# United Nations Children Fund (UNICEF) & United Nations World Food Programme (WFP)

# 2<sup>nd</sup> Additional Financing for the Health Emergency Response Project Afghanistan (HER AF-2)

**Environmental and Social Management Framework** 

**April 2025** 

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#### **Abbreviations**

ADB Asian Development Bank

ALCS Afghanistan Living Conditions Survey
APMU Afghanistan Programme Management Unit
ARTF Afghanistan Reconstruction Trust Fund

CBE Community based education

CERC contingent Emergency Response Components

CRG Community Representative Group
CFM Community Feedback Mechanism

CoC Certificate of compliance
CP Cooperating Partner
ITA Interim Taliban Agency

EHS Environmental, Health and Safety
EIA Environmental Impact Assessment

ESF Environmental and Social Framework of the World Bank

ESHS Environment, Social Health, and Safety

ESIA Environmental and Social Impact Assessment

ESMF Environmental and Social Management Framework

ESMP Environmental and Social Management Plan

ESS Environmental and Social Standard

FLA Field Level Agreement

FMFA Financial Management Framework Agreement

GBV Gender based violence

GRM Grievance Redress Mechanism IDPs Internally Displaced Persons

IE&LFS Income, Expenditure and Labour Force Survey

CP Cooperating Partner

IPCP Infection Prevention and Control Plan
HCWMP Health Care Waste Management Plan
MCBP Maternal and Child Benefit Programme
MoLSA Ministry of Labour and Social Affairs

MoPH Ministry of Public Health

NEPA National Environment Protection Agency

NGO Non-Governmental Organization
OHS Occupational Health Safety
PDO Project Development Objective
PCA Programme Cooperation Agreement

SEA Sexual Exploitation and Abuse SEP Stakeholder Engagement Plan

SH Sexual Harassment

SMF Security Management Framework

SP NGO Service Provider
TPM Third Party Monitoring
TPMA Third Party Monitoring Agent

UN United Nations

UNICEF United Nations Children's Emergency Fund

WASH Water, Sanitation and Hygiene

WFP World Food Programme
WHO World Health Organization

#### **Executive Summary**

The World Bank is financing the 2<sup>nd</sup> Additional Financing to the Afghanistan Health Emergency Response (HER AF 2). The project is being implemented by UNICEF, WFP and their respective NGO Service Providers (SPs), Cooperating Partners (CPs), and contractors to provide essential health services to the population of Afghanistan. The project development objective (PDO) for the 2<sup>nd</sup> Additional Financing is to increase the utilization and quality of essential health and nutrition services in Afghanistan. The words "and nutrition" have been added to reflect both the enhanced focus on promoting nutritional outcomes among vulnerable pregnant women and mothers of young children.

The project consists of three components (i) Urgent Provision of Essential Primary and Secondary Healthcare (UNICEF); (ii) Strengthening Service Delivery and Project Coordination (UNICEF); and, (iii) Strengthening Demand and Access to Enhance Nutritional Outcomes Among the Most Vulnerable (WFP).

In line with the World Bank ESF as well as relevant national laws, each agency's respective ES policies, and as per the agreed minutes of negotiations regarding Second Additional Financing (AF2) to Afghanistan Health Emergency Response (Her) Project (P178775) on December 4-12, 2024, the delegations agreed to have a joint ESMF with WFP based on an update of the existing ESMF from the Additional Financing to the HER Project (HER AF1). The revisions of the ESMF includes modifications in addendums. Within the joint ESMF, certain instruments will continue to be separated, such as the separate Security Management Framework (SMF) for UNICEF and a Security Risk Management Plan (SMP) for WFP.

UNICEF and WFP had revised this ESMF for AF1 which was prepared under the parent Afghanistan Health Emergency Response Project (P178775). These revisions included the proposed changes to the scope of the project including the new component 3 on the Maternal and Child Benefit Program. The updated ESMF includes the new sub-component 3.5 on nutrition-sensitive livelihoods and further builds on the lessons learned from the parent project to ensure the effective management of E&S risks.

The objectives of the Environmental and Social Management Framework (ESMF) are to:

- Provide a framework for environmental and social (E&S) risk and impact management of the project;
- Provide clear procedures and methodologies for environmental and social risk screening and monitoring of environmental and social mitigation measures to be financed under the Project;
- Describe the appropriate roles and responsibilities of UNICEF, WFP, SPs, CPs, and other stakeholders;
- Outline the reporting procedures on E&S mitigation measures; and,
- Promote positive environmental and social outcomes.

UNICEF and WFP have each prepared an Environmental and Social Commitment Plan (ESCP) and a joint Stakeholder Engagement Plan (SEP) that includes a grievance redress mechanism (GRM) and communication strategy. The ESMF as agreed with the World Bank includes Labour Management Procedures (LMP), Environmental, Social, Health, and Safety (ESHS) Requirements, a template for Environmental and Social Management Plan (ESMP) for minor civil works if any, Health Care Waste Management Plan (HCWMP) and Infection Prevention and Control Plan (IPCP).

To manage the contextual security risks to communities and project actors in accordance with their respective ESCPs, UNICEF and WFP will implement the UN security protocols and any measures necessary to ensure consistency between the protocols and the ESF requirements in the implementation of project activities and for the provision of security to project workers, sites and/or assets. UNICEF has developed a Security Management Framework (SMF) for its work in the health and education sectors for the HER AF project; UNICEF has also hired a Security Advisor to support the implementation of this Framework. WFP has developed a Security Management Plan which has pre-existing full-fledged security staffing and expertise in place for WFP operations. UNICEF and WFP will revise the previously joint Sexual Exploitation and Abuse (SEA) /Sexual Harassment (SH) Action Plan to have separate SEA/SH action plans with specific and timebound actions to mitigate the SEA/SH risks. The E&S management instruments prepared for the HER AF 2 project draw on the E&S instruments previously prepared under the original and first additional financing for the HER Project.

### Component 1: Provision of BPHS/EPHS Urgent provision of essential primary and secondary health services

- Subcomponent 1.1: Enhancing utilization and quality of the Basic Package of Health Services and Essential Package of Hospital Services;
- Subcomponent 1.2: Enhancing community and facility level nutrition service; and
- Subcomponent 1.3: Preserving the health system's capacity to prevent major infectious disease outbreaks.
   As is the case for the parent project, these activities will be implemented by WHO through an UN-to-UN agreement with UNICEF.

#### **Component 2: Strengthening service delivery (UNICEF) and project coordination:**

- Subcomponent 2.1: Promoting quality of care and strengthening health care workers' capacity;
- Subcomponent 2.2: Enhancing quality health product and equipment supply chains.
- Subcomponent 2.3: Third-Party Monitoring and Management Accompaniment for UNICEF
- Subcomponent 2.4: UNICEF Project Implementation Costs
   Sub-component 2.5: Conduct Afghanistan Income, Expenditure, and Labour Force Survey

### Component 3: Strengthening Demand and Access to Enhance Nutritional Outcomes Among the Most Vulnerable) (WFP).

- Subcomponent 3.1: Cash transfers.
- Subcomponent 3.2: Social and behavioural change communication (SBCC).
- Subcomponent 3.3: Third-Party Monitoring Arrangements for WFP
- Subcomponent 3.4: WFP Project Implementation Costs
- Sub-component 3.5: Nutrition-sensitive livelihoods

#### **Potential Environmental and Social Risks and Mitigation Measures**

Environmental and social risks for the HER AF2 Project are remained as substantial. The Project will not finance any new health facilities or major construction works – only minor construction/rehabilitation works of WASH facilities and accessibility (e.g., ramp for persons with disabilities) confined within the existing footprint of the health care facilities. There are no envisaged impacts on biodiversity or cultural heritage. The newly introduced subcomponent 2.5 supports the implementation of the 2025–26 round of the Afghanistan Income Expenditure and Labor Force Survey (IE-LFS), a nationally representative household survey that generates critical data on poverty, labor markets, access to services, and other development outcomes. As a data collection activity, the IE-LFS does not involve any civil works or infrastructure-related interventions and is therefore not expected to

generate adverse environmental impacts. The survey methodology, including its nationwide and year-round reach, has been well established through six previous rounds with international support. There are no additional environmental or social risks or impacts envisaged for the new sub-component 3.5 under HER AF2 beyond the risks already identified below.

The identified social risks for both sub-component 2.5 and 3.5, particularly those related to community health and safety, stakeholder engagement, and the inclusion of marginalized groups, will be effectively mitigated by existing measures for the project which include implementation of the Security Management Framework/Security Management Plan, the GBV/SEA/SH Action Plan, a Stakeholder Engagement Plan, and the use of an existing Grievance Redress Mechanism.

#### Environmental risks include:

- Occupational health and safety of healthcare personnel and patients mainly related to exposures to
  potential hazards during testing and handling of supplies and in some instances, misuse of supplies by
  unauthorized personnel;
- Community Health and Safety issues associated with poor medical waste management. Wastes that may
  be generated from Basic Package of Health Services (BPHS) and Essential Package of Hospital Services
  (EPHS) facilities and laboratories could include both liquid contaminated waste (e.g., blood, other body
  fluids and contaminated fluids) and solid waste (used PPE, sharps, used vials and medical equipment);
- Potential for nosocomial infections due to poor implementation of infection prevention measures;
- Issues relating to on-site storage and disposal of construction material;
- Generation of noise and dust during rehabilitation works.

#### Social risks include:

- Inequitable distribution of benefits to targeted beneficiaries;
- Social inequalities, exclusion, and discrimination of certain categories of people, such as vulnerable and marginalized groups;
- Child and forced labor issue
- Occupational health and safety (OHS) risks, and infectious disease exposure risks for project workers and communities;
- Sexual exploitation, abuse and sexual harassment (SEA/SH) risks;
- Low capacity of Service Providers (SPs) and Cooperating Partners (CPs) to manage E&S risks;
- Possible occurrence of conflict (including armed conflict) near healthcare facilities and distribution and training sites and/or terrorist attacks on project workers is also an important contextual risk that may affect safety of the health care workers.
- Risk of possible intimidation and physical assault of healthcare workers and SP/CP staff by unauthorized armed elements

These risks and impacts will be managed through the mitigation hierarchy approaches (avoid, minimize, mitigate and compensate) included in this ESMF. No irreversible and adverse environmental and social impacts are foreseen since most of these risks and impacts are small in scale, localized, mostly site specific and manageable through the mitigation measures proposed in this ESMF and other relevant E&S instruments.

UNICEF and WFP have prepared this ESMF and supporting E&S management instruments including Project Labor Management Procedures (LMP) to ensure that all interventions meet the objectives and requirements of the World Bank's ESF in line with UNICEF's Environmental and Social Standards and WFP's Environmental and Social Standards. The provisions of the E&S instruments will be incorporated by reference and by UNICEF and WFP into the relevant procurement and contract documents / agreements and monitored through reporting mechanisms with SPs, CPs, and contractors to effectively address environmental and social risks and impacts associated with the project. Such requirements will be extended by UNICEF and WFP's SPs, CPs, and contractors to all subcontractors in their contracts. The project SEP outlines ways in which the project will engage with stakeholders and summarizes key stakeholder engagement activities to date.

UNICEF and WFP are responsible for the overall implementation of the ESMF for their respective components of the Project. The ESMF implementation will draw on the organizations' efforts for integration and mainstreaming within relevant internal regulations, processes, and systems.

For the components 1 and 2 implemented by UNICEF will continue to maintain sufficient capacity for environmental safeguards, dedicated E&S personnel include a Security Advisor, Environmental Safeguard Specialist, Social Safeguard Specialist, SEA/SH Specialist and Medical Waste Management Specialist. UNICEF will contract and supervise SPs to deliver the services provided in BPHS and EPHS facilities and communities.

UNICEF or its contracted SPs will also hire and supervise contractors for the minor construction/rehabilitation works. Through their contracts and scope of work, SPs and contractors will be responsible for complying with environmental and social risks in accordance with the ESMF and supporting E&S instruments. UNICEF will continue implementing training on E&S guidelines and procedures to ensure SPs and contractors are aware and able to comply with the ESMF requirements.

WFP as the implementer of component 3, will continue to maintain sufficient E&S capacity, including an ESS specialist and continue to leverage existing capacity to support Security, Protection, Gender, Accountability to Affected Populations, and PSEA elements of the programming.

UNICEF and WFP will screen all new subproject proposals to: (i) identify the environmental and social risks that might emanate from the activities, (ii) identify the applicable Environmental and Social Standards (ESSs); (iii) determine the appropriate Environmental and Social risk rating for the subproject activities, including risks to human security, and; (iv) specify the type of environmental and social instruments required (e.g. assessment, plans) for mitigation. In agreement with the donor, it is not foreseeable that WFP's E&S risk screening categorization will result in a need to develop and apply an ESIA for the components being implemented by WFP.

The Implementing Agencies will apply their respective E&S screening procedures for sub-projects under their respective components of the Project. For Components 1 & 2 of the Project, UNICEF will leverage the UNICEF screening tool (Annex 1) and where required, the ESMP template which can be adapted, as required (Annex 7), For Component 3, WFP will use the WFP E&S Risk Screening Tool (Annex 8). If the WFP screening results in the need to develop an ESMP (Annex 9) will be used to develop a robust plan for mitigating and minimising foreseeable E&S risks.

UNICEF and WFP will implement the Project in line with the World Bank's ESS10 requirements for consultation and disclosure and in accordance with each agency's respective information disclosure policies as detailed in the Project SEP. Consultations will be initiated for each new subproject at the earliest and consultation records will be kept in the Project Site Office. Consultations will take into consideration the sociocultural context of Afghanistan,

as outlined in the SEP.

UNICEF and WFP will incorporate the relevant aspects of the ESCP, including inter alia, the relevant E&S instruments, the ESMF, and the code of conduct into the environmental, social health, and safety (ESHS) specifications of the procurement documents with their respective SPs, CPs, and contractors. Such requirements will be extended by UNICEF and WFP's respective SPS, CPs, and contractors to all subcontractors in their contracts. The cost of respective SPs, CPs and contractors for meeting the E&S requirements will be included in their respective contracts. UNICEF and WFP will monitor compliance of their respective SPs, CPs, and contractors with these requirements.

UNICEF and WFP will monitor and report on implementation of the ESMF, with input from the Third-Party Monitoring agent. UNICEF and WFP will ensure that E&S monitoring is included in the Project's reports to the World Bank.

The Project will use the grievance redress mechanism (GRM), as detailed in the Project SEP, which will be used for redressing grievances related to environmental and social issues (including SEA/SH) associated with project activities. UNICEF and WFP will have in place an adequate staffing structure to handle Project activity-related complaints.

The cost of due diligence for specific subprojects (preparation of the screening form, consultations, GRM, preparation of ESMPs, and monitoring) will be covered from the project budget and are included in the costs/budget in the overall project budget.

#### 1 Overview and Introduction

#### 1.1 Introduction

The World Bank is financing the 2<sup>nd</sup> Additional Financing to the Afghanistan Health Emergency Response (HER AF 2) project implemented by UNICEF, WFP and their implementing partners/contractors to provide essential health services to the population of Afghanistan. For the HER AF 2, UNICEF's implementing partners are referred to as NGO Service Providers or "SPs" and WFP's implementing partners are referred to as Cooperating Partners "CPs". The project development objective (PDO) for the 2nd Additional Financing is to increase the utilization and quality of essential health and nutrition services in Afghanistan. The words "and nutrition" was added for the 1<sup>st</sup> Additional Financing to reflect both the enhanced focus on promoting nutritional outcomes among vulnerable pregnant women and mothers of young children.

UNICEF and WFP had revised the ESMF which was prepared under the parent project for HER AF1. These revisions included the proposed changes to the scope of the project including the new component 3 on the Maternal and Child Benefit Program and adjustment of provinces from 34 to 24 for Components 1 and 2. The revised ESMF further built on the lessons learned and stakeholder consultations from the Parent Project to ensure the effective management of E&S risks. This revision of the ESMF for HER AF2 include modifications in addendums.

The objectives of the ESMF are to:

- Provide a framework for environmental and social (E&S) risk and impact management of the project.
- Provide clear procedures and methodologies for environmental and social risk screening and monitoring of environmental and social risk mitigation measures to be financed under HER Project.
- Describe the appropriate roles and responsibilities of UNICEF, WFP, SPs, and CPs and other stakeholders.
- Outline the reporting procedures on E&S mitigation measures and other activities related to the project investments.
- Promote positive environmental and social outcomes.

The ESMF is prepared to meet the objectives and requirements of the World Bank's Environmental and Social Framework (ESF), and Environment, Health and Safety (EHS) Guidelines, Afghanistan environmental and social laws and regulations, and in accordance with each agency's respective Environmental and Social Policies.

The ESMF will guide UNICEF and WFP to ensure that the Project is implemented in line with the relevant environmental and social standards (ESS), including the preparation of sub-project or activity specific E&S instruments as relevant to the activity nature, type, and scale. For this purpose, the ESMF details how UNICEF and WFP will assess the environmental and social risks and impacts, identify the necessary mitigation measures, and monitor the E&S measures implementation, including the environmental and social performance of SPs, CPs and contractors.

The updated ESMF includes Labor Management Procedures, Agency-specific screening procedures and ESMP templates, and existing Health Care Waste Management (HCWM) Plan from (HER AF 1). To manage the contextual security risks to communities and project actors, UNICEF will implement the Security Management Framework updated for AF1, whilst WFP prepared its own security risk management measures through a Security Management Plan based on their security risk assessment and consistent with the ESF (ESS1 and 4). UNICEF and WFP have also updated the joint SEA/SH action plan developed for HER AF1 to be separate action plans for the respective

components to manage SEA/SH related risks.

UNICEF and WFP have each prepared a separate Environmental and Social Commitment Plan (ESCP) and have jointly updated the existing Stakeholder Engagement Plan (SEP) from the parent project to reflect the new project design, new components and new E&S risks and mitigation measures, including GRM. Each Agency's ESCP and the joint SEP were agreed and disclosed on UNICEF's, WFP's, and the WB's external websites in November 2024.

#### 1.2 Rationale

In line with ESS1, the Project uses an Environmental and Social Management Framework because the exact nature and location of subprojects as their impacts are not fully known at the time of Project appraisal.

#### 1.3 Lessons Learned

The implementation approach builds on experience with similar projects and the implementation of the parent project.

UNICEF previously implemented the Afghanistan Reconstruction Trust Fund Transfer Out (ARTF TO) phase of the support to BPHS and EPHS to continue urgent provision of essential primary and secondary health services and continues to provision this support under the HER Project. Under the ARTF TO and HER original financing, UNICEF strengthened medical waste management and infection prevention and control systems and practices in health facilities where little data exists. New evidence from the current programmes and the findings of the assessment conducted by UNICEF on the existing practices of HCWM and IPC have been used to update this HCWMP. Based on the findings of the assessment, a comprehensive and sustainable waste management system is necessary to improve healthcare waste management practices in Afghanistan. This is mainly due to the absence of clear policy and guidelines on health care waste management, appropriate healthcare waste treatment equipment and facilities, the lack of appropriate technologies, human resources, and know-how among health care workers for safe collection and transport, and effective waste segregation at sources, treatment, and disposal. UNICEF and the World Bank have had continued coordination regarding the allocation of resources for implementing HCWM measures under AF2. Based on this dialogue, prioritization of interventions has been agreed, focusing on higher-risk and high-waste-generating facilities.

Thus, it is recommended that practical guidelines with clear procedures should be developed by the SPs for the health facility level prior to the implementation of the HCWM initiatives to enhance the capacity of healthcare workers and stakeholders to properly segregate infectious, sharp, and general wastes, and to safely store, collect, transport, treat and dispose of them. UNICEF will monitor SP adherence to such guidelines and procedures throughout the life of the project. Furthermore, healthcare waste management should be integrated into broader public health initiatives and provided adequate resources to reduce potential environmental and health risks. Investment in centralized waste treatment systems and non-combustible technologies such as autoclaves is also essential to allow smaller facilities to transport waste to larger facilities. Within the scope of the HER 2<sup>nd</sup> AF, UNICEF will continue to support SPs to develop relevant guidelines and procedures to enhance the capacity of healthcare workers and relevant stakeholders.

**UNICEF** is in the process of strengthening monitoring of client satisfaction and health worker satisfaction. The findings will help to inform and further tailor the design of the support to BPHS and EPHS facilities in the HER project.

UNICEF has experience working with the various NGO Service Providers (SPs) engaged in the contracting mechanism for BPHS and EPHS and has had the opportunity to assess and monitor the capacity of the various organizations. These capacity assessments will inform capacity building plans in the HER 2<sup>nd</sup> AF project in areas such

as social and behaviour change communication, advocacy, networking and alliance building as well as grants and sub-grants management, to select NGOs with a positive record of accomplishment of environmental and social awareness and capacity, and to build capacity of partners where a need is identified. While requirements for ESHS capacity are included in the contracting documents for SPs, not all SPs engaged ESHS officers due to budgeting limitations. Going forward, SP/IP budgets will be developed to ensure these requirements are met.

Regular ESS orientation and training is needed to support the effective implementation of the ES instruments and requirements. For example, an assessment of ES implementation on the HER project conducted by the health technical extenders found that the health workers at health facilities and SPs needed additional ESS orientation. UNICEF conducted various ES capacity-building and training sessions for the UNICEF's Country and Zonal offices, Technical Extenders (TEs), SP management teams, and ESHS officers and plans to develop a training module as well as continue face-to-face training workshops in all UNICEF zonal offices during the implementation of the HER 2<sup>nd</sup> AF.

Accountability to affected populations (AAPs) is a top priority for UNICEF. Raising awareness of the HER projects and details on what beneficiaries should expect to receive from the project will continue during HER AF2. UNICEF has put in place a Grievance Redress Mechanism (GRM) and a contracted Call Centre will continue as an independent channel for grievance uptake.

**UNICEF** has been committed to enhancing the effectiveness of existing grievance redress structures through strategic capacity building initiatives. Central to this approach has been the comprehensive training program encompassing fundamental principles and components of a robust and responsive grievance redress mechanism. Notably, this has included the development of time-bound escalation procedures specifically tailored to address sensitive grievances. Additionally, UNICEF has focused on establishing the required elements for Service Provider's standard operating procedures, minimum requirements for the grievance redress mechanism, categorizing grievance types, and ensuring timely reporting.

It is important to acknowledge that this approach demands a substantial investment of time and resources, necessitating continuous training for optimal implementation. Moving forward, UNICEF remains dedicated to capacity building, with a particular emphasis on monitoring service provider staff training on operationalizing the grievance redress mechanisms and raising awareness at both the facility and community levels. Moreover, the integration of the project into the call centre and management information system requires significant investment in capacity building for both service providers and UNICEF staff, and this will remain a key focus throughout the next implementation phase.

WFP has extensive experience working with Cooperating Partners (CPs) under the Field Level Agreements (FLAs) arrangements. The environmental and social safeguards compliance is among the criteria for CP selection and this principle shall guide WFP during all phases of the project. Under HER AF2, WFP will continue to strengthen CP capacity on E&S safeguards.

WFP has vast experience in the implementation of cash transfers, both globally and in Afghanistan. WFP is implementing a large cash transfer programme in Afghanistan and constantly reviews its processes to learn lessons and optimize efficiency and effectiveness. In 2022, WFP Afghanistan distributed over USD 325 million in cash and vouchers to programme beneficiaries in all 34 provinces. As part of its effort to be as effective and efficient as possible in its response, WFP was able to reduce the costs of direct cash and value transfer as compared to the previous year by negotiating lower transfer fees and removing cost elements like the generation of monthly token numbers. Lastly, WFP's cash activities optimize operational effectiveness and sustainability in Afghanistan by creating 720 full-time jobs across the country, of which 145 are held by women. An additional 3,150 part-time jobs were created as a direct result of cash distributions such as drivers, porters, labourers, etc. In total, approximately

USD 26.5 million was transferred to around 200 Afghan small-scale retailers in 2022 to support national markets during the economic crisis.

WFP has experience implementing Social and Behaviour Change Communication at global, regional, and country level. In Afghanistan, WFP endeavours to ensure SBCC is mainstreamed in its nutrition programmes to ensure effectiveness and sustainability. Lessons learnt indicate that SBCC can have long term impact, by increasing beneficiary knowledge on nutrition that can be sustained for years after the intervention. As a spillover effect, neighbours of beneficiary households, including future mothers, may also improve their nutrition knowledge.

WFP leverages six decades of experience in fragile and conflict affected contexts to ensure its response in Afghanistan is tailored to the unpredictable operational environment, building on its lessons learned to ensure an agile and efficient response. WFP has built in contingencies responsive to new developments and needs such as sudden-onset natural disasters, forced displacements, or a renewed peak of returns from neighbouring countries. In case of such events, WFP would adapt its programming and selection of beneficiaries under this contribution to reach those families, according to approved vulnerability criteria and rations reflected in this proposal.

WFP has established and will be using its existing Grievance Redress Mechanism, internally called Community Feedback Mechanism (CFM). This is a toll-free hotline that can be reached via phone and a dedicated email address. Help desks are also available at each distribution site for Component 3 to provide an in-person feedback channel. Since 15 August 2021, WFP quickly transformed its CFM, ensuring it was fit for purpose and capable of responding within the highly fluid and uncertain context. WFP has made large strides to ensure its CFM is accessible, safe, and trusted by communities such as scaling from 2 operators in August 2021, to 26 in August 2023, of which 20 are women. This effort has resulted in an increase in monthly cases from several hundred in August 2021 to approximately 13,000/month in August 2023. The CFM has an established, structured SOP for handling, responding, and escalating cases. In addition, the mechanism also has an information management and reporting framework that produces various types of reports and ad-hoc analysis, e.g., to look at specific issues in a specific location, assess rumours, undertake perceptions surveys. All operators are trained to handle sensitive cases and be survivor-centred, particularly when receiving and escalating GBV, SEA, SH and other cases of misconducts. Referrals are undertaken through Awaaz, the interagency call center in Afghanistan. UNICEF, WFP, and other UN agencies have nearly five years of experience implementing the Awaaz system for two- way communication with affected communities including grievance collection and response.

#### 2 Legal and Regulatory Framework

This ESMF is prepared to:

- (i) meet the objectives and requirements of the World Bank's Environment and Social Standards (ESSs), and the EHS Guidelines, and other guidelines and guidance;
- (ii) meet each agency's relevant ES policies, procedures, and guidelines for their respective parts of the project; and
- (iii) Apply/Rely/Use national E&S laws and regulations where applicable.

#### 2.1 National Legal Framework

The HER 2<sup>nd</sup> AF will be implemented within the framework of international standards presented above and the relevant national laws, as applicable.

• Afghanistan Labour Law (2008)

UNICEF, WFP, IPs and CPs will apply the relevant national laws and regulations and collaborate with the relevant authorities, as applicable. Where national laws and policies are inconsistent with the World Bank ESF or UNICEF Environmental and Social Standards, the aim will be to apply whichever standards are more stringent.

#### 2.2 World Bank Environmental and Social Framework

The World Bank ESF sets out the World Bank's commitment to sustainable development. It includes a set of ten ESSs that establish the mandatory requirements that the Borrower and the projects must meet through the project life cycle. The standards establish objectives and requirements to avoid, minimize, reduce, and mitigate environmental and social risks and impacts, and to compensate for or offset any residual impacts. The relevant ESSs are presented in Table 1.

**Table 1: Relevant ESS Standards** 

World Bank ESS standards	Relevant to Component 1 and 2 (UNICEF) (Y/N)	Relevant to Component 3 (WFP) (Y/N)	Rationale
ess 1: Assessment and Management and Monitoring of Environmental and Social Risks and Impacts	Yes	Yes	ESS1 discusses the borrower's responsibilities in identifying and managing the E&S risks/impacts of the project. ESS1 is relevant as there are potential environmental and social risks and impacts associated with the project's interventions that mitigation actions would be required. The project could cause environmental, social, labour, security, health, and safety risks due to the nature of the operation and the FCV setting.
			For component 1 & 2, the key impacts would be poor management of health care wastes, chemical reagents and other materials to be used in the health centres; inequitable distribution of project benefits excluding certain vulnerable groups; inadequate public engagement and consultation;

infectious disease exposure risks and security ris project workers and SEASH risks. For components 1: the EHS General Guidelines are applicable cont specific environmental, health and safety measure construction and rehabilitation of WASH infrastrut within the premises of health facilities. The Ge Guidelines will provide measures on environ occupational health and safety, community health safety, and construction and decommissioning, identification procedures are outlined in Section 4.  For Component 3, including the new sub-component 3, foreseeable risks include multiple barriers which may e access marginalized and minority communities. These i but are not limited to insecurity, remoteness of certain communities, weather, and road conditions, especially winter, restrictions posed by DfA or community leaders especially on women, literacy levels, and language barr However, WFP, as highlighted under various sections w mitigating measures are required, has in place the capa country, regional and headquarters level to mitigate/minimise/control the risks.  ESS 2 claals with labour related issues associated with project activities. ESS2 also ensures that workers ha access to the grievance redress channels, freed of association, and access to cleetube bargaining as prescribed by national law. The project implements will involve direct workers (consultants and staff recruby UNICEF and WFP), contracted workers (workers of CPs, and Contractors), and, for UNICEF, community will be engaged in the HER 2**d AF Project. The LMPs for project are included in Annex 4 and Annex 5 of this ES UNICEF and WFP personnel may report possible misco or wrongdoing to UNICEF's Office of Internal Audi Investigations (OIAI) or WFP's Office of the Insp. General (OIG), via established reporting channels. Thi include the following: fraud; corruption; work harassment; sexual harassment; abuse of auth discrimination; retailation; sexual exploitation and abu				
foreseeable risks include multiple barriers which may e access marginalized and minority communities. These is but are not limited to insecurity, remoteness of certain communities, weather, and road conditions, especially winter, restrictions posed by DfA or community leaders especially on women, literacy levels, and language barr However, WFP, as highlighted under various sections w mitigating measures are required, has in place the capa country, regional and headquarters level to mitigate/minimise/control the risks.  ESS 2: Labour and Working Conditions  Yes  Yes  ESS 2 deals with labour related issues associated with project activities. ESS2 also ensures that workers ha access to the grievance redress channels, freed of association, and access to collective bargaining as prescribed by national law. The project implementa will involve direct workers (consultants and staff recruby UNICEF and WFP), contracted workers (workers of CPs, and Contractors), and, for UNICEF, community were (Community Health Workers). No primary supply work will be engaged in the HER 2 <sup>nd</sup> AF Project. The LMPs for project are included in Annex 4 and Annex 5 of this ES UNICEF and WFP personnel may report possible misco or wrongdoing to UNICEF's Office of Internal Audi Investigations (OIAI) or WFP's Office of the Insp. General (OIG), via established reporting channels. This include the following: fraud; corruption; work harassment; sexual harassment; abuse of auth discrimination; retaliation; sexual exploitation and abu				forced labour; occupational health and safety (OHS) risks, infectious disease exposure risks and security risks to project workers and SEA/SH risks. For components 1 and 2, the EHS General Guidelines are applicable containing specific environmental, health and safety measures for construction and rehabilitation of WASH infrastructures within the premises of health facilities. The General Guidelines will provide measures on environment, occupational health and safety, community health and safety, and construction and decommissioning. Risk identification procedures are outlined in Section 4.
ESS 2: Labour and Working Conditions  Yes  ESS 2 deals with labour related issues associated with project activities. ESS2 also ensures that workers had access to the grievance redress channels, freed of association, and access to collective bargaining as prescribed by national law. The project implements will involve direct workers (consultants and staff recruby UNICEF and WFP), contracted workers (workers of CPs, and Contractors), and, for UNICEF, community workill be engaged in the HER 2 <sup>nd</sup> AF Project. The LMPs for project are included in Annex 4 and Annex 5 of this ES  UNICEF and WFP personnel may report possible miscoor wrongdoing to UNICEF's Office of Internal Audi Investigations (OIAI) or WFP's Office of the Insp. General (OIG), via established reporting channels. This include the following: fraud; corruption; work harassment; sexual harassment; abuse of auth discrimination; retaliation; sexual exploitation and abuse of auth discrimination; sexual exploitation and abuse of auth discriminati				
policies, procedures, and standards of conduct.  UNICEF shall put in place a GRM for its workers an workers of its subcontractors that is proportionate workforce. The GRM is accessible to all project wo including SPs and contractors. The WFP CFM is accessi	and Working	Yes	Yes	ESS 2 deals with labour related issues associated with project activities. ESS2 also ensures that workers have a c c e s s to the grievance redress channels, freedom of association, and access to collective bargaining rights as prescribed by national law. The project implementation will involve direct workers (consultants and staff recruited by UNICEF and WFP), contracted workers (workers of SPs, CPs, and Contractors), and, for UNICEF, community workers (Community Health Workers). No primary supply workers will be engaged in the HER 2 <sup>nd</sup> AF Project. The LMPs for the project are included in Annex 4 and Annex 5 of this ESMF.  UNICEF and WFP personnel may report possible misconduct or wrongdoing to UNICEF's Office of Internal Audit and Investigations (OIAI) or WFP's Office of the Inspector General (OIG), via established reporting channels. This may include the following: fraud; corruption; workplace harassment; sexual harassment; abuse of authority; discrimination; retaliation; sexual exploitation and abuse; or any other failure to observe prescribed regulations, rules,

	T	1	
			standard contractual terms and conditions.
			UNICEF GRM and WFP CFM systems are available through easily accessible reporting channels (UNICEF/WFP staff in person and UNICEF/WFP toll-free hotline). This enables beneficiaries and workers to directly communicate their concerns and issues to UNICEF and WFP, respectively.  To ensure broad awareness, UNICEF and WFP, and their
			relevant IP/SP/CP, will conduct community-based awareness campaigns, informing individuals about the existence of the GRM system, and educating them on how to effectively voice their concerns. Moreover, it is important to prominently display UNICEF and WFP call center posters on-site, ensuring that people are aware of the availability of the GRM system and call center.
ESS 3: Resource Efficiency and Pollution Prevention and Management	Yes	No	ESS3 addresses efficient resource use and pollution prevention. Medical wastes and chemical wastes (including wastewater, reagents, infectious and potentially infectious materials, expired drugs, etc.) from the health centres to be supported (drugs, supplies, and medical equipment) can have a significant impact on the environment and human health if not properly handled and disposed. Wastes that may be generated from medical facilities/ labs may include liquid contaminated waste, chemicals and other hazardous materials, and other waste from labs and quarantine and isolation centres including sharps, used in diagnosis and treatment. Proper management of healthcare waste is a challenge in Afghanistan.
ESS 4: Community Health and Safety	Yes	Yes	ESS 4 discusses the need and requirement for community health and safety issues in World Bank financed projects. Communities may be subject to risks resulting from poor medical waste management and infection prevention and control practices; GBV/SEA/SH perpetrated by project workers and other actors as a result of beneficiaries' contact with us or our projects, accidents, community exposure to infectious diseases and security issues, including use of contracted security personnel, particularly in conflict-affected and remote areas.  For Component 3, including the new sub-component 3.5, this project carries a low risk to community health, safety, and security.  There is a potential for inclusion or exclusion error for WFP's targeting modalities, which could lead to exacerbating existing, or creating new, conflicts within the community or between communities. There could also be repercussion on socio economic inequalities. Targeting of beneficiaries takes

			have been occasions that De facto Authorities (DfA) and community leaders have been seen to try and influence the targeting process.
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	No	No	ESS 5 deals with land acquisition, restrictions on land use, and involuntary resettlement issues in World Bank financed projects. Rehabilitation works are expected to occur in existing facilities and will not impact private lands and assets. No land acquisition and donation is envisaged under HER 2 <sup>nd</sup> AF project and thus the standard is not relevant. Based on lessons learned from the Afghanistan portfolio and in accordance with the findings of the Environmental and Social Assessment for the HER Additional Financing (AF) project, it is confirmed that the project will not involve any form of land acquisition, including voluntary land donations or endowments. As such, Environmental and Social Standard 5 (ESS5) on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement is deemed not relevant to this project. This exclusion is clearly reflected in the project's environmental and social screening tools, including the E&S screening checklist, to ensure systematic identification and mitigation of potential risks and to prevent the inadvertent inclusion of land-related activities during sub-project implementation.
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	No	No	ESS 6 deals with biodiversity conservation and sustainable management of living natural resources. This standard is not relevant as the project will operate within existing facilities/physical footprint.
ESS 7: Indigenous Peoples/Sub- Saharan African Historically Underserved Traditional Local Communities	No	No	ESS7 seeks to mitigate adverse impacts of projects and promote sustainable development benefits and opportunities for Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in a manner that is accessible, culturally appropriate, and inclusive. This standard is not relevant as there are no Indigenous People that meet the criteria of ESS7 in the country that could potentially benefit or be adversely affected by the Project's activities.
ESS 8: Cultural Heritage	No	No	ESS8 sets out general provisions on risks and impacts to cultural heritage from project activities This standard is not relevant as the project is not expected to affect any tangible or intangible Cultural Heritage as activities are to be carried out in existing facilities.
ESS 9: Financial Intermediaries	No	No	ESS9 sets out how Financial Intermediaries will assess and manage environment and social risks and impacts associated with subprojects. The standard is not relevant as the Project does not include financial intermediaries.

ESS 10: Stakeholder Engagement and Information Disclosure	Yes	Yes	ESS10 recognizes the importance of open and transparent engagement with project stakeholders. UNICEF and WFP have developed a joint SEP for the HER 2 <sup>nd</sup> AF project. The SEP is also in line with the principles outlined in UNICEF's Environmental and Social Standards, as well as WFP's Environmental and Social Standards. The SEP lays out the plan for meaningful consultations and engagement with all stakeholders throughout the project lifecycle, including information disclosure and grievance management.  The SEP will be a live document that may be updated during project implementation, as appropriate.
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The project will also apply the Environmental, Social, Health and Safety (ESHS) requirements in Annex 6 for Component 1 which are aligned to the following guidelines and Good Practice Notes:

- WBG General EHS Guidelines, 2007<sup>1</sup>
- World Bank Good Practice Notes:
  - Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Human Development Operations (2022)
  - o Road safety, 2019
  - o Assessing and Managing the Risks and Impacts of the Use of Security Personnel
- Managing the risks of adverse impacts on communities from temporary project induced labour influx,
   2016
- World Bank Technical Note on Public Consultations and Stakeholder Engagement in World Bank- Supported Operations when there are Constraints of Conducting Public Meetings, 2020

#### 2.3 Environmental and Social Risk Classification

The risk clarification will remain "Substantial" under the 2<sup>nd</sup> additional financing as identified under the parent project. The World Bank will review the risk classification on a regular basis during implementation and can change the classification, if necessary, to ensure that it continues to be appropriate.

For this project, the EHS General Guidelines is applicable containing specific environmental, health and safety measures for construction and rehabilitation of WASH infrastructures within the premises of health facilities. The General Guidelines will provide measures on environment, occupational health and safety, community health and safety, and construction and decommissioning.

#### 2.4 UNICEF Environmental and Social Standards

UNICEF is in the process of developing a comprehensive set of environmental and social safeguards policies and standards that will be applicable to all the Projects it implements. The safeguards will be based on the Model Approach to Environmental and Social Standards for UN Programming. The Model Approach represents a key step in moving towards a common approach among UN entities for addressing environmental and social standards for UN programming.

UNICEF has drafted a policy on ESS, which is now being finalized for adoption. These standards apply to underpin

<sup>&</sup>lt;sup>1</sup> https://www.ifc.org/en/insights-reports/2000/general-environmental-health-and-safety-guidelines

UNICEF's commitment to mainstream social and environmental sustainability to support sustainable development. Through application of the UNICEF ESS, UNICEF enhances the consistency, transparency, and accountability of its decision-making and actions, improves performance, and strengthens achievement of sustainable development outcomes. The main objectives of these standards are:

- Strengthen the quality of programming by ensuring a principled approach
- Avoid adverse impacts to people and the environment
- Minimize, mitigate, and manage adverse impacts where avoidance is not possible
- Strengthen UNICEF and partner capacities for managing social and environmental risks
- Ensure full and effective stakeholder engagement, including through a mechanism to
- respond to complaints from project-affected people

#### 2.5 WFP Environmental and Social Sustainability Framework:

In line with the mandate given by the WFP Environmental Policy, the WFP Environmental and Social Sustainability Framework consists of a set of principles, standards, and tools created to increase WFP's environmental and social sustainability and to limit the potentially negative impacts WFP may have on the environment, people, or communities. The WFP Sustainability Framework integrates the core values, principles, and standards embedded in a range of existing WFP policies, directives, and guidelines, and provides tools to implement them. It has been drafted with due regard to UN-wide practices and following a review of international standards for environmental and social sustainability.

The WFP Environmental and Social Standards of the WFP Sustainability Framework are a collection of commitments and minimum standards enshrined in existing WFP policies, directives, and guidelines, as well as commitments and minimum standards enshrined in relevant international law.

In addition, WFP has the following safeguards tools to ensure its programs and operations are environmentally and socially sustainable. These are Environmental and Social Risks Screening (ESRS), Environmental and Social Impact Assessments (ESIA); Environmental and Social Management Plan (ESMP), and the Community Feedback Mechanism (CFM).

#### 2.6 International Conventions

Afghanistan is party to a member of international environmental agreements, the most important of which are shown in Table 2Table 2.

**Table 2: Afghanistan International environmental agreements** 

Convention	Ratified
Convention concerning the Protection of the World Cultural and Natural Heritage.	20/03/1979
Convention on Biological Diversity	19/09/2002
Convention on the Conservation of Migratory Species	01/08/2015
United Nations Framework Convention on Climate Change	19/09/2002
<ul> <li>United Nations Convention on Combating Desertification</li> </ul>	1/11/ 1995 (accession)
<ul> <li>Environmental Modification Convention</li> </ul>	10/22/85 (accession)
<ul> <li>Stockholm Convention on Persistent Organic Pollutants</li> </ul>	20/02/2013 (accession)
<ul> <li>Law of the Sea</li> </ul>	8/03/1983 (signed)
Equal Remuneration Convention, 1951 (No. 100)	In Force (ratified 1969)
Abolition of Forced Labour Convention, 1957 (No. 105)	In Force (ratified 1963)
Discrimination (Employment and Occupation) Convention, 1958 (No. 111)	In Force (ratified 1969)

Minimum Age Convention, 1973 (No. 138) Minimum age specified: 15 years	In Force (ratified 2010)
Worst Forms of Child Labour Convention, 1999 (No. 182)	In Force (ratified 2010) 2014:
	Ministry of Labour and Social
	Affairs (MoLSA) announced a List
	of Prohibited Jobs for Child
	Labourers (Labour Code 41,42)
Night Work (Women) Convention (Revised), 1948 (No. 89)	Abrogated by decision of the
	International Labour Conference
	at its 106th Session (2017)
Night Work (Women) Convention, 1919 (No. 4)	Abrogated by decision of the
	International Labour
	Conference at its 106 <sup>th</sup> Session
	(2017)
Equal Remuneration Convention, 1951 (No. 100)	In Force
Underground Work (Women) Convention, 1935 (No. 45)	In Force
Protection of Wages Convention, 1949 (No. 95)	In Force
Weekly Rest (Commerce and Offices) Convention, 1957 (No. 106)	In Force
Dock Work Convention, 1973 (No. 137)	In Force (ratified 1979)
Occupational Cancer Convention, 1974 (No. 139)	In Force
Paid Educational Leave Convention, 1974 (No. 140)	In Force
Human Resources Development Convention, 1975 (No. 142)	In Force (ratified 1979)
Vocational Rehabilitation and Employment (Disabled Persons) Convention, 1983	In Force (ratified 2010)
(No. 159)	

#### 3 Potential Environmental and Social Risks, Impacts and Mitigation Measures

#### 3.1 Component 1 and 2 Environmental and Social Risks/Impacts and Mitigation Measures (UNICEF)

This section summarizes key environmental and social risks in line with UNICEF supported Project components and sub-components and guided by the harmonized application of the ESF ESSs, and UNICEF ESS.

The project will have positive environmental and social impacts, insofar as it would improve surveillance, monitoring, and containment of disease outbreaks, acute watery diarrhea, measles, and polio, as well as it will help project beneficiaries especially the poor to have access to essential health care services and strengthening monitoring, promoting quality healthcare, and ensuring accountability. Positive social impacts will accrue through an improved reporting system for GBV management and referral, several initiatives aimed at strengthening citizen engagement and improved access to health services by women as the project improves availability of female health workers and female nutrition counsellors. Table 3Table 3 identifies the potential environmental and Social (including labour), Health, and Safety risks associated with project activities and the corresponding mitigation measures.

Table 33: Potential Environmental and Social Risks and Mitigation Measures for Component 1 & 2 (UNICEF)

Potential Risk	Mitigation Measure
Occupational Health and Safety	
Occupational Health and Safety Risks can occur because of the potentially hazardous work environment. OHS risks may include:	<ul> <li>Ensure implementation of OHS measures detailed in Annex 6 and address related grievances as detailed in the LMP (Annex 4)</li> </ul>
<ul> <li>Work-related accidents and injuries may increase during minor construction/rehabilitation works</li> </ul>	<ul> <li>Incorporate by reference the relevant aspects of the ESCP, including, inter alia, the ESMF, into the ESHS (Annex 6) specifications of the procurement documents with SPs and</li> </ul>
<ul> <li>Road safety hazards, traffic accidents</li> </ul>	contractors. Such requirements will be extended by UNICEF's contractors/SPs to all subcontractors. <sup>3</sup>
<ul> <li>Exposure to heavy objects, heavy machinery and equipment, falling objects</li> </ul>	<ul> <li>Ensure that targeted Health Care Facilities apply safety standards to avoid infection, provide the necessary medicines, continuously clean using proper detergents,</li> </ul>
<ul> <li>Exposure to noise and dust, and exposure to electrical hazards from the use of tools</li> </ul>	provide the necessary equipment, chemicals and specialized medical staff, provide potable drinking chlorinated water, properly dispose of and manage medical waste, provide proper PPE to health workers and to patients, ensure safe
<ul> <li>Exposure to chemicals such as paints, solvents, lubricants, and fuels</li> </ul>	disposal of used Personal Protective Equipment (PPEs), and use related guidelines and procedures mainly those prepared by WHO, and the WBG EHS and apply the
<ul> <li>Lifting of heavy loads</li> </ul>	Project HCWMP
<ul> <li>Welding hazards (fumes, burns and radiation)</li> </ul>	<ul> <li>Require SPs/contractors to provide quarterly monitoring reports to UNICEF on ESHS performance in accordance with the ESHS metrics specified in the respective procurement documents.</li> </ul>
	<ul> <li>Provide laminated signs of relevant safe working procedures in a visible area on work sites, in English and local language as required, including infection prevention</li> </ul>
	<ul> <li>Provide PPE as suitable to the task and hazards of each worker, without cost to the worker</li> </ul>

- Provide training on OHS and Infection Prevention and Control Protocols
- Ensure construction/rehabilitation sites have protective measures (barriers, fencing)
- Erect removable barriers in high-risk areas
- Put in place warning signs, and allow only authorized persons access to working area
- Carry out the medical follow-up of the workers (such as emergency medical treatment on site, transportation to nearby hospitals) and appropriate medical cover in line with national laws
- Require all vehicles and drivers to have valid and appropriate licenses
- Equip workers with hard helmets, safety boots and protective gloves and/or PPE equipment, as needed
- Provide First Aid equipment and facilities in accordance with the Labour Law, and where appropriate, provide basic first aid training or PEP talks among workers
- Require at least one supervisory staff trained in safety procedures to be present at all times when rehabilitation work is in progress
- Ensure adequate provision of hygiene facilities (toilets, hand-washing basins), resting areas etc. separated by gender as needed and with distancing guidelines in place
- Require all workplace health and safety incidents to be properly recorded in a register detailing the type of incident, injury, people affected, time/place and actions taken, and reported to UNICEF and the World Bank in compliance with the terms set in the ESCP
- Implement the Life and Fire Safety requirements
- Require BPHS partners to confirm the compliance of health facilities with local building codes and fire department regulations. Where the above evidence is missing, work with local authorities to ensure a life and fire safety review is conducted for the relevant building.

#### **Labour and Working Conditions**

Risks related to labour and working conditions may include:

- Unfair / discriminatory recruitment practices (e.g., against women)
- Recruitment of under aged persons (child labour)
- Noncompliance with national Labour laws
- Low capacity to manage E&S risks

- Implement the updated LMP set and agreed for the project (Annex 4)
- Establish, maintain, and operate a grievance mechanism that is accessible for Project workers, as described in the SEP and LMP.
- Incorporate by reference the relevant aspects of the ESCP, including, inter alia, the ESMF, into the ESHS (Annex 6) specifications of the procurement documents with SPs and contractors. Such requirements will be extended by UNICEF's contractors/SPs to all subcontractors.

- Forced labour,
- Occupational health and safety risks, and infectious disease exposure risks for Project workers and communities served
- Sexual exploitation and abuse/sexual harassment (SEA/SH) risks for Project workers and beneficiaries
- Require existence of contractual requirements on prevention of child labour, minimum age of 14 and age verification protocol for each implementing entity
- Implement capacity building plans for SPs and contractors to mitigate against the risks of low capacity among SPs and contractors to manage E&S risks

### Gender Inequality, Gender-based Violence (GBV)/ Sexual Exploitation and Abuse (SEA) /Sexual Harassment (SH)

- Women and girls may face gender
  barriers including GBV, in accessing
  health services because of Low level of
  consultation of women and girls on
  barriers and risks, mobility restrictions on
  women and girls and lack of awareness of
  availability of services.
- Health workers and SPs have limited capacity in SEA/SH prevention; detection, reporting and responding including handling disclosure, referral pathways.
- Women and children as beneficiaries have limited information on SEA/GBV, including where to report and limited access to reporting mechanisms and/or women and children have limited access to reporting channel due to imposed movement restriction and limited access to digital devices/phones.
- SEA/SH survivors do not have access to quality, survivor centered and gender responsive GBV treatment services.
- UNICEF and implementing partners lack capacity to effectively implement gender responsive programs, support sectoral PSEA/SH & GBV Risk Mitigation, Monitoring and Response.

- FGD and consultation with women and girls (beneficiaries/communities and frontline workers)
- Raise awareness targeting women and adolescent girls, including pregnant women and lactating mothers, on health and nutrition, access to MNCH services, and GBV/SEA/SH prevention
- Conduct periodic GBV/SEA Safety Audit around health facilities and communities collaboratively with women led CSOs and HER partners
- Orient all personnel/workers on PSEA/SH and GBV and assure all sign on Code of Conduct, including community health workers.
- Ensure availability of a functional grievance redressal mechanism which can be used as reporting channel with specific referral pathways for GBV/SEA/SH. A workers' GRM will allow project workers to report any instances of sexual harassment and abuse on the job, while a beneficiaries' GRM will allow project participants to report instances of SEA or GBV perpetrated by project workers
- Ensure that all SP are assessed of their PSEA capacity before the
  partnership and the Capacity Strengthening Implementation Plan
  (CSIP) is agreed and implemented until they achieve full capacity.
  UNICEF technically supports PSEA/SH training for SP's all
  staff/personnel. UNICEF makes sure all 3<sup>rd</sup> Party HR Contractors
  who work under HER are trained on PSEA/SH.
- Awareness raising among community members on GBV/SEA/SH risks and the presence of GRM continues using IEC materials on PSEA/SH and GRM.UNICEF is engaging a standby partner with dedicated expertise to provide on-going services to survivors of SEA.
- UNICEF is working to strengthen the capacity of SPs to mitigate, prevent and respond to SEA/SH.

#### Resource efficiency, Pollution and Waste Management

Environmental risks associated with resource efficiency and material supply; construction related solid wastes, wastewater, noise, dust and emission management; hazardous materials management etc. may include:

- Assess the environmental and social risks and impacts of proposed Project activities, in accordance with ESSs, the Environmental, Health and Safety Guidelines (EHSGs) and its OHS component
- Adopt ESHS requirements (Annex 6) and ESMP template

- Dust generation during construction equipment and materials loading and unloading, and working material mixing
- Increased levels of noise and vibration due to vehicles movement and construction machineries
- Air pollution due to emissions from construction vehicles and machinery
- Poor management of liquid wastes, leading to soil or groundwater pollution
- Poor disposal of construction debris and waste materials
- Ground water pollution from pit latrines
- Improper handling and disposal of hazardous waste

(Annex 7) capturing resource minimization and mitigation measures of adverse impacts on material sources

- Use well-maintained equipment
- Spray water for dust control
- Use operational noise muffler
- Limit noisy activities to normal daylight hours
- Limit vehicle speed at critical locations
- Properly maintain construction machinery to minimize exhaust emissions of CO, suspended particulates and fumes
- Remove and recycle liquid waste
- Properly dispose of solid waste at designated permitted sites
- Ground water quality testing at source development and regular intervals

#### **Medical Waste Management**

Issues associated with poor health care waste management, such as wastes that may be generated from health facilities (e.g., blood, other body fluids, <u>wastes from septic tanks</u>, and contaminated fluid) and solid waste (e.g., used personal protective equipment, sharps, used vials, and medical equipment):

- Medical waste generation
- Risk of infection, cross contamination, contamination of soil and groundwater, accidental infection through poor handling of sharps, etc.
- Risk of spread of diseases, personnel exposure to disease and bacteria
- Incinerator Impact (Smoke, flue gas, lung diseases)
- Mismanagement of wastes
- potential for nosocomial infections due to poor implementation of infection prevention measures
- issues relating to disposal of obsolete or expired medicines
- potential for spread of infectious diseases as a result of poor handling, storage and disposal of infectious materials.

- Implement the project HCWMP (Annex 2.1) and IPCP (Annex 2.2).
- Provide training on health care waste management and infection prevention and control to enhance capacity among the national government, service providers and health facility staffs, to safely manage the health care waste generated in the health facilities and comply to the appropriate infection prevention and control practices
- Support SPs to develop guiding documents (job-aid) to support the health care personnel understand the potential risks of mishandling health care waste and guide on appropriate methods for handling, segregation, collection, transportation, treatment and final disposal.
- Avoid open burning practices and explore alternative treatment methods, to avoid air and soil pollutions.

#### **Community Health and Safety**

Community Health and Safety risks may include:

- Risk of accidents or infection within the facilities
- Ensure that targeted Health Care Facilities apply safety standards to avoid infection, provide the necessary hygiene supplies, continuously clean using proper detergents, provide

- Inadequate hygiene practices and behaviour
- Fire risks in health facilities

- the necessary equipment, chemicals and specialized medical staff, provide potable drinking water, properly dispose of and manage medical waste, provide proper PPE to health workers and to patients, ensure safe disposal of used PPEs, use related guidelines and procedures including those prepared by WHO and the WBG EHS, and apply the Project HCWMP and IPCP
- Ensure availability of a grievance redress mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties.
- Provide a Life and Fire Safety and Emergencies
   Preparedness and response checklist for all health care facilities, and/or refurbished buildings
- Ensure provision of proper and safe equipment and materials to be used by health workers including waste management staff and site workers
- Provide awareness to employees, patients, and the community on the importance of personal hygiene and cleanliness of the surrounding environment,
- Train cleaning crew and providing (appropriate PPEs) tools for safety and hygiene
- Conduct regular monitoring visits to HER Project supported BPHS and EPHS facilities

#### Security

The security and conflict situation remains fragile in Afghanistan with multiple armed groups currently active. . This creates a challenging security situation. Possible occurrence of conflict (including armed conflict) near healthcare facilities and/or terrorist attacks on project workers iremains a prevalent risk in terms of the following/

- Threats to the personal safety of the workers due to fighting, airstrikes, shelling, improvised explosive devices (IEDs) and landmines
- Threat of physical violence for individuals involved in the transportation of supplies or provision of the operational cost services
- Detention including arrest or kidnapping of project workers, and community members during the course of, or as a result of, projectrelated work
- Criminal acts against project infrastructure including theft and

- Implement project SMF in line with the United Nations Security Management Systems (UNSMS) policies and processes, including the Saving Lives Together framework (SLT), for project personnel and premises
- Prepare and maintain a projecetproject security risk assessment (SRA) to dentify security threats to the project and establishment of clear channels of communication to communicate changes in threat levels between the various parties involved in project implementation, monitoring the development of SMPs by project IPs
- Follow deconfliction procedures before any field mission for direct staff
- Ensure updated and real-time mapping of roads and potentially affected areas
- Ensure that all project workers are duly trained on the security clearances from relevant authorities for all contracted work
- Temporarily restrict project activities in areas with active conflict or where political and governance risks cannot be effectively managed
- Through the stakeholder engagement plan, ensure that authorities and influencers at all levels are adequately engaged

- robbery by various actors for economic gain.
- Road traffic accidents may also occur which involve those involved with project activities
- Require personnel to comply with vehicle Train require contractors and SPs to develop activity level SRAs and SMPs and to provide adequate training to its personnel, on safety and security considerations tailored to the local context in Afghanistan, including on conflict sensitive communication, cultural awareness, implementation, and risk management, and road safety.

#### **Vulnerable Groups**

- The central social risk is the limitations and challenges marginalized and vulnerable social groups may face in accessing health facilities and services. Specifically, reaching traditionally excluded groups, remotely located communities, and internally displaced people may be challenging in the present vulnerable country context. There are also structural barriers for these disadvantaged groups to access healthcare services like security and mobility concerns, especially for women.
- Implement the updated SEP and ensure regular updates of the SEP (to ensure that vulnerable groups have equal access to the project benefits).
- Enforce UNICEF's equity policy, based on evidence, to ensure equitable distribution of benefits to targeted beneficiaries including use of mobile teams in hard-to- reach areas and support to the various elements of the Community-Based Health Care (CBHC) program, namely Community Health Workers (CHWs), Family Health Houses (FHH), and Family Health Action Groups (FHAG)
- Ensure availability of a grievance redress mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties
- Design interventions, operational modalities, and funding flows to avoid elite capture of resources and ensure that as much of the funds as possible reach the intended beneficiaries, including vulnerable groups

#### **Natural Disasters**

Afghanistan is prone to Natural disasters which may impact project activities implementation, staff ability to work, and infrastructure and project resources, for example:

- Heat waves
- Severe winter
- Floods
- Cyclones
- Earthquakes and landslides

- Monitor the weather conditions and develop emergency response plans to ensure the safety of direct and contracted staff.
- Establish communication mechanisms between offices and entities to share information as situations evolve
- Adapted working hours at sites to avoid work during the heavy weather period
- Provide flexible scheduling and alternative work modalities
- Use as much as possible local workers to provide the services, to avoid workers traveling long distances

#### Delivery and storage of goods, including pharmaceuticals, reagents, and hazardous materials

Risks may include:

- Issues related to delivery and storage of goods, (medicines)
- Issues of transparent and equitable distribution of supplied goods
- Ensure delivery and storage of goods follows WHO guidelines and international procedures on transport and storage of medicines, pharmacy and other material are
- Conduct regular inspection of goods and warehouse and will keep log of inventories for monitoring purposes
- Communicate transparently on eligible locations and facilities and will engage with communities to ensure fair access to

project benefits, as indicated in the SEP

#### 3.2 Component 3 Environmental and Social Risks/Impacts and Mitigation Measures (WFP)

This section summarizes key environmental and social risks in line with WFP supported Project component and sub-components and guided by the harmonized application of the WB's ESSs, and WFP ESS. It is important to note that the main SEA/GBV risks are reflected in the separate joint SEA/SH Action Plan.

The project will have positive environmental and social impacts, insofar as it would improve the nutritional status of pregnant and breastfeeding women and children under two years of age in selected districts with high child malnutrition. Positive social impacts will accrue through improved community and mother awareness of service availability, nutritional options and strategies for themselves and their children and, ultimately, improved access to health services by women as the project provides a stable safety net style transfer to improve access to health services, and link to additional (non-WFP) project components, such as increased availability of female health workers and female nutrition counsellors.

The newly added sub-component 3.5 will contribute to sustaining health and nutrition outcomes and provide financial protection related to access and use of health and nutrition services, by building more diversified livelihoods of selected vulnerable households.

Table 4Table 4 (below) identifies the potential environmental and Social (including Labour), Health, and Safety risks associated with project activities, including for sub-component 3.5, and the corresponding mitigation measures.

Table 4: Potential Environmental and Social Risk and Mitigation Measures for Component 3 (WFP)

Potential Risk	Mitigation Measure	
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.	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 WFP Protection and Accountability Policy, and its Protection Guidance Manual.	
	<ul> <li>WFP provides transparent information on project activities, benefits, eligibility criteria to communities, through accessible channels, trusted intermediaries, such as community, Cooperating Partners and does so in relevant languages.</li> </ul>	
	<ul> <li>As part of our regular programming, 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.</li> </ul>	
	<ul> <li>WFP ensure that its GM/CFM is accessible to disadvantaged and vulnerable groups through raising awareness among these groups and in relevant languages, providing different intake channels etc.</li> </ul>	
	WFP monitors the GM/CFM to ensure adaptive management.	
	Stakeholder engagement and grievance risks will be managed through:	

### • The project's operational design, further detailed in the updated Project Operations Manual; and,

• Updated Stakeholder Engagement Plan (SEP).

**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.

Ensuring that its activities and benefits reach the most vulnerable and in-need households is at the core WFP operations, as outlined in the WFP Protection and Accountability Policy, and its Protection Guidance Manual. Based on these:

- Community consultations are formed to support partners during the targeting process. These consultations are composed of nominated community representatives who are key members of the community.
- WFP implements spot checks after targeting and registration processes to minimize the possibility of inclusion/exclusion errors and redress problems around targeting.
- WFP provides transparent information on project activities, benefits, eligibility criteria to communities, through accessible channels, trusted intermediaries, in relevant ethnic languages, and trains partners to share the same during each stage of the project cycle.
- WFP ensures that its grievance redress mechanism (GRM)/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.

#### Exclusion risks will be managed through:

- The project's operational design, further detailed in the updated Project Operations Manual; and,
- Updated Stakeholder Engagement Plan (SEP)

Risks to community members: Risks to community members may include safety/security risks in collecting assistance, discrimination/exclusion, and SEA risks.

WFP's Protection and Accountability Policy, its Protection Guidance Manual and Standard Operating Procedures on Protection from SEA address how to assess and manage risks to community members. Based on these:

- For project activities, WFP conducts field visits to assess how
  existing risks, such as safety, security, GBV (including SEA) risks,
  are emerging and are relevant to WFP's operations, and
  understand how WFP activities may create harm or reduce risks
  for project beneficiaries. This analysis also identifies and
  assesses risks for disadvantaged and vulnerable groups. This
  analysis is done inclusive and accessible consultations with
  development partners, NGOs, religious and community leaders,
  and community-based organizations, as well as participatory
  protection analysis.
- 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 languages. This includes information, awareness raising and training on the GM/CFM, on protection from SEA.

- 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 GRM/ CFM is accessible to all through raising awareness among these groups and in relevant regional languages, providing different intake channels.
- WFP has Standard Operating Procedures for receiving, managing and, where applicable, referring SEA cases, including referrals to GBV services. WFP will ensure that the GRM/CFM applies these procedures throughout the project. Designated WFP staff are trained on how to manage SEA incidents and capacity building and monitoring plans shall be implemented in line with the GBV Action Plan prepared for the World Bank.

#### Community health and safety risks will be managed through:

- The project's operational design, further detailed in the updated Project Operations Manual; and,
- Updated Stakeholder Engagement Plan (SEP)
- World Bank Good Practice Note on SEA/SH where applicable,
- United Nations implementing partner PSEA capacity assessment tool
- WFP SEA/SH Action Plan.

# **Child labour and forced labour:** due to the fragility of the country, child and forced labour may occur.

The WFP as per WFP's Guidance Note to Prevent the Use of Child Labour does not allow the employment of minors in its programmatic activities and operations.

WFP will ensure partners have processes to mitigate the risk of child labour and forced labour with partners by ensuring:

- Additional capacity and updating of partner level ESMPs to capture the potential risks of child labour and forced labour and propose clear mitigation measures for the risks.
  - Partners processes to verify the ages of workers and ensure compliance with the minimum age of workers
  - Ensure specific labour provisions are applied to partners e.g. maximum working hours, wages.

#### Child labour and forced labour risks will be managed through:

- The updated project risk screening
- The Project's Environmental and Social Management Plan (ESMP) and partner level ESMPs
- Labour management procedures
- WFP's Guidance Note to Prevent the Use of Child Labour

#### WFP Community Feedback Mechanism (CFM, or GRM)

#### • Updated Stakeholder Engagement Plan (SEP)

**Security**: The security situation remains fragile in Afghanistan with Islamic State – Khorasan (ISK) and other armed groups active. There is a low intensity conflict situation with terrorist and criminal acts conducted to challenge the DfA. Violence or the threat of it often accompanies criminal acts across the country.

The ongoing conflict creates a challenging security situation.

#### Security risks may include:

- Threats to the personal safety of project workers and communities due to armed clashes, IED strikes;
- Robberies targeting workers and staff;
- Threat of physical violence for individuals involved in the transportation of supplies or provision of the operational cost services;
- Detention including arrest or kidnapping of project workers and communities during the course of, or as a result of, project-related work; and,
- Road traffic accidents.

- Implement project SMP in line with the United Nations Security Management Systems (UNSMS) policies and processes, including the Saving Lives Together framework (SLT), for UNICEF personnel and premises.
- Regular Community of Practice for security with WFP security staff and CP personnel to ensure implementation of the SMP.
- Identify security threats to the project and establishment of clear channels of communication to communicate changes in threat levels between the various parties involved in project implementation
- Follow deconfliction procedures before any field mission for direct staff
- Ensure updated and real-time mapping of roads and potentially affected areas
- Suspend, if required, project activities in areas with active conflict or where political and governance risks cannot be effectively managed
- Through the stakeholder engagement plan, ensure that authorities and influencers at all levels are adequately engaged.
- Require WFP personnel to comply with WFP's vehicle fleet and road safety/management policies, procedures, and guidelines
- Train WFP staff and require contractors and partners to develop, where appropriate, SRAs and SMPs, and provide adequate training to its staff, on safety and security considerations tailored to the local context in Afghanistan, including on conflict sensitive communication, cultural awareness, implementation, and risk management

#### Community health and safety risks will be managed through:

Security Management Plan.

**Natural disasters:** Afghanistan is prone to Natural disasters which may impact project activities implementation, staff ability to work, and project resources, for example:

- Heat waves
- Severe winter
- Floods
- Cyclones
- Earthquakes and landslides

 Monitor the weather conditions and develop emergency response plans to ensure the safety of direct and contracted staff. Establish communication mechanisms between offices and entities to share information as situations evolve.

#### 3.3 Security Management

The evolving and complex political, socio-economic environment presents multiple risks, both direct and indirect, to project staff, contractors, health workers and facilities as well as local partners as outlined in Table 6. UNICEF has developed a Security Management Framework (SMF) for Components 1 & 2 of the Project and WFP has developed a Security Management Plan (SMP) for Component 3 to help identify, prevent and mitigate the risks.

UNICEF's SMF and WFP's SMP include the following key components:

**UNSMS**: The UNSMS comprises a variety of instruments, including policies, guidelines, manuals, handbooks, aide memoires and communiqués. Relevant guiding documents are maintained on the United Nations Security Information Network (UNSMIN)<sup>4</sup>

Saving Lives Together Framework (SLT): The SLT is a series of recommendations aimed at enhancing security collaboration between the United Nations (UN), and international NGOs and/or international organizations (known as "SLT partner organizations"). The objective of SLT "is to enhance the ability of partner organizations to make informed decisions, manage risk and implement effective security arrangements to enable delivery of assistance and improve the safety and security of personnel and operations." There are two levels of collaboration within the SLT – "regular" and "enhanced." The UNICEF and WFP implementation of the SLT under this project, when applicable, will follow the "enhanced" level of collaboration with regards to security plans and information management to bolster security coordination arrangements, information sharing and operational / logistics arrangements with any international SPs or CPs.

Security Incident reporting: The Security Incident Reporting process is detailed in the World Bank ESIRT and by UNICEF and WFP regular monitoring of the security situation on the ground, including monitoring of the security situation using data received from multiple sources, including UNDSS, UNICEF and WFP service providers, partners, media, etc. UNICEF and WFP will notify the Bank within 48 hours after learning of and confirming the incident or accident. A summary report (using an agreed template) of the incident will be provided within thirty (30) days of making the initial report of the incident or accident The World Bank will advise UNICEF and WFP on any requirement for additional security incident reporting and development of a corrective action plan.

Service Providers/contractors: UNICEF and WFP Partners and contractors are responsible for the security of its personnel, premises, equipment, and activities when implementing UNICEF and WFP supported programmes. Per the project ESCPs, UNICEF and WFP will, where relevant, (i) cause partners and contractors to ensure risk assessments and security measures are developed for their respective activities and (ii) will monitor their implementation. Partners and contractors will report security incidents in accordance with the World Bank ESIRT. These responsibilities are outlined in the clauses of the contracts entered between UNICEF and WFP and their respective SPs / CPs / contractors and derive from their fundamental duty of care as employers and as independent legal entities. The SPs / CPs / contractors will report to UNICEF and WFP on all matters related to program implementation including security incidents that negatively affect delivery or impact personnel according to the SOPs in place.

**Road Safety**: UNICEF's and WFP'S vehicle fleet and road safety management policies, procedures and guidelines will apply to UNICEF and WFP staff as they conduct their regular monitoring visits to HER supported Health sites. SPs, CPs and Contractors will be responsible for the engagement and management of personnel, ensuring compliance with road safety and convoy procedures.

#### 3.4 SEA/SH Action Plans

The operating context for women and girls continues to be characterized by restrictions and edicts, which necessitate

monitoring and adaptation of implementation modalities in order to keep reaching women and girls safely. UNICEF and WFP have developed respective SEA/SH Action Plans to address gender barriers to accessing health services and cash interventions and to prevent and mitigate the high SEA and SH risks. Within the context of restrictions in GBV services, multisectoral collaboration is required in order to safeguard services for women and children and in order to provide referral pathways to project beneficiaries. Both WFP and UNICEF are members of the interagency Gender in Humanitarian Action (GIHA); PSEA Inter Agency Network and GBV Sub-Cluster and encourage their SPs / CPs to join these platforms. UNICEF and WFP collaborate with other UN agencies (mainly UNFPA and WHO) and other key stakeholders involved in gender equality, GBV and PSEA/H programming.

UNICEF will work in coordination with WFP in the implementation of the SEA/SH action plan and continue to work with other partners and inter-agency network/working group including the GBV sub-cluster as well as PSEA Network to ensure consistency and coordination and will leverage its coordination role in Health sector to further advance SEA/SH and GBV risk mitigation and response.

The PSEA/SH action plans prepared by UNICEF and WFP will contain specific activities for their respective components of the project under the following pillars:

- Gender responsive access to health services and cash assistance by women and girls including roll out of safety audits / monitoring as required to ensure safe and accessible project sites, as well as measures to promote proximity and ease of travel to and from project sites.
- Health workers have capacity to provide quality, survivor centred and gender responsive care and referral services for SEA/SH and GBV survivors (specific to UNICEF), includes training and sensitization of implementing staff at health centres.
- Project staff and partners have capacity to identify, prevent and escalate SEA/SH including training of all
  implementing project staff, and capacity assessments and building of service providers for SEA/SH intake and
  referral.
- Beneficiaries and affected communities have access to safe reporting channels for SEA/SH including establishment of community facing GRM mechanisms and community engagement to ensure reporting mechanisms are known.
- Beneficiaries and affected communities have access to quality, survivor centred and gender responsive GBV support services ensuring adequate referral systems are in place to existing GBV services.
- **SEA and GBV risks are monitored with accountability** including monitoring of reports received via respective GRMs, and escalation of incidents to the World Bank as per reporting agreements.
- Technical capacity and coordination on Gender/GBV/PSEAH are established and sustained at UNICEF and WFP, including sufficient technical capacity to implement the action plans, monitor the implementation, oversight and technically support SPs and CPs, and coordinate the SEA/SH Action Plans within and across both agencies and other related counterparts.

## 4 Procedures to Identify and Assess Potential Environmental and Social Risks and Impacts for Subprojects

This section sets out in detail the procedures to be followed in addressing the environmental and social risks and impacts of subprojects by UNICEF and WFP.

#### 4.1 UNICEF Procedures

#### 4.1.1 UNICEF's Exclusion List

The first step in addressing a subproject's environmental and social risks and impacts is for the ESS Specialist to exclude as **ineligible for UNICEF support all new** subprojects that include any of the following attributes in the UNICEF Exclusion List (Annex 10).

#### 4.1.2 Screening

E&S screening is the first step to understand the potential risks and impacts of the subproject/activity. The screening process follows the methodology outlined in Annex 1 of this ESMF. The E&S Screening template will be reviewed and updated as needed during the project implementation.

Under the 1<sup>st</sup> additional financing, all health facilities planned for the 2<sup>nd</sup> additional financing have been screened. Therefore, for the second additional financing, screening will only be conducted for newly identified sites that were not previously assessed, UNICEF would revisit the E&S screening results to ensure compliance with requirements of the updated ESMF version. The screening results will allow to filter out the activities that are not eligible or those on the exclusion list and classify eligible activities on the basis of predictable risks and impacts. All activities that are not sustainable due to their location or because they represent risks and impacts that are neither avoidable, mitigable nor compensable will not be financed by the project.

The environmental and social risks and impacts identified through the E&S screening will then determine the need for the implementation of appropriate E&S mitigation measures, for example in the form of preparation and implementation of subproject specific ESMPs if required (See the ESMP template in Annex 7).

Upon receiving a draft subproject proposal from UNICEF technical staff, the ESS Specialists will prepare, sign, and pass on to the Project Manager, a subproject specific screening form (Template in Annex 1), indicating:

- The proposed environmental and social risk rating (Substantial, Moderate or Low), with justifications,
- The proposed environmental and social risk management instruments need to be prepared, as appropriate.

#### 4.1.3 Environmental and Social Risk Management Instruments

The Environmental and Social Management Plan (ESMP) identifies prevention, minimization, mitigation, and compensation measures to be applied to relevant subprojects, as required. The ESMP template is included in Annex 7 for minor construction/rehabilitation works and can be adapted based on site conditions using the ESHS specifications and mitigation measures outlined in Annex 6. The mitigation table serves as a reference on potential risks and impacts, mitigation measures and indicators or outcomes that can be planned and implemented throughout the project. The risks and impacts, mitigation measures and monitoring indicators are presented according to the relevant ESSs.

When applicable, contractors will ensure that sufficient funds are budgeted to implement the required ESMP and monitor and report on ESMP performance. Where contractors are required to develop an ESMP for construction works, ESMPs must be approved by UNICEF Engineers prior to construction and rehabilitation activities.

#### 4.1.4 Incorporating E&S requirements in contracts

UNICEF or its SPs will ensure that:

- Requests for Proposals reference the ESCP, including, inter alia, the relevant E&S instruments, the ESMF, LMP,
   SEP and the code of conduct in the ESHS specifications including reporting requirements
- The bidders' past environmental and social performance, and their ability to manage environmental and social issues will be considered in the selection of contractors.

#### 4.1.5 Consultation and Disclosure Requirements

For each subproject, the service providers will engage with affected communities, including host communities, through the process of stakeholder engagement described in the SEP. UNICEF through its service providers will initiate consultations with individuals and communities that might be affected by the subproject, directly from the start of the project. The purpose of the consultations will be to: (i) inform stakeholders about the activities to be undertaken, and possible impacts, and (ii) document and address their concerns. Consultation summaries should be included in E&S safeguard instruments, including who was consulted, where and when, what concerns were expressed, and how these concerns were addressed. The records of consultations are kept in the Project Site Office. In addition, subprojects should regularly consult with project-affected persons and communities throughout subproject implementation, as indicated in the Project's Stakeholder Engagement Plan. Furthermore, all stakeholders participating in the consultation will be informed on the GM and where/how complaints can be made.

The consultation process will take into account the sociocultural context of Afghanistan. Consultations can take the form of focus groups, discussions with elders/community leaders, or interviews. If applicable separate consultations will be done for women to ensure that any special concerns and needs are considered during the preparation of the E&S safeguard instruments. In light of the fragility, conflict, and violence (FCV) context of Afghanistan, the service providers of the concerned subproject will ensure that Project Affected Person (PAPs) are not exposed to risks as part of their participation in consultations, for example by avoiding large meetings, and not disclosing personal information/photos.

#### 4.1.6 Grievance Redress Mechanism (GRM)

UNICEF will apply the Project Grievance Mechanism detailed in the Project Stakeholder Engagement Plan(SEP) and LMP, to all subprojects.

This mechanism allows affected individuals to raise grievances related to; (i)non-fulfilment of contracts or agreements; (ii)compensation entitlements; (iii)types and levels of compensation: (iv)disputes over the destruction of assets or livelihoods; (v) disputes in receiving project services; (vi)issues related to Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), or Sexual Harassment (SH); (vii)disturbances caused by construction activities such as noise, vibration, dust, or smell. It also covers any other project-related complaints.

The GRM is gender- and age-inclusive and responsive and address potential access barriers to women, the elderly, the disabled, youth and other potentially marginalized groups as appropriate to the Project. The GRM will not impede access to judicial or administrative remedies as may be relevant or applicable and will be readily accessible to all stakeholders at no cost and without retribution.

Information about the Grievance Mechanism and how to make a complaint and/or grievance must be communicated during the stakeholder engagement process and placed at prominent places for the information of the key stakeholders.

The GRM also handles anonymous complaints, though the extent to which action can be taken to address them will

depend on the information the caller is willing to provide. Where the complainant is not satisfied with the resolution, grievances can also be escalated. The GRM system has agreed referral pathways for GBV cases/complaints to refer them to the appropriate channels. For all cases received, the national GBV referral pathway is used to refer the survivor to the services available including medical care and psychosocial support. This process is elaborated further in the SEA/SH Action Plan. Please refer to the SEP for details on the GRM process.

#### 4.2 WFP Procedures

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

#### 4.2.1 WFP's Exclusion List

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 (Figure 2, Annex 11). The Screening should be done at the State/Region level to ensure higher familiarity with the local context, environment, and communities.

## 4.2.2 Environmental and Social Risk Screening

Risk screening is an integral part of context analysis and activity design. The environmental and social risk screening tool helps identify the possibility that an intervention, when implemented, would infringe one or more of the WFP environmental or social standards. In particular, the risk screening helps identify:

- the risk of causing unintended negative impacts on natural resources (WFP Standard 1)
- the risk of causing unintended negative impacts on biodiversity or ecosystems (WFP Standard 2)
- the risk of consuming high amounts of resources, generating waste, or causing pollution (WFP Standard 3)
- the risk of contributing to climate change or reducing resilience in the face of climate change (WFP Standard 4)
- the risk of not providing adequate protection or infringing human rights or labour rights (WFP Standard 5)
- the risk of increasing gender inequality (WFP Standard 6)
- the risk of compromising community health or security or increasing conflict (WFP Standard 7)
- the risk of not ensuring accountability to affected populations (WFP Standard 8)

The screening tool determines if the risks may lead to negative impacts in different forms, at different levels, with different timescales, and perceived differently by different persons:

- Direct and indirect impacts: Direct impacts are the immediate consequences of the activity. For example, the construction of a road leads to the fragmentation of wildlife habitat because it cuts it in half. Indirect impacts are secondary consequences that are not fully under control.
- Cumulative impacts: These are the combined effects of several otherwise unrelated activities.
- Transboundary impacts: When potential impacts could expand beyond a national or other administrative or physical boundary, special caution is warranted. Specific border agreements or international regulations could apply. This may require additional consultation.
- Residual impacts: These are impacts that will, or are likely to, remain after mitigation measures have been implemented.

# 4.2.3 Environmental and Social Risks Management Instruments

Planning – Environmental and Social Safeguards Implementation

At this stage, as part of activity planning, WFP should ensure that necessary measures included in the ESMF and SEP

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 and SEP should be integrated into the general operating procedures for all activities.

At this stage, WFP will work with CPs and relevant stakeholders to organise participatory assessments with communities to inform beneficiary selection. In addition, 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.

## **Environmental and Social Management Plan**

Once the screening of interventions is completed, in the case of a medium-risk activity or intervention (Category B), an ESMP is developed by the person or entity designing the activity or intervention. The ESMP should include:

- the measures proposed to manage the risks and/or impacts;
- the cost of these measures;
- when the measures will be implemented and by whom;
- how the risks and the implementation of the risk management measures will be monitored

## **Community Feedback Mechanism**

WFP will use its own Grievance Redress Mechanism (GRM), internally called Community Feedback Mechanism (CFM), a toll-free hotline that can be reached via phone, a dedicated email address, and helpdesks at each distribution site managed by CPS to provide an in-person channel to provide information and collect feedback. This enables beneficiaries, regardless of literacy levels, to raise concerns or offer feedback on the operation, targeting, and entitlements with an element of anonymity. The hotline is operated by both female and male staff in line with Afghan cultural protocols, who speak both national languages (Pashto and Dari). Beneficiaries, partner staff, community members, and others can confidentially call the direct line to provide feedback, comments, or report a concern about any WFP supported operation. Since 15 August 2021, WFP quickly transformed its CFM, ensuring it was fit for purpose and capable of responding within the highly fluid and uncertain context. WFP has made large strides to ensure its CFM is accessible, safe, and trusted by communities such as scaling from 2 operators in 15 August, to 26 today, of which 20 are women. This effort has resulted in an increase in monthly cases from several hundred in August 2021 to approximately 11,000 to 13,000/month today.

# 5 Institutional Arrangements, Responsibilities and Capacity Building

# 5.1 Institutional Arrangements and Responsibilities for Components 1 & 2 (UNICEF)

## **5.1.1** UNICEF Role & Responsibilities

UNICEF will implement Components 1 and 2, either directly or through agreements with SPs and/or contractors. As such, UNICEF will:

- Take responsibility for project implementation, either directly or through oversight of SPs;
- Monitor the project targets and results in coordination with the local partners.
- Handle relevant procurement, financial management, and disbursement management including the preparation of withdrawal applications under the project; and
- Ensure compliance with all reporting requirements as per the Project Financing Agreement.

UNICEF is responsible for the overall implementation of the ESMF and supporting E&S instruments. More specifically UNICEF will ensure that:

- Tender documents and construction contracts include effective and enforceable environmental and social contractual clauses to manage environmental and social risks.
- The environmental and social performance of contractors will be monitored and reported to meet the Project's environmental and social requirements.

UNICEF will have in place ESS personnel which will include the Security Advisor, Environmental Safeguard Specialist, Social Safeguard Specialist, SEA/SH Specialist, OHS Specialist, and Medical Waste Management Specialist. ESS personnel will be available to support the implementation shared across the EERA AF and HER 2<sup>nd</sup> AF projects funded by the World Bank. The ESS personnel will be supported by the project staff to conduct the management, monitoring and reporting of environmental and social risk management aspects throughout project implementation.

## 5.1.2 UNICEF Service Providers and Contractors

UNICEF will contract Service Provider NGOs (SPs) to implement the services provided in BPHS and EPHS facilities and communities. UNICEF will also hire and supervise Contractors for rehabilitation works. Through their contracts and scope of work, SPs and Contractors will be responsible for the following within the ESMF:

- Implement/comply with all relevant environmental and social requirements as defined in the contracting documents
- Monitor the implementation of the ESMF in health facilities and by sub-contractors (if relevant)
- Implement and manage a GRM
- Report on the implementation of the implemented components of the ESMF including grievances, accidents, and incidents
- Assign an E&S Focal Point within each Health Facilities and provide relevant training. E&S focal points will be responsible for:
  - Supporting implementation and monitoring of the ESMF requirements at health facility level, including HCWM and IPC, in coordinating with UNICEF and the WB Monitoring Agent
  - o Recording and reporting grievances/incidents to UNICEF
  - Training health workers on relevant ESHS protocols

Liaising with ESHS Officers of SPs on E&S related issues and trends

Service Providers will also be required to:

- Continue preparation and updating of individualized HCWM Plans under AF2, identifying needs for improved medical waste management and IPC procedures in health facilities, and support to improve practices through the provision of capacity building activities, advocacy on appropriate use of equipment and guiding documents, as appropriate.
- Have in place Environmental, Social, Health and Safety (ESHS) officer which will be responsible for environmental and social safeguards implementation including project screening, ESS instrument adoption/preparation, grievance management, medical waste management, and training of SP's project staff and contractor.

## 5.1.3 Capacity Building and Training

UNICEF and SPs have the responsibility for ensuring systems are in place so that relevant employees, contractors, and other workers are aware of the environmental and social requirements for project implementation, including the ESMF. The following capacity building and training programmes will be in place, as part of capacity building activities of UNICEF staff, extenders, and its SPs.

- Capacity building of UNICEF (led by UNICEF): To impart awareness on essential regulatory and other requirements and elements of the ESMF, to help understand the importance of social and environmental management from design stage through implementation.
- Capacity building and awareness of service providers (led by UNICEF) on PSEA risk mitigation, prevention, including capacity on safe access to SEA/SH Reporting mechanisms.
- Training and awareness of service provider personnel (led by the SPs and overseen by UNICEF): A training on relevant ESMF requirements, including environmental, social, health and safety requirements, including security risk management, will be embedded in the training of all service provider personnel conducted prior to the project engagement.

The design of training modules shall take into account differing levels of responsibility, ability, language skills, literacy and risk exposure. UNICEF will continue to report on the status of capacity building activities as part of regular progress reporting. SPs will report on the implementation of capacity building activities are part of their regular progress reports to UNICEF.

UNICEF and its SPs shall ensure that persons under their control performing tasks related to environmental and social risk management are competent on the basis of appropriate education, training or experience, and shall retain associated records. The Capacity building plan outlined in Table 5: Capacity building plan for UNICEF summarizes the capacity building plan to support the implementation of the ESMF and is aligned with the commitments outlined in the Project's ESCP. Relevant capacity building activities have been dran from the ESCP and reflected in the plan to ensure consistency.

Table 5: Capacity building plan for UNICEF

Activity	Content	Participants	Timeframe	Responsible Actor
Community Mobilization/ Risk Communication	<ul> <li>Importance of community participation and mobilization to enhance project ownership, transparency, and accountability</li> <li>Risk Communication</li> <li>Community Mobilization Strategies</li> <li>Concept of Vulnerability</li> <li>Community consultation and awareness raising</li> <li>GBV/SEA/SH</li> <li>Violence Against Children (Children SEA/SH)</li> <li>Stakeholder engagement</li> <li>Social inclusion and diversity</li> </ul>	Community members, tribal and religious leaders, Health Facility Managers, Media	During mobilization	SPs
Protection from Sexual Exploitation, Abuse and Harassment	<ul> <li>GBV/SEA/SH</li> <li>Violence Against Children (Children SEA/SH)</li> <li>Reporting and response to SEA/SH</li> <li>Code of conduct on SEA/SH and child safeguarding</li> </ul>	Community Members, Health Facility and School Management, Community Health Workers Workers at health care facilities Project Consultants UNICEF staff	Throughout project implementation	UNICEF/SPs
Grievance Redressal	<ul> <li>Dispute resolution management and grievance redress</li> <li>Trust and Consensus Building</li> <li>Project Grievance Redress Systems</li> </ul>	Community Members, Health Facility and School Management, Tribal and Religious Leaders and Community based Organizations, Community Health Workers Workers at the laboratories and health care facilities Project Consultants UNICEF staff	Throughout project implementation	UNICEF/SPs
Training on ESS guidelines, ESMF Implementation and procedures particularly on ESMP implementation	<ul> <li>E&amp;S Screening of subprojects</li> <li>Introduction to World Bank's ESF</li> <li>ESMF Implementation</li> <li>Responsibilities of Service Providers and Contractors in implementing ESMPs</li> <li>Toolbox meeting on OHS/CHS issues including the use of PPEs</li> <li>Community health and safety (including</li> </ul>	Contractors BPHS partners Health Facility Managers Project Consultants UNICEF staff	Before the commencement of sub-project activities	UNICEF/SPs

	emergency prevention and preparedness, response arrangements to emergency)  Training on first aid			
Training on Health Care Waste Management and infection prevention	<ul> <li>HCWMP - Measures for proper implementation of HCWMP, e.g., segregation, collection, transportation, treatment and disposal of HCWs</li> <li>Infection Prevention and Control (Environmental Cleanliness and Disinfection; Hand and personal hygiene, use of PPEs, Spill management)Source Separation</li> <li>Toolbox meeting on OHS issues including the use of PPEs</li> <li>Managing Incinerators</li> </ul>	Sanitation Service Providers All workers at the health facilities and Laboratories Ancillary workers	Throughout project implementation	UNICEF/SPs
Training on Security Management Framework and Security risk management procedures	<ul> <li>The packages include: Security Risk Management (Assessment, Analysis, Humanitarian Strategies for mitigation)</li> <li>Reporting, analysis, and security incident reporting</li> <li>Security Management Planning (including SRAs, Preparedness, Incident Management, Contingency Planning, and SOPs)</li> <li>Physical Security Management (see World Bank GPN)</li> <li>Development of financial proposals in support of identified security-related budgetary requirements (including security budgeting)</li> <li>Road Safety Training</li> <li>Options for access to Personal Security Training (UN SLT/INSO)</li> <li>Creation of Community of Practice for coordination</li> </ul>	Service Providers/ UNICEF Staff / Extenders/ Contractors	Throughout project implementation	UNICEF/SPs

# **5.1.4** Third Party Monitoring Organizations

Third Party Monitoring Organizations will monitor and provide reports on the implementation of the ESMF and other ES instruments, based on indicators and timelines agreed with UNICEF and World Bank, these include the UNICEF Third Party Monitoring Agent as well as the Bank's ARTF Monitoring Agent. The ARTF MA will conduct independent monitoring of the project including verification of delivery of the respective goods, works and services and implementation of environmental and social standards.

# 5.1.5 Monitoring and Reporting

UNICEF will monitor the overall implementation of the ESMF for Component 1 & 2 of the Project, as well as the environmental and social performance of its SPs/contractors as part of its overall Project monitoring, as defined in the Harmonized Approach to Cash Transfers HACT framework. The monitoring of project implementation will be done through UNICEF's internal mechanism as well as through TPM.

UNICEF monitoring will focus on the following risk assurance activities:

- Programmatic visits are conducted to obtain evidence on the status of program implementation and to review progress towards achievement of planned results.
- Spot-checks are conducted to review SP's financial records for the project in question, which enables UNICEF to obtain reasonable assurance that the expenditure amounts reported by implementation partners are accurate.

## Monitoring will cover:

- Timely preparation of environmental and social screening checklist
- Timely adoption, preparation, and clearance of subproject ESMPs, as needed
- Management of prior review requirements of the World Bank
- Monitoring of ESMF implementation, including monitoring of mitigation measures and monitoring of contractors environmental and social performance
- Training of project staff, SPs, and contractors
- UNICEF and SP GRM channels

UNICEF will primarily rely on quarterly reports from its SPs and Contractors to monitor the implementation of the ESMF and the environmental and social performance of contractors. Where ESMPs are applicable, respective indicators to be monitored through the implementation are included in the ESMP template (See Annex 7).

Table 10: Estimated ESMF implementation budget for UNICEF

No.	Activities	Cost USD
1	ESMF Capacity Building/Trainings /ToTs	20,000
2	ESMF implementation monitoring	20,000
3	HCWM	64,710
	Total	104,710

# 5.2 Institutional Arrangements and Responsibilities for WFP

## 5.2.1 WFP Role & Responsibilities

WFP will be implementing component 3, through agreements with cooperating partners. As such, WFP will:

take responsibility for project implementation, either directly or through oversight and monitoring of

cooperating partners;

- monitor the project targets and results in coordination with the local partners;
- handle relevant procurement, financial management, and disbursement management including the preparation of withdrawal applications under the project; and
- ensure compliance with all reporting requirements as per the Project Financing Agreement.

WFP will maintain dedicated ESS personnel which includes an Environmental and Social Specialist, as well as leveraging existing capacity within the WFP Afghanistan Country Office to ensure the timely and expert implementation and monitor of ESS requirements. The Environmental/Social Specialist, supported by project staff, will conduct the management, monitoring and reporting of environmental and social risk management aspects throughout project implementation.

# **5.2.2** WFP Cooperating Partners

WFP will contract Cooperating Partners to implement sub-component 3.1 (the cash transfer), subcomponent 3.2 (SBCC activities), and sub-component 3.5 (nutrition-sensitive livelihoods). 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 rostered for potential engagements 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. 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. Cooperating Partners will be responsible for the following within the ESMF:

- Implement / comply with all relevant environmental and social requirements as defined in the contracting documents;
- Implement and manage relevant components of a GRM (helpdesks); and,
- Report on implementation of the implemented components of the ESMF including grievances, accidents, and incidents.

WFP will require CPs to allocate adequate resources to support the management of environmental and social risks and impacts and ensure basic environmental and social risk management capacity is a selection criterion in the procurement process for new partners. WFP will incorporate, to the extent aligned with WFP regulations and procedures, its ESMP (Annex 9) for contractors in tender documentation and contract documents, so that potential bidders are aware of environmental and social performance requirements expected from them and are able to reflect that in their bids. The cost to contractors of meeting the ESMP requirements will be included in their respective contracts and CPs will be required to designate E&S focal points, including security focal points, prior to the commencement of project activities. WFP will provide training and awareness raising for the CP focal points on the relevant instruments and requirements. Thereafter, WFP will monitor that the CPs and contractors comply with the specifications of their respective contracts, and work to resolve issues as they are identified. WFP will monitor compliance by contractors with these requirements set out in the following documents:

- i WFP ESMP (Annex 9)
- ii WFP Labour Management Plan (Annex 5)
- iii Stakeholder Engagement Plan
- iv SEA/SH Action Plan

# 5.2.3 Capacity Building and Training

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 to ensure effective implementation ESMF, SEP and provisions of the ESCP. An initial training and capacity building plan is outlined in Table 6 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 possible access limitations, a cascading model of training is proposed.

Table 6

**Table 6: Capacity Building Plan for WFP** 

Level	Training Topics/Themes	Participants	Timeframe	Responsible Actor
National Level	<ul> <li>World Bank Environmental and Social Standards, as relevant for the project activities</li> <li>ESMF, SEP measures and approach</li> <li>E&amp;S monitoring and reporting</li> <li>Incident and accident reporting</li> </ul>	ESS Specialist and other relevant focal points (Head of Protection, Head of Gender, Head of Social Protection)	Throughout project implementation	World Bank
State / Regional Level	<ul> <li>Capacity Building of Afghanistan's operation         Application of ESMP, SEP and the GRM</li> <li>Onboarding of Partners and inductions on         program quality         Incident reporting, SEA/SH/GBV, child labour and         forced labour training</li> </ul>	State/region level E&S Specialist and focal points Other relevant WFP Operational Staff Member Relevant CP Operational Staff	Throughout project implementation	Trained national level WFP staff
Activity Site Level	<ul> <li>Capacity Building of Afghanistan's operation         Application of ESMP, SEP and the GRM</li> <li>Onboarding of Partners and inductions on         program quality</li> <li>Incident reporting, SEA/SH/GBV, child labour         and forced labour training</li> </ul>	Relevant CP Staff	Throughout project implementation	State/region level E&S Focal Points
Community Level	<ul> <li>Community health and safety issues</li> <li>Rights to PSEA and</li> <li>Grievance redress</li> <li>Child labour and forced labour</li> </ul>	Community members	Throughout project implementation	State/region level E&S focal points  Other relevant WFP Operational Staff  Relevant CP Operational Staff

## 5.2.4 Monitoring and Reporting

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. 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. Additional information collected through Seasonal Food Security Assessments supports 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 to the ARTF MA, 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 this stage, WFP conducts further analysis through engagement with communities, other relevant stakeholders and authorities to identify and prioritize activities to be implemented under different components of the E&S.

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) community consultation updates, and (iv) 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.

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.

Table 7: ESMF implementation budget for WFP

No.	Activities	Cost USD
1	Capacity Building of Afghanistan's operation	USD 20,000
	Total	USD 20,000

# Annex 1. UNICEF Template for Component 1 and 2 Subproject Screening

UNICEF will use this form to screen for the potential environmental and social risks and impacts of a proposed sub-project. The form will allow the UNICEF to: (i) identify the risks and impacts potentially arising from sub-projects activities and the associated Environmental and Social Standards (ESS); (ii) establish appropriate Environmental and Social risk category for the sub-projects, and; (iii) specify the type of environmental and social risks management measures required, including specific instruments/plans.

The Screening Form is not a substitute for project-specific environmental and social assessments or specific mitigation plans

Subproject Name	
Subproject Location	
Implementation stage of subproject	
Service provider (s) name & type	
(CSO/NGO/INGO, governmental partners, private	
sector)	
Risk level (low, moderate, substantial or	
high) with brief justification	
Date of screening/field visit	
Consultation Summary	
Observations/Comments	
Signature of responsible ESS Specialist	
Approved by management Dep Rep/Section Chief	

#### **Exclusion list:**

The first step in addressing a subproject's environmental and social risks and impacts is for the ESS Specialists to recommend for approval exclusion as ineligible for UNICEF support all subprojects that include any of the following attributes:

- Production or activities involving harmful or exploitative forms of forced labour/harmful child labour or safety concerns for workers and communities.
- Activities involving production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements.
- Activities involving production or trade in weapons and munitions.
- Activities that have engagement with gambling, casinos and equivalent enterprises.
- Activities that have linkages to trade in wildlife or wildlife products regulated under Convention on International Trade in Endangered Species of Wild Fauna and Flora.
- Activities that include production or trade in radioactive materials.
- Production or trade in or use of un-bonded asbestos fibers.
- Activities that involve production or trade in wood or other forestry products from unmanaged forests.
- Activities that have production, trade or use of products containing Polychlorinated Biphenyls.
- Activities that have production, trade, storage, or transport of significant volumes of hazardous chemicals, or commercial scale usage of hazardous chemicals.

- Activities that support production or trade in pharmaceuticals subject to international phase outs or bans.
- Activities that support production or trade in pesticides / herbicides subject to international phase outs or bans
- Activities that support production or trade in ozone depleting substances subject to international phase out.
- Activities that impinge on the lands owned, or claimed under adjudication, by indigenous peoples, without full documented consent of such people.
- Investments in extractive industries; commercial logging,
- Dams, or projects involving allocation or conveyance of water, including inter-basin water transfers or activities resulting in significant changes to water quality or availability.
- Subprojects with high environment or high social risks.
- Activities that would significantly convert natural habitats or significantly alter potentially important biodiversity and/or cultural heritage areas.
- · Activities that would require land acquisition, donation, and/or restrictions on land use and
- Activities in disputed areas.

Question		ver	Comments	Relevant	Extent of Required
		No	1	ESS	Measures
Does the subproject involve civil works including new construction, expansion, upgrading or rehabilitation of existing infrastructure?				ESS1, ESS2, ESS4, ESS10	ESIA/ESMP
Is there a risk that the selection of the activity location or beneficiaries will lead to community tensions or conflict?				ESS1	SEP
Is the subproject associated with any external waste management facilities such as a sanitary landfill, incinerator, or wastewater treatment plant?				ESS3	ESMP
Does the subproject have an adequate system in place (capacity, processes and management) to address waste (hazardous and non hazardous)?				ESS1, ESS3	ESMP
Does the subproject involve the recruitment of workers including contracted, primary supply, and/or community workers?				ESS2	LMP, SEP
Has the subproject included a review of applicable labour national requirements? /ESS 2 non- compliance risks in Afghanistan (child and forced labour)?				ESS2	LMP, ESMP
Will the activity require a larger contractor workforce?				ESS2	LMP, ESMP
Will the activity include payments or cash transfers?				ESS4	SEP, ESMP
Does the subproject have appropriate OHS procedures in place, and an adequate supply of PPE (where necessary)?				ESS2	ESMP, ESHS

Does the subproject have a GRM in place, to which all workers and beneficiaries, and local communities have access, designed to respond quickly and effectively?		ESS10	SEP
Does the subproject involve use of security or military personnel during construction and/or operation of healthcare facilities and related activities?		ESS4	ESMP, SMF
Can the activity contribute to the spread of disease (e.g., health facilities)?		ESS4	ESMP
Is there a security risk to the community triggered by project activities?		ESS4	SMF
Does the project area present considerable Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) risk?		ESS1	ESMP, SEA/SH Action Plan
Is there a risk that the activity fails to incorporate measures to allow meaningful, effective and informed consultation of stakeholders, such as community engagement activities?		ESS10	SEP
Are women likely to participate in decision-making processes in regards to the subproject?		ESS10	SEP
Is there a risk that exclusion of beneficiaries leads to grievances?		ESS10	SEP
Could the project expose more people to natural hazards or make some people more vulnerable to natural hazards?		ESS8	ESMP
Would the potential outcomes of the project be sensitive or vulnerable to potential impacts of climate change?		ESS8	ESMP
Is the proposed project likely to directly or indirectly increase social and environmental vulnerability to climate change now or in the future (also known as maladaptive practices)? Could the project change people's behaviour or livelihood strategies, increasing their exposure to natural hazards?		ESS8	ESMP

# Conclusions of the screening:

- 1. Indicate the proposed environmental and social risk ratings<sup>5</sup> (Substantial, Moderate or Low), and provide justifications.
- 2. Indicate the proposed environmental and social risk management instruments that must be prepared and how they will be implemented (responsibilities, resources, timeline).

# Annex 2. Health Care Waste Management and Infection Prevention and Control

# **Medical Waste Management Plan**

## **Waste Segregation and On-site Storage Waste Management**

Segregation at source is the most critical step towards a well-functioning waste management system. Separation of infectious and non-infectious waste becomes impossible once mixed, resulting in greater risk to all concerned.

Categories	Descriptions and examples				
Hazardous health-care waste					
Infectious waste	Contact with infectious waste, especially sharps, broken containers. Waste known or suspected to contain pathogens and pose a risk of disease transmission, e.g., waste and waste water contaminated with blood and other body fluids, including highly infectious waste such as laboratory cultures and microbiological stocks; and waste including excreta and other materials that have been in contact with patients infected with highly infectious diseases in isolation wards.				
Sharps waste	Broken/leaking container or packaging, Used or unused sharps, e.g., hypodermic, intravenous, or other needles; auto-disable syringes; syringes with attached needles; infusion sets; scalpels; pipettes; knives; blades; broken glass.				
Pathological waste	Human tissues, organs, or fluids; body parts; fetuses; unused blood products.				
Pharmaceutical waste, cytotoxic waste	Pharmaceuticals that are expired or no longer needed; items contaminated by or containing pharmaceuticals. Cytotoxic waste contains substances with genotoxic properties, e.g., waste containing cytostatic drugs (often used in cancer therapy).				
Chemical waste	Waste containing chemical substances, e.g., laboratory reagents; film developer; disinfectants that are expired or no longer needed; solvents; waste with high content of heavy metals, e.g., batteries, broken thermometers, and blood pressure gauges.				
Radioactive waste	Waste containing radioactive substances, e.g., unused liquids from radiotherapy or laboratory residue, contaminated glassware, packages, or absorbent paper; urine and excreta from patients treated, tested with unsealed radionuclides; sealed sources.				
Non-hazardous or gen	eral healthcare waste				
Non-hazardous or general healthcare waste	Waste that does not pose any specific biological, chemical, radioactive, or physical hazard.				

## **Collection and Transportation of Bio-medical Wastes**

Transportation of bio- medical wastes, within and outside the healthcare facility needs to be secure and well-managed. Spills and leakages can be risky for patients and the community, but can also result in pilferage and reuse of potentially infectious items such as syringes etc.

## Specific steps to be taken by each facility include:

Waste should be collected from various sources and transported to a central location. Within the facility, special waste routes should be designated to avoid patient care areas. Special timing should be identified for transportation of biomedical waste to the central point. Dedicated wheeled containers, trolleys or carts should be used to transport the waste to the collection/treatment site. These should be such that the waste can be easily loaded and emptied and remain secured during transportation. They should not have any sharp edges and be easy to clean and disinfect. If disposal is done within the premises of the healthcare facility, care should be taken that different categories of waste are disposed of accurately (sharps in sharps pit, anatomical waste in deep burial pits etc.) as designated in the Biomedical Rules. Waste handlers should be properly trained and should use barrier protection during

### transportation.

# **Treatment and Disposal of Bio-medical Wastes**

- The waste containers should be emptied at least once every day.
- Infected linen in the clinic should be carefully packed in plastic bags and disinfected before being sent for washing. Personnel involved in laundering infected linen should take adequate precautions to prevent the exposure to infections.
- Disposal as recommended in the Afghanistan National infection prevention and control guideline (2021), Sharps
  in their puncture proof containers should be treated and disposed in the sharps pit, constructed within the
  premises. This will be done where these pits already exist and do not need repairs. Where the pits do not exist
  or require some works, this will not be done. Infected organic waste should be disposed of in the deep burial
  pits/placenta pits also constructed within the facility and covered with a layer of lime and soil. This will be done
  where these pits already exist and do not need repairs. Where the pits do not exist or require some works, this
  will not be done.
- The first two activities will be conducted as mentioned here until the need for O&M arises. Following this, if the need remains unmet, and alternate funding sources for needed O&M are not available adequate treatment and disposal of sharps and infected organic waste would not be optimally ensured.
- As a general practice of maintaining good hygiene, the floors of the facility should be first swabbed with a wet cloth, then swept to remove grits to avoid dust carrying pathogens from rising into the air and, finally, swabbed with a disinfectant solution. The swab cloth should be washed with detergent after every use. The housekeeping personnel should employ use of protective barriers to prevent exposure to infection.

# **Sharps Management**

Given the high risk of infection from infected sharps, a separate section on the safe use and disposal of sharps is being detailed. Sharps are anything that may cause puncture and cuts. Sharps include needles, scalpels, blades, broken glass, slides, lancets, sutures, and IV catheters. Infected needles, sharps and blood, if improperly handled, can be a source of infection for the health care workers.

Although the risk of infection from contaminated sharps is high for all categories of health car workers, those most at risk of exposures are nurses, medical staff and clinical laboratory staff (blood collectors). Physicians are at some risk, but surgical and dental staff, although at high risk of injury, have a lower risk of infection. It must be remembered that all health care personnel (including cleaners, laundry staff and waste contractors) may be exposed to inappropriately discarded sharps. While emergency rooms and operating theatres pose high risk for health care workers, it has been found that a) the majority of exposures have occurred in general ward areas and b) a larger number of exposures which would be classified as high risk have occurred in medical wards.

The following measures must be taken to ensure sharps safety in the workplace:

- Barrier protection must always be used when handling sharps.
- Sharps must be segregated and stored in puncture-proof containers at the point of generation.
- Sharps such as used disposable, or auto-disable syringes should be put into a puncture-proof container immediately after use at the source. Clipping, bending, or breaking needles by hand or re-capping should be avoided as this may cause accidental injuries.
- Used sharps should not be left untreated or carelessly on countertops, food trays, or beds, as this can pose a
  risk to all concerned.
- A sharps pit is a circular or rectangular pit, where sharp wastes are disposed. These pits are lined with brick, masonry, or concrete rings.
- The pit should be covered with a concrete slab. When the pit is full, it should be sealed completely, and

another pit is prepared.

### Blood safety in Laboratory

Blood is a major source of infections for health care workers. It is mandatory to screen blood units for five transmissible infections: Hepatitis B, Hepatitis C, HIV, syphilis and malaria. The Rules in the country also require for testing procedures, quality control, standard qualifications, and experience for blood bank personnel, maintenance of complete and accurate records, strict guidelines for holding of blood donation camps etc. and to be further improved.

Careful donor screening, discouraging use of paid donors, stringent screening of donated units of blood to prevent transmission of disease through blood and blood products. Another important action taken by MoPH has been to modernize the blood banks in the country.

Risk of infection varies with a number of factors, including type and number of exposures, amount of blood involved in the exposure, amount of virus in the patients' blood etc. Modes of exposure to blood borne pathogens in a laboratory have been defined as below:

Modes of Exposure to Blood-borne Pathogens in the Laboratory				
Procedure	Health Care Workers at risk	Source/Modes of Transmission		
Collection of blood/body fluid	Laboratory technician	Needle stick injury; Broken specimen container; Blood contamination of hand with skin lesions/breach		
Transfer of specimen	Laboratory technician and transport worker	Contaminated exterior of container; Broken specimen container Spills/splashes of specimen		
Processing of specimen	Laboratory personnel	Puncture of skin; Contamination of skin from spills, splashes, glassware, and work surface; Faulty techniques; Perforated gloves		
Cleaning /Washing	Laboratory support staff	Puncture of skin Contamination of skin from spills, splashes, glassware, and work surface		
Disposal of waste	Laboratory support staff	Contact with infectious waste, specially sharps, broken containers		
Specimen transportation/mailing	Transport/postal staff	Broken/leaking container or packaging		

## Infection Prevention and Control Plan

Activities of high risk include invasive diagnostic and therapeutic procedures, wound dressing, operation theatre procedures, handling of blood/serum/body fluids and tissues etc. and special attention should be paid to ensuring safety precautions during these activities. Barrier protection (gowns, masks, caps, gloves, shoes) should be maintained to prevent contact with contaminated blood/body fluids. Health care worker working in high-risk areas should be immunized, at the minimum, against HBV. In addition, daily cleaning of facility premises with appropriate disinfection should be done.

Spills are an important source of infection and should be cleaned up immediately. The spill should be covered with absorbent material, disinfectant poured around the spill and over the absorbent material. The surface should be wiped again with disinfectant. Health care worker must utilize barrier protection, particularly gloves, when managing spills.

Cleaning and disinfection of environmental surfaces must be done on regular basis and whenever required; to reduce

any role that fomites might play in the transmission of infections in health-care settings. Appropriate disinfectants and procedures should be applied for the routine cleaning and disinfection of the environmental surfaces.

Basic personal hygiene is important for reducing the risks of handling HCW, and convenient washing facilities should be available for personnel involved. As the hands of health care workers are the most frequent vehicle of nosocomial infections, maintaining hand hygiene is the best primary preventive measure.

General observance of personal hygiene is important, and all staff needs to wear clean uniforms, nails, short or tied-up hair, etc.

# Annex 3. Life and Fire Safety Requirements for Buildings Accessible to the Public

The World Bank requires implementation of the of the Bank's requirements on life and Fire Safety for buildings accessible to the public such as health care facilities schools, hotels airports and passenger terminals. The HER 2<sup>nd</sup> AF project will be implemented through existing health care facilities making the L&FS applicable. UNICEF will apply the specific L&FS Requirements for existing buildings as follows:

- 1. Work with BPHS partners to confirm the health facilities comply with local building codes and fire department regulations
- 2. Were the above evidence is missing, work with local authorities to ensure a life and fire safety review is conducted for the relevant building
- 3. Require BPHS partners to ensure that Operation and Maintenance (O&M) practices meet all local building codes and fire department regulations

Oxygen cylinders and oxygen concentrators are hazardous materials that must be managed (that is, used, stored and handled) in accordance with WBG EHSGs. UNICEF will require BPHS partners to implement WHO-UNICEF technical specifications and Guidance for Oxygen Therapy devices.

# Annex 4. UNICEF Labour Management Procedures for Components 1 & 2

Under ESS2, Labour Management Procedures (LMP) are required for the Project. The purpose of the LMP is to facilitate the planning and implementation of the project's labor requirements. The LMP describes the requirements and expectations in terms of compliance, reporting, roles and responsibilities, monitoring, and training with respect to labor and working conditions for Components 1 and 2 of the project.

These procedures apply to all project workers including direct, contracted, and community workers employed by the project. As the Health Workers receiving salaries under this project are contracted by the SPs/contractor directly, they are considered contracted workers and are not civil servants. The LMP sets out the project's approach to meeting national labor laws and regulations requirements as well as the objectives of UNICEF's Social and Environmental Standards and Procedures and World Bank's Environmental and Social Framework, specifically objectives of Environmental and Social Standard 2 (Labour and Working Conditions).

The key objectives of the LMP include:

- Promote safety and health at work,
- Promote fair and equitable labor practices for the fair treatment, non-discrimination and equal opportunity of workers engaged under all components of the project.
- Safeguard all categories of project workers, including vulnerable workers such as women, workers with disabilities, etc.
- Prevent the use of all forms of forced and child labor.
- Protect project workers' rights and ensure the management and control of activities that may pose labor-related risks.
- Protect project workers with accessible means to raise workplace concerns.
- Prevention of any form of workplace GBV/SEA/SH.

The recruitment and assignments of the workers will be done in an inclusive manner and all conditions of contracts of all types of workers in this project will be undertaken in accordance with this LMP and its objectives as mentioned above. The LMP assesses potential labor risks and impacts and describes how they will be mitigated. The LMP is a living document and will be reviewed and updated throughout the development and implementation of the project.

## **Overview of Labour Use on the Project Direct Workers**

Direct workers include all persons engaged directly by UNICEF to work specifically in relation to the project. They include current and new UNICEF staff members and consultants, who will be assigned to work on the Project.

The Project will be implemented by UNICEF based on demonstrated capacities from ongoing activities in Afghanistan and global expertise. UNICEF will leverage its in-country capacity, technical expertise, direct experience implementing relevant activities, readiness on the ground to start implementation on approval, and relationships with various stakeholders. The partnership will also allow synergies with other health and nutrition projects and build on ongoing health and nutrition activities and make a greater impact.

UNICEF is responsible for the overall project implementation and use of funds. It will introduce systems and procedures to ensure transparency, accountability, and proper use of resources provided. UNICEF has a well-equipped team in place that will oversee the day-to-day management of the project, including fiduciary, environmental and social aspects, as well as monitoring and reporting. UNICEF estimates that approximately 60 staff across the Health, Nutrition, PMU, Child Protection, Social and Behavioural Change, Gender, Monitoring and

Supply sections will be involved in /support various aspects of the Project (noting that staff are not all fully dedicated to the Project).

#### **Contracted Workers**

UNICEF engage SPs, contractors, and service providers to implement all the project components. Contracted workers are the persons employed as deemed appropriate by contractors, subcontractors, and other intermediaries. Contractors may also hire casual unskilled laborers from within communities where, for example, construction/rehabilitation activities will occur.

**Component 1:** Throughout all sub-components of Component 1, UNICEF will engage SPs using its Programme Cooperation Agreement (PCA) modality. SPs will recruit/retain their own staff including community health supervisors, who will be considered contracted workers under the definition in ESS2. In the previous phase of the project, UNICEF contracted 15 Service Provider NGOs across the 34 provinces. Under the AF, UNICEF will contract 11 SPs across 24 provinces. The number of contracted workers (staff, monitors, and others) varies by NGO and by Province. The exact number can be provided once the HER 2<sup>nd</sup> AF SPs are contracted.

In addition, under Sub-Component 1.1, the SPs will engage health facility staff through a direct contracting modality. Thus, staff of the health facilities will be considered "contracted workers" rather than civil servants. Under Sub-Component 1.2, the SPs will further contract 2,000 Nutrition Counsellors across the health facilities providing the BPHS.

**Component 2:** Several activities will be implemented through contractors within the various sub-components of Component 2, for example, Sub-component 2.1 provides for contracting of training institutions and specialized firms to implement training and mentorship to improve quality of care.

## **Primary Suppliers**

No primary supply workers will be involved in the HER Project.

# **Community Workers**

In 2003, the Afghan government launched the Community-Based Health Care (CBHC) Program as a foundational component of the Basic Package of Health Services (BPHS) with the aim of extending health services to the last mile through meaningful engagement and enhanced participation of communities. The CBHC Program is fully integrated and has been an integral component of the broader Afghanistan's primary health care (PHC) system as articulated in various national policies/frameworks (including the National Health Policy and Strategy, National Reproductive, Maternal, Neonatal, Child and Adolescent Health (RMNCAH) Strategy, National Gender strategy and the National Community Health Strategy). The CBHC comprises four components, all of which engage community volunteers and will be engaged in the project.

- Community Health Workers: Afghanistan has 29,600 CHWs (49% female, 51% male), assigned to health posts country-wide, with plans to scale up the community health workforce to 33,000 by 2025. Each health post was designed to have a catchment population of 1,000-1,500 people (100-150 families). Following a three-to four-month training, CHWs are deployed as the first contact point in the PHC referral chain to deliver a basic package of health prevention, promotion, and basic curative services focused on RMNCAH and TB (prevention and compliance to treatment).
- Community Health Shura/Council (Shura-e-Sehi): The community elders/influencers comprise the Shuras;

they support health-related activities in the community and select, support and monitor the CHWs. Training of the Shuras was provided at the beginning of the CBHC program and a refresher training program was initiated in 2014. Attempts to include women in the health shura has been met with mixed success.

• <u>Family Health Action Groups:</u> The FHAG program was started in 2009, as a local adaptation of the Care Group model with leadership responsibility placed on the female CHWs. This growing network of female-led community groups aims to enhance the uptake of key family health practices.

# **Overview of Labour Requirements**

# World Bank Environment and Social Standard (ESS2): Labour and Working Conditions

This LMP is prepared in line with the requirements of ESS2: Labour and Working Conditions. It ensures a safe, healthy conducive working environment for workers in which the working environment is free of forced and child labour as well as other forms of intimidation and harassment. ESS2 also ensures that workers have channels for grievance redress, freedom of association, and access to collective bargaining rights as prescribed by national laws and regulations. The requirements of Labour and Working Conditions (ESS2) extends to direct, indirect, community and contracted workers as well as primary supply workers on a Bank financed project.

## **UNICEF Labour Requirements**

This LMP is also prepared in accordance with UNICEF relevant policies and procedures.

# **National Legislation**

The National Labour Law (2007), the National Labour Policy (2017-2020), and the Regulation on Compensating Work-Related Health Problems (2019) provide legal basis for safe and decent working conditions in Afghanistan. The National Labour Law provides guidance around non-discrimination in recruitment (Article. 9), compliance with international conventions (Article. 12), working hours (Article. 30), breaks (Article. 40), non-discrimination in payment (Article. 59), special provision for female and youth workers (Article. 121,127-130), and compensation (Article 134) of law and (Article 12) for contracted workers and (Article 14 & 15) for daily workers of the above regulation. These further provide occupational health and safety regulations that provide legislation around safety training, hygiene rules, protective equipment, and medical treatment when necessary. The law also addresses Work Standards and Regulations (Article. 88), Regulation on Compensating Work-Related Health Problems (2019) as well as how labor disputes over terms and conditions of employment will be resolved in the public, private and joint sectors (Article. 89). The above terms and conditions apply to employees, workers, service workers, contractual workers, including the long-term consultants. However, some of these terms and conditions apply to community workers i.e., prohibition of child labor, prohibition of forced labor, prohibition of discrimination and maximum hours of work. The legislation requirements conform to the guidance provided in WB's ESF and ESS2.

# Occupational health and safety

Chapter 10 of the National Labour Law "Ensuring Health and Occupational Safety Conditions" from Article 107-119 provide various OHS measures to be applied for ensuring workers health and safety. The Labour Law of Afghanistan further provides OHS legislation around safety trainings, hygiene rules, protective equipment, medical treatment when necessary, health insurance compensation, reduced standard work weeks for pregnant and nursing mothers and minors.

It further describes that employers shall provide a safe and healthy workplace setting to prevent accidents and injury to health arising out of, linked with, or occurring during the work or as a result of the operation of employer's facilities. Employers shall adopt responsible measures to mitigate negative impacts that the workplace has on the environment. Apart from the provisions listed above, Labour Law further describes mandatory assurance of health

and safety conditions for the employer in Article 108, "The Administration shall be obliged to ensure reservation of health and labour safety, application of safety techniques to prevent work and production related accident, and to provide healthy condition in order to prevent occupational diseases of Employees". Based on the Labour Law the employer shall take appropriate precautions to ensure that the workplace is safe and without risk of injury to the safety and health of workers. Mitigation measure will be adopted to protect the workers present at or in the vicinity of an Implementation Site from all risks which may arise from such site.

## Grievance Redress Mechanism (GRM) For Worker

The Grievance Redress Mechanism (GRM) that was designed under HER shall continue to be utilized under HER-AF2 as the grievance mechanism for project workers, following the project's Stakeholder Engagement Plan (SEP) and ESS2. Employers shall implement a comprehensive communication strategy to ensure that all project workers are well-informed about the GRM. This will include orientation sessions, targeted training, accessible informational materials, and prominently displayed posters in relevant areas. Employers shall prioritize maintaining confidentiality throughout the grievance process and enforce a robust non-retaliation policy to protect workers who raise concerns. Employers shall handle grievances transparently, adhering to the clear procedures outlined in the project's SEP. Additionally, a feedback mechanism shall be established to gather input on the effectiveness of the GRM, ensuring that workers have a voice in the process.

The Grievance Redress Mechanism (GRM) for workers is structured into two tiers: a Centralized GRM, managed directly by UNICEF through its country office and zonal teams, and a Decentralized GRM, handled by the NGO Service Providers (SPs) at the local level. This two-tier system is designed to ensure clarity, accountability, and transparency while effectively addressing workers' grievances.

- a. At the centralized level, UNICEF oversees the process through its #455 free hotline managed by a Call Center, allowing workers to submit grievances independently and anonymously. These grievances are recorded in a Management Information System (MIS), categorized, and assigned to relevant UNICEF personnel for resolution while maintaining confidentiality. Monthly reviews by responsible UNICEF personnel helps to ensure consistent management and closure of cases. When complainants are identifiable, they are provided with feedback on the status of their grievance.
- b. At the local level, the SPs are responsible for managing non-sensitive grievances through accessible channels such as complaint boxes, phone lines, or in-person reporting, based on workers' preferences. Sensitive grievances are escalated by SPs to UNICEF within 24 hours for immediate action. SPs document and resolve grievances where possible and submit monthly reports to UNICEF on the grievances received and resolved, ensuring accountability at the ground level. UNICEF support and monitors the performance of SPs through partnership agreements, monthly reporting, and capacity-building efforts to ensure adherence to GRM procedures.

Oversight of the GRM is divided between the two tiers. At the local level, the SPs are primarily responsible for grievance management, while UNICEF monitors their performance and ensures compliance. At the central level, the Accountability to Affected Populations (AAP) team within UNICEF's Afghanistan Country Office takes charge,

overseeing the centralized grievance system and addressing escalated or unresolved cases. This multi-tiered system ensures that grievances are resolved efficiently, confidentially, and in alignment with UNICEF's Accountability to Affected Populations framework and Core Commitments for Children.

# **Code of Conduct**

UNICEF through its SPs shall implement the Code of Conduct to ensure a safe and ethical working environment that prioritizes the rights of children and vulnerable populations while explicitly prohibiting abuse, exploitation, and discrimination. The Code emphasizes integrity, accountability, and transparency, and mandates regular training to foster a culture of respect and safeguarding among project workers. It will serve as a critical component in addressing environmental and social risks associated with project activities. The Code applies to all project workers, including labors and employees at all locations where the HER 2<sup>nd</sup> AF fund is allocated, as well as to personnel from subcontractors and any other individuals assisting in the execution of these activities.

# **Roles and Responsibilities**

For the HER 2<sup>nd</sup> AF, UNICEF is the Grant Recipient for Components 1 and 2 and is responsible to hire the direct workers<sup>2</sup>. The estimated number of direct workers includes around 60 staff, for Health and Nutrition, that will be involved in /support various aspects of the project (noting that staff are not all fully dedicated to the Project). An appropriate project structure will be established to carry out such key functions as coordination, technical design and oversight, planning, environmental and social risk management, fiduciary management, monitoring and evaluation, and reporting.

UNICEF will be responsible for supervising and supporting SPs/contractors who will be contracted to carry out project-specific tasks. The SPs/contractors are responsible for employing project workers to perform these tasks. UNICEF will be responsible for:

- Establishing the LMP
- Informing SPs/contractors of the provisions of the LMP and ensure provisions on key requirements are included in contracts
- Updating this procedure when necessary, throughout the Project implementation.
- Monitoring that occupational health and safety standards are met at workplaces in line with national occupational health and safety legislation.
- Monitoring training of the project workers on OHS

**Contractor Management:** UNICEF will use its own procurement procedures for solicitations and contracts for its respective parts of the Project. UNICEF will make reasonable efforts to ascertain that the contractor/service provider who will engage contracted workers is a legitimate and reliable entity and able to comply with the relevant requirements under the LMP. Such requirements shall be included in the bidding documents. As part of the process of selecting the contractors/service providers who will engage contracted workers, UNICEF reviews the following

<sup>&</sup>lt;sup>2</sup> UNICEF Staff follow the UN/UNICEF internal Staff Rules, Policies, Procedures and Guidelines and do not follow local legislation.

documentation for vendor pre-qualification and registration:

- UNGM registration number
- Copy of valid official registration documents includes: Trade registration certificate, Taxpayer card
- Supplier profile Signed & stamped of UN Code of conduct document.
- Official Bank letter signed & stamped shows (Company Name, Bank account, and currency).
- Screening against UN Sanctions list
- In addition, for high-value contracts (greater that USD \$100,000), the following are mandatory:
- Two-year set of financial statements for the full financial year signed/stamped (preferably audited)
- Certificate of incorporation
- Vendor's contact details' contact person, e-mail, and telephone number
- Screening against UN Sanctions list

Contractual Provisions and Non-Compliance Remedies: UNICEF will incorporate the agreed labour management requirements as specified in the bidding documents into contractual agreements with the contractor/service provider, together with appropriate non-compliance remedies (such as the provision on withholding percentage of payment to the contractor in case of non-compliance with relevant environmental, social, health and safety requirements; and removal of personnel from the works.). In the case of subcontracting, UNICEF will require the contractor/service provider to include equivalent requirements and non-compliance remedies in their contractual agreements with subcontractors.

**Performance Monitoring:** UNICEF will monitor the performance of the SPs/contractors in relation to the LMP as part of the periodic E&S reporting. The monitoring may include inspections, and/or spot checks, which may be conducted through SPs/contractor self-reporting and/or third-party monitoring, of project locations or work sites and/or of labor-management records and reports compiled by the SPs/contractors. SPs/Contractors' labor management records and reports that should be reviewed would typically include the following:

- Representative samples of employment contracts and signed code of conduct;
- Grievances received from the community and workers and their resolution;
- Reports relating to fatalities and incidents and implementation of corrective actions;
- Records relating to incidents of non-compliance with national Labour Code and the provisions of the LMP including compliance with all relevant labour laws in relation to child labour and World Bank's ESF policies on child labour; and
- Records of training provided for contracted workers to explain occupational health and safety risks and preventive measures.

# **Service Providers (SPs)/Contractors**

Service Providers/Contractors will be responsible for the engagement and management of personnel (contracted workers), ensuring compliance with project protocols and providing labor instructions on safety and security.

Service providers/contractors will be responsible for the following:

- Comply with the ESMF, relevant instruments, and this labor management procedure. These measures will apply to contracted and sub-contracted workers.
- Implement fair and transparent recruitment processes, ensuring non-discrimination and equal opportunity for all candidates.

- Maintain records of the recruitment and employment process of contracted workers.
- Clearly communicate job description and employment conditions to contracted workers.
- Report any incidents and accidents (in line with the definition of the ESCP and provisions in the SMF) to UNICEF promptly.
- Establish/maintain a GM for their own workers, where appropriate/feasible, and sensitize them to the use of the UNICEF project GRM.
- Have a system for regular review and reporting on labor, and occupational safety and health performance.
- Ensure all contracted workers train and sign UNICEF's Standard Code of Conduct.
- Maintain accurate records of employment, training sessions, the Code of Conduct, and any labormanagement incidents.
- Safeguard the rights of workers, including fair wages, working hours, and safe working conditions, in line with the LMP.
- Submit regular reports to UNICEF on the LMP implementation, non-compliance issues, incidents and accidents, workers' grievances, and mitigation measures.
- Comply with all relevant local legislation, including labor laws and regulations in relation to child labor and minimum age as outlined in the LMP.

# **Community Health Volunteers**

The community health workers (CHWs) are an important member of the health system in Afghanistan. a Health Post, which covers a catchment area of 1000 people (equivalent to 100-150 families). A Health Post is usually staffed by a female and a male CHW. Each CHW is selected from an area he/she serves (familiarity with the culture and language of the people). CHWs receive targeted training from 4 to 6 months to deliver basic health services. Their work is supervised and monitored by a community health supervisor from the nearest health facility. At present, there are over 31,522 CHWs serving in rural areas in Afghanistan. The main responsibilities of community health workers are as follows:

- Health education and changing of health habits in the community
- Referral of patients to health facilities when needed
- Provision of first aid
- Treatment of common and simple illnesses (e.g. upper respiratory tract infection, diarrhea and malaria) based on community-integrated management of childhood illnesses or C-IMCI treatment protocol
- Mother and child health
- Community mobilization for health actions.
- Follow-up of TB-DOTs
- Participation in campaigns, as well as community-based rehabilitation awareness.

CHWs are volunteers and do not receive any salary. Atter completion of the basic training, they are provided with a supplies kit supply by implementer NGOs and start their work.

Labour Incident Reporting: The incident reporting process is outlined in the World Bank's Environmental and Social Incident Response Toolkit (ESIRT) and the project's Environmental and Social Commitment Plan (ESCP). All labor-

related incidents, including those involving child labour, forced labour, fatalities, injuries, or any other related occurrences, should be reported to the World Bank within 48 hours of identifying and confirming the incident or accident. Subsequently, a detailed summary report, utilizing the ESIRT forms, should be submitted within thirty (30) days of the initial notification.

# Annex 5. WFP updated Labour Management Procedures for Component 3

These procedures apply to all project workers, specifically the three contractor types (cooperating partners, financial service providers, and third-party monitors) engaged for the implementation of component 3, 'Strengthening Demand and Access to Enhance Nutritional Outcome among the Most Vulnerable', or the Maternal and Child Benefit Programme (MCBP)), and including the new sub-component 3.5.

The LMP sets out the project's approach to meeting national requirements as well as the objectives of WFP's Social and Environmental Sustainability Framework, specifically the minimum requirements of Environmental and Social Standards 5 (Protection and Human Rights) and the World Bank's Environmental and Social Framework, specifically the minimum requirements of Environmental and Social Standard 2 (Labour and Working Conditions).

The recruitment and assignments of workers will be done in an inclusive manner and all conditions of contracts of all types of workers in this project will be undertaken in accordance with this LMP and its objectives as mentioned below and in line with prevailing International Labour Organisation (ILO) and WFP guidelines and procedures on human rights protection and the prevention of child labour.<sup>3</sup>

The LMP assesses potential labour risks and impacts and describes how they will be mitigated. The LMP is a living document and will be reviewed and updated throughout development and implementation of the project. The key objectives of the LMP include:

- Promoting safety and health at work.
- Promoting fair and equitable labour practices for the fair treatment, non-discrimination and equal opportunity of workers engaged under all components of the project.
- Protecting all categories of project workers, including vulnerable workers such as women, workers with disabilities etc.
- Preventing the use of all forms of forced and child labour.
- Protecting project workers' rights and ensure the management and control of activities that may pose labourrelated risks.
- Protecting project workers with accessible means to raise workplace concerns.
- Prevention of any form of workplace GBV/SEA/SH.

## **Overview of Labour use on the Project**

Component 3 will be implemented by WFP based on demonstrated capacities from ongoing activities in Afghanistan and global expertise. WFP will leverage its in-country capacity, technical expertise, direct experience implementing relevant activities, relationships with various stakeholders, and readiness on the ground to implement Component 3.

WFP is responsible for the implementation and use of funds for Component 3. It will maintain systems and procedures to ensure transparency, accountability and proper use of resources provided. WFP's Afghanistan team will oversee the day-to-day management of the project, including fiduciary, environmental and social aspects, as well as monitoring and reporting.

<sup>3:</sup> ILO Declaration on Fundamental Principles and Rights at Work; ILO Convention 29 on Forced Labour; ILO Convention 105 on the Abolition of Forced Labour; ILO Convention 100 on Equal Remuneration; ILO Convention 111 on Discrimination (Employment and Occupation), WFP Guidance Note to Prevent the Use of Child Labour

## WFP staff members

Direct workers include all persons engaged directly by WFP to work specifically in relation to Component 3 being implemented by WFP. They include current and new WFP staff members and consultants, who will be assigned to work on the implementation component 3. This will include WFP staff and consultants working across the Social Protection, Nutrition, Cash-based Transfers, Accountability to Affected Populations, Gender, Protection, Environmental and Social Safeguards, Monitoring and Evaluation, and Supply Chain units, as well as in Kabul, Jalalabad, Kandahar, Faizabad, and Mazar Area Offices. Persons directly engaged by WFP are solely governed by WFP policies, rules, and regulations in performance of their duties.

Cooperating Partners (CPs), Third Party Monitors (TPMs) and Financial Services Providers (FSPs)

Component 3 will be implemented through the recruitment of CPs, TPMs, and FSPs using the WFP Supply Chain and Procurement guidelines. The exact number of CPs, TPMs, and FSPs engaged and contracted for the implementation of Component 3 will be provided after contracting processes are completed. WFP will ensure that any new contracts will include the flow down of the relevant obligations under the Grant Agreement, the ESMF, under agreed actions in the ESCP for HER AF2 and any existing contracts will be amended to do so in a timely manner.

## **Overview of Labour Requirements**

World Bank Environment and Social Standard (ESS2): Labour and Working Conditions

This LMP is prepared in line with the requirements of ESS2 (Labour and Working Conditions), which ensures a safe, healthy conducive working environment for workers in which working environment is free of forced and child labour as well as other forms of intimidation and harassment. ESS2 also ensures that workers have channels for grievance redress, freedom of association and access to collective bargaining rights as prescribed by national law, as applicable to the project context. The standard also seeks to protect vulnerable workers such as migrant labour. The requirements of Labour and Working Conditions (ESS2) extends to direct, indirect, and contracted workers as well as primary supply workers on a Bank financed project.

## WFP Labour Requirements

This LMP is also prepared in accordance with WFP's Social and Environmental Sustainability Framework specifically minimum requirements of Environmental and Social Standards (ESS) 5 (Protection and Human Rights), which promotes upholding human rights and protection as a core responsibility of WFP. The rationale is to ensure that WFP interventions do not increase the protection risks faced by the populations receiving assistance. Rather, interventions should contribute to the safety, dignity and integrity of people in vulnerable situations. ESS5 aims to prevent the use of child labour and forced labour in all WFP operations and activities, as well as prevent the inappropriate participation of children in all WFP operations and activities. WFP is committed to ensuring it conducts due diligence on partners, contractors, and - where possible - primary suppliers to identify and minimize risks of human rights violations, including risks of sexual exploitation and abuse, forced labour, and child labour<sup>4</sup>.

The LMP is also based on WFP's internal policy on occupational safety and health (OSH).<sup>5</sup> The policy ensures the development and implementation of effective OSH management systems to identify, assess, manage, control, and monitor safety and health risks at workplaces deriving from medical, psychosocial, and physical work environment factors. The policy establishes standards for OSH in WFP workplaces, giving due consideration also to national safety and health standards within the countries in which WFP operates, as set out below.

#### National Legislation

<sup>&</sup>lt;sup>4</sup> https://newgo.wfp.org/documents/wfp-environmental-and-social-standards

<sup>&</sup>lt;sup>5</sup> https://docs.wfp.org/api/documents/WFP-0000124265/download/

In the Afghanistan context, the ongoing applicability and relevance of components of the legal environment are uncertain. However, the National Labour Law (2007) and the National Labour Policy (2017-2020) provided for a legal basis for safe and decent working conditions in Afghanistan. The National Labour Law provide guidance around non-discrimination in recruitment (Article. 9), compliance with international conventions (Article. 12), working hours (Article. 30), breaks (Article. 40), non-discrimination in payment (Article. 59) and special provision for female and youth workers (Article. 121,127-130). These further provides occupational health and safety regulations that provide legislation around safety trainings, hygiene rules, protective equipment, and medical treatment when necessary. The law also addresses Work Standards and Regulations (Article. 88), Regulation on Compensating Work-Related Health Problems (2009) as well as how labour disputes over terms and conditions of employment will be resolved in the public, private and joint sector (Article. 89). The above terms and conditions apply to employees, workers, service workers, contractual workers, including the long-term consultants. However, some of these terms and conditions apply to community workers i.e., prohibition of child labour, prohibition of forced labour, prohibition of discrimination and maximum hours of work. The legislation requirements conform to guidance provided in WB's ESF and ESS2.

Chapter 10 of the National Labour Law "Ensuring Health and Occupational Safety Conditions" from Article 107-119 provide various OHS measures to be applied for ensuring workers health and safety. The Labour Law of Afghanistan further provides OHS legislation around safety trainings, hygiene rules, protective equipment, medical treatment, when necessary, health insurance compensation, reduced standard work weeks for pregnant and nursing mothers and minors.

It further describes that employers shall provide a safe and healthy workplace setting to prevent accidents and injury to health arising out of, linked with, or occurring during the work or as a result of the operation of employer's facilities. Employers shall adopt responsible measures to mitigate negative impacts that the workplace has on the environment. Apart from the provisions listed above, Labour Law further describes mandatory assurance of health and safety conditions for the employer in Article 108, "The Administration shall be obliged to ensure reservation of health and labour safety, application of safety techniques to prevent work and production related accident, and to provide healthy condition in order to prevent occupational diseases of Employees". Based on the Labour Law the employer shall take appropriate precautions to ensure that the workplace is safe and without risk of injury to the safety and health of workers. Mitigation measure will be adopted to protect the workers present at or in the vicinity of an Implementation Site from all risks which may arise from such site.

## Overview of WFP's Roles and Responsibilities

For the HER AF Project's component 3, WFP is the Grant Recipient and, per the POM, has established an appropriate management framework for the project, to carry out key functions such as coordination, technical design and oversight, planning, environmental and social risk management, fiduciary management, monitoring and evaluation, and reporting.

WFP will be responsible for supervising and supporting contracted CPs, FSPs, and TPMs to carry out project specific tasks while the CPs, FSPs, and TPMs are responsible for employing project workers to perform these tasks. WFP will be responsible for:

- Establishing the LMP
- Monitoring implementation of the key provisions of the LMP
- Informing CPs, FSPs, and TPMs of the provisions of the LMP and ensure provisions on key requirements are included in new contracts while existing contracts will be amended to do so in a timely manner
- During preparation, development and implementation of the Project, contractors and WFP will:
  - o Maintain records of the recruitment and employment process which safeguard against forced labour

(wages, maximum working hours, and other provisions as deemed necessary)

- Ensure processes to ensure verification of the minimum age of project workers
- Monitor that occupational health and safety standards are met at workplaces in line with national occupational health and safety legislation and internal WFP policies
- Encourage CPs, FSPs, and TPMs to put in place internal grievance and redressal mechanisms/processes.
- o In line with the requirement of the World Bank, ensure CPs, FSPs and TPMs notify and report incidents and accidents within agreed timelines.
- o Ensure all WFP staff completed the standard Code of Conduct on GBV/SEA/SH
- Carrying out the activities in accordance with the agreed Environmental and Social Standards and applying appropriate measures to identify and manage environmental and social risks, including through the application of WFP's Environmental and Social Risk Screening before entering into field-level agreements with CPs.
- Operating the existing WFP grievance mechanism (also called Complaint and Feedback Mechanism CFM),
  which is open to contractor staff through easily accessible reporting channels (WFP staff in person and WFP tollfree hotline). This enables beneficiaries and workers to directly communicate their concerns and issues to WFP.

WFP personnel may report possible misconduct or wrongdoing to WFP's Office of the Inspector General (OIG), which comprises of the Office of Internal Audit (OIGA) and the Office of Inspections and Investigations (OIGI). This may include the following: fraud; corruption; workplace harassment; sexual harassment; abuse of authority; discrimination; retaliation; sexual exploitation and abuse; or any other failure to observe prescribed regulations, rules, policies and procedures and standards of conduct.

## **Contract Management**

WFP has substantive procedures for engaging CPs, FSPs, and TPMs. WFP contract management is a cyclical process, from market intelligence, through award, via implementation, to performance.

WFP conducts due diligence on all its partners. WFP only engages CPs that meet a set of minimum Core Corporate Standards (and demonstrate capacity to engage successfully in the implementation as set out in detail in the Programme Operations Manual), undertaking Partner Capacity Assessments and Partner Performance Evaluations for new and existing partners, respectively. WFP also conducts evaluations and spot-checks of partners' financial accounts and programmatic performance, to ensure they deliver interventions in an effective and efficient manner.

WFP has a zero-tolerance policy for Sexual Exploitation and Abuse (SEA), and fraud and corruption. By entering into an agreement with WFP, the CP undertakes to establish the policies and processes to ensure that its personnel conform to the highest standards of moral and ethical conduct. Furthermore, all existing CPs plus those newly entering into partnership with WFP must be vetted against the consolidated UN Sanction List and other entities banned by the key and relevant stakeholders.

Once selected, CPs enter into a Field Level Agreement with WFP that governs the conditions and duration of the partnership.

The contract management process for TPMs and FSPs are set out in the table below:

	СР	TPM	FSP
Market intelligence	Expression of interest	The EoI is launched in	The FSI process
		UNGM. The normal	integrates Macro
		tender period is 2	Financial Assessment

			Assessment (FCA), Macro Information Technology Assessment Tool (MAITA), Micro
			Technology Assessment Tool
			Assessment Tool
		ř.	Information
			Technology
			Assessment Tool
			(MIITA), and FSP Due
			Diligence (DD) to
			streamline the
			assessment process
			Nine-step process
			involving kick-off, data
			collection,
			presentations, early
			engagements, gate assessments, output
			creation, review calls,
			clearance, and
			publishing.
			, and the second
			Validity of FSI is for 2
			years
Procurement process	Request for proposal	Request for proposal	Request for proposal
			The procurement
		The procurement	method used for FSP is
		method used for TPM	RFP. The tender is
		is RFP. The tender is	launched via In-tend
		launched via In-tend	and is issued to the
		and is issued to the vendors that are in	vendors that are in WFP approved roster.
		WFP approved roster.	The tender duration is
		The tendering period	21 days
		spans a minimum of 21	minimum. The
		days. The evaluation	evaluation process
		process employs a	employs a weighted
		weighted method,	method, assigning 70%
		assigning 70% weight	weight to the technical
			· · ·
		1 ' '	' '
		separately requested,	with the technical
		with the technical	evaluation taking
		proposal and 30% to the financial proposal. The technical and financial proposals are	proposal and 30% to the financial proposal. The technical and financial proposals are separately requested,

		1	
		evaluation taking precedence. Only offers meeting the minimum technical evaluation score proceed to the financial evaluation stage. Following the completion of the technical evaluation, financial evaluation is initiated for technically qualified offers. Once both evaluations are concluded, the LPCC is presented and processed. Subsequently, upon drafting and clearance of the contract, it is awarded to the recommended bidder/s.	precedence. Only offers meeting the minimum technical evaluation score proceed to the financial evaluation stage. Following the completion of the technical evaluation, financial evaluation is initiated for technically qualified offers. Once both evaluations are concluded, the LPCC is presented and processed. Subsequently, upon drafting and clearance of the contract, it is awarded to the recommended bidder/s. Normal process of FSP Tender from solicitation till contract award takes 12 months. FSP tender has three modality 1: Cash in Hand to beneficiaries, 2: Bank Account/Mobile
			Money Wallet and 3:
Implementation	WFP programme  Upon contract award, the WFP Programme (CP Management and relevant Programme section) Unit assumes responsibility for contract management.	WFP programme  Upon contract award, the WFP Programme (M&E) Unit assumes responsibility for contract management, diligently overseeing its implementation on a regular basis. In the event of any shortcomings in contract execution, an internal meeting is convened involving representatives from	Electronic voucher  Upon the contract's award, the WFP CBT Programme Unit assumes the role of leading contract management, conducting regular monitoring of its implementation. In the event of any shortcomings during the contract execution, an internal meeting is convened, involving representatives from

		M&E, procurement, and other pertinent units. Following a consensus, the contractor is formally invited to a meeting where an improvement plan is collaboratively devised and shared. The purpose of the meeting is to identify the shortcomings and effectively address and rectify them.	the CBT Programme, procurement, finance, and other pertinent units. Upon reaching a consensus, the contractor is formally invited to a meeting to address and discuss the identified issues in detail. The purpose of the meeting is to identify the shortcomings and effectively address and rectify them.
Performance	Under its contract management role, the relevant Programme section and CPM Unit consistently monitors the contractors' performance to ensure alignment with the stipulated contract requirements.	Under its contract management role, the M&E Unit consistently monitors the contractors' performance to ensure alignment with the stipulated contract requirements. This regular oversight aims to verify that the deliverables are met in accordance with the specified criteria and requirements of the contract.	Within its contract management responsibilities, the CBT Programme consistently conducts regular monitoring of Financial Service Providers (FSPs) to ensure that their performance aligns with the contract's stipulated requirements. This ongoing oversight is designed to verify that the FSPs meet the specified criteria and will deliver the required outcomes as outlined in the contract.
Evaluation	Regular checks and performance evaluations are conducted by the relevant Programme section and CPM unit to ensure that CPs' activities are on track and in line with the required standard, and that gaps are identified and	Performance of Contractors is evaluated annually to determine whether they have performed as per the contract and adhered to the contract requirements.	Performance of FSPs is evaluated annually to determine whether they have performed as per the contract and adhered to the contract requirements.

addressed accordingly.	

WFP will ensure that new contracts include the flow down of relevant obligations as per this LMP, while existing contracts will be amended to do so in a timely manner. Contracts with CPs, FSPs, and TPMs include appropriate non-compliance remedies (amongst others, provision on withholding percentage of payment to the contractor in case of non-compliance with relevant environmental, social, health and safety requirements; removal of personnel from the works; request for indemnifications and/or damages; and even contract termination).

WFP will monitor the performance of contractors (including CPs, FSPs, and TPMs) in relation to the LMP as part of the periodic E&S reporting. The monitoring may include inspections, and/or spot checks, which may be conducted through contractor self-reporting and/or third-party monitoring, of project locations or work sites and/or of labour management records and reports compiled by the contractor.

# Cooperating Partners (CPs), Financial Service Providers (FSPs), and Third- Party Monitors (TPMs)

The provisions of the ESMF, including this LMP, will be followed through relevant contracting documents and monitored through reporting mechanisms with CPs, FSPs, and TPMs. CPs, FSPs, and TPMs are responsible for the engagement and management of personnel (contracted workers) and ensuring compliance with obligations as per contractual agreements. This will include:

- Complying with the ESMF, relevant instruments, and this LMP. These measures will apply to contracted and subcontracted workers.
- Maintaining records of recruitment and employment process of contracted workers
- Clearly communicating job description and employment conditions to contracted workers
- Reporting any incidents and accidents (in line with the definition of the ESCP) to WFP in a timely manner
- Having a system for regular review and reporting on labour, and occupational safety and health performance
- Ensuring that all beneficiary-facing contracted workers sign a Code of Conduct on GBV/SEA/SH
- Putting in place processes for workers to report work situations that they believe are not safe or healthy, and to remove themselves from a work situation which they have reasonable justification to believe presents an imminent and danger to their life or health.
- Complying with all relevant local legislation, as well as WFP and World Bank Policies, as summarised in this LMP.

# Annex 6. Environment, Social (including labour), Health, and Safety Requirements for Component 1 & 2

In accordance with the provisions of the ESMF, contractors shall meet the following Environmental, Health, Safety and Social (including labour) requirements – thereafter called ESHS requirements<sup>6</sup>.

The ESHS requirements include 9 sections:

- 1. Use of ESMP template
- 2. ESHS Training
- 3. Construction Site Management
- 4. Occupational Health and Safety (OHS)
- 5. Community Safety including Road safety and Traffic Safety
- 6. Emergency Preparedness and Response
- 7. Stakeholder Engagement
- 8. Contractor Environmental and Social Reporting
- 9. Labour force management, including the Code of Conduct

# 1. Use of ESMP template

The Contractor shall:

- Prepare and adapt ESMP template, as applicable.
- Prepare a detailed explanation of how the contractor's performance will meet the ESHS requirements.
- Ensure that sufficient funds are budgeted to meet the ESHS requirements, and that sufficient capacity is in place to oversee, monitor and report on ESMP performance.
- Put in place controls and procedures to manage their ESHS performance.
- Get prior written approval from UNICEF Engineers before starting construction or rehabilitation activities.

#### 2. ESHS Training

The Contractor shall:

- Determine ESHS training needs in collaboration with UNICEF.
- Maintain records of all ESHS training, orientation, and induction.
- Ensure, through appropriate contract specifications and monitoring that service providers, as well as contracted and subcontracted labour, are trained adequately before assignments begin.
- Demonstrate that its employees are competent to carry out their activities and duties safely. For this
  purpose, the Contractor shall issue a Competence Certificate for every person working on site (relative
  to trade and aspect of work assignment) that specifies which tasks can be undertaken by which key
  personnel.

## **Orientation Training**

The Contractor shall:

Provide ESHS orientation training to all employees, including management, supervisors, and workers,

<sup>&</sup>lt;sup>6</sup> The ESHS requirements build on the General EHS Guidelines of the World Bank Group, but also take into account other World Bank guidelines, and good practice notes. Note that not all requirements are considered applicable for Component 1 and 2 activities.

- as well as to subcontractors, so that they are apprised of the basic site rules of work at/on the site and of personal protection and preventing injury to fellow employees.
- Training should consist of basic hazard awareness, site-specific hazards, safe work practices, and emergency procedures for fire, evacuation, and natural disaster, as appropriate. Any site-specific hazard or colour coding in use should be thoroughly reviewed as part of orientation training.

#### **Visitor Orientation**

The Contractor shall:

- Establish an orientation program for visitors, including vendors, that could access areas where hazardous conditions or substances may be present.
- Visitors shall not enter hazard areas unescorted.
- Ensure that visitors shall always be accompanied by an authorized member of the contractor, or a representative of UNICEF or of its SPs, who has successfully fulfilled the ESHS orientation training, and who is familiar with the project site construction hazards, layout, and restricted working areas.

## **New Task Employee and Contractor Training**

The Contractor shall:

- Ensure that all workers and subcontractors, prior to commencement of new assignments, have received adequate training and information enabling them to understand work hazards and to protect their health from hazardous ambient factors that may be present. The training should adequately cover the step-by-step process that is needed for Project activities to be undertaken safely, with minimum harm to the environment, including:
- Knowledge of materials, equipment, and tools
- Known hazards in the operations and how they are controlled
- Potential risks to health
- Precautions to prevent exposure
- Hygiene requirements
- Wearing and use of protective equipment and clothing
- Appropriate response to operation extremes, incidents and accidents
- Construction Site Management

#### 3. Construction Site Management

## Vegetation

- Prevent any unnecessary destruction, scarring, or defacing of the natural surroundings in the vicinity of the construction site
- Protect all trees and vegetation from damage by construction operations and equipment, except where clearing is required for permanent works, approved rehabilitation of roads/pathways, or excavation operations
- Plant 3 trees as a corrective measure in the footprint of the healthcare facility for every tree that was cut due to project activities.
- Revegetate damaged areas on completion of the Works, and for areas that cannot be revegetated, scarifying the work area to a condition that will facilitate natural revegetation, provide

- for proper drainage, and prevent erosion
- Use, as much as possible, local species for replanting and species that are not listed as a noxious weed
- Repair, replant, reseed or otherwise correct, as directed by UNICEF or its representative, and at the Contractor's own expense, all unnecessary destruction, scarring, damage, or defacing of the landscape resulting from the Contractors operations
- Transport labour and equipment in a manner to avoid as much as possible damage to grazing land, crops, and property

# **Protection of the Existing Installations**

The Contractor shall:

- Safeguard all existing buildings, structures, works, pipes, cables, sewers, or other services or installations from harm, disturbance or deterioration during construction activities
- Coordinate with local authorities to identify existing infrastructure that might not be visible
- Repair any damage caused by the Contractor's activities, in coordination with concerned authorities.
- Take all reasonable precautions to prevent or reduce any disturbance or inconvenience to the owners, tenants or occupiers of properties to the construction activities, and more generally to the public
- Maintain safe access to public and private properties that might be affected by construction activities.
   If necessary, provide acceptable alternative means of passage or access to the satisfaction of the persons affected.
- Avoid working during night hours

#### **Waste from Construction Activities**

The Contractor shall:

- Collect and properly manage all solid wastes resulting from the construction activities, including construction debris and spoils, to prevent the contamination of soil and groundwater
- Remove unneeded excavation material from construction sites as soon as possible
- Agree with relevant municipalities about construction waste disposal
- Carefully select waste disposal sites including for hazardous waste, to be approved by UNICEF or its SP
- Minimize littering of roads by ensuring that vehicles are licensed and loaded in such a manner as to
  prevent falling off or spilling of construction materials, and by sheeting the sides and tops of all
  vehicles carrying mud, sand, other materials or debris
- Transfer construction waste to assigned places in the selected waste disposal sites with documented confirmation.
- Properly dispose of solid waste and debris at designated permitted sites waste disposal sites
  allocated by the local authorities and obtain a receipt of waste from the authorized landfill
  authority.

#### **Air Quality**

The most common pollutant involved in fugitive emissions is dust or particulate matter (PM) that is released during the transport and open storage of solid materials, and from exposed soil surfaces, including unpaved roads. Accordingly, the Contractor shall:

- Use dust control methods, such as covers, water suppression, or increased moisture content for open
  materials storage piles, or controls, including air extraction and treatment through a baghouse or
  cyclone for material handling sources, such as conveyors and bins.
- Use water suppression for control of loose materials on paved or unpaved road surfaces. Oil and oil by-products are not a recommended method to control road dust.
- Use wheel washes at quarries, ready-mix plants, construction sites, and other facilities to prevent trackout of mud, dust and dirt on to public road.
- Regularly clean road surfaces within the construction sites to remove accumulated fine material, and regularly clean transportation vehicles.
- Cover open bodied trucks handling sand, gravel or earth.
- Minimize smoke from diesel engines by regular and proper maintenance, in particular by ensuring that the engine, injection system and air cleaners are in good condition.

#### **Hazardous and Toxic Materials**

Toxic and deleterious wastes resulting from the Contractor's activities require special attention in order to forestall their introduction into the natural environment which could result in harm to people, aquatic life or natural growth of the area. Accordingly, the Contractor shall:

- Train workers regarding the handling of hazardous materials
- Label using easily understandable symbols, and provide material safety data sheets, for chemical substances and mixtures according to the Globally Harmonized System (GHS) of classification and labelling of chemicals.
- Store hazardous materials as per the statutory provisions of the Manufactures, Storage and Import of Hazardous Chemicals Rules (1989), under the Environment (Protection) Act, 1986.
- Provide adequate secondary containment for fuel storage tanks and for the temporary storage of other fluids such as lubricating oils and hydraulic fluids,
- Use impervious surfaces for refuelling areas and other fluid transfer areas
- Train workers on the correct transfer and handling of fuels and chemicals and the response to spills
- Provide portable spill containment and cleanup equipment on site and training in the equipment deployment
- Deposit or discharge toxic liquids, chemicals, fuels, lubricants and bitumen into containers for salvage or subsequent removal to off- site locations.
- Treat hazardous waste separately from other waste
- Avoid the storage or handling of toxic liquid adjacent to or draining into drainage facilities.
- Keep absorbent materials or compounds on Site in sufficient quantities corresponding to the extent of possible spills.
- Locate landfill pits for the disposal of solid waste at least 100 m from water courses and fencing them off from local populations.
- Ensure adequate primary treatment of sanitation effluents and installing septic tanks away from village watering points.
- Dispose hazardous waste at sites to be approved by UNICEF or its SPs

## **Area Signage**

- Appropriately mark hazardous areas.
- Install warning signs
- Ensure that signage is in accordance with international standards and is well known to, and easily understood by workers, visitors and the general public as appropriate.
- Demarcate work sites with safety tape, fencing or barricades, as appropriate, to prevent unauthorized access to the construction sites
- Safeguard public safety by covering holes and by installing guardrails along temporary pathways.
- Health and Safety
- Contractors will collaborate with other contractors in applying health and safety requirements, when
  workers from more than one contractor are working together in one location, without prejudice to the
  responsibility of each party for the health and safety of its own workers.

#### 4. Health and Safety

# **Severe Weather and Facility Shutdown**

The Contractor shall:

- Design and build workplace structures to withstand the expected elements for the region and designate an area designated for safe refuge, if appropriate.
- Develop Standard Operating Procedures (SOPs) for project or process shutdown, including an evacuation plan.

#### Lavatories and Showers.

The Contractor shall:

- Provide adequate lavatory facilities (toilets and washing areas) for the number of people expected to work at the construction sites, and make allowances for segregated facilities for males and females
- Provide toilet facilities with adequate supplies of hot and cold running water and soap
- Where workers may be exposed to substances poisonous by ingestion and skin contamination may occur, provide facilities for showering and changing into and out of street and work clothes.

# **Potable Water Supply**

The Contractor shall:

- Provide adequate supplies of potable drinking water or with a sanitary means of collecting the water for the purposes of drinking
- Ensure that water supplied to areas of food preparation or for the purpose of personal hygiene (washing or bathing) meets drinking water quality standards

## **Clean Eating Area**

The Contractor shall:

 Where there is potential for exposure to substances poisonous by ingestion, make suitable arrangements to provide clean eating areas where workers are not exposed to the hazardous or noxious substances

## Personal Protective Equipment (PPE)

The Contractor shall:

• Identify and provide at no cost appropriate PPE to workers, the workers of subcontractors, as well as

to visitors, which gives adequate protection without incurring unnecessary inconvenience to the individual

- Ensure that the use of PPE is compulsory.
- Provide sufficient training in the use, storage and maintenance of PPE to its workers and workers of its subcontractors.
- Properly maintain PPE, including cleaning when dirty and replacement when damaged or worn out;
- Determine requirements for standard and/or task-specific PPE based on of Job specific Safety Analysis (JSA);Consider the use of PPE as a last resort when it comes to hazard control and prevention, and always refer to the hierarchy of hazard controls when planning a safety process.

#### Noise

The Contractor shall institute appropriate measures to reduce the exposure of workers to construction noise, including but not limited to:

- Avoid exposure to a noise level greater than 85 dB(A) for a duration of more than 8 hours per day
  without hearing protection. In addition, no unprotected ear should be exposed to a peak sound
  pressure level (instantaneous) of more than 140 dB(C).
- Enforce the use of hearing protection should be enforced actively when the equivalent sound level over 8 hours reaches 85 dB(A), the peak sound levels reach 140 dB(C), or the average maximum sound level reaches 110 dB(A).
- Provide hearing protective devices capable of reducing sound levels at the ear to at most 85 dB(A).
- Reduce the "allowed" exposure period or duration by 50 percent for every 3 dB(A) increase in in excess of 85 dB(A).
- Perform periodic medical hearing checks on workers exposed to high noise levels.
- Rotate staff to limit individual exposure to high levels.
- Install practical acoustical attenuation on construction equipment, such as mufflers.
- Use silenced air compressors and power generators
- Keep all machinery in good condition
- Install exhaust silencing equipment on bulldozers, compactors, crane, dump trucks, excavators, graders, loaders, scrapers and shovels.
- Post signs in all area where the sound pressure level exceeds 85 dB(A).
- Shut down equipment when not directly in use
- Provide advance notice to occupants if an activity involving high level impact noise is in close proximity to buildings.

## Old asbestos waste

The contractor shall apply all the required measures to protect the workers and the surrounding communities from the hazards associated with the old asbestos waste, in accordance with the WBG General EHS Guidelines (www.ifc.org/EHSguidelines), including but not limited to the following:

- Treat the waste contaminated with asbestos safely in collection, transportation and proper disposal in the authorized site to prevent spreading into the air.
- Providing the containers to use for isolating the asbestos material, the signs to install in the site
  and the criteria for choosing the location in which to bury the asbestos are available for the disposal.
- Ensure that the equipment used for and next to the Asbestos Cement Material (ACM) is washed after

use.

- Ensure that the resting areas and the eating facilities are clear from any potential contamination from asbestos.
- Provide adequate washing facilities.
- Ensure that the PPE provided to the workers on site includes disposable coveralls, safety goggles, gloves and footwear.
- Ensure that a local exhaust ventilation system (LEV) that draws in airborne asbestos is in place when cutting (ACM).
- Ensure that the appropriate filter is installed in the LEV to capture the airborne asbestos before releasing to the environment. The filers should also be treated as a hazardous waste for disposal.
- Ensure that training that is fit for purpose is delivered to the workers to enhance their awareness of
  the health and safety risks when working with asbestos, to inform them on the method of work and
  on the control measures to have in place.
- Excavated contaminated soil to be directly placed into the truck and cover it and transport it while it still wet to minimize its effects
- Contaminated soil and damaged asbestos materials and pipes should be buried to prevent spreading into the air.
- Arrangements in the disposal area should be done to ensure it is done properly and documented.
- Proper masks should be worn by all workers and supervisors in the working area. Respirators must be
  equipped with HEPA filtered cartridges (colour coded purple) or an N-100, P-100 or R-100 NIOSH
  rating.

# **Painting**

The contractor shall apply all the required measures to protect the workers and the surrounding communities from the hazards associated with painting works including the hazards resulting from use of lead containing paint, in accordance with the WBG General EHS Guidelines (www.ifc.org/EHSguidelines), including but not limited to the following:

- Provide workers with specialized training and provided with, and wear, appropriate PPE (gloves, apron, splash suits, face shield or goggles, etc);
- Ensure that the air is renewed, and ventilation are continuous inside the work station;
- Apply working shift time with minimum time for every worker;
- Ensure that emergency showers are close to the working site;
- Ensure availability of the first aid box.
- Ensure not procure or use paints containing lead.

## **First Aid and Accidents**

- Ensure that qualified first aid by qualified personnel is always available. Appropriately equipped first-aid stations should be easily accessible throughout the place of work.
- Provide workers with rescue and first-aid duties with dedicated training so as not to inadvertently
  aggravate exposures and health hazards to themselves or their co- workers. Training would include the
  risks of becoming infected with blood-borne pathogens through contact with bodily fluids and tissue.
- Provide eye-wash stations and/or emergency showers close to all workstations where immediate

- flushing with water is the recommended first-aid response.
- Provide dedicated and appropriately equipped first-aid room(s) where the scale of work or the type of activity being carried out so requires.
- Equip first aid stations and rooms with gloves, gowns, and masks for protection against direct contact with blood and other body fluids.
- Make widely available written emergency procedures for dealing with cases of trauma or serious illness, including procedures for transferring patient care to an appropriate medical facility.
- Immediately report all accidental occurrences with serious accident potential such as major equipment failures, contact with high- voltage lines, exposure to hazardous materials, slides, or caveins to UNICEF.
- Immediately investigate any serious or fatal injury or disease caused by the progress of work by the Contractor and submit a comprehensive report to UNICEF.

#### **Communicable Diseases**

Recognizing that no single measure is likely to be effective in the long term, the Contractor shall implement a combination of behavioural and environmental modifications to mitigate communicable diseases:

- Conduct Information, Education and Consultation Communication (IEC) campaigns, at least every other
  month, addressed to all construction site staff (including all the Contractor's employees, all
  subcontractors of any tier, consultants' employees working on the site, and truck drivers and crew
  making deliveries to the site for Works and Services executed under the Contract, concerning the risks,
  dangers and impact, and appropriate avoidance behaviour of communicable diseases.
- Provide for active screening, diagnosis, counselling and referral of workers to a dedicated national STD and HIV/AIDS program, (unless otherwise agreed) for all Site staff and labour.
- Provide male or female condoms to all Site staff and workers, as appropriate.
- Provide treatment through standard case management in on-site or community health care facilities.
- Ensure ready access to medical treatment, confidentiality and appropriate care, particularly with respect to migrant workers.
- Promote collaboration with local authorities to enhance access of workers families and the community to public health services and ensure the immunization of workers against common and locally prevalent diseases.
- Provide basic education on the conditions that allow the spread of other diseases such as COVID-19,
   Cholera and other communicable diseases. The training should cover sanitary hygiene education.
- Prevent illness in immediate local communities by:
- Implementing an information strategy to reinforce person-to-person counselling addressing systemic factors that can influence individual behaviour as well as promoting individual protection, and protecting others from infection, by encouraging condom use
- Training health workers in disease treatment
- Conducting immunization programs for workers in local communities to improve health and guard against infection
- Providing health services

#### **Vector-Borne Diseases**

Reducing the impact of vector-borne disease on the long-term health of workers is best accomplished by

implementing diverse interventions aimed at eliminating the factors that lead to disease. The Contractor, in close collaboration with community health authorities, shall implement an integrated control strategy for mosquito and other arthropod-borne diseases that includes the following measures:

- Prevent of larval and adult propagation through sanitary improvements and elimination of breeding habitats close to human settlements
- Eliminate unusable impounded water
- Increase water velocity in natural and artificial channels
- Consider the application of residual insecticide to dormitory walls
- Implement integrated vector control programs
- Promote the use of repellents, clothing, netting, and other barriers to prevent insect bites
- Use chemoprophylaxis drugs by non-immune workers and collaborating with public health officials to help eradicate disease reservoirs
- Monitor and treat circulating and migrating populations to prevent disease reservoir spread
- Collaborate and exchange in-kind services with other control programs in the project area to maximize beneficial effects
- Educate project personnel and area residents on risks, prevention, and available treatment
- Monitor communities during high-risk seasons to detect and treat cases
- Distribute appropriate education materials
- Follow safety guidelines for the storage, transport, and distribution of pesticides to minimize the potential for misuse, spills, and accidental human exposure

## 5. Road safety and Traffic Safety

- The Contractor shall ensure traffic safety by all project personnel during displacement to and from the
  workplace, and during the operation of project equipment on private or public roads. The Contractor
  shall adopt best transport safety practices across all aspects of project operations with the goal of
  preventing traffic accidents and minimizing injuries suffered by project personnel and the public,
  including:
- Emphasize safety aspects among drivers
- Improve driving skills and requiring licensing of drivers
- Institute defensive driving training for all drivers prior to starting their job
- Adopt limits for trip duration and arranging driver rosters to avoid overtiredness
- Avoid dangerous routes and times of day to reduce the risk of accidents
- Use speed control devices (governors) on trucks, and remote monitoring of driver actions
- Require that drivers and co-passengers wear seatbelts, and duly sanction defaulters.
- Regularly maintain vehicles and use manufacturer approved parts to minimize potentially serious accidents caused by equipment malfunction or premature failure.
- Where the project may contribute to significant changes in traffic along existing roads the Contractor shall:
- Commence activities that affect public motorways and highways, only after all traffic safety measures necessitated by the activities are fully operational.
- Arrange diversions for providing alternative routes for transport and/or pedestrians

- Minimize pedestrian interaction with construction vehicles, particularly at crossing points to schools, markets, and any animal crossing points of significance, through appropriate signage, engineered footpaths or traffic slowing devices.
- Organize meaningful road accident awareness events at all roadside schools and communities within 150 meters of the road centreline, covering safe road crossing, road accident hazards from weather conditions and vehicle roadworthiness, overloading and driver alertness, dangers posed by parked and broken-down vehicles, etc.
- Collaborate with local communities and responsible authorities to improve signage, visibility and overall safety of roads, particularly along stretches located near schools or other locations where children may be present.
- Collaborate with local communities on education about traffic and pedestrian safety (e.g., school education campaigns).
- Coordinate with emergency responders to ensure that appropriate first aid is provided to all affected persons in the event of accidents.
- Use locally sourced materials, whenever possible, to minimize transport distances, and locate associated facilities such as worker camps close to project sites.
- Employ safe traffic control measures, including road signs, traffic cones, removable barriers, and flag persons to warn of dangerous conditions.
- Avoid indirect damage to existing cultural heritage, such as affecting masonry through vibration

#### 6. Emergencies

- Establish and maintain an emergency preparedness and response system, in collaboration with appropriate and relevant third parties including to cover: (i) the contingencies that could affect personnel and facilities of the project to be financed; (ii) the need to protect the health and safety of project workers; (iii) the need to protect the health and safety of the Affected Communities. The emergency preparedness and response system shall include:
- Identification of the emergency scenarios
- Specific emergency response procedures
- Training of emergency response teams
- Emergency contacts and communication systems/protocols (including communication with Affected Communities when necessary)
- Procedures for interaction with government authorities (emergency, health, environmental authorities)
- Permanently stationed emergency equipment and facilities (e.g., first aid stations, firefighting equipment, spill response equipment, personal protection equipment for the emergency response teams)
- Protocols for the use of the emergency equipment and facilities
- Clear identification of evacuation routes and muster points
- Emergency drills and their periodicity based on assigned emergency levels or tiers
- Decontamination procedures and means to proceed with urgent remedial measures to contain, limit and reduce pollution within the physical boundaries of the project property and assets to the extent possible.

#### 7. Stakeholder Engagement

As part of the overall Project Stakeholder Engagement<sup>7</sup>, the Contractor will undertake a process of stakeholder engagement with representative persons and communities directly affected by the activities it undertakes. The Contractor shall also maintain throughout the Project good relations with local communities and will give these communities prior notice of plans and schedules as they might affect local people.

## 8. Service Providers/Contractor Environmental and Social Reporting

The Service Providers/Contractor shall report major work-related incidents, accidents or loss of life to UNICEF or the relevant SP/contractor within 24 hours. The SPs/Contractors shall monitor, keep records and report on the following environmental and social issues:

- Occupational Health and Safety: hours worked, lost time injury (LTI), lost workdays, recordable incidents
  and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high
  potential near misses, and remedial and preventive activities required (for example, revised job safety
  analysis, new or different equipment, skills training, and so forth), needle stick injuries, exposure to
  blood/chemical spills, exposure to infectious wastes/equipment and nosocomial infections.
- Environmental incidents and near misses: environmental incidents (examples: ground water contaminations from open dumping of the wastes, chemicals or air pollutions resulted due to open burning activities/ use of obsolete technologies/burning in inappropriate temperature) and high potential near misses and how they have been addressed, what is outstanding, and lessons learned.
- Major works: those undertaken and completed, progress against project schedule, and key work fronts (work areas).
- ESHS requirements: noncompliance incidents with permits and national law (legal noncompliance),
   project commitments, or other ESHS requirements.
- ESHS inspections and audits: by the Contractor, UNICEF and its SPs, or others—to include date, inspector or auditor name, sites visited, and records reviewed, major findings, and actions taken.
- Workers: list of workers at each site, confirmation of ESHS training, indication of origin (expatriate, local, nonlocal nationals), gender, age with evidence that no child labour is involved, and skill level (unskilled, skilled, supervisory, professional, management).
- Training on ESHS issues: including dates, number of trainees, and topics.
- Footprint management: details of any work outside boundaries or major off-site impacts caused by ongoing construction—to include date, location, impacts, and actions taken.
- External stakeholder engagement: highlights, including formal and informal meetings, and information disclosure and dissemination— to include a breakdown of women and men consulted and themes coming from various stakeholder groups, including vulnerable groups (e.g., disabled, elderly, children, etc.).
- Details of any security risks: details of risks the Contractor may be exposed to while performing its work, the threats may come from third parties external to the project.
- Worker grievances: details including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken grievances listed should include those received since the preceding report and those that were unresolved at the time of that report.
- External stakeholder grievances: grievance and date submitted, action(s) taken and date(s), resolution (if any) and date, and follow-up yet to be taken grievances listed should include those received since the preceding report and those that were unresolved at the time of that report. Grievance data should be gender disaggregated.

 $<sup>^{7}</sup>$  The overall stakeholder engagement process is described in the Project Stakeholder Engagement Plan

- Major changes to Contractors environmental and social practices.
- Deficiency and performance management: actions taken in response to previous notices of deficiency or observations regarding ESHS performance and/or plans for actions to be taken should continue to be reported to UNICEF until it determines the issue is resolved satisfactorily.

#### 9. Labour Force Management

#### **Labour Conditions**

The Contractor shall:

- Implement the measures and commitments defined in the Project Labour Management Procedures.
- Provide all workers with terms and conditions that comply with Afghanistan Labour laws and Legislations, and applicable International Labour Organization conventions on workplace conditions.
- Put in place workplace processes for project workers to report work situations that they believe are not safe or healthy, and to remove themselves from a work situation that they have reasonable justification to believe presents an imminent and serious danger to their life or health. Project workers who remove themselves from such situations will not be required to return to work until necessary remedial action to correct the situation has been taken. Project workers will not be retaliated against or otherwise subject to reprisal or negative action for such reporting or removal.
- Avoid all forms of forced or compulsory labour, i.e., all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.

#### Insurance

The Contractor shall:

- Protect the health of workers involved in onsite activities, as indicated in Afghanistan Labour Law.
- Compensate all project workers including technical and non-technical workers based on national labour law and especially Regulation on Compensating Work-Related Health Problems (2009) in case on death and injuries.

#### **Grievance Redress Mechanism for Workers**

The Contractor shall put in place a Grievance Redress Mechanism (GRM) for its workers and the workers of its subcontractors that is proportionate to its workforce that adheres to the following principles:

- Provision of information. All workers should be informed about the grievance mechanism at the time
  they are hired, and details about how it operates should be easily available, for example, included in
  worker documentation or on notice boards.
- Transparency of the process. Workers must know to whom they can turn in the event of a grievance and the support and sources of advice that are available to them. All line and senior managers must be familiar with their organization's grievance procedure.
- Keeping it up to date. The process should be regularly reviewed and kept up to date, for example, by referencing any new statutory guidelines, changes in contracts or representation.
- Confidentiality. The process should ensure that a complaint is dealt with confidentially. While procedures may specify that complaints should first be made to the workers' line manager, there should also be the option of raising a grievance first with an alternative manager, for example, a human resource (personnel) manager.
- Non-retribution. Procedures should guarantee that any worker raising a complaint will not be subject to any reprisal.

- Reasonable timescales. Procedures should allow for time to investigate grievances fully, but should
  aim for swift resolutions. The longer a grievance is allowed to continue, the harder it can be for both
  sides to get back to normal afterwards. Time limits should be set for each stage of the process, for
  example, a maximum time between a grievance being raised and the setting up of a meeting to
  investigate it.
- Right of appeal. A worker should have the right to appeal to the World Bank or national courts if he or she is not happy with the initial finding.
- Right to be accompanied. In any meetings or hearings, the worker should have the right to be accompanied by a colleague, friend or union representative.
- Keeping records. Written records should be kept at all stages. The initial complaint should be in writing
  if possible, along with the response, notes of any meetings and the findings and the reasons for the
  findings. Any records on SEA shall be registered separately and under the strictest confidentiality.
- Relationship with collective agreements. Grievance procedures should be consistent with any collective agreements.
- Relationship with regulation. Grievance processes should be compliant with the national employment code

# **Protection from Sexual Exploitation and Abuse**

The Contractor shall:

- Provide repeated training and awareness raising to the workforce about refraining from unacceptable conduct toward local community
- Inform workers about national laws that make sexual harassment and gender-based violence a punishable offence which is prosecuted
- Prohibit its employees from exchanging any money, goods, services, or other things of value, for sexual favours or activities, or from engaging in any sexual activities that are exploitive or degrading to any person.
- Take appropriate disciplinary actions against employees, including Community Health workers under their purview who are found to have violated the Code of Conduct.
- Develop a system to capture gender-based violence, sexual exploitation and workplace sexual harassment related complaints/issues.

#### **Protection from Child Labour**

The Contractor shall:

- Verify that workers are older than 18 when hiring
- Exclude all persons under the age of 18.
- Review and retain copies of verifiable documentation concerning the age of workers
- Comply with all relevant local legislation, including labour laws in relation to child labour and World Bank's ESF policies on child labour and minimum age.

## **Code of Conduct**

The Contractor shall ensure that all employees, including those of subcontractors, community health workers who are employed by BPHS/EPHS, are informed about and sign the following Code of Conduct:

#### CODE OF CONDUCT FOR CONTRACTOR'S PERSONNEL

We the Contractor [enter name of Contractor] have signed a contract with UNICEF for [enter description of the activities]. These activities will be carried out at [enter the Site and other locations where the activities will be carried out]. Our contract requires us to implement measures to address environmental and social risks related to the activities, including the risks of sexual exploitation and assault and gender-based violence.

This Code of Conduct is part of our measures to deal with environmental and social risks related to the activities. It applies to all our staff, including labourers and other employees at the at all the places where the activities are being carried out. It also applies to the personnel of every subcontractor and any other personnel assisting us in the execution of the activities. All such persons are referred to as "Contractor's Personnel" and are subject to this Code of Conduct.

## This Code of Conduct identifies the behaviour that we require from all Contractor's Personnel.

Our workplace is an environment where unsafe, offensive, abusive or violent behaviour will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation.

## **Required Conduct**

Contractor's Personnel shall:

- carry out his/her duties competently and diligently.
- comply with this Code of Conduct and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and well-being of other Contractor's Personnel and any other person.
- maintain a safe working environment including by:
- ensuring that workplaces, machinery, equipment and processes under each person's control are safe and without risk to health.
- wearing required personal protective equipment.
- using appropriate measures relating to chemical, physical and biological substances and agents; and following applicable emergency operating procedures.
- report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and serious danger to his/her life or health.
- treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers or children.
- not engage in any form of sexual harassment including unwelcome sexual advances, requests for sexual favours, and other unwanted verbal or physical conduct of a sexual nature with other Contractor's or Employer's Personnel.
- not engage in Sexual Exploitation, which means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. In Bank financed projects, sexual exploitation occurs when access to or benefit from Bank financed Goods, Works, Consulting or Non-consulting services is used to extract sexual gain.
- not engage in Sexual Assault, which means sexual activity with another person who does not consent. It is a violation of bodily integrity and sexual autonomy and is broader than narrower conceptions of "rape", especially because (a) it may be committed by other means than force or violence, and (b) it does not necessarily entail penetration.

- not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage.
- complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including on health and safety matters, and Sexual Exploitation and Abuse(SEA) and Sexual Harassment.
- report violations of this Code of Conduct; and
- Not retaliate against any person who reports violations of this Code of Conduct, whether to us or the Employer, or who makes use of the Grievance mechanism for Contractor's Personnel or the project's Grievance Mechanism.

## **Raising Concerns**

If any person observes behaviour that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she should raise the issue promptly. This can be done in either of the following ways:

- 1. Contacting the Individual designated by the Contractor [enter name of Contact)
- 2. In writing at this address [ ]
- 3. By telephone at [ ]
- 4. In person at [ ]
- 5. Calling [ ] to reach the Contractor's hotline and leave a message (if available)

The person's identity will be kept confidential, unless reporting of allegations is mandated by the country law. Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. We take seriously all reports of possible misconduct and will investigate and take appropriate action. We will provide warm referrals to service providers that may help support the person who experienced the alleged incident, as appropriate.

There will be no retaliation against any person who raises a concern in good faith about any behaviour prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

## **Consequences of Violating the Code of Conduct**

Any violation of this Code of Conduct by Contractor's Personnel may result in serious consequences, up to and including termination and possible referral to legal authorities.

#### **For Contractor's Personnel**

I have received a copy of this Code of Conduct written in a language that I comprehend. I understand that if I have any questions about this Code of Conduct, I can contact [enter name of Contractor's contact person with relevant experience in handling gender-based violence] requesting an explanation.

Name of Contractor's Personnel: [insert name]		
Signature:		
Date: (day month year):	<u>Countersignature</u>	of
authorized representative of the Contractor:	-	
Signature:		
Date: (day month year):		

A copy of the code shall be displayed in a location easily accessible to the community and project affected people. It shall be provided in languages comprehensible to the local community, Contractor's personnel (including subcontractors and day workers) and affected persons.]

# Annex 7. Environmental and Social Management Plan (ESMP) template for Minor Rehabilitation / Construction Works under Component 1 & 2

The Environmental and Social Management Plan (ESMP) template identifies prevention, minimization, mitigation, and compensation measures to be applied to relevant subprojects, as required. The ESMP template is intended for minor construction/rehabilitation works and can be adapted based on site conditions using the ESHS specifications and mitigation measures outlined in Annex 5. The mitigation table serves as a reference on potential risks and impacts, mitigation measures and indicators or outcomes that can be planned and implemented throughout the project. The risks and impacts, mitigation measures and monitoring indicators are presented according to the relevant ESSs.

When applicable, contractors will ensure that sufficient funds are budgeted to implement the required ESMP and monitor and report on ESMP performance. Where contractors are required to develop an ESMP for construction works, ESMPs must be approved by UNICEF Engineers prior to construction and rehabilitation activities.

Potential Risks and Impacts	Proposed Mitigation Measures	Phas	e	Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost (USD)
		Planning	Implementat ion		Continuous	Monthly	Quarterly		
Exclusion of vulnerable groups from project's benefits	<ul> <li>Implement and monitor Project GRM</li> </ul>	Х	х	o per cent of GRM cases addressed			X	Implementati on: UNICEF/SPs  Monitoring: UNICEF	
Lack of access to beneficiaries for meaningful stakeholder and community	<ul> <li>Work through local partners with sufficient access</li> <li>Implement SMF</li> </ul>	Х	Х	<ul><li>Availability of GRM</li><li># of stakeholder information sessions and</li></ul>	Х			Implementati on: SPs Monitoring: UNICEF	

engagements as		consultations			
well as grievance		sessions			
redress and		conducted			
monitoring, as					
project locations					
are likely to be					
remote areas or					
conflict-prone					
areas					

Potential Risks and Impacts	Proposed Mitigation Measures	Phase		Indicators for monitoring		Frequency of Monitoring		Responsibilit y for implementati on and monitoring	Estima ted Cost <sup>5</sup> (USD)
		Planning	Implementat ion		Continuous	Monthly	Quarterly		
Work-related accidents and injuries are likely to increase during civil work  OHS risks including infection and disease  Poor working conditions: unsafe	Implement the ESHS provisions on OHS (Annex 6)		Х	Safety measures     in place	Х			Implementati on: Contractors/B PHS partner Monitoring: UNICEF/SPs	

work environment	Comply with the	X	a # of reported	X	loral or or baki	
Conflicts over provision of employment or contracts	<ul> <li>Comply with the LMP (Annex 4), in addition to:</li> <li>Apply fair terms and conditions shall be applied for workers (guided by relevant laws and WB ESS2)</li> </ul>	^	<ul> <li># of reported disputes by workers through workers' GRM</li> <li>per cent of cases resolved in a timely manner (according to the workers' GRM records)</li> </ul>	*	Implementati on: Contractors/ BPHS partners  Monitoring: UNICEF	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase	•	Indicators for monitoring		equency Monitori		Responsibilit y for implementati on and monitoring	Estima ted Cost <sup>5</sup> (USD)
		Planning	Implementat ion		Continuous	Monthly	Quarterly		

	promptly address their workplace grievance (see LMP Annex 4 and ESHS Annex 6) • The project shall respect the workers' rights of labour unions and freedom of association		<ul> <li>Records of composition of the labour force (male/female, communities of origins of the workers)</li> </ul>		
Delayed payment of workers for work leading to complaints and conflict	<ul> <li>○ Implement and monitor LMP</li> <li>○ Implement and monitor workers'</li> <li>GRM</li> <li>○ Communication / awareness campaign of payment mechanisms</li> </ul>	X	<ul> <li># of cases filed         with workers'         GRM that relate         to payment</li> <li>Records of cases         filed through         workers' GRM</li> <li>Evidence of         communication         and awareness         campaigns</li> <li>No of delayed         payments as         evidenced by         record of</li> </ul>	X	Implementati on: Contractors  Monitoring: UNICEF

Potential Risks and Impacts	Proposed Mitigation Measures	Phase	•	Indicators for monitoring		equency Monitori		Responsibilit y for implementati on and monitoring	Estima ted Cost <sup>5</sup> (USD)
		Planning	Implementat ion		Continuous	Monthly	Quarterly		

Labour standards are not in accordance to national laws and international standards	Implement and monitor the LMP (Annex 4) in addition to:  O Develop and implement OHS Plan for workers  Listing of all staff and titles, new hires and departure	X	0	payments made by SP with date OHS Plan in place and compliance status available Staff lists available Site visits conducted	X		Implementati on: Contractors Monitoring: UNICEF	
	osites visited and records reviewed, major findings, and actions taken by contractor, engineer, or others, including authorities—to include date, inspector or auditor name							
Insecurity of all project workers		X	0	# of workers trained	X		Implementato in:	

Potential Risks and Impacts	Proposed Mitigatio n Measures	Phase	Indicators for monitoring	Frequency of Monitoring	Responsibilit y for implementat i on and monitoring	Estim a ted Cost <sup>5</sup> (USD)
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		Planning	Implement at ion		Continuous	Monthly	Quarterly	
and project affected persons	<ul> <li>Ensure         compliance with         all requirements         in the SMF.</li> <li>Incident reports         submitted on         time for UNICEF         review.</li> <li>SPs attend the         UNICEF COP and         other         membership         groups (INSO, SLT         etc) as required         in the SMF.</li> <li>SPs produce and         maintian activity         level SRAs and         Security         Measures</li> <li>Monitoring of         SPs SRM</li> </ul>			<ul> <li>Security incidents are reported by SPs and subsequently by UNICEF as per the agreed timelines.</li> </ul>			X	UNICEF/SP /Contractors Monitoring: UNICEF
Child and forced labour	Comply with the LMP (Annex 4) in addition to: Set a minimum age for all types of work (in compliance with national laws and ESS2) and document age of	X	X	<ul> <li># of         violations         (child, forced         labour)</li> <li># of         existence/maint         enance of a         labour registry         of all contracted         workers with         age         verification</li> </ul>	X			Implementati on: Contractors/I Ps  Monitoring: UNICEF/SP

Potential Risks and Impacts	Proposed Mitigation Measures	Phase	,	Indicators for monitoring	Frequency of Monitoring			Responsibilit y for implementati on and monitoring	Estima ted Cost <sup>5</sup> (USD)
		Planning	Implementat ion		Continuous	Monthly	Quarterly		
	workers upon hiring  Conduct a track record search of the contractors at the bidding process (record of health and safety violations, fines, consult public documents related to workers' rights violations etc.)  Raise awareness of communities/suppli ers to not engage in child labour			o # of awareness campaigns					
Discrimination against women in employment	<ul> <li>Recruitment and retention policies that enable fair working conditions and women's safe and equitable participation.</li> <li>List number of workers, indication</li> </ul>		Х	<ul> <li>List of         workers         available</li> <li>Number of         complaints         related to         discriminatio         n on the</li> </ul>	Х			Implementati on: Contractors/ SPs  Monitoring: UNICEF	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase		Indicators for monitoring	Frequency of Monitoring			Responsibilit y for implementati on and monitoring	Estima ted Cost <sup>5</sup> (USD)
		Planning	Implementat ion		Continuous	Monthly	Quarterly		
	of origin, gender, and skill level (unskilled, skilled, supervisory, professional, management).			basis of gender					
Emergency Preparedness and Response	<ul> <li>Develop site specific emergency plan</li> </ul>	Х		Emergency plan in place	х			Implementati on: Contractors/ SPs  Monitoring: UNICEF	
Construction works exacerbate soil erosion, erosion and sedimentation of rivers from earth works and run- off/flash floods	<ul> <li>Avoid or minimize clearing of vegetation during preparation for rehabilitation and construction works in the targeted areas, to reduce chances of soil erosion</li> <li>Proceed to revegetation when</li> </ul>	X	X	o per cent of land with vegetation rehabilitated	X			Implementati on: Contractors  Monitoring: UNICEF/SPs	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase		Indicators for monitoring		Frequency of Monitoring			Responsibilit y for implementati on and monitoring	Estima ted Cost <sup>5</sup> (USD)
		Planning	Implementat ion			Continuous	Monthly	Quarterly		
	possible with native trees and vegetation after vegetation removal • Carefully design siting of the activity site to avoid soil erosion • Rehabilitation of borrow pits sites after extraction									
Soil pollution	<ul><li>Implement ESHS    measures on waste    management    (Annex 6)</li></ul>	Х	Х	0	Evidence of proper waste disposal Evidence of presence of a drainage system	Х			Implementati on: Contractors  Monitoring: UNICEF	
Dust emissions (air quality)	Implement ESHS air quality (Annex 6)		Х	0	Evidence that spraying of water is conducted # of workers that have been	Х			Implementati on: Contractors  Monitoring: UNICEF/ SPs	

Potential Risks and Impacts	Proposed Phase Mitigation Measures		Indicators for Phase monitoring			equenc Jonitori		Responsibilit y for implementati on and monitoring	Estima ted Cost <sup>5</sup> (USD)
		Planning	Implementat ion		Continuous	Monthly	Quarterly		
				provided with dust masks					
Noise/vibrations	Implement ESHS noise prevention measure (Annex 6)	X	Х	<ul> <li>Evidence of muffler installation where relevant</li> <li># of workers supplied with ear plugs/muffler s</li> </ul>	Х			Implementati on: Contractors Monitoring: UNICEF/SPs	
Water bodies contamination from uncontrolled spillages, wastewater	Implement ESHS provisions on waste management, handling of hazardous and toxic materials (Annex 6) in addition to O Avoid high water table areas during excavations and		Х	Evidence of proper waste disposal	Х			Implementati on: SPs Monitoring: UNICEF/SPs	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase		Indicators for monitoring	Frequency of Monitoring			Responsibilit y for implementati on and monitoring	Estima ted Cost <sup>5</sup> (USD)
		Planning	Implementat ion		Continuous	Monthly	Quarterly		
	use appropriate technologies such as lining Equip drainage systems with a water/oil separator Limit the use of chemical products such as oils, lubricants and fuels; and control/supervise its usage								

Waste generation (liquid, solid, hazardous), for example from use of fossil fuel- based equipment and machinery	Implement ESHS provisions on waste management, handling of hazardous and toxic materials (Annex 6) in addition to  • Ensure provision of waste bin on site • Efficient use of materials • Avoid and minimize waste production		Х	0 # ir s 0 # fi	of waste bins on site of of control of contr	Х			Implementati on: Contractors  Monitoring: UNICEF SPs	
Potential Risks and Impacts	Proposed Mitigation Measures	Phase	•		monitoring		equency Ionitorii		Responsibilit y for implementati on and monitoring	Estima ted Cost <sup>5</sup> (USD)
		Planning	Implementat ion			Continuous	Monthly	Quarterly		
	<ul> <li>Ensure waste is recycled/reused before opting to dispose</li> <li>Train workers in waste management</li> </ul>									
Disposal and management of large amounts of excavated material generated from construction	Implement ESHS provisions on construction waste management (Annex 6)		Х	0	Excavated material disposed at designated sites	Х			Implementati on: Contractors Monitoring: UNICEF/SPs	

Improper disposal of human waste which may contaminate soils and water bodies	Implement ESHS provisions in lavatories and showers (Annex 6)		X	0	-# of sanitary facilities on construction sites	Х	Implementati on: Contractors  Monitoring: UNICEF/ SPs	
Improper disposal of medical waste	Implement Medical Waste Management and Infection Prevention	Х	Х	0	Health Facility Medical Waste and Infection prevention	Х	Implementati on: BPHS partner  Monitoring: UNICEF	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase	•	Indicators for monitoring		Frequency of Monitoring		Responsibilit y for implementati on and monitoring	Estima ted Cost <sup>5</sup> (USD)
		Planning	Implementat ion		Continuous	Monthly	Quarterly		
				procedures in place					

Common pests attracted to dirty environment (rats, cockroaches, flies) are also disease vectors, transporting germs from the toilet to nearby human settlement (latrines)  Latrines have the possibilities of spread and contact of pathogens and other pollutants with humans at the household level	<ul> <li>Provide hand         washing facilities         and water in all the         sanitation         infrastructures</li> <li>Ensure proper         cleaning of toilets</li> <li>Ensure and provide         training on cleaning         of toilet</li> <li>Use biopesticides         to manage pests</li> </ul>	X	<ul> <li>Hand washing facilities provided</li> <li>Records of hygiene status of toilets available</li> <li># of trainings provided to the community</li> </ul>	X	Implementati on: Contractors / communities/ SPs  Monitoring: UNICEF/SPs
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Potential Risks and Impacts	Proposed Mitigation Measures	Phase		Indicators for monitoring		Frequency of Monitoring		Responsibilit y for implementati on and monitoring	Estima ted Cost <sup>5</sup> (USD)
		Planning	Implementat ion		Continuous	Monthly	Quarterly		

Latrine usage and maintenance can be at risk should communities fail to recognize the health benefits linked to such technology  Road safety traffic accidents/fatalitie s due to presence of traffic of heavy machinery through the communities	o Locate facilities in a location that is safe for women, girls and young children to use without risks to safety and security o Construct facilities in a manner that will be accessible to children and PWDs Implement the ESHS requirements (Annex 6) for road safety and traffic safety	Х	X		Checklist developed and used to identify safe locations Designed with provisions to allow for children's access and accommodates PWDs  Evidence of speed limit signs Evidence of speed bumps Evidence of warning signs Evidence of local procurement	X	Implementati on: Contractors  Monitoring: UNICEF/SPs  Implementati on: Contractors  Monitoring: UNICEF/SPs
Fire outbreaks as a result of improper use/ storage of flammable products	<ul> <li>Provide fire hazard training to construction workers</li> <li>Provide evacuation route</li> </ul>		X	0	number of workers trained Clearly marked evacuation routes	X	Implementati on: Contractors/ BPHS Partners

otential Risks and Impacts	Proposed Mitigation Measures	Phase		Indicators for monitoring		equency Monitori		Responsibilit y for implementati on and monitoring	Estima ted Cost <sup>5</sup> (USD)
		Planning	Implementat ion		Continuous	Monthly	Quarterly		

	<ul> <li>Adequately store         <ul> <li>any flammable             materials</li> </ul> </li> <li>Implement life and         <ul> <li>fire safety             measures (Annex 3)</li> </ul> </li> </ul>		<ul> <li>Life and fire safety</li> <li># of health facilities which meet all local building codes and fire department regulations</li> </ul>		Monitoring: UNICEF/SPs
Risk of wildfires	<ul> <li>Proper siting of activity area at sufficient distance of any forest areas</li> <li>Appropriate storage areas for chemicals, hazardous and flammable materials</li> </ul>	X	<ul> <li>Storage areas available</li> </ul>	X	Implementati on: Contractors  Monitoring: UNICEF/SPs
Health and safety risks from creation of open pits following extraction of construction	Implement ESHS requirements on vector borne diseases (Annex 6) in addition to:	Х	<ul> <li>Presence of         unusable         impounded water</li> <li>Presence of fences</li> <li>Number of         incidents /injuries</li> </ul>	X	Implementati on: Contractors  Monitoring: UNICEF

Potential Risks and Impacts	Proposed Phase Mitigation Measures	Indicators for monitoring	Frequency of Monitoring	Responsibilit y for implementati on and monitoring	Estima ted Cost 5(USD)
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		Planning	Implementat ion		Continuous	Monthly	Quarterly		
materials (for children and communities and breeding grounds for mosquitoes)	<ul> <li>Fence the area and post warning signs at entrance</li> </ul>			caused by open pits					
Increase of transmission of infectious diseases (COVID-19)	o Implement ESHS requirements on Covid 19 (Annex 6)		Х	<ul> <li># of reported         cases on sites</li> <li>Evidence of PPE         used and social         distancing among         workers</li> </ul>	Х			Implementati on: Contractors/ SPs  Monitoring: UNICEF	
Damages to infrastructure caused by natural disasters (flooding, earthquakes, snow avalanches/flashfl oods, landslides) causing EHS and OHS issues among workers and communities	<ul> <li>Build resilient         <ul> <li>infrastructures in safe</li> <li>locations, careful</li> <li>siting and conception</li> <li>at project design</li> <li>phase</li> </ul> </li> <li>Training of workers         <ul> <li>and communities on</li> <li>emergency</li> <li>procedures</li> </ul> </li> <li>Make provisions for         <ul> <li>a health unit or first</li> <li>aid and prepare an</li> </ul> </li> </ul>	Х	Х	Evidence of an     ERP in place     # of trainings     conducted     # first-aid kit/help     on site     or nearby		Х		Implementati on: UNICEF/BPHS partners  Monitoring: UNICEF/SPS	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase	Indicators for monitoring	Frequency of Monitoring	Responsibilit y for implementati on and monitoring	Estima ted Cost 5(USD)
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		Planning	Implementat ion		Continuous	Monthly	Quarterly		
SEA/SH increase among workers and communities members	emergency response plan for each activity  Comply with the measures prescribed in the SEA Action Plan and ESHS provisions on prevention of SEA (Annex 6), in addition to: Sensitization/comm unity awareness of project workers and the benefiting communities; Implementation of a designated GRM to handle these		X	<ul> <li># of SEA/SH         related         complaints         recorded</li> <li>per cent of         complaints         handled in timely</li> <li>per cent of         workers that         have signed CoCs.</li> <li>-# of SEA/SH         community         awareness         trainings</li> </ul>		X		Implementati on: Contractor/B PHS partners  Monitoring: UNICEF/SPs	
	types of complaints  o Each contractor to implement CoC for the workers with specific obligations with regards to SEA/SH								

Potential Risks Proposed and Impacts Mitigation Measures		Phase		Indicators for monitoring		Frequency of Monitoring			Responsibilit y for implementati on and monitoring	Estima ted Cost <sup>5</sup> (USD)
		Planning	Implementat ion			Continuous	Monthly	Quarterly		
	<ul> <li>All project staff         should be trained in         SEA awareness         programs for         workers and the         beneficiary         community</li> </ul>									
Exclusion of vulnerable groups in the stakeholder engagement processes	Implement the SEP in addition to Oldentify minority, marginalized and disadvantaged communities in each of the participating districts. OEstablish and maintain continuous liaison with the communities including marginalised groups to sensitize them on the project	Х		<ul> <li># of marginalize minority and disadvantaged groups per districts</li> <li># of meetings held</li> <li># of participants to the consultation belonging to a vulnerable category</li> <li>Level of participation to the programs (in per cent of tota number of people eligible)</li> </ul>	;	X			Implementati on: UNICEF/BPHS partners  Monitoring: UNICEF/SPs	

Potential Risks and Impacts	Proposed Mitigation Measures	Phase		Indicators for monitoring		Frequency of Monitoring		Responsibilit y for implementati on and monitoring	Estima ted Cost <sup>5</sup> (USD)
		Planning	Implementat ion		Continuous	Monthly	Quarterly		
	objectives and design.  Use innovative communication means to reach the communities with information on the project.  Establish GRM structures in the communities and sensitize the communities on the project GRM.  Maintain a system of receiving and responding to any project concerns by the communities								

# Annex 8. WFP E&S Screening Tool for Component 3 Subprojects

E&S S	tandar	d 1: Sustainable Natural Resources Management		Level	Annotations
1	Could	the project alter the land cover of forests, wetlands, farming land,	No		The project will not alter any land cover nor wetlands.
	grazin	g land, or other landscapes of ecological or economic importance?			
Si	1.1	Could the project degrade, fragment, or convert the vegetation cover	N/Y	Medium	
1 is yes		in an area (contiguous or cumulative) of 1 to 10 ha?			
1	1.2	Could the project degrade, fragment or convert the vegetation cover	N/Y	High	
Ħ		in an area (contiguous or cumulative) of more than 10 ha?			
2	Could	the project alter the quantity or quality of groundwater, surface	No		The project is not related to this domain/field.
	water	, or sea water?			
	2.1	Could the project include the rehabilitation or construction of dams,	N/Y	Medium	
		weirs, reservoirs, or ponds that are more than 3m high/deep OR have			
		a storage capacity of more than 400m <sup>3</sup> ?			
	2.2	Could the project include the rehabilitation or construction of	N/Y	Medium	
		irrigation schemes that cover more than 20ha OR withdraw more			
		than 1000m <sup>3</sup> per day OR withdraw more than 10% of the average flow			
		of a stream or river?			
	2.3	Could the project include the rehabilitation or construction of dams,	N/Y	High	
		weirs, reservoirs, or ponds that are more than 5m high/deep OR have			
2 is yes	2.4	a storage capacity of more than 10,000m <sup>3</sup> ?	A1 /2 /		
. is	2.4	Could the project include the rehabilitation or construction of	N/Y	High	
if 2		irrigation schemes that cover more than 100ha OR withdraw more			
		than 5000m <sup>3</sup> per day OR withdraw more than 50% of the average flow of a stream or river?			
	2.5	Could the project involve groundwater extraction in arid or semi-arid	N/Y	Medium	
	2.5	areas?	IN/ I	ivieululli	
	2.6	Could the project contaminate water sources that are used for	N/Y	High	
	2.0	human consumption above national or WHO limits?	11/ 1	nigii	
		numan consumption above national of write limits:			
3		the project degrade soils, increase soil erosion, or increase sediment	No		Not related to this domain.
		n surface water flows?			
3 is	3.1	Could the project convert between 1 and 10 ha of land into	N/Y	Medium	
= = >		agricultural land or infrastructure, without introducing soil			

		conservation measures appropriate to the topography of the landscape?			
	3.2	Could the project convert more than 10 ha of land into agricultural land or infrastructure, without introducing soil conservation measures appropriate to the topography of the landscape?	N/Y	High	
	3.3	Could the project rehabilitate or develop irrigation schemes, without introducing measures to mitigate possible water logging and salinization?	N/Y	Medium	
	3.4	Could the project introduce agricultural practices or agrochemical inputs that are likely to decrease soil quantity and quality?	N/Y	Medium	
E&S S	Standar	d 2: Ecosystems and Biodiversity		Level	Annotations
4		the project negatively affect natural habitats, ecosystems, or versity?	No		Not related to this domain.
	4.1	Could the project fragment, reduce or degrade the natural habitat of autochthonous animal, plant or insect species?	N/Y	Medium	
	4.2	Could the project lead to an increase in unregulated or unlicensed collecting, hunting, or fishing?	N/Y	Medium	
Q4 is yes	4.3	Could the project negatively affect endangered or protected animal, insect, or plant species, or their habitats?	N/Y	High	
if Q4	4.4	Could the project alter the migration corridors of endangered or protected animals?	N/Y	High	
	4.5	Could the project introduce species that are alien or genetically modified?	N/Y	Medium	
	4.6	Could the project introduce alien or genetically modified species that may be invasive?	N/Y	High	
5	Could	the project lead to negative impacts in protected areas?	No		Not related to this domain.
Q5 is yes	5.1	Could activities of the project be located in the buffer zone of an area that is protected by national or international law or conventions?	N/Y	Medium	
÷	5.2	Could the project be located within, or have impacts on, an area that is protected by national or international law or conventions?	N/Y	High	
E&S S		d 3: Resource Efficiency and Waste and Pollution Management		Level	Annotations
6		the project increase the consumption of fuel (wood, charcoal, fossil or water?	No		Not related to this domain.
if Q6 is	6.1	Could the project lead to a permanent increase in the consumption of fuel (wood, charcoal, or fossil fuels) compared to the situation before the project?	N/Y	Medium	

	6.2	Could the project lead to a sustained withdrawal of more than 1000m <sup>3</sup> of freshwater per day OR the withdrawal of more than 10% of the average flow of a stream or river?	N/Y	Medium	
	6.3	Could the project lead to a sustained withdrawal of more than 5000m <sup>3</sup> of freshwater per day OR the withdrawal of more than 50% of the average flow of a stream or river?	N/Y	High	
7		the project involve substances or activities that could pollute the air, rwater?	No		Not related to this domain.
	7.1	Could the project lead to the pollution of the air, soil or water that is	N/Y	Medium	
	7.1	temporary, limited in scale, and remediable?	14/ 1	Wicaiaiii	
if Q7 is yes	7.2	Could the project lead to the pollution of the air, soil or water that is continuous OR large-scale OR irremediable?	N/Y	High	
if Q.	7.3	Could the project contaminate water sources that are used for human consumption?	N/Y	High	
	7.4	Could the project involve chemicals or materials that are subject to international bans?	N/Y	High	
8	canno	the project generate waste (hazardous or non-hazardous) that t be reused, recycled, or adequately disposed of by the beneficiaries, or partners?	No		Not related to this domain.
Q8 is yes	8.1	Could the project produce non-hazardous waste that cannot be reused, recycled, or adequately disposed of by the beneficiaries, WFP, or partners?	N/Y	Medium	
if Q8	8.2	Could the project generate any quantity of hazardous waste that cannot be adequately disposed of by WFP, partners or beneficiaries?	N/Y	High	
9	Could	the project lead to increased use of agrochemicals?	No		Not related to this domain.
Q9 is yes	9.1	Could the project lead to an increase in the use of synthetic agrochemicals that could easily be substituted by natural products or techniques?	N/Y	Medium	
if Q9	9.2	Could the project involve the use of pesticides that are subject to international bans?	N/Y	High	
E&S S	tandar	d 4: Climate Change		Level	Annotations
10		the project increase greenhouse gas emissions from fuel combustion,	No		Not related to this domain.
	_	es in land cover, or other sources?			
ji 01	10.1	Could the project lead to a permanent increase in the consumption of fuel (wood, charcoal, or fossil fuels) compared to the situation before	N/Y	Medium	

		the project?			
	10.2	Could the project degrade or convert the vegetation cover in an area (contiguous or cumulative) of 1 to 10 ha?	N/Y	Medium	
	10.3	Could the project degrade or convert the vegetation cover in an area (contiguous or cumulative) of more than 10 ha?	N/Y	High	
11		the project expose more people to natural hazards or make some e more vulnerable to natural hazards?	No		Not related to this domain.
	11.1	Will the project create infrastructure or assets that could increase the exposure of any person to natural hazards?	N/Y	Medium	
/es	11.2	Could the project change people's behaviour or livelihood strategies, increasing their exposure to natural hazards?	N/Y	Medium	
Q11 is yes	11.3	Could the project make any person more dependent on assets that would likely be damaged by natural hazards in the next 5 years?	N/Y	Medium	
ij	11.4	Could the project make any farmer more dependent on a smaller number of crops?	N/Y	Medium	
	11.5	Could the project reduce the livelihood options of any person?	N/Y	Medium	
E&S	Standar	d 5: Protection and Human rights		Level	Annotations
12	Could the project violate the rights of some people (whether beneficiaries or not)?		Yes		Specifically for component 3, it is not expected that risk of child labour and forced labour will occur. Nevertheless, WFP is making considerations to prevent and avoid such risks of child labour and forced labour. WFP will ensure all partners continue to conduct risk screenings and develop/update
					interventions specific Environmental and Social Management Plans with processes and procedures to avoid the risk of child labour as per WFP's Guidance Note to Prevent the Use of Child Labour and ensure intervention specific ESMPs have provisions for avoidance of forced labour.
is yes	12.1	Could the project violate or limit the rights of people granted to them by international rights standards and national law?	N/Y	High	interventions specific Environmental and Social Management Plans with processes and procedures to avoid the risk of child labour as per WFP's Guidance Note to Prevent the Use of Child Labour and ensure intervention
<b>13</b> if Q12 is yes	12.2		N/Y N/Y Yes	High High	interventions specific Environmental and Social Management Plans with processes and procedures to avoid the risk of child labour as per WFP's Guidance Note to Prevent the Use of Child Labour and ensure intervention

	13.1	Could the targeting or implementation of the project be controlled by a subset of the target group?	Yes	Medium	addition to consultations and modalities above to ensure inclusion and fair selection of beneficiaries a Community Feedback mechanism (CFM)will be made operational to capture grievances/incidents/compliments etc  Targeting of beneficiaries takes places based on WFP determined criteria. However, there have been occasions that De facto Authorities (DfA) and community leaders have been seen to try and influence the targeting process.  Ensuring that its activities and benefits reach all eligible beneficiaries without discrimination is at the core WFP operations, as outlined in the WFP Protection and Accountability Policy, and its Protection Guidance Manual.  Based on these, the operational design for the project, mitigation measures are put in place.
if Q13 is yes					Ensuring that its activities and benefits reach all eligible beneficiaries without discrimination is at the core WFP operations, as outlined in the WFP Protection and Accountability Policy, and its Protection Guidance Manual. Based on these, the operational design for the project, and existing practices:  - For project activities, WFP conducts field visits to assess how existing risks, such as safety, security, GBV (including SEA) risks, are emerging and are relevant to WFP's operations, and understand how WFP activities may create harm or reduce risks for project beneficiaries. This analysis also identifies and assesses risks for disadvantaged and vulnerable groups. This analysis is done 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 languages. This includes information, awareness raising and training on the GM/CFM, on protection from SEA.  - 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 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 regional languages, providing different intake channels.
	13.2	Could the project perpetuate existing socio-economic inequalities?	Yes	Medium	Socio-economic inequalities would potentially be perpetuated based on the accuracy of the targeting process. If the targeting is done incorrectly, controlled or influenced by external actors, including DfA and community leaders, then this can have a negative repercussion on socio-economic inequalities.  Mitigating measures on targeting, which would subsequently impact have been elaborated above.
	13.3	Could the project further limit vulnerable people's access to assets?	No	High	
	13.4	Could the project change tenure arrangements in such a way that	No	High	

		they create, reinforce, or exacerbate socio-economic inequalities or conflicts?			
14	Could	Could the project lead to the involuntary resettlement (either physical or			
		economic) of people?			
is yes	14.1	Could the project lead to the involuntary economic or physical resettlement of up to 20 people?	N/Y	Medium	
if Q14 is yes	14.2	Could the project lead to the involuntary economic or physical resettlement of more than 20 people?	N/Y	High	
15	Could	the project lead to child labour?	No		
Q15 is yes	15.1	Could the project involve the paid or unpaid employment of minors below the age of completion of compulsory schooling (which should be no less than 14 years) in light or regular work?	N/Y	High	
if Q15	15.2	Could the project involve the paid or unpaid employment of minors of less than 18 years in activities that could jeopardise their health, safety or morals?	N/Y	High	
16	Could the project negatively affect any cultural heritage (either tangible or				
	intang	•			
is yes	16.1	Could the project negatively affect tangible or intangible cultural heritage in a <i>temporary</i> AND <i>remediable</i> way?	N/Y	Medium	
if Q16 is yes	16.2	Could the project negatively affect any tangible or intangible cultural heritage with implications that are <i>permanent</i> OR <i>irremediable</i> ?	N/Y	High	
17	Could	the project involve or affect indigenous peoples or their territories?	No		
if 017	17.1	Could the project be implemented in territories managed or claimed by indigenous peoples?	N/Y	Medium	
E&S 6	: Gend	er Equality		Level	Annotations
18	Could the project lead to gender-based inequalities, discrimination, exclusion, unwanted workload and/or violence?		Yes		Risks of women experiencing GBV (at community and intra-household level) on account of the project may increase during targeting, distribution and assistance utilization stages, noting also an overall lack of legal and societal recourse to GBV in Afghanistan. These risks apply to both women participants and women non-participants of the project.  The GBV/SEA Action Plan as well as the CFM will ensure to minimize the potential risks which may otherwise result in increased GBV/SEA.
۷,	18.1	Could the project lead to increased unpaid work (including domestic and care work) for women and/or girls?	No	Medium	
if Q18 is <i>yes</i>	18.2	Could the project amplify gender inequities in decision-making in households and/or communities?	Yes	Medium	The project does not require significant additional labour or time-use of households beyond collection of, and registration for, assistance. Project could amplify women's lower decision-making power in the household and community over resources (specifically, utilization of assistance from the project) with associated risks of GBV. It is however also possible that decision-making of women could increase in some households.  WFP has Standard Operating Procedures for receiving, managing and, where applicable, referring SEA cases, including referrals to GBV services. WFP will

	18.3	Could the project amplify existing conditions for gender-based inequalities or create new conditions for inequalities?  Could the project exacerbate or lead to gender-based violence?	No No	High High	ensure that the GM/CFM applies these procedures throughout the project.  Designated WFP staff are trained on how to manage SEA incidents and capacity building and monitoring plans shall be implemented in line with the GBV Action Plan prepared for the World Bank.  Therefore, the operationalization of the GBV/SEA Action Plan as well as the CFM will ensure to minimize the potential risks which may otherwise result in gender inequality.
E&S S	Standar	d 7: Community Health, Safety and Security		Level	Annotations
19		the project increase tension or conflicts within the community, with bouring communities, or with workers from outside the community?	Yes		The project carries a medium risk to the community health, safety and security, linked to the potential of inclusion or exclusion error of WFP's targeting:  - Community consultations are formed to support partners during the targeting process. These consultations are composed of nominated community representatives who are key members of the community.  - WFP implements spot checks after targeting and registration processes to minimize the possibility of inclusion/exclusion errors and redress problems around targeting.  - WFP provides transparent information on project activities, benefits, eligibility criteria to communities, through accessible channels, trusted intermediaries, in relevant ethnic languages, and trains partners to share the same during each stage of the project cycle.  - 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
	19.1	Could activities exacerbate existing, or create new conflicts within the community or between communities?	Yes	Medium	Targeting of this project could impact underlying community tensions.  Mitigation measures will be put in place accordingly as per above.
yes	19.2	Could activities exacerbate existing violent conflicts or create new violent conflicts within the community or between communities?	No	High	
if Q19 is <i>yes</i>	19.3	Could the project decrease opportunities for income or employment without providing new alternatives for income or employment?	No	Medium	
if C	19.4	Could the project lead to influx of alien workers (less than 10% of the host community)?	No	Medium	
	19.5	Could the project lead to influx of a large alien workforce (more than 10% of the host community)?	No	High	
20		the work arrangements in the project violate the labour rights of the employed by the project or pose a risk to their health or safety?	No		

	20.1	Could the project disregard fundamental labour rights or principles as defined by national and international standards?	N/Y	Medium	
Q20 is yes	20.2	Could the project pose a risk to the health or safety of people through the use of heavy equipment, heavy means of transportation, or hazardous materials?	N/Y	Medium	
) <u>ii</u>	20.3	Could the project cause permanent injury or the death of people through the use of heavy equipment, heavy means of transportation, or hazardous materials?	N/Y	High	
21	Could diseas	the project facilitate the spread of diseases or introduce new ses?	No		
s yes	21.1	Could the project facilitate the spread of endogenous or existing diseases in the community?	N/Y	Medium	
Q21 is yes	21.2	Would the project develop water infrastructure that could facilitate the spread of water-borne diseases?	N/Y	Medium	
÷	21.3	Could the project introduce new diseases in the community?	N/Y	High	
E&S S	Standar	d 8: Accountability to Affected Populations		Level	Annotations
22	Is there a risk that the voice of some key stakeholders would not be heard in the design, implementation or monitoring of the project?		Yes		There are multiple barriers to accessing marginalised and minority communities., including due to insecurity, restrictions posed by DfA and language ones. WFP will ensure that multiple channels for communication and engagement, including remote ones, and in person and on the ground access is facilitated to ensure all relevant stakeholders are engaged. However, challenges with the operational context remain and it may occur that some, due to the multiple access barriers that exist, some main stakeholders maybe missed and their inclusion more limited within the programme cycle. However, this will be an exception rather than the norm.
	22.1	Could some relevant stakeholders feel that they have not been adequately consulted?	Yes	Medium	As mentioned above, access to communities is often quite challenging in Afghanistan and some stakeholders may feel they are not adequately consulted. WFP will continue to adopt measures (previously highlighted) to reach all relevant stakeholders and will continue to make the Community Feedback Mechanism (CFM) available and disseminate information about it so that all stakeholders are able to reach WFP and provide to us the information they wish.
Q22 is yes	22.2	Could some relevant stakeholders, in particular people or groups who are already prone to marginalization, be pressed not to participate in	Yes	Medium	It may happen that more marginalised communities are restricted by DfA, community leaders or local population to engage with WFP. However, WFP has an understanding of who are the marginalised communities and where they live and will always continue to negotiate access and consult them. In
Ħ		the consultations?  Could some relevant stakeholders, in particular people or groups who		Medium	addition. WFP will continue to make the Community Feedback Mechanism (CFM) available and disseminate information about it so that all stakeholders are able to reach WFP and provide to us the information they wish.  It may happen that more marginalised communities are restricted by DfA,

# Annex 9. Environmental and Social Risk Management Plan (ESMP) for Component 3

The following ESMP has been developed following the risk screening of Component 3 (rated Moderate, while the overall project is rated Substantial). WFP's cooperating partners will re-screen the interventions to confirm the risk classifications and mitigation measures, so the ESMP below will serve as a guiding template to ensure CPs are aware of the requirements for ES implementation, monitoring, and reporting.

#### Introduction

The Maternal and Child Benefit Program (MCBP) will complement the provision of health and nutrition services (component 1) by providing a combination of cash transfers and Social and Behavioural Change Communication (SBCC) to women that are pregnant and or have children under two years of age in selected districts in order to increase utilization of health and nutrition services, improving related behaviours and practices, and increase access to nutritious foods. Globally, cash transfers targeted to households with young children have been found to improve child nutritional outcomes, particularly when combined with SBCC. The program also aims to contribute to empowering women by making them the main recipients and providers of benefits. Child health and nutrition are among the few 'spaces' women in Afghanistan are allowed to be involved in. The project will be implemented under third-party implementation arrangements by WFP.

**Sub-component 3.1: Cash transfers.** This sub-component will finance quarterly cash transfers of US\$60 for over 18 months to women beneficiaries, aiming at incentivizing the utilization of health and nutrition services and increasing access to nutritious foods. Payments will be delivered at designated cash distribution points, which beneficiaries will be informed about along with assigned payment days. Beneficiaries will attend the SBCC sessions before collecting cash benefits. The program will make use of multiple payment providers to deliver cash benefits, including commercial banks, money service providers (MSP) and mobile network operators (MNO). Payments will be mostly delivered in cash. However, wherever possible, payments will be delivered digitally using bank's debit and pre-paid cards at ATMs or mobile money (mobile app/QR code) through agents and/or merchants.

Sub-component 3.2: Social and behavioural change communication (SBCC). This sub-component will finance all the costs incurred by the CPs contracted by WFP to implement the SBCC sessions. SBCC will be mainly delivered through structured sessions for beneficiary women, aiming at enticing good health and nutrition practices and the utilization of relevant health and nutrition services. Beneficiary women will be encouraged to bring children under 2 to the sessions. Parallel sessions for male companions will also be organized. The sessions will be delivered quarterly around the designated cash distribution points and prior to collecting cash benefits. Messages will be delivered utilizing videos, charts/banners, handouts, registration cards, etc. Given the large number of beneficiary women, and the time constraints on nutrition counsellors (NCs)—who would also need to be present at the health facilities to attend the beneficiaries that need their services, facilitators will be contracted to lead the sessions. Facilitators will encourage beneficiaries to go to the health facilities right after receiving the cash benefits.

**Sub-component 3.5: Nutrition-sensitive livelihoods.** This new sub-component will contribute to the sustaining of health and nutrition outcomes, and the financial protection related to access and use of health and nutrition services, by building more diversified livelihoods of selected vulnerable households. The sub-component will target vulnerable youth aged 18-35 from a subset of vulnerable households who are un- or underemployed in the informal sector and interested in receiving skilling and support to start or expand nutrition-sensitive income generating activities (IGAs), while ensuring that 50 percent of these beneficiaries are female. Beneficiaries will receive business and life skills training and at the end of the training, will be encouraged to identify a nutrition-sensitive IGA. Those skills will be selected based on relevance for beneficiaries, potential on local markets, and contributions to climate resilience and adaptation. At the end of each training, beneficiaries will receive a one-time Conditional Cash Transfer (CCT) to facilitate nutrition-sensitive IGAs. In MCBP districts, these CCTs will complement MCBP cash and SBCC benefits. The

sub-component will therefore strengthen the MCBP as a safety net delivery platform. In places where school feeding programs supported under EERA and ADB are active, beneficiaries of this sub-component will be connected to local markets and school kitchens to sell their products. This sub-component will only finance (a) beneficiary profiling and market assessment, (b) the development and delivery of a training program, (c) support CCT beneficiaries in developing a business plan, (d) a one-time CCT, and (e) coaching of CCT beneficiaries.

## Risks and potential adverse impacts

The below identifies the potential environmental and Social identified through the risk screening including labour), Health, and Safety risks associated with project activities and the corresponding mitigation measures. Measures to avoid/reduce the risks or to mitigate/offset the negative impacts are also outlined.

Potential Risk	Mitigation Measure	Timeframe	Responsibility for Implementation
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.	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 WFP Protection and Accountability Policy, and its Protection Guidance Manual.  - WFP provides transparent information on project activities, benefits, eligibility criteria to communities, through accessible channels, trusted intermediaries, such as community, implementing partners and does so in relevant languages.  - As part of our regular programming, 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.  - WFP ensure that its GM/CFM is accessible to disadvantaged and vulnerable groups through raising awareness among these groups and in relevant languages, providing different intake channels etc.  - WFP monitors the GM/CFM to ensure adaptive management.  Stakeholder engagement and grievance risks will be managed through:  • The project's operational design, and  • SEP.	SEP updating and GRM operationalis ation throughout the project cycle	
beneficiary selection for these	<ul> <li>WFP implements spot checks after targeting and registration processes to minimize the possibility of inclusion/exclusion errors and redress problems around targeting.</li> <li>WFP provides transparent information on project activities, benefits, eligibility criteria to communities, through accessible channels, trusted intermediaries, in relevant ethnic languages, and trains partners to share the same during each stage of the project cycle.</li> </ul>	consultations before implementation and operationalisation of the grievance mechanism throughout the project	

	<ul> <li>Exclusion risks will be managed through:</li> <li>The project's operational design, further detailed in the Project Operations Manual; and,</li> <li>Stakeholder Engagement Plan (SEP)</li> </ul>		
Risks to community members Risks to community members may include safety/security risks in collecting assistance, discrimination/exclusion, and SEA risks.	<ul> <li>WFP's Protection and Accountability Policy, its Protection Guidance Manual and Standard Operating Procedures on Protection from SEA address how to assess and manage risks to community members. Based on these:         <ul> <li>For project activities, WFP conducts field visits to assess how existing risks, such as safety, security, GBV (including SEA) risks, are emerging and are relevant to WFP's operations, and understand how WFP activities may create harm or reduce risks for project beneficiaries. This process also identifies and assesses risks for disadvantaged and vulnerable groups. These are, where-ever possible, inclusive and accessible consultations with development partners, NGOs, religious and community leaders, and community-based organizations, as well as participatory protection assessments.</li> <li>WFP regularly develops, reviews, adapts mitigation measures that are integrated into project activity design and implementation. These may include, but are not limited to, the mitigation measures below.</li> <li>WFP provides transparent information on project activities, benefits, eligibility criteria to communities, through accessible channels, trusted intermediaries, in relevant languages. This includes information, awareness raising and training on the GM/CFM, on protection from SEA.</li> <li>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.</li> <li>WFP ensures that its grievance mechanism GM/ CFM is accessible to all through raising awareness among these groups and in relevant regional languages, providing different intake channels.</li> <li>WFP has Standard Operating Procedures for receiving, managing and, where applicable, referring SEA cases, including referrals to GBV services. WFP will ensure that the GM/CFM applies these procedures thr</li></ul></li></ul>	SEP updati ng and GRM operat ionalis ation throug hout the projec t cycle	WFP

	Community health and safety risks will be managed through:  • The project's operational design,  • SEP,  • World Bank Good Practice Note on SEA/SH where applicable,  • WFP SEA/SH Action Plan		
Child labour and forced labour: due to the fragility of the country, child and forced labour may occur.	WFP as per WFP's Guidance Note to Prevent the Use of Child Labour does not allow the employment of minors in its programmatic activities and operations.  WFP will ensure partners have processes to mitigate the risk of child labour and forced labour with partners by ensuring:  • Additional capacity and updating of partner level ESMPs to capture the potential risks of child labour and forced labour and propose clear mitigation measures for the risks.  ○ Partners processes to verify the ages of workers and ensure compliance with the minimum age of workers  ○ Ensure specific labour provisions are applied to partners e.g. maximum working hours, wages.  Child labour and forced labour risks will be managed through:  • The updated project risk screening  • The Project's Environmental and Social Management Plan (ESMP) and partner level ESMPs  • WFP's Guidance Note to Prevent the Use of Child Labour  • WFP's Community Feedback Mechanism (CFM)  • Stakeholder Engagement (SEP)	Intervention level risk screening and manageme nt plan (ESMP) with partners. SMP, GRM application throughout the project.	WFP and partners
Security: The security situation remains fragile in Afghanistan with Islamic State – Khorasan (ISK) and other armed groups active. There is a low intensity conflict situation with terrorist and criminal acts conducted to	<ul> <li>(UNSMS) policies and processes, including the Saving Lives Together framework (SLT), for UNICEF personnel and premises.</li> <li>Identify security threats to the project and establishment of clear channels of communication to communicate changes in threat levels between the various parties involved in project implementation</li> </ul>	SMP application throughou t project cycle	Head of Security for WFP Afghanistan in coordination with the Afghanistan UN Designated Official (DO) and

challenge the DfA. Violence or the threat of it often accompanies criminal acts across the country.  The ongoing conflict creates a challenging security situation.  Security risks may include:  Threats to the personal safety of the workers due to armed clashes, IED strikes;  Robberies targeting workers and staff;  Threat of physical violence for individuals involved in the transportation of supplies or provision of the operational cost services;  Detention including arrest or kidnapping during the course of, or as a result of, project-related work; and,  Road traffic accidents.	<ul> <li>Require WFP personnel to comply with WFP's vehicle fleet and road safety/management policies, procedures, and guidelines</li> <li>Train WFP staff and require contractors and partners to provide adequate training to its staff, on safety and security considerations tailored to the local context in Afghanistan, including on conflict sensitive communication, cultural awareness, implementation, and risk management</li> <li>Community health and safety risks will be managed through:</li> <li>Security Management Plan.</li> </ul>		the Principal Security Adviser, UNDSS
Natural disasters: Afghanistan is prone to Natural disasters which may impact project activities implementation, staff ability to work, and infrastructure and project resources, for example:	<ul> <li>Monitor the weather conditions and develop emergency response plans to ensure the safety of direct and contracted staff. Establish communication mechanisms between offices and entities to share information as situations evolve</li> <li>Adapted working hours at sites to avoid work during the heavy weather period</li> <li>Provide flexible scheduling and alternative work modalities</li> </ul>	Monitoring throughout the project cycle as per the ESMP and SMP	WFP

•	Heat waves	Use as much as possible local workers to provide the	
•	Severe winter	services, to avoid workers traveling long distances	
•	Floods		
•	Cyclones		
•	Earthquakes and landslides		

# Monitoring plan

**Below is an outline of the project identified environmental and social risks**, Indicators to monitor the possible negative impacts, Indicators to monitor the implementation of the management measures, Methodology, frequency of each indicator, and responsibilities for monitoring.

Environmental & Social Risk Management and Monitoring						
Identified risk: 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.	Monitoring indicator	Methodology, frequency	Responsibility			
<ul> <li>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 WFP Protection and Accountability Policy, and its Protection Guidance Manual:         <ul> <li>WFP provides transparent information on project activities, benefits, eligibility criteria to communities, through accessible channels, trusted intermediaries, such as community, implementing partners and does so in relevant languages.</li> <li>As part of our regular programming, 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.</li> <li>WFP ensure that its GM/CFM is accessible to disadvantaged and vulnerable groups through raising awareness among these groups and in relevant languages, providing different intake channels etc.</li></ul></li></ul>	Percentage of beneficiaries reporting they were provided with the information on the GM/CFM.	Quarterly	WFP			
Identified risk: Exclusion	1	1				
The targeting and beneficiary selection for these activities carries risks that certain communities, ethnic minorities, or vulnerable households may be excluded from project benefits.	Monitoring indicator	Methodology, frequency	Responsibility			
Ensuring that its activities and benefits reach the most vulnerable and in-need households is at the core WFP operations, as outlined in the WFP Protection and Accountability Policy, and its Protection Guidance Manual.  Based on these:  - Community consultations are formed to support partners during the targeting process. These consultations are composed of nominated community representatives who are key members of the community.  - WFP implements spot checks after targeting and registration processes to minimize the possibility of inclusion/exclusion errors and redress problems around targeting.  - WFP provides transparent information on project activities, benefits, eligibility criteria to communities, through accessible channels, trusted intermediaries, in relevant ethnic languages, and trains partners to share the same during each stage of the project cycle.  - 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.	Percentage of beneficiaries reporting they were provided with accessible information about WFP programmes, including PSEA	Quarterly	WFP			

Identified risk Risks to community members			
<b>Risks to community members</b> : Risks to community members may include safety/security risks in collecting assistance, discrimination/exclusion, COVID-19 risks, and SEA risks.	Monitoring indicator	Methodology, frequency	Responsibility
WFP's Protection and Accountability Policy, its Protection Guidance Manual and Standard Operating Procedures on Protection from SEA address how to assess and manage risks to community members. Based on these, for project activities, WFP conducts field visits to assess how existing risks, such as safety, security, GBV (including SEA) risks, are emerging and are relevant to WFP's operations, and understand how WFP activities may create harm or reduce risks for project beneficiaries. This analysis also identifies and assesses risks for disadvantaged and vulnerable groups. This analysis is done 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, 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 languages. This includes information, awareness raising and training on the GM/CFM, on protection from SEA.  - 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 regional languages, providing different intake channels.  - WFP has Standard Operating Procedures for receiving, managing and, where applicable, referring SEA cases, including referrals to GBV services. WFP will ensure that the GM/CFM applies these procedures throughout the project. Designated WFP staff are trained on how to	Percentage of beneficiaries reporting no safety concerns experienced as a result of their engagement in WFP programmes	Quarterly	WFP
manage SEA incidents and capacity building and monitoring plans shall be implemented in line with the GBV Action Plan prepared for the World Bank.			
Identified risk: Security		1	<u> </u>
The security and conflict situation remains fragile in Afghanistan with Islamic State – Khorasan (ISK) and other military groups active. The ongoing conflict creates a challenging security situation, in addition to the risk of road traffic accidents due to poor infrastructures.	Monitoring indicator	Methodology, frequency	Responsibility
<ul> <li>Implement project SMP in line with the United Nations Security Management Systems (UNSMS) policies and processes, including the Saving Lives Together framework (SLT), for UNICEF personnel and premises;</li> <li>Identify security threats to the project and establishment of clear channels of communication to</li> </ul>	Number of Security situation updates internally within WFP to ensure safety of	Monthly	WFP

communicate changes in threat levels between the various parties involved in project implementation;	operations		
Follow deconfliction procedures before any field mission for direct staff;			
Ensure updated and real-time mapping of roads and potentially affected areas;			
<ul> <li>Suspend, if required, project activities in areas with active conflict or where political and governance risks cannot be effectively managed;</li> </ul>			
<ul> <li>Through the stakeholder engagement plan, ensure that authorities and influencers at all levels are adequately engaged;</li> </ul>			
<ul> <li>Require WFP personnel to comply with WFP's vehicle fleet and road safety/management policies, procedures, and guidelines; and,</li> </ul>			
<ul> <li>Train WFP staff and require contractors and partners to provide adequate training to its staff, on safety and security considerations tailored to the local context in Afghanistan, including on conflict sensitive communication, cultural awareness, implementation, and risk management.</li> </ul>			
<ul> <li>Monitor contactors SRM performance and ensure security incidents are reported to meet ESIRT requirements.</li> </ul>			
Identified risk: Natural Disasters		l	
Afghanistan is prone to Natural disasters which may impact project activities implementation, staff ability to work, and infrastructure and project resources, for example: Heat waves; Severe winter; Floods; Cyclones; and, earthquakes and landslides.	Monitoring indicator	Methodology, frequency	Responsibility
Mitigation strategies include monitoring the weather conditions and develop emergency response plans to ensure the safety of direct and contracted staff. Establish communication mechanisms between offices and entities to share information as situations evolve.	Number of Early Warning Forums, and/or other climate and warning products, conducted/disseminated within WFP to mitigate the impact on project activities implementation	Monthly	WFP

#### Costs

#### Costs of risk management measures

WFP will have in place dedicated ESS personnel which will include an Environmental and Social Specialist, as well as leveraging existing capacity within the WFP Afghanistan Country Office to ensure the timely and expert implementation and monitor of ESS requirements. The Environmental/Social Specialist, supported by project staff, will conduct the management, monitoring and reporting of environmental and social risk management aspects throughout project implementation.

#### WFP Cooperating Partners

WFP will contract Cooperating Partners (CPs), including NGOs, to implement sub-component 3.1 (the cash transfer) and subcomponent 3.2 (SBCC activities). 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. 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. Cooperating Partners will be responsible for the following within the ESMF:

- Implement / comply with all relevant environmental and social requirements as defined in the contracting documents;
- Implement and manage a GRM; and,
- Report on implementation of the implemented components of the ESMF including grievances, accidents, and incidents.

#### **Complaints and Feedback Mechanisms**

WFP will be using its existing Grievance Mechanism, internally called Community Feedback Mechanism (CFM). This is a toll-free hotline that can be reached via phone and a dedicated email address. Wherever possible, an information desk is available also at distribution sites to provide information and collect feedback and at the moment led by our cooperating partners. Since 15 August 2021, WFP quickly transformed its CFM, ensuring it was fit for purpose and capable of responding within the highly fluid and uncertain context. WFP has made large strides to ensure its CFM is accessible, safe, and trusted by communities such as scaling from 2 operators on 15 August 2023, to 26 today, of which 20 are women. This effort has resulted in an increase in monthly cases from several hundred in August 2021 to approximately 11,000 to 13,000/month today.

## Reporting schedule

WFP will provide updates on the implementation of the applicable E&S tools and instruments in line with relevant indicators as per the ESCP, SEP, ESMF, and SMP in the quadrimester progress report.

## **Annex 10. UNICEF Exclusion List**

#### Figure 1: Exclusion List

- Production or activities involving harmful or exploitative forms of forced labour/harmful child labour or safety concerns for workers and communities.
- Activities involving production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements.
- Activities involving production or trade in weapons and munitions.
- Activities that have engagement with gambling, casinos and equivalent enterprises.
- Activities that have linkages to trade in wildlife or wildlife products regulated under the Convention on International Trade in Endangered Species of Wild Fauna and Flora.
- Activities that include production or trade in radioactive materials.
- Production or trade in or use of un-bonded asbestos fibres.
- Activities that involve production or trade in wood or other forestry products from unmanaged forests.
- Activities that have production, trade or use of products containing Polychlorinated Biphenyls.
- Activities that have production, trade, storage, or transport of significant volumes of hazardous chemicals, or commercial scale usage of hazardous chemicals.
- Activities that support production or trade in pharmaceuticals subject to international phase outs or bans.
- Activities that support production or trade in pesticides / herbicides subject to international phase outs or bans
- Activities that support production or trade in ozone depleting substances are subject to international phase out.
- Activities that impinge on the lands owned, or claimed under adjudication, by indigenous peoples, without full documented consent of such people.
- Investments in extractive industries; commercial logging,
- Dams, or projects involving allocation or conveyance of water, including inter-basin water transfers or activities resulting in significant changes to water quality or availability.
- Subprojects with high environment or high social risks.
- Activities that would significantly convert natural habitats or significantly alter potentially important biodiversity and/or cultural heritage areas.
- Activities that would require land acquisition, donation, and/or restrictions on land use and
- Activities in disputed areas.

## **Annex 11. WFP Exclusion List**

#### Figure 2: 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, archaeological sites, and other cultural structures
- Activities that cause or lead to forced labour 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