploitation will be prevented or addressed appropriately
- Special measures of protection and assistance to remedy discrimination or selection for a particular job will not be deemed as discrimination.
- Vulnerable project workers will be provided with special protection.
- WFP, CPs and contractors will provide job / employment contracts with clear terms and conditions including rights related to hours of work, wages, overtime, compensation and benefits, annual holiday and sick leave, maternity leave and family leave. Basic Codes of Conduct, an example of which is included at the end of this LMP, will be applicable for all project workers.
- WFP will ensure compliance with its Codes of Conduct including providing training/awareness raising on the Codes.
- WFP, CPs and contractors will ensure compliance with occupational health and safety procedures and COVID-19 specific procedures, including that the workers are properly trained in application of the standards that are relevant to the work.
- WFP, CPs and contractors will have due diligence systems in place to ensure that there will be no child labor under the project.
- Workers shall be recruited voluntarily, and no worker is forced or coerced into work.
- WFP will supervise and monitor to ensure compliance with the above requirements.
- All workers will be made aware of the worker grievance mechanism available under the WFP People Policy, as well as of the project GM/CFM, to which they can submit work-related complaints.

Occupational Health and Safety (OHS) Procedures

The objective of the procedure is to achieve and maintain a healthy and safe work environment for all project workers and communities.

- On procurement for contractors, WFP will avail the ESMF to the contractors so that contractors include the budgetary requirements for OHS and community health and safety measures in their respective bids.
- The contractor will develop and maintain an OHS management system that is consistent with the scope of work, duration of contract and this LMP.
- Contractor will adopt all E&S risk mitigation measures proposed for the subproject.
- Contractor provides preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances informed by assessment and plan.
- Contractor provides for appropriate training/induction of project workers and maintenance of training records on OHS subjects.
- Contractor documents and reports on occupational accidents, diseases and incidents as per ESMF guidance.
- Contractor provides emergency prevention and preparedness and response arrangements to emergency situations including and not limited to workplace accidents, workplace illnesses, flooding, fire outbreak, disease outbreak, labor unrest and security.
- Contractor shall maintain all such record for activities related to the safety health and environmental management for inspection by WFP or the World Bank.

COVID-19 Procedures

- Contractors should ensure that all workers are hired locally to the extent possible.
- Contractors should provide training to all workers on signs and symptoms of COVID-19, how it is spread, how to protect themselves (including regular handwashing and social distancing) and what to do if they or other people have symptoms, as well as policies and procedures listed here. Training of workers should be conducted regularly, providing workers with a clear understanding of how they are expected to behave and carry out their work duties. Training should address issues of discrimination or prejudice if a worker becomes ill and provide an understanding of the trajectory of the virus, where workers return to work. Training should cover all issues that would normally be required on the work site, including use of safety procedures, use of construction PPE, occupational health and safety issues, and code of conduct, taking into account that work practices may have been adjusted.
- A summary of basic guidelines and COVID-19 symptoms should be displayed at works sites, with images and text in Myanmar/ethnic languages.
- Workers who are sick or showing possible symptoms should not be allowed on work site, should be isolated and referred to local medical facilities immediately.
- Contractors should review work arrangements, tasks and hours to allow social distancing.
- Contractors should provide workers with appropriate forms of personal protective equipment, including masks as needed.
- Contractors should ensure handwashing facilities supplied with soap, disposable paper towels and closed waste bins exist at key places at the work site.

Contractor Management Procedures

The objective of this procedure is to ensure that WFP has contractual power to administer oversight and action against contractors for non-compliance with the LMP.

- WFP will make available relevant documentation to inform the contractor about requirements for effective implementation of the LMP.
- Before submitting a bid for any sub-contract, the contractor shall incorporate the requirements of the ESMF, including the LMP.
- Contractor will ensure that all workers are aware of the Code and Conduct for workers.
- Contractor will show evidence of OHS and Emergency Preparedness procedures.
- Where mitigation or corrective measures are required in order to ensure compliance with ESMF and LMP, the contractor will submit the progress reports on the implementation of the mitigation measures, including those of the LMP.
- Where appropriate, the WFP may withhold contractor's payment until corrective action(s) is/are implemented on significant non-compliance with the LMP, such as failure to notify WFP of incidents and accidents.

Procedures for Primary Suppliers

The objective of the procedure is to ensure that labor-related risks, especially child and forced labor as well as serious health and safety issues to the project from primary supply workers are managed. WFP, CPs and all contractors will undertake the following measures:

- Procure supplies from legally constituted suppliers.
- To the extent feasible, conduct due diligence to ensure that primary suppliers conduct age verifications, employ workers without any force or coercion, and maintain basic OHS systems.

Institutional Arrangement for Implementation of the LMP

WFP will carry the main responsibility for the implementation and monitoring of the LMP. WFP will identify project activities, prepare bidding/legal documents, as well as procure CPs and contractors. WFP will be responsible for contractor site supervision, quality assurance, certification, and payment of works. WFP will ensure that labor management procedures are integrated into the procurement of contracts and bidding processes.

Grievance Mechanism

Under WFP's People Policy and WFP's Circular on Protection from Harassment, Sexual Harassment, Abuse of Authority and Discrimination, employees who have complaints related to the violation of the Policy can raise these through formal or informal processes. The formal process allows complainants to file a report with the Office of the Inspector General, which is reviewed, investigated, resolved, closed and reported to the Executive Director and the Human Resources Management Director. The informal process allows the complainant to raise the issue with a supervisor, human resources officer, a Staff Counsellor, the Ombudsman, a Security Officer, a Staff Association Representative or the Ethnic Office. The complaint is then reviewed, mediated and resolved, or referred to the formal process. Any employee affected by abusive conduct may also contact the Critical Incident Management Hotline at +39-06-6513-3333.

Affected persons are entitled to reasonable and appropriate support from WFP. This includes:

- *guidance as to the options for remedial action and potential consequences of each course of action;*
- *being accompanied by another colleague, family member or trusted friend during the key stages of the below processes, such as an investigation interview;*
- *being assured of professional standards of conduct and respect for confidentiality while a report is being investigated; and*
- *being informed in writing of the outcome of the investigation, once WFP's review of the matter is concluded (i.e., due process requirements fulfilled and any final decisions made).*

All workers will also be able to use the GM/CFM used by WFP in Myanmar to register work-related grievances. To sensitize beneficiaries about the CFM and information about WFP's programmes, various communication tools are used including banners, loudspeakers with recorded audio messages in local languages, on-site help desks, decentralized helplines to ensure the use of local languages, and other avenues such as SMS, messaging apps, email and suggestion boxes. Each CP and contractor organization will be required to maintain a functioning workplace grievance mechanism accessible to their employees

The CFM is implemented with a comprehensive Standard Operating Procedure, use of a customer relationship management database SugarCRM, a mobile data collection tool MoDA, and there is a live dashboard in Tableau. The CFM can also be used as the vehicle for SEA complaints, with CFM focal points being trained in handling sensitive cases including protection referrals where appropriate, assignment of high priority status and referral to Headquarters for investigation and response.

Example Code of Conduct for Workers

- Treat women, children (persons under the age of 18), and men with respect regardless of ethnicity, language, religion, political or other opinion, national, social origin, citizenship status, property, disability, birth or other status.
- Do not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Do not participate in sexual activity with children—including through digital media. Mistaken belief regarding the age of a child and consent from the child is not a defense.
- Do not engage in sexual favors or other forms of humiliating, degrading or exploitative behavior.
- Do not engage in any activity that will constitute payment for sex with members of the communities surrounding the workplace.
- Report through the grievance mechanism/community feedback mechanism suspected or actual gender-based violence by a fellow worker or any breaches of this Code of Conduct.
- Use any computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass children or to access child pornography through any medium
- Refrain from hiring 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 all relevant local legislation, including labor laws in relation to child labor.
- Before photographing or filming a child, 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 a parent or guardian of the child. As part of this, 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.

II. Annex 2. WFP Standard Operating Procedures on COVID-19

As the Novel Coronavirus (COVID-19) continues to spread in an unpredictable manner it presents a growing risk to WFP personnel, Cooperating Partners (CP) and beneficiaries, particularly during food distributions.

This document aims to guide the revision of Food Distribution Standard Operating Procedures (SOPs) in the COVID-19 context at the country level, to minimize the risk of exposure of personnel, partners and beneficiaries. Adjustments to existing food distribution SOPs should be in alignment with country-specific guidance shared by the relevant health authorities and partners (e.g. Ministry of Health, WHO), where available.

For WFP Offices, these guidelines should be read in conjunction with the Emergency Pocketbook chapter on Implementing an emergency response, which supersedes the 2005/2006 GFD guidelines.

RECOMMENDATION ACTIONS

Organize and clearly mark the allocated spaces at the distribution site

- Reception point, (identity) verification point, collection point and exit to channel off traffic and allow for personal space of at least one meter between each beneficiary.
- Set up hand washing area with adequate supply of hand washing solution (0.05% bleach solution).
- Allocate areas for body temperature checks by health officials.
- Establish sheltered/covered area for beneficiaries that do not receive clearance at the body temperature check point. The allocated area should be spacious enough to allow beneficiaries to sit/stand at least one meter apart from each other
- Ensure that there are clearly marked entrance and exit points in the distribution area.

Organize rations ahead of the scheduled distribution

- If not already prepositioned, offload the food supplies into the temporary storage and organize rations ahead of the scheduled distribution.
- Separate storage from the collection points where possible.

Do not allow crowding around the distribution point

- Instruct beneficiaries to maintain a distance of one metre from each other throughout the distribution process
- One-meter area around the desk to be cordoned off (with a rope or tape) at the collection point if possible. This will ensure that the collection point is accessible to only one beneficiary at a time.

Manage the flow of traffic at the distribution site

- Upon arrival at the distribution site, direct beneficiaries to the hand washing area and then to the temperature check area to have their body temperature assessed using a non- invasive thermometer. *Ideally, the temperature check should be conducted by a medical or health professional endorsed by government authorities.*
- If a beneficiary is detected to have a fever, they should be directed to the specified sheltered/covered area for a follow up by the local government or health official. *CPs to inform identified beneficiaries that they will receive rations irrespective of the results of the temperature test.*
- Beneficiaries cleared at the temperature check area are to be directed to the (identity) verification checkpoint.
- Beneficiaries should not pass through the distribution point more than once.

Consider hygiene and sanitation measures

- There should be no physical contact between CP staff and beneficiaries or between beneficiaries.
- Operators at the collection point should place the food rations on the tarpaulin/table at the distribution point and step back, permitting the beneficiary to collect the ration.
- Following the collection of the ration, beneficiaries are to be directed to exit the collection site and encouraged to depart the distribution site.

SPECIFIC INSTRUCTIONS FOR COOPERATING PARTNER STAFF AT THE DISTRIBUTION SITES

(Reception point operator, Queue Management Operator and Distribution Point Operator etc.)

- Monitor the entry of beneficiaries into the distribution point channel.
- Instruct beneficiaries to maintain a distance of one-meter at all points during distributions. o Ensure that the hand washing point is supplied with appropriate quantities of handwash solution.
- Ensure that all beneficiaries wash their hands at the hand washing point and have body temperature checks before approaching the identity verification checkpoint. If a beneficiary presents high temperature, they must be directed to the sheltered/covered area and referred to the relevant health authorities.
- Oversee and assist with offloading and organising rations before distributions are scheduled to start.
- Step back from the ration and direct the beneficiary to collect the ration and leave via the marked exit route.
- Instruct the beneficiaries to leave the distribution site immediately after the collection of rations.
- On completion of distribution, ensure that the distribution point (room/ area/ tarpaulin) is swept clean and sprayed with disinfectant (0.5% chlorine solution). Once dry, the tarpaulin should be folded away for storage/transportation. The broom may be used again after bleach spraying to remove any debris.
- Remove all tapes, ropes and signage.
- Clear hand wash station and remove/store hand washing solution.
- It is mandatory that all staff at the distribution site perform hand sanitation and follow general hygiene practices.

HYGIENE AND SANITATION

Hand wash solution (0.05% bleach solution) and can be made from a variety of chlorine bases available in the market. *Washing hands with clean water and soap is mandatory for all WFP and CP personnel, beneficiaries as well as any other party involved in the process/present at the distribution site.*

Disinfectant solution (0.5% bleach solution) and can be made from a variety of chlorine bases available in the market. All washing and disinfecting solutions must be prepared prior to dispatching to distribution point and marked clearly.

Instructions for making disinfectant solution (0.5% bleach solution) from liquid bleach:

Concentrated chlorine and bleach are highly toxic substances that can cause irritation and inflammation to eyes, throat and nose. When mixing and using 0.5% disinfecting solution, appropriate PPE (including impermeable coverall, apron, N95 mask, goggles and double glove ie. inner disposable latex gloves and outer heavy-duty latex gloves) must be worn.

Important Note: All WFP personnel and CPs are responsible for complying with all aspects of the SOPs identified at the country level. If any individual (WFP personnel and CPs) demonstrates symptoms of COVID-19 they should avoid contact with beneficiaries and not be present at the distribution site.

III. Annex 3. Landmine Procedures

Definitions

Unexploded Ordnance (UXO) refers to munitions (bombs, rockets, artillery shells, mortars, grenades and the like) that were used but failed to detonate as intended. UXO include artillery and tank rounds, mortar

rounds, fuses, grenades, and large and small bombs including cluster munitions, sub-munitions, rockets and missiles. UXOs are usually found in areas where conflict has taken place or at military firing ranges. They are often extremely unstable and can detonate at the slightest touch. Injuries can often occur when people are farming or undertaking construction work in a contaminated area and touch, move or tamper with them. UXO accidents are often more lethal than landmines due to their higher explosive and fragmentation content.

Landmines are victim-activated explosive traps. They can target a person and/or a vehicle. A mine comprises a quantity of explosive, normally contained within some form of casing (typically in metal, plastic or wood), and a fusing mechanism to detonate the main explosive charge. Land mines are difficult to be detected with natural eyes as they are mostly covered with vegetation and soil over time or intentionally covered to hide their tracks. They can be activated by a range of mechanisms including pressure, trip wire, electrical command or magnetic influence.

UXO and Landmine Contamination in Myanmar. Landmines have been widely used by parties to hostilities in Myanmar. Their use causes casualties and deaths and further restricts movement, hindering access to services and farmland and preventing people from returning home. Prior to February 2021, the mine-affected areas were mainly the border areas of Myanmar adjacent to Bangladesh, China, Lao PDR, and Thailand. However, with the proliferation of conflict and parties to hostilities since then, mine contamination has spread to most all states and regions. Among the states and regions targeted by the project Rakhine, Shan, and Kachin states are among the higher risk areas.

Status of Landmine Clearance in Myanmar. Myanmar is neither a signatory to the anti-personnel mine-ban treaty nor to the Convention on Certain Conventional Weapons. Land Release, a process that includes non-technical survey, technical survey and clearance activities, has not occurred in Myanmar yet as NGO mine action operators are not permitted to conduct clearance by either the government or ethnic minority authorities. Myanmar does not have national mine action legislation or standards. Mine survey and clearance operators of the Government (MAF Engineers) follow International Mine Action Standard (IMAS) and their own standard operating procedures.

UXO/Landmine Risk Screening. WFP is in constant engagement with development partners, local actors, non-governmental organizations communities. WFP will conduct screening and due diligence to ensure to the best of its ability that project activities will not take place in areas with a potential risk of UXOs or landmines. If any actors or communities identify potential risks for a subproject siting, WFP will consider alternative sites or subprojects.

Mitigation Measures. Even after going through the risk screening and avoiding the landmine contaminated areas during screening process, there is a possibility of “chance finds” of suspected ordinance during project implementation in the subproject areas. In order to minimize the risk of such encounters, the following measures should be followed in project implementation.

Issue	Proposed Measures
Selection of routes by project workers	- To select the common and safe routes used by many local people; avoid using routes not commonly traveled at early morning and night when visibility is poor; don't use highly vegetated roads or trails

	<ul style="list-style-type: none"> - Do not go to unknown places, abandoned areas where troops previously sheltered or where armed fighting has occurred, or where landmine explosion have occurred - To inquire the local signs of landmines and strictly follow the rules - To select another route in case of uncertain information of landmines on the selected route - Do not touch objects that are not familiar or appear out of place in a given environment
Information gathering and sharing	<ul style="list-style-type: none"> - WFP/CP staff and volunteers should always inquiry the information of landmine prone places/dangerous places from the local villagers and always avoid these places/routes - Awareness raising to the all project workers/contractors working or visiting the site as well as nearby community by the project
Signs of landmines	<ul style="list-style-type: none"> - Beware of the international sign for the existence of landmine in a specific area is a skull with two crossed bones beneath it. - Locals also warn about the landmines by using branches/sticks to form crosses, piling some stones and paint red, marking some crosses on the tree trunks, and erecting a stick in the ground and tie a cloth at the top.
Preparedness	<ul style="list-style-type: none"> - Communities in UXO/Landmine risk areas should have information on location and contact details of nearby clinics or health facilities that can treat serious laceration and avulsion. This information should also be maintained by contractors and be notified to all workers.
Chance Finds	<p>In case of finding a suspected object that has potential of being a UXO or landmine during construction works:</p> <ul style="list-style-type: none"> - Immediately stop all works and move out using the same path use - Immediately restrict the entry of all the persons including the workers, in any case - Immediately inform about the existence of landmine in a specific area to the community nearby and have to make sure no one enter those areas until the authorities arrive and the landmines are cleared - Set the signs and markings with the use of yellow, red and blue ropes in the landmine existence area to warn the public - After that the information about the landmine occurrence must be informed to the township DRD by the committee members and the project IFs as well as to the village tract GAD - Then the information is step by step reported via township committee to the regional DRD, Tatmadaw, ethnic minority authorities and then to the mine clearance operators (like Tatmadaw engineers) or Non-technical survey groups (Danish Demining Group (DDG); Mines Advisory Group (MAG); The HALO Trust) while the area is still under control by the local committee. - Clear the suspected objects with the support of relevant operators (like MAF engineers) safely <p>The chance find should be reported to WFP and the World Bank.</p>

IV. Annex 4. Security and Safety Approach

Conflict Sensitivity

WFP conducts conflict analysis and conflict sensitivity risk assessment on an ongoing basis in conflict-affected areas and has been successful in avoiding aggravating tensions as well as taking opportunities to increase connectors, such as through engaging Rakhine and Rohingya communities in asset creation activities in central Rakhine. CBT has also supported community connectors, providing a market in IDP camps for Rakhine traders. In 2021 since the military takeover a formal updating process of conflict analysis and conflict sensitivity risk assessment was launched, and consultation workshops have taken place with staff, partners and interagency protection actors.

In 2022 WFP Myanmar retained a conflict analyst consultant to deepen and initialize the analysis and support implementation of the recommendations. This work is helping WFP to fix its approach in line with the fast-changing dynamics of the post-coup operating environment to ensure that WFP operations avoid inadvertently negatively impacting conflict dynamics. The Conflict Analysis and Conflict Sensitivity Risk Assessment reports are in their final stages.

Risk Analysis and Approach

Risk is an ever-present consideration in decision making at WFP. Risk-informed decisions help to build organizational reliability and resilience. Within this context, WFP employs enterprise risk management to provide structure, consistency and transparency in risk decision making. It provides a framework whereby risks—strategic, operational, fiduciary and financial—can be identified, assessed and managed in accordance with the organization’s appetite for risk. WFP Myanmar constantly monitors the risks to the people it serves, its employees and partners; it adjusts operations in response to changes in the environment as needed.

Despite the ongoing security challenges in Myanmar, WFP is committed to ‘stay and deliver’. WFP operations remain anchored in the United Nations’ security management system, which seeks to identify threats and manage risks, and provides the basis for continued presence and humanitarian action even in complex and volatile security contexts. WFP employs one national security officer and is recruiting an international security officer. At all times, the safety and security of WFP’s beneficiaries, partners and staff remains paramount.