



Republic of Mozambique
Ministry of Planning and Development

**ENVIRONMENTAL AND SOCIAL MANAGEMENT
FRAMEWORK (ESMF)**

**Northern Mozambique Social Cohesion and Community Resilience
for Jobs Program (MozCommunity – P514199)**

Appraisal Draft

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List of Acronyms

Acronym	Definition
ADIN	Agency for Integrated Development of the North (Agência de Desenvolvimento Integrado do Norte)
ANOP	National Administration of Public Works (Administração Nacional de Obras Públicas)
ARP	Abbreviated Resettlement Plan
CESMP / C-ESMP	Contractor Environmental and Social Management Plan
CERC	Contingent Emergency Response Component
CF	Community Facilitator
CoC	Code of Conduct
CoE	Center of Excellence
CSO	Civil Society Organization
DIT	District Implementation Team
DLDP	District-Level Development Plan
E&S	Environmental and Social
EIA	Environmental Impact Assessment
EHSG	Environmental, Health and Safety Guidelines (World Bank Group)
ERP	Emergency Preparedness and Response Plan
ESCP	Environmental and Social Commitment Plan
ES COP	Environmental and Social Code of Practice
ESF	Environmental and Social Framework (World Bank)
ESIA	Environmental and Social Impact Assessment
ESIRT	Environmental and Social Incident Response Toolkit
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESRC	Environmental and Social Risk Classification
ESS	Environmental and Social Standard (ESS1–ESS10)
FCV	Fragile and Conflict-Affected Situations
GBV	Gender-Based Violence
GALS	Gender Action Learning System
GM / GRM	Grievance Mechanism / Grievance Redress Mechanism
HIV/AIDS	Human Immunodeficiency Virus / Acquired Immunodeficiency Syndrome
IDP	Internally Displaced Person
ILO	International Labour Organization
LMP	Labor Management Procedures
LRP	Livelihood Restoration Plan
MPD	Ministry of Planning and Development
MOPHRH	Ministry of Public Works, Housing and Water Resources
NCRP	Northern Crisis Recovery Project
NRCF	Northern Regional Consultative Forum
OHS	Occupational Health and Safety
PAP	Project-Affected Person
PASP	Productive Social Action Program
PCU	Program Coordination Unit
PDO	Project Development Objective
PPE	Personal Protective Equipment

Acronym	Definition
PPT	Provincial Project Team
RP	Resettlement Plan
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
SEP	Stakeholder Engagement Plan
SPD	Standard Procurement Document
STD	Sexually Transmitted Disease
TPM	Third-Party Monitoring
VLD	Voluntary Land Donation
WB	World Bank

1. Executive Summary

The Northern Mozambique Social Cohesion and Community Resilience for Jobs Program (MozCommunity – P514199) aims to strengthen community and government collaboration and improve economic inclusion and access to resilient infrastructure in northern Mozambique.

The Program will be implemented by the Ministry of Planning and Development (MPD). The provincial governments and targeted districts will lead the implementation of the project while MPD will provide technical and quality assurance support to the districts and provinces. The Northern Integrated Development Agency (ADIN) will be the main coordinating entity of the activities at the regional level, across the three provinces.

The Program supports investments in community infrastructure, basic services, livelihoods, and institutional strengthening through decentralized implementation mechanisms involving district authorities and local communities.

Due to the community-driven nature of investments, the specific locations and designs of many subprojects will only be determined during implementation. Consequently, the Program has prepared this Environmental and Social Management Framework (ESMF) to establish procedures for identifying, assessing, and managing environmental and social risks and impacts associated with project activities.

Environmental and Social Risk Classification

The Program has been assigned an Environmental and Social Risk Classification (ESRC) of Substantial in accordance with the World Bank Environmental and Social Framework. Environmental risks are primarily associated with small-scale construction activities that may cause:

- localized soil disturbance and erosion,
- vegetation clearing,
- improper disposal of construction waste,
- pollution from construction materials,
- occupational health and safety risks.

These impacts are expected to be site-specific, temporary, and reversible, and can be effectively mitigated through standard environmental management measures.

Social risks relate primarily to the fragility and displacement context in Northern Mozambique. Key risks include:

- community health and safety risks associated with construction activities,
- tensions between host communities and internally displaced persons (IDPs),
- labor influx and worker-community interactions,
- risks of sexual exploitation and abuse and sexual harassment (SEA/SH),
- limited institutional capacity for environmental and social risk management at local levels.

Environmental and Social Management Approach

This Environmental and Social Management Framework establishes the procedures for managing environmental and social risks across all Program activities.

Key elements include:

- **Environmental and social screening procedures** to identify risks associated with each subproject.
- **Preparation of site-specific environmental and social instruments**, including Environmental and Social Management Plans (ESMPs), where required.
- **Implementation of mitigation measures** addressing pollution prevention, occupational health and safety, community health and safety, and biodiversity protection.
- **Labor management measures** consistent with the Labor Management Procedures (LMP) including Workers' Grievance Mechanism.
- **Stakeholder engagement and grievance redress mechanisms** to ensure inclusive participation and accountability.

Detailed operational procedures will draw upon the experience and tools developed under the **MozNorte Environmental and Social Management Framework**, which provides additional guidance for implementation.

Institutional Arrangements

The Program will establish a **Program Coordination Unit (PCU)** responsible for overseeing environmental and social risk management.

Key institutional responsibilities include:

- **ADIN** – overall coordination of environmental and social management activities;
- **Provincial and District authorities** – local monitoring and stakeholder engagement.

The PCU will include dedicated environmental and social specialists responsible for supervising implementation of environmental and social measures.

2. Introduction

2.1 Background and Context

Northern Mozambique has experienced significant socio-economic challenges in recent years, driven by a combination of structural poverty, climate vulnerability, and escalating insecurity. Since 2017, an armed insurgency in Cabo Delgado province has led to widespread displacement, disruption of livelihoods, and destruction of infrastructure. The humanitarian and development consequences of this crisis have been substantial. Large numbers of internally displaced persons (IDPs) have relocated to neighboring districts and provinces, including Nampula, Niassa, and Zambezia, placing additional pressure on already limited public services, natural resources, and local infrastructure.

Host communities are often required to accommodate displaced populations while facing similar levels of poverty and vulnerability. This dynamic has increased the need for interventions that simultaneously address service delivery gaps, livelihood opportunities, and social cohesion between host communities and displaced populations. In addition to the conflict-related challenges, Northern Mozambique is highly vulnerable to climate-related hazards, including tropical cyclones, flooding, and extreme rainfall events. These risks further exacerbate the fragility of local infrastructure, agriculture systems, and rural livelihoods.

The Northern Mozambique Social Cohesion and Community Resilience for Jobs Program (MozCommunity) has been designed to address these challenges by supporting community-driven development, strengthening local institutions, and improving access to essential services and livelihood opportunities.

2.2 Purpose of the Environmental and Social Management Framework

Given the community-driven nature of the Program, many of the specific investments to be financed under the MozCommunity Program will only be identified during implementation. These investments may include small-scale infrastructure, rehabilitation of community facilities, and other local economic development activities selected through participatory processes.

Because the precise locations, technical designs, and environmental and social characteristics of individual subprojects are not yet known, it is not feasible to prepare detailed environmental and social assessments for all potential activities at this stage.

To address this situation, the Program has prepared this Environmental and Social Management Framework (ESMF).

The ESMF establishes a systematic process to:

- identify environmental and social risks and impacts associated with subprojects,
- determine appropriate environmental and social instruments required for each activity,
- define mitigation measures and management procedures,
- clarify institutional roles and responsibilities for environmental and social management,
- ensure compliance with national legislation and the World Bank Environmental and Social Framework.

This ESMF therefore functions as a “living framework”, providing guidance for environmental and social risk management throughout the Program lifecycle. Site-specific environmental and social instruments will be prepared during implementation in accordance with the procedures defined in this framework.

2.3 Relationship with Other Environmental and Social Instruments

The ESMF forms part of the broader environmental and social risk management framework for the MozCommunity Program.

Key complementary instruments include:

- Environmental and Social Commitment Plan (ESCP) – which defines the actions and measures the borrower will implement to manage environmental and social risks.
- Stakeholder Engagement Plan (SEP) – which outlines the approach for engaging affected communities and stakeholders.
- Labor Management Procedures (LMP) – which define labor standards, occupational health and safety requirements, and grievance mechanisms for project workers.
- SEA/SH Risk Assessment and Action Plan – which establishes measures to prevent and respond to risks of sexual exploitation and abuse and sexual harassment.

In addition, site-specific instruments that may be prepared during implementation include:

- Environmental and Social Management Plans (ESMPs),
- Contractor Environmental and Social Management Plans (C-ESMPs),
- Resettlement instruments, where required,
- Biodiversity management measures.

Where appropriate, the Program will draw upon operational procedures and tools developed under the Northern Mozambique Rural Resilience Project (MozNorte - P174635) and Northern Crisis Recovery Project (NCRP - P176517) Environmental and Social Management Framework, ensuring consistency and efficiency in implementation.

2.4 Scope of the ESMF

This ESMF applies to all activities financed under the MozCommunity Program and provides guidance for managing environmental and social risks associated with:

- small-scale community infrastructure,
- rehabilitation of public facilities,
- local public works,
- livelihood and social cohesion activities,
- technical assistance and institutional strengthening activities.

The framework establishes procedures for screening, assessment, mitigation, monitoring, and reporting of environmental and social risks throughout the Program lifecycle.

Monitoring and Reporting

Environmental and social performance will be monitored through:

- regular supervision by implementing agencies,
- contractor monitoring and reporting,
- quarterly environmental and social monitoring reports,
- grievance tracking mechanisms,
- third-party monitoring where necessary due to security constraints.

Updating the ESMF

This document represents an appraisal-stage ESMF, prepared to meet the requirements of the World Bank Environmental and Social Framework for projects with Substantial environmental and social risks. The ESMF will be updated and expanded within three months after Program effectiveness, incorporating additional operational guidance, detailed screening tools, and expanded annexes. This Environmental and Social Management Framework (ESMF) is a live and dynamic document and will be reviewed and updated throughout project implementation, as necessary, to reflect changes in project design, implementation context, activities, or emerging environmental and social risks and impacts, and to ensure that mitigation measures remain appropriate and effective.

3. Program Description

3.1 Program Development Objective

The objective of the Northern Mozambique Social Cohesion and Community Resilience for Jobs Program (MozCommunity) is to strengthen social cohesion and improve access to resilient infrastructure in districts affected by fragility, conflict, and displacement in Northern Mozambique. The Program aims to support vulnerable communities—including both host communities and internally displaced persons (IDPs)—through investments that improve service delivery, strengthen local governance, and promote inclusive development.

3.2 Program Components

The MozCommunity Program is organized into five components, as described in the table below.

Component	Key Sub-component
<p>Component 1: Strengthening Community and Government Collaboration (US\$7 million)</p>	<p><u>Sub-component 1.1: Mobilizing dialogue forums (US\$2 million).</u> This sub-component will activate the NRCF to become a dynamic and inclusive semi-annual northern cross-province dialogue forum, where the governors from the three provinces and government and community representatives from the districts will jointly discuss and monitor the implementation of provincial development strategies. The project will finance the cost of meetings and workshops, as well as exchanges within the region. The project will also support the development of a communication strategy to ensure that the objectives of the dialogue forums and the process of constituting them and selecting participants is clearly communicated to all stakeholders as a way of building complicity and ensuring transparency. The sub-component will also activate provincial observatories (one in each northern province) that will bring together district government and community representatives to monitor the implementation of district development strategies; and mobilize existing and new district-level Consultative Councils to facilitate regular dialogue between the districts and community groups and between different groups at the community level, by financing their operating costs and training. The Project Operations Manual will specify the level of representation and role of communities in these forums and establish protocols for transparent and accountable decision-making processes.</p> <p><u>Sub-component 1.2: Developing District-level Development Plans (US\$5 million).</u> This sub-component will finance the incorporation of climate resilience considerations into MPD’s 2025 participatory planning and budgeting tool and provide training to district, provincial, and central project teams on its use. Under the oversight of the National Directorate for Planning (DNP), the District Implementation Team (DITs), with the support of Community Facilitators (CFs), will engage with the selected localities to carry out a community mapping exercise to identify needs, and develop community projects (one per locality) that answer key needs, to be financed under sub-component 3.1 within a financing envelope determined by the locality’s population size. Consultative committees of elected representatives of IDPs, host communities, returnees, men, women, youth, and people with disabilities will</p>

Component	Key Sub-component
	<p>identify the projects. The selected projects will prioritize creating jobs and facilitating engagement with the private sector and address issues of accessibility, manpower, power sources, and availability of local skills and services to ensure projects' viability. Each project will include an operation and maintenance (O&M) plan specifying the revenue source used to sustain the investments. The projects will be compiled into District-level Development Plans (DLDPs) to be reviewed and approved by the District Executive Committee, headed by the District Administrator, who will ensure that projects reflect recorded community needs, are eligible, viable, and sustainable, are aligned with the financial envelope, do not have negative impacts on neighboring localities, and create local jobs. The approved DLDPs will be endorsed by the provincial government. The CFs will be competitively recruited as volunteers, trained by the district teams, and provided with stipends and communication tools to coordinate the mapping exercises. The Project Operations Manual will outline transparent and inclusive project selection and approval processes.</p>
<p>Component 2: Improving Access to Economic Opportunities and Jobs (US\$22 million)</p>	<p><u>Sub-component 2.1: Supporting cash-for-work, youth upskilling, and women and youth socio-economic enterprises (US\$20 million). This component will finance:</u></p> <p>a. <u>Cash-for-work support to vulnerable people (US\$8,000,000):</u> This sub-component will provide cash transfers and livelihoods support to the most vulnerable households in the 56 districts to mitigate welfare shocks, stabilize household consumption, and promote economic inclusion, while mitigating risks of recruitment to violent extremism. Cash transfers will also reduce people's reliance on climate-sensitive and environmentally degrading practices, including charcoal production, wood extraction, bush burning for hunting, and unsustainable fishing, particularly in coastal and riverine districts. The design and implementation of this intervention will build on the model of the World Bank Productive Social Action Program (PASP), a package that includes a mix of public works, basic training, and economic inclusion components. The Project Operations Manual will provide adaptations to the PASP model, informed by local conflict and political economy analysis and social inclusion considerations to ensure equitable access to resources, to avoid exacerbating tensions, prioritizing women and youth, and to strengthen community resilience. This intervention will strengthen Mozambique's social protection systems, such as targeting tools, existing registry of vulnerable families, digital payments mechanisms, and others, in consideration of the fragile context and by stabilizing incomes, the intervention will reduce pressure on natural resources and support more sustainable livelihood strategies. This sub-component will use strategic partnerships with third-party providers for implementation.</p>

Component	Key Sub-component
	<p>b. <u>Youth upskilling (US\$4,000,000):</u> SICsCenters of Excellence (CoEs) - one in each province—such as tertiary technical colleges or universities, will deliver technical and vocational training, technology skills courses, artisanal courses, mentorship, and certification guidance to youth in professions relevant to local market demand. The SICCoEs will also provide training to participating youth on climate risk management, resilient business practices and integration of resilience measures into business plans. The Project Operations Manual will define transparent, inclusive, and conflict-sensitive procedures for beneficiary identification and selection.</p> <p>c. <u>Support to women and youth socio-economic enterprises (US\$8,000,000):</u> The project will provide grants to existing women and youth enterprises to, inter alia, implement their business plans, expand operations, and generate employment opportunities, including for youth graduating from the SICCoEs. The grants will help enterprises integrate measures to reduce their climate risks, such as basic planning for floods, droughts, or other disruptions that may affect their operations. The grant amount will be split evenly between women enterprises and youth/people with disabilities enterprises. A grants manual will specify eligibility criteria and a transparent application process that mitigates risks of elite capture.</p> <p>Youth upskilling and support to socio-economic enterprises will be informed by a market needs assessment to be carried out in consultation with private sector actors, including from the LNG industry, to determine the existing and future economic opportunities and market access and thus ensure viability and sustainability of the skills provided and enterprises supported.</p> <p><u>Sub-component 2.2: Providing GBV and psycho-social support services (US\$2 million).</u> This sub-component will focus on GBV prevention and response through an integrated package of awareness raising and community engagement activities to make sure that trauma survivors are in a better position to participate in economic activities. Targeted social and behavior change communication campaigns on GBV, sexual and reproductive health, and mental health will be implemented across the three provinces using theater, radio, and printed materials, complemented by community engagement through the GALS and other psycho-social support programs in districts with high IDP populations to address underlying drivers of GBV. The project will strengthen existing district and community level structures to improve GBV prevention, referral, and response by reinforcing the capacity of community-based mechanisms and strengthening</p>

Component	Key Sub-component
	<p>coordination and referral pathways with formal service providers to ensure timely access to medical, psycho-social, and legal support. Implementation will be carried out in close coordination with the Capacity Building for Improved GBV Response Project (P502471) to ensure alignment and leverage ongoing capacity building and system strengthening efforts at district and community levels.</p>
<p>Component 3: Improving access to climate resilient infrastructure (US\$66 million)</p>	<p><u>Sub-component 3.1:</u> Providing climate resilient community infrastructure (US\$20 million). This sub-component will finance the design, development/rehabilitation, and supervision of the community infrastructure projects selected by the communities under sub-component 1.2, and preferably ones that enable the participation of community members in labor and monitoring, as financed under sub-component 2.1. The design of the infrastructure will be carried out by the relevant district departments with the support of the provincial Public Works Department and ANOP, while the tendering will be done by the district secretaries under the leadership of the District Permanent Secretary.</p> <p><u>Sub-component 3.2.</u> Providing climate resilient public infrastructure (US\$46 million). This sub-component will finance the construction, rehabilitation, and supervision of climate resilient public infrastructure works that were prioritized by the government under the Northern Crisis Recovery Project (NCRP, P176157) to serve IDPs in relocation sites, host communities, and returnees in ten districts in Cabo Delgado.¹⁴ The infrastructure includes administrative post headquarters offices, locality secretariat offices, primary and secondary schools, health centers, district hospitals, houses for teachers, nurses, and doctors, community markets, multipurpose social spaces, and a water supply system. The sub-component will also finance the supervision of works and assessment of damage and vulnerabilities of public infrastructure in Niassa and Nampula provinces, and the preparation of bidding documents for the works by ANOP, for financing by Phase II. ADIN, in collaboration with ANOP and the provinces, will lead the implementation of this sub-component, while ANOP will provide technical designs and quality assurance to ensure resilient construction. Works will engage community members as laborers to enhance participation, ownership, and accountability, and to provide employment. Following completion, infrastructure under this sub-component will be handed over to the respective provincial and district authorities for service delivery to local populations, with support from active World Bank operations in the north.</p> <p>Income generated through employment under sub-components 3.1 and 3.2 is expected to reduce dependence on natural resource extraction. Wages will enable households to access more durable and climate-resilient construction materials, reducing the use of</p>

Component	Key Sub-component
	locally sourced materials and contributing to more resilient housing practices.
Component 4: Improving Project Management and Coordination and Financing a Learning Agenda (US\$5 million).	This component will finance the operating costs of an ADIN-housed Program Coordination Unit (PCU), Provincial Project Teams (PPTs) and DITs that will coordinate and manage the project from fiduciary, E&S risk management, grievance redress, and M&E perspectives. It will also finance the incremental operating costs of a Steering Committee (SC) and the regional and district dialogue forums and the costs of communication activities. The component will also support the development of a climate finance roadmap for MPD’s National Directorate of Climate Finance to secure climate finance for the Northern Region to further enhance community resilience. Finally, this component will finance capacity evaluations, impact assessments, perception surveys, and localized needs assessments in support of the program’s learning agenda. The component’s costs reflects these expenses and the expected elevated costs of work in remote and at-risk areas.
Component 4: Contingent Emergency Response (CERC) (US\$0)	This component will enable access to rapid financing by providing for a possible reallocation of uncommitted project funds in the event of a natural disaster, either by a formal declaration of emergency by the national or provincial government or upon a formal request from the Government of Mozambique. A CERC Manual and an Emergency Action Plan will be prepared separately and approved by the World Bank, which will constitute a disbursement condition for the CERC. If this component is activated, the project will be restructured to reallocate funds, and to revise the PDO, indicators, and implementation arrangements as needed. The CERC activities will be carried out in accordance with the CERC Manual and the Emergency Action Plan.

The CERC Manual to be prepared for the Project will include a description of the environmental and social risk assessment and management arrangements if the CERC component becomes activated. This may include a CERC ESMF or an Addendum to this ESMF based on the subproject activities that will be funded under the CERC component. If such additional documentation or revision to documentation is needed, the [responsible party in the implementing agency] will prepare, consult, adopt, and disclose these in accordance with the CERC Manual, and implement the measures and actions necessary

3.3 Environmental and Social Risk Management Approach

Given that many investments will be identified during implementation, environmental and social risk management will follow a framework approach. Under this approach:

1. Subprojects will be screened using the environmental and social screening checklist.
2. Appropriate environmental and social instruments will be prepared as required.
3. Mitigation measures will be implemented and monitored during construction and operation.

Detailed procedures for this process are described in Chapter 7 of this ESMF.

Types of Eligible Activities

The Program will support small-scale community investments that contribute to resilience, social cohesion, and improved service delivery. Examples of eligible activities include:

- rehabilitation of community infrastructure;
- rehabilitation of small rural water supply systems;
- rehabilitation of small community access roads;
- construction or rehabilitation of small public service facilities;
- community livelihood activities;
- small public works aimed at improving local infrastructure.

All activities financed under the Program must comply with the environmental and social screening procedures defined in this ESMF.

Ineligible Activities (Negative List)

To ensure that environmental and social risks remain manageable, the Program will not finance activities that may generate significant adverse environmental or social impacts. The following activities are considered ineligible for financing under the MozCommunity Program:

- construction of large dams or reservoirs;
- activities that are high environmental risk that include industrial-scale agriculture, mining operations, large-scale irrigation schemes and activities involving hazardous chemical storage or handling;
- activities located within critical natural habitats or protected areas;
- activities involving significant conversion of natural habitats;
- activities requiring large-scale land acquisition or any type of temporary and/or permanent physical displacement;
- activities involving the use of hazardous materials at significant scale;
- activities that may cause significant cultural heritage impacts;
- activities that may generate significant or irreversible environmental impacts;
- activities involving forced labor or child labor.

Sub-projects identified during implementation will be screened against this Negative List before proceeding with environmental and social assessment.

4. Policy, Legal, and Institutional Framework

4.1 National Legal and Regulatory Framework

The MozCommunity Program will be implemented in accordance with the environmental and social legislation of the Republic of Mozambique. The national legal framework establishes principles for environmental protection, sustainable development, land management, and social safeguards. Key legal instruments can be found in Table 1 below.

Table 1: Relevant Mozambican E&S legal Instruments

Legal Instrument	CONTENT AND RELEVANCE
ENVIRONMENTAL IMPACT ASSESSMENT AND MANAGEMENT	
<i>Environment Law (Law No. 20/97, of 1 October)</i>	Defines the legal bases for the use and management of the environment, in order to ensure the sustainable development of the country. It defines the Environmental Impact Assessment (EIA) as an instrument that assists the Government of Mozambique in the decision-making process regarding the issuance of environmental licenses for development projects. The issuance of an environmental permit must precede any other required legal permits. Applicable to all public or private activities that may, directly or indirectly, affect the environment.
<i>Regulation on the Environmental Impact Assessment Process (Decree No. 54/2015, of 31 December)</i>	Establishes the rules on the environmental assessment process, namely the process of categorization of activities, the level and content of environmental studies required for the different categories, public participation process, review process, stages of environmental licensing (Provisional, Installation and Operation), responsibilities, inspections, fees and sanctions.
<i>Environmental Audit Regulation (Decree No. 32/2003)</i>	It defines the environmental audit as an objective and documented instrument for the systematic management and evaluation of the management and documentation system implemented to ensure the protection of the environment. Its purpose is to assess compliance with the operational and working processes with the environmental management plan, including the existing legal environmental requirements, approved for a given project.
<i>Regulation on Environmental Inspections (Decree No. 11/2006)</i>	It regulates the supervision, control and verification of the project's compliance with environmental protection standards at national level
<i>General Directive for the Preparation of Environmental Impact Assessments (Ministerial Diploma No. 129/2006, of 19 July)</i>	Sets out the format, general structure and content of the EIA report.
<i>General Directive for the Participation of Public Participation in the Environmental Impact Assessment Process (Ministerial Diploma No. 130/2006, of 19 July)</i>	Sets out the basic principles, methodologies and procedures for the Public Participation Process in the Environmental Impact Assessment process. It considers public participation to be an interactive process that starts at the design stage and continues throughout the project life cycle.
LAND AND RESETTLEMENT	
<i>Land Law (Law No. 19/97 of 1 October) and Land Law Regulation (Decree No. 66/98, amended by Decree No. 1/2003);</i>	It establishes as a main principle that land is owned by the State and cannot be sold, alienated, mortgaged or pledged, in accordance with the Mozambican constitution. It defines, at the level of the public domain, total and partial protection zones, and the following areas classified as partial protection zones (Art. 5 to 8) should be highlighted for this Project: <ul style="list-style-type: none"> - Primary roads and the adjoining 30-meter strip of land; - Motorways and four-lane roads and the adjoining 50-meter strip of land;

Legal Instrument	CONTENT AND RELEVANCE
	<p>- Installations and surface aerial conductors (..) of electricity, telecommunications (..) along the coast and the adjoining 50-meter strip of land on each side.</p> <p>In the event of the need to restrict the right to use and use the land for the installation of infrastructures of public interest, the public or private entity must compensate the holder of the right, in an amount that represents the actual damage for the non-use of the affected part, which will constitute the easement, (Art. 17)</p>
<p><i>Regulation on the Use of Roads and Their Protection Zones (Decree No. 109/2014)</i></p>	<p>It regulates the use of partial road protection zones, defining permissions and restrictions on their use."</p>
<p><i>Directive on the Expropriation Process for the purposes of Spatial Planning (Ministerial Diploma No. 181/2010)</i></p>	<p>It defines the procedures for payment of compensation: in cash (in a single instalment) or in kind (in the case of buildings or residential constructions it is made through the construction of equivalent property)</p> <p>Defines how compensation is calculated for properties (based on typology, importance, quality, location and depreciation) and for plants (based on age, growth period, average annual production, sale price) and annual crops (based on production per hectare)</p>
<p><i>Regulation on the Resettlement Process Resulting from Economic Activities (Decree No. 31/20012, of 8 August)</i></p>	<p>Establishes that the activity proponent is responsible for developing and implementing the resettlement plan and bearing the costs of the process. The approval of Resettlement Plans is the responsibility of the District Government (Art. 9.1) and will be preceded by the issuance of a favorable technical opinion from the sector responsible for territorial planning after hearing the sectors of agriculture, local administration and public works and housing (Art. 9.2).</p> <p>The Decree, in Article 10, establishes the Rights of the Affected Population - understood as those who have lost their assets (such as houses, livelihoods and other types of infrastructure) to see their level of income and standard of living restored, equal to or higher than the previous one</p>
<p><i>Technical Directive on the Process of Preparation and Implementation of Resettlement Plans (Ministerial Diploma No. 156/2014, of 19 September)</i></p>	<p>The aim is to put into practice the process of resettlement caused by economic activities, as outlined in Article 3(c) of the Decree 31/2012, which approves the Regulation on the process of Resettlement Resulting from Economic Activities.</p> <p>During the preparation of the Resettlement Plans, CTASR, through its District and Provincial Commissions, monitors the entire process, and must also pronounce on the choice of the site for resettlement, compensations, public consultations and implementation of the entire resettlement project.</p> <p>The technical directive sets out the procedures and steps to be followed in preparing the resettlement plan. The steps in resettlement plan preparation are as follows:</p> <ul style="list-style-type: none"> Phase 1. Physical and Socioeconomic Research Report. Phase 2. Resettlement Plan; Phase 3. The Action Plan for Resettlement Implementation.

LAND USE PLANNING AND RESETTLEMENT

Legal Instrument	CONTENT AND RELEVANCE
<p><i>Territorial Planning Law (Law No. 19/2007, 18 July)</i></p>	<p>It aims to ensure the organization of the national land and the sustainable use of its natural resources; the observance of legal, administrative and cultural conditions; to provide favorable conditions for the socioeconomic development of the country; the promotion of the quality of life of the population; and environmental protection and conservation.</p> <p>"Expropriation for public interest, necessity or utility gives rise to the payment of fair compensation, under the terms of the Law, to be calculated in order to compensate, among others: a) the loss of tangible and intangible assets; b) the rupture of social cohesion; c) the loss of production goods." (Art. 20).</p>
<p><i>Regulation of the Territorial Planning Law (Decree No. 23/2008, of 1 June)</i></p>	<p>Expropriation for the purposes of territorial planning is considered to be carried out in the public interest, when its final objective is to safeguard the common interest of the community, and may be declared in cases of (...) the acquisition of areas for the implementation of economic or social infrastructures with a great positive social impact (Art. 68)</p> <p>Expropriation is always preceded by a public declaration of the interest, necessity or public utility of the area to be expropriated (to be issued by the Government), in which the grounds for the expropriation are indicated. (Art. 69)</p> <p>Expropriation for public interest, necessity or utility always gives rise to the payment of fair compensation, to be made prior to the transfer of ownership or possession of the assets to be expropriated. The compensation must cover not only the real and current value of the expropriated property at the time of payment, but also the damage arising from and the loss of profits of the owner, resulting from the dispossession of his assets. (Art. 70)</p>
<p><i>Regulation for the Management and Planning of the Coastal Zone and Beaches (Decree No. 97/2020)</i></p>	<p>Conditions activities and enterprises in the coastal zone to their compatibility with the Maritime Spatial Planning Plan (POM), National Territorial Development Plan (PNDT) and Local Territorial and Environmental Planning Plans</p>
<p><i>Directive on the Expropriation Process for the purposes of Spatial Planning (Ministerial Diploma No. 181/2010)</i></p>	<p>It defines the procedures for payment of compensation: in cash (in a single instalment) or in kind (in the case of buildings or residential constructions it is made through the construction of equivalent property)</p> <p>Defines how compensation is calculated for properties (based on typology, importance, quality, location and depreciation) and for plants (based on age, growth period, average annual production, sale price) and annual crops (based on production per hectare)</p>
<p><i>Regulation on the Resettlement Process Resulting from Economic Activities (Decree No. 31/20012, of 8 August)</i></p>	<p>Establishes that the activity proponent is responsible for developing and implementing the resettlement plan and bearing the costs of the process. The approval of Resettlement Plans is the responsibility of the District Government (Art. 9.1) and will be preceded by the issuance of a favorable technical opinion from the sector responsible for territorial planning after hearing the sectors of agriculture, local administration and public works and housing (Art. 9.2).</p> <p>The Decree, in Article 10, establishes the Rights of the Affected Population - understood as those who</p>

Legal Instrument	CONTENT AND RELEVANCE
<p><i>Technical Directive on the Process of Preparation and Implementation of Resettlement Plans (Ministerial Diploma No. 156/2014, of 19 September)</i></p>	<p>have lost their assets (such as houses, livelihoods and other types of infrastructure) to see their level of income and standard of living restored, equal to or higher than the previous one</p> <p>Its objective is to operationalize the process of Resettlement Resulting from Economic Activities under Article 3(c) of Decree No. 31/2012, which approves the Regulation on the process of Resettlement Resulting from Economic Activities.</p> <p>During the preparation of the Resettlement Plans, CTASR, through its District and Provincial Commissions, monitors the entire process, and must also pronounce on the choice of the site for resettlement, compensations, public consultations and implementation of the entire resettlement project.</p> <p>The technical directive sets out the procedures and steps to be followed in preparing the resettlement plan. The steps in resettlement plan preparation are as follows:</p> <ul style="list-style-type: none"> Phase 1. Physical and Socioeconomic Research Report. Phase 2. Resettlement Plan; Phase 3. The Action Plan for Resettlement Implementation.

4.2 World Bank Environmental and Social Framework

The MozCommunity Program is financed by the World Bank and will therefore be implemented in accordance with the World Bank Environmental and Social Framework (ESF). The ESF includes ten Environmental and Social Standards (ESSs), which define requirements for identifying and managing environmental and social risks in investment projects. The following Environmental and Social Standards are relevant to the Program:

Environmental and Social Standard	Relevance to the Program
ESS1 – Assessment and Management of Environmental and Social Risks and Impacts	Establishes overall risk management framework
ESS2 – Labor and Working Conditions	Applies to project workers and contractors
ESS3 – Resource Efficiency and Pollution Prevention	Relevant for resources efficient use, waste, effluent and emissions management and pollution control.
ESS4 – Community Health and Safety	Addresses community safety and security risks
ESS5 – Land Acquisition and Involuntary Resettlement	Applies if small-scale land acquisition, voluntary land donations and/or economic displacement should occur.
ESS6 – Biodiversity Conservation	Relevant for activities near natural habitats
ESS8 – Cultural Heritage	Requires protection of cultural heritage resources
ESS10 – Stakeholder Engagement	Establishes requirements for consultation and grievance redress

These standards guide the preparation and implementation of environmental and social instruments under the Program.

4.3 Institutional Responsibilities

Environmental and social management under the MozCommunity Program will involve multiple institutions at the national, provincial, and local levels.

Institution	Responsibility
Ministry of Planning and Development (MPD)	MPD will provide overall strategic oversight for the Program and ensure alignment with national development policies.
Northern Development Agency (ADIN)	ADIN will serve as the primary implementing agency for the Program. It will be responsible for: <ul style="list-style-type: none"> • overall program coordination; • supervision of environmental and social risk management; • monitoring of implementation of E&S instruments; • reporting to the World Bank.
Provincial and District Authorities	Provincial and District authorities will play an important role in local implementation, including: <ul style="list-style-type: none"> • community engagement; • local monitoring of project activities; • support for grievance redress mechanisms.
Program Coordination Unit (PCU)	A PCU will be established in ADIN to manage day-to-day implementation of the Program. The PCU will include one full-time environmental, health and safety specialist, one social specialist, one

Institution	Responsibility
	GBV Specialist and one security specialist responsible for overseeing environmental and social risk management, including: <ul style="list-style-type: none"> • environmental management; • social risk management; • grievance redress mechanisms; • SEA/SH risk mitigation.

4.4 Gap Considerations

While Mozambique has an established environmental and social regulatory framework, some aspects of the World Bank Environmental and Social Framework provide additional requirements, particularly in relation to stakeholder engagement, grievance redress mechanisms, SEA/SH risk management, and labor management procedures. Therefore, the Program will implement additional measures to ensure full compliance with the World Bank Environmental and Social Standards. The subsequent table provides a comparison between the ESF and relevant national legislation and recommendations for application during project implementation.

Table 2: Comparison between ESF and national legislation

Topic	Mozambican Legislation	World Bank ESS	Gap Filling Approach
Environmental and social assessment process	Environmental and social requirements are established across multiple laws and regulations adopted at different times, which can be difficult to apply consistently and may contain overlaps or inconsistencies.	ESS1 (and ESS5 where relevant) provides a single, integrated framework that systematically addresses environmental and social risks throughout the project life cycle.	Both national legislation and the ESF require environmental and social assessment as a condition for project approval; where national provisions are fragmented or less comprehensive, the Project will apply ESS1 and ESS5 to supplement national requirements and ensure a coherent, project wide assessment approach.
Risk-based Project Categorization	Decree No. 54/2015 classifies projects into Categories A+, A, B, and C, with corresponding ESIA requirements, but does not provide for framework-level instruments when project locations or activities are not yet defined.	ESS1 classifies projects by environmental and social risk and requires proportional instruments, including ESMFs and RPFs when project details are unknown at preparation stage.	Both systems classify projects and link categorization to the level of assessment required; where national procedures do not provide for framework instruments for activities with undefined locations, the Project will apply ESS1 requirements, including preparation and implementation of an ESMF and related instruments.
Environmental authorization prior to approval	An environmental license must be issued before any other license or authorization for project implementation.	ESS1 requires environmental and social assessment approval and disclosure by the competent authority prior to appraisal and implementation.	Both national legislation and ESS1 require environmental approval prior to project approval and implementation; the Project will follow national permitting procedures while ensuring that ESF disclosure and due diligence requirements are met.
Land acquisition and expropriation	Land is state-owned and cannot be sold; only improvements can be transferred. While compensation is required for expropriation, legislation provides limited guidance on eligibility, valuation methods, procedures, and timing.	ESS5 establishes clear principles on eligibility, compensation at replacement cost, livelihood restoration, and transparent resettlement procedures, regardless of land tenure status.	Both systems recognize the need for compensation when land or assets are affected by public interest projects; where national legislation lacks detailed guidance on eligibility, valuation, and livelihood restoration, the Project will apply ESS5 principles to address these gaps.
Occupational Health and Safety (OHS)	The Labor Law and related regulations establish general OHS obligations but provide limited detail on risk management, exposure limits, noise standards, and site-specific mitigation measures.	ESS2 is supported by the World Bank Group EHS Guidelines, which provide detailed, internationally recognized standards for managing worker health and safety risks.	Both Mozambican legislation and ESS2 require employers to protect worker health and safety; where national OHS provisions are general or lack detailed standards, the Project will apply the World Bank Group EHS Guidelines as good international industry practice.

Topic	Mozambican Legislation	World Bank ESS	Gap Filling Approach
Resource Efficiency and Pollution Prevention and Management	Environmental quality standards and emission limits are established under Decrees No. 18/2004 and 67/2010, focusing on compliance with permissible limits.	ESS3 promotes resource efficiency and pollution prevention through a risk-based approach consistent with good international industry practice.	Both systems establish requirements to prevent pollution and protect environmental quality; where national regulations focus on compliance with limits, the Project will apply ESS3 and relevant EHS Guidelines to promote proportionate resource efficiency and pollution prevention measures.
Community Health and Safety	Community health and safety is addressed indirectly through labor and occupational accident legislation.	ESS4 explicitly addresses risks to project-affected communities, including traffic safety, infrastructure safety, and exposure to project-related hazards.	Both frameworks aim to reduce risks to human health and safety; where national legislation does not explicitly address community level risks from project activities, the Project will apply ESS4 requirements to identify and manage such risks.
Gender Based Violence	GBV is addressed under the Domestic Violence Law, but project-specific prevention, reporting, and response mechanisms are not detailed.	The ESF requires project-specific GBV risk management measures, survivor-centered grievance mechanisms, and response procedures proportionate to risk.	Both systems recognize GBV as a legal and social concern; where national legislation does not provide project specific prevention, reporting, and response mechanisms, the Project will apply ESF consistent GBV risk management and survivor centered procedures.
Cultural Heritage	Cultural heritage protection is regulated through sector-specific laws covering tangible and archaeological heritage.	ESS8 applies to all projects with potential impacts on cultural heritage and requires risk screening and chance-find procedures.	Both national legislation and ESS8 provide for protection of cultural heritage; where national procedures do not require systematic risk screening or chance find measures, the Project will apply ESS8 requirements, including chance find procedures.

5. Environmental and Social Baseline

5.1 Geographic Scope

The MozCommunity Program will be implemented in Northern Mozambique, particularly in provinces affected by fragility and displacement dynamics, including all 56 districts of Cabo Delgado, Nampula, and Niassa. The region is characterized by a combination of coastal ecosystems, rural agricultural landscapes, and dispersed rural settlements, with varying levels of infrastructure development and service provision.

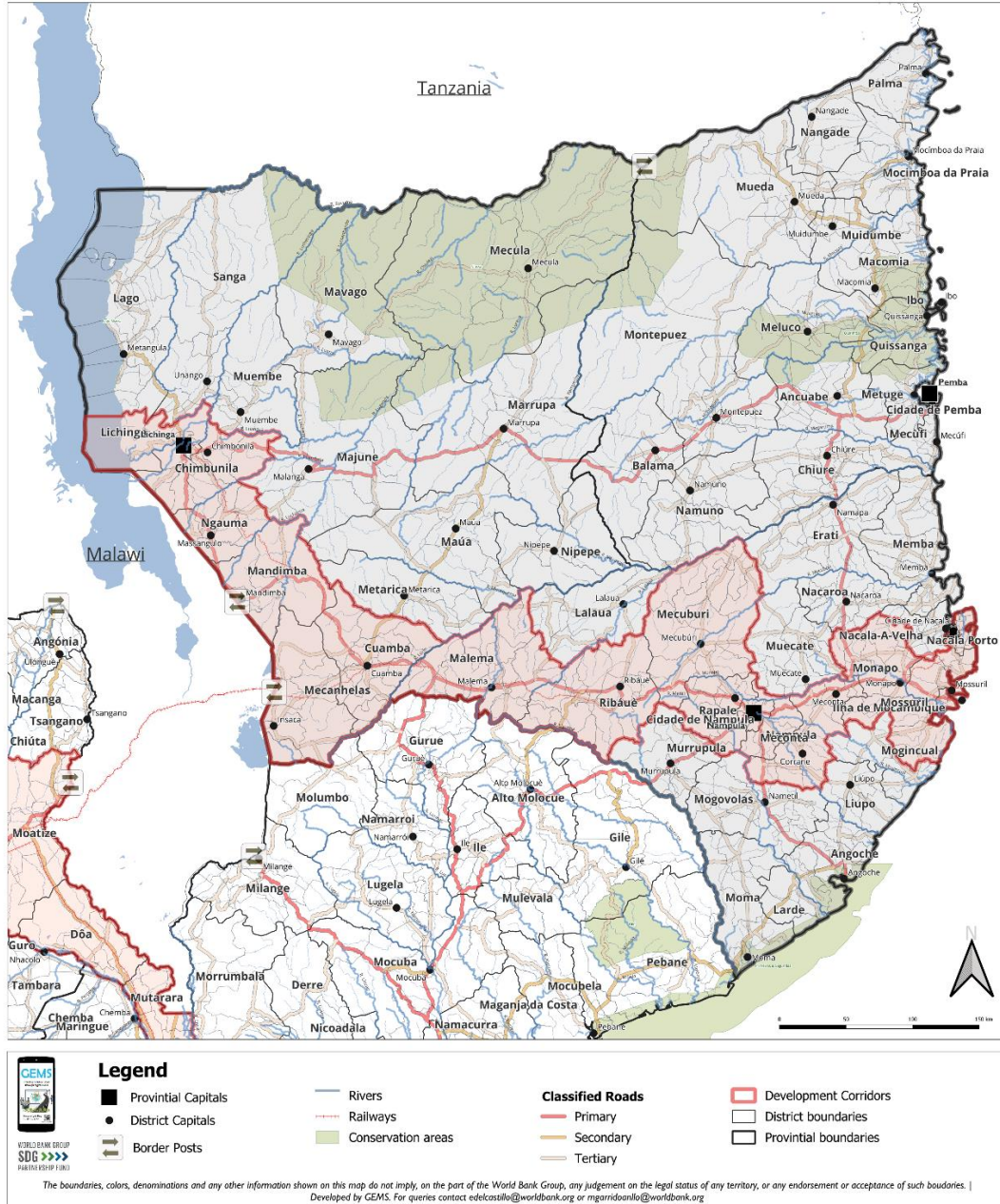


Figure 1: Map of Project Location

5.2 Environmental Baseline

5.2.1 Climate and Natural Hazards

Northern Mozambique is highly vulnerable to climate variability and extreme weather events. Key climate-related risks include tropical cyclones, which frequently affect coastal areas; seasonal flooding, particularly in low-lying areas; intense rainfall events, which may damage infrastructure; periodic droughts, which affect water availability and agricultural production. Recent cyclones such as Cyclone Kenneth and Cyclone Gombe have demonstrated the vulnerability of northern districts to extreme weather events, resulting in damage to housing, water systems, roads, and public infrastructure. These climate risks must be considered in the design and implementation of Program-supported infrastructure.

5.2.2 Land Use and Ecosystems

The region includes a mixture of ecosystems and land uses, including coastal ecosystems; wetlands and seasonal watercourses; agricultural landscapes; and areas of natural vegetation. Many communities depend heavily on natural resources for livelihoods, including small-scale agriculture, fishing, and forest products. Environmental pressures in the region include deforestation associated with agriculture and charcoal production; land degradation and soil erosion; and localized water pollution. Although the Program will support primarily small-scale infrastructure, careful screening is necessary to ensure that activities do not adversely affect sensitive ecosystems.

5.2.3 Water Resources

Water resources in Northern Mozambique include rivers, seasonal streams, and groundwater systems used for community water supply. Many rural communities rely on boreholes, wells, or small gravity-fed water systems for drinking water. Water access remains limited in many areas, particularly in rural districts hosting displaced populations. Investments in water supply infrastructure under the Program will therefore play an important role in improving community resilience. However, poor construction practices or inadequate waste management may create risks of water contamination, which will need to be managed through appropriate mitigation measures.

5.3 Social Baseline

5.3.1 Population and Livelihoods

Northern Mozambique is one of the poorest regions of the country. The population relies largely on subsistence agriculture, small-scale trade, fisheries in coastal areas, and informal economic activities. Access to essential services, including water supply, sanitation, education, and health services—remains limited in many rural areas. Infrastructure deficits are particularly pronounced in remote districts.

5.3.2 Internally Displaced Persons (IDPs)

Since the onset of the insurgency in Cabo Delgado, large numbers of people have been displaced from their homes and have relocated to host communities across northern provinces. Many displaced households currently live in temporary settlements or within host communities, often placing pressure on local infrastructure and services. The presence of displaced populations creates additional challenges related to competition for natural resources, pressure on water and sanitation systems, and increased demand for

social services. Programs such as MozCommunity therefore play a critical role in supporting both displaced populations and host communities, helping to mitigate social tensions and promote inclusive development.

5.3.3 Gender and Social Vulnerabilities

Women and girls in Northern Mozambique face multiple vulnerabilities, including limited access to economic opportunities, lower levels of education, higher exposure to gender-based violence. The displacement crisis has increased the risks of sexual exploitation and abuse and sexual harassment (SEA/SH), particularly in situations where vulnerable populations depend on humanitarian or development assistance. The Program will therefore include measures to prevent and respond to SEA/SH risks, including codes of conduct for project workers, community awareness programs, confidential grievance mechanisms.

5.3.4 Social Cohesion and Conflict Sensitivity

The coexistence of displaced populations and host communities can sometimes create **social tensions**, particularly in contexts where resources are scarce. Development interventions must therefore be designed with a strong emphasis on **conflict sensitivity and inclusive participation**, ensuring that:

- Both host communities and displaced populations benefit from project investments.
- Community consultations are inclusive and transparent.
- Grievance mechanisms are accessible to all groups.

5.4 Institutional Capacity Context

Institutional capacity for environmental and social management varies significantly across districts in Northern Mozambique. Common challenges include limited technical capacity at district level; limited experience with environmental and social risk management procedures; logistical challenges related to remoteness and security constraints. The Program will address these challenges through capacity-building measures and technical support, including training on environmental and social screening, monitoring, and grievance management.

6. Potential Environmental and Social Risks and Mitigation Measures

6.1 Overview of Environmental and Social Risks

Based on the preliminary environmental and social assessment conducted during project preparation, the MozCommunity Program has been assigned an Environmental and Social Risk Classification (ESRC) of Substantial. The risk classification reflects the following factors:

- the geographic dispersion of small-scale infrastructure investments;
- the fragile and conflict-affected context of Northern Mozambique;
- the presence of internally displaced persons (IDPs) in many program areas;
- limited institutional capacity at local levels for environmental and social risk management.

Most environmental impacts associated with the Program are expected to be site-specific, temporary, and manageable through appropriate mitigation measures. Social risks are more closely linked to the fragility context, including risks related to social cohesion, labor influx, SEA/SH and community safety.

6.2 Environmental Risks

The Project's overall environmental risk is assessed as Substantial, reflecting the geographically dispersed nature of activities, the fragile and conflict-affected operating environment in northern Mozambique, limited institutional capacity at local levels, and reliance on framework instruments to guide subproject-level environmental risk management. Although investments will primarily consist of small-scale community and public infrastructure works, they will be implemented across environmentally sensitive landscapes, including coastal zones, riverine systems, wetlands, and degraded miombo woodlands.

Soil Disturbance, Erosion, and Drainage Impacts (ESS1, ESS3)

Small-scale construction and rehabilitation activities may result in localized soil disturbance, erosion, and temporary alteration of natural drainage patterns, particularly in areas with sloping terrain, sandy soils, or proximity to seasonal streams and wetlands. These risks may be exacerbated by intense rainfall events and limited site supervision capacity in remote districts.

Mitigation measures will include: (i) screening of subprojects to identify erosion-prone or hydrologically sensitive sites; (ii) application of standard good construction practices through site-specific ESMPs and Contractor ESMPs (C-ESMPs), including erosion control, sediment management, and drainage protection measures; (iii) minimization of disturbed areas and prompt stabilization or rehabilitation of exposed soils; and (iv) avoidance of works within natural drainage channels or flood-prone areas where feasible.

Waste Management and Pollution Risks (ESS3)

Construction activities are expected to generate limited quantities of solid waste, including construction debris, packaging materials, and small amounts of hazardous waste such as used oils or paint containers. Improper storage, handling, or disposal could lead to localized soil and water contamination, particularly in areas with weak waste management services.

Mitigation measures will include: (i) implementation of basic waste management procedures at site level, including segregation, storage, reuse, and disposal at authorized facilities; (ii) prohibition of dumping or burning of waste at worksites; (iii) safe storage of fuels, oils, and chemicals in sealed containers away from water bodies; (iv) supervision and monitoring of waste management practices as part of routine E&S oversight; and capacity building of waste management service providers to ensure adequate implementation of procedures.

Air Quality, Dust, and Noise Impacts (ESS3)

Localized dust generation and noise emissions may occur during excavation, material transport, and construction activities, potentially affecting nearby households, schools, markets, or other sensitive receptors, particularly in densely populated rural settlements.

Mitigation measures will include: (i) application of dust suppression measures, such as watering of exposed surfaces; (ii) maintenance of construction equipment to reduce emissions and noise; (iii) limitation of noisy activities to daytime hours; and (iv) advance communication with communities regarding construction schedules and expected disturbances. Covering materials during storage and transport.

Water Resources and Small Water Supply Systems (ESS3)

Rehabilitation or installation of small water supply systems may generate risks related to water quality, wastewater management, and inefficient use of water resources if not properly designed and managed. Poor construction practices could also result in temporary contamination of surface or groundwater sources.

Mitigation measures will include: (i) technical screening of water-related subprojects to ensure appropriate siting and design; (ii) adherence to basic water quality protection measures during construction; (iii) proper

management of wastewater and construction runoff; and (iv) incorporation of resource-efficiency considerations into the design and operation of water supply systems, as relevant.

Occupational and Community Health and Safety (ESS4)

Occupational health and safety (OHS) risks are anticipated during labor-intensive public works and small-scale construction, particularly given the reliance on community workers, locally hired labor, variable contractor capacity, and weak enforcement of OHS standards in remote areas. Community health and safety risks may also arise from increased traffic, movement of materials, and inadequate site demarcation in populated areas.

Mitigation measures will include: (i) integration of proportionate OHS requirements into ESMPs, C-ESMPs, and contractual documents; (ii) provision and use of appropriate personal protective equipment (PPE); (iii) basic OHS training and site safety measures, including fencing, signage, and controlled access; and (iv) implementation of traffic and material transport management measures where relevant.

Sensitive Habitats and Natural Features (ESS6)

The Project will not finance activities within protected areas or critical habitats. However, some subprojects may be located near wetlands, seasonal streams, or modified natural habitats, requiring careful screening and site-specific mitigation to avoid or minimize adverse impacts.

Mitigation measures will include: (i) environmental screening to identify proximity to sensitive natural features; (ii) avoidance of high-risk locations where feasible; (iii) application of site-specific mitigation measures to protect adjacent habitats; and (iv) monitoring of environmental performance during implementation.

Cumulative and Institutional Capacity Considerations (ESS1)

Cumulative environmental impacts are expected to be limited due to the small scale and dispersed nature of investments. However, institutional capacity constraints, FCV-related access challenges, and reliance on framework instruments necessitate strengthened oversight.

Mitigation measures will include: (i) adaptation and updating of the ESMF based on existing NCRP and MozNorte frameworks; (ii) preparation and approval of site-specific ESMPs prior to commencement of works; (iii) targeted capacity building for implementing agencies and contractors; and (iv) use of third-party monitoring or enhanced supervision arrangements where access or capacity constraints exist.

These risks will be managed through appropriate environmental and occupational health and safety measures. Mitigation measures will follow standard good construction practices proportionate to the scale of activities and will be detailed in site-specific ESMPs or C-ESMPs, as applicable.

6.3 Social Risks

The Project's overall social risk is assessed as Substantial, reflecting the fragile and conflict-affected context of the Northern Provinces, including Cabo Delgado, Nampula, and Niassa, where the operation will be implemented. These areas are characterized by conflict-related displacement, insecurity, poverty, limited service delivery, and weak institutional presence, particularly at district and community levels. While the Project is expected to generate significant social benefits—such as improved access to livelihoods, basic services, and community infrastructure—the operating environment presents material social risks that require targeted and proportionate mitigation measures.

Labor and Working Conditions Risks (ESS2)

The Project will rely in part on labor-intensive community works and locally recruited workers, which presents risks related to weak contractor capacity, inconsistent labor management practices, and the potential use of child labor, particularly in rural and vulnerable communities where child labor prevalence is higher. Uneven supervision capacity and limited familiarity with ESF requirements among local contractors and community groups further heighten these risks.

Mitigation measures will include: (i) preparation and implementation of Labor Management Procedures (LMP) as part of the ESMF, clearly defining worker categories, terms and conditions of employment, minimum age requirements, and child labor prevention measures; (ii) contractual requirements obligating contractors and community facilitators to comply with ESS2, including the application of Codes of Conduct; (iii) screening and monitoring mechanisms to prevent child and forced labor; (iv) establishment of a project-level worker Grievance Redress Mechanism (GRM); and (v) capacity building and supervision support for implementing partners and contractors, including training on labor standards and OHS requirements.

Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH) Risks (ESS4, ESS2, ESS10)

The Project's SEA/SH risk is rated High, given the FCV context, high levels of displacement, widespread poverty, and limited availability of survivor-centered services. Risks are amplified by labor-intensive public works, close interactions between workers and community members, and activities targeting highly vulnerable populations, including IDPs, returnees, women, youth, and survivors of violence. There is also a heightened risk that access to employment opportunities or project benefits could be perceived or conditioned on the provision of sexual favors, particularly in areas with weak oversight and limited enforcement capacity.

Mitigation measures will include: (i) preparation and implementation of a dedicated SEA/SH Action Plan early in project implementation; (ii) integration of SEA/SH prevention and response requirements into bidding documents, contracts, and supervision arrangements; (iii) mandatory Codes of Conduct for all project workers, with clear sanctions for non-compliance; (iv) establishment of safe, confidential, and survivor-centered reporting channels integrated into the project GRM; (v) mapping and strengthening of referral pathways to existing medical, psychosocial, legal, and protection services, including collaboration with specialized NGOs operating in the region; and (vi) deployment of a dedicated GBV/SEA-SH specialist within the PIU, alongside targeted training for government, district, and contractor staff.

Community Health and Safety Risks (ESS4)

Small-scale construction and rehabilitation activities may take place near residences, schools, markets, and other public spaces, posing risks related to accidents, dust, noise, and temporary disruption of access. These risks are heightened in densely populated or displacement-affected communities where informal settlement patterns are common.

Mitigation measures will include: (i) application of standard community health and safety measures through site-specific ESMPs or C-ESMPs; (ii) implementation of traffic management, dust suppression, and site safety measures proportionate to the scale of works; (iii) clear signage, fencing, and access control at worksites; and (iv) community awareness activities to inform residents of construction schedules, risks, and grievance channels.

Risks of Exclusion and Elite Capture (ESS10)

There is a risk that vulnerable groups—including IDPs, returnees, unemployed youth, female-headed households, and communities in remote or insecure areas—may face barriers to equitable access to project benefits such as cash transfers, cash-for-work, and livelihood grants or meaningful participation in decision-making processes. In addition, weak local governance and power asymmetries create a risk of elite capture of project benefits at community level.

Mitigation measures will include: (i) implementation of a Stakeholder Engagement Plan (SEP) with inclusive, context-appropriate engagement strategies; (ii) transparent and clearly communicated eligibility and selection criteria for project benefits; (iii) targeted outreach to vulnerable and marginalized groups; (iv) monitoring of beneficiary selection and participation processes to detect exclusion or capture risks; and (v) a functional, accessible GRM to allow communities to raise concerns related to exclusion, favoritism, or unfair treatment.

Security and FCV-Related Risks (ESS1, ESS4)

Ongoing insurgent activity in parts of Cabo Delgado and neighboring districts presents security risks that may affect stakeholder engagement, supervision, mobility of implementing partners, and the safety of workers and communities. These risks are compounded by geographic remoteness and limited institutional capacity for monitoring and incident response.

Mitigation measures will include: (i) development of a Security Management Plan; (ii) adaptive implementation and supervision arrangements sensitive to evolving security conditions; (iii) reliance on local partners and third-party monitoring where access is constrained; (iv) flexible engagement modalities tailored to insecurity and displacement dynamics; and (v) coordination with relevant authorities and humanitarian actors to align activities with prevailing security and access conditions.

Detailed mitigation measures and implementation tools are provided in Annexes C (Generic ESMP), K (ESCOPs), E (SEA/SH Action Plan), and F (LMP).”

6.4 Environmental and Social Risk Mitigation Matrix

Risk ID	Potential Impact	Mitigation Measures	Responsible Party	Timing
ENV-01	Soil disturbance and erosion	Limit earthworks to approved footprints; apply erosion and sediment control measures; stabilize exposed soils and restore sites after construction	Contractor / Supervision Consultant	Construction
ENV-02	Vegetation clearing and habitat disturbance	Restrict clearing to areas strictly required; avoid sensitive habitats; clearly demarcate work areas; undertake site restoration or re-vegetation with native species	Contractor	Construction
ENV-03	Construction waste and debris	Implement site-level waste management measures, including segregation, reuse where feasible, and disposal at authorized facilities; prohibit dumping or burning	Contractor	Construction
ENV-04	Water contamination and pollution	Ensure safe storage of fuels and chemicals; prohibit discharge of waste into water bodies; implement spill prevention and response measures	Contractor	Construction
ENV-05	Dust, noise, and air emissions	Apply dust suppression measures (e.g. watering); maintain equipment; limit noisy activities to daylight hours; inform communities of work schedules	Contractor	Construction
ENV-06	Impacts on water resources and small water systems	Screen water-related subprojects; apply water quality protection measures; manage wastewater and runoff; promote efficient use of water resources	Contractor / PIU	Construction / Operation

Risk ID	Potential Impact	Mitigation Measures	Responsible Party	Timing
ENV-07	Occupational health and safety risks	Apply proportionate OHS measures; provide PPE; conduct site inductions and toolbox talks; ensure first-aid and emergency preparedness	Contractor	Construction
SOC-01	Community health and safety risks	Install fencing and signage; control access to worksites; implement traffic and material transport management measures	Contractor	Construction
SOC-02	Labor-related risks (including child labor)	Implement Labor Management Procedures; enforce Codes of Conduct; prevent child and forced labor; operate worker GRM; provide contractor training	Contractor / PIU	Implementation
SOC-03	SEA/SH risks	Implement SEA/SH Action Plan; enforce Codes of Conduct; establish confidential, survivor-centered GRM; link to referral services; deploy GBV specialist	PCU / PIU	Throughout
SOC-04	Exclusion of vulnerable groups and elite capture	Apply inclusive stakeholder engagement; ensure transparent eligibility criteria; targeted outreach to vulnerable groups; monitor beneficiary selection	PCU / District Authorities	Throughout
SOC-05	Security and FCV-related risks	Adapt implementation and supervision to security conditions; coordinate with local authorities and partners; use third-party monitoring where needed	PCU	Throughout

6.5 Residual Risk

After implementation of the mitigation measures described in this ESMF and associated environmental and social instruments, the residual environmental and social risks associated with the Program are expected to be **moderate and manageable**. Effective supervision, monitoring, and capacity building will be essential to ensure that these mitigation measures are implemented successfully.

7. Procedures and Implementation Arrangements

7.1 Environmental and Social Management Process

Because many investments under the MozCommunity Program will be identified during implementation, environmental and social risk management will follow a framework-based approach. This approach ensures that each subproject undergoes an appropriate level of environmental and social assessment prior to implementation. The environmental and social management process consists of the following steps:

1. Identification of subproject
2. Environmental and social screening
3. Determination of required environmental and social instruments
4. Preparation of environmental and social instruments
5. Review and approval
6. Implementation and supervision

7. Monitoring and reporting.

These procedures are designed to ensure that environmental and social risks are properly identified and managed throughout the Program lifecycle.

7.2 Subproject Environmental and Social Screening

All subprojects proposed under the MozCommunity Program will undergo environmental and social screening prior to approval. The screening process will determine:

- the nature and magnitude of potential environmental and social risks;
- whether the subproject is eligible for financing;
- the environmental and social instruments required.

Screening will be conducted using the using the Screening Form (Annex A), Exclusion List (Annex B), and ESS5 guidance (Annex J).

7.3 Environmental and Social Risk Classification

Based on the screening results, subprojects will be assigned an environmental and social risk classification.

Risk Level	Required Instrument
Low	Application of standard mitigation measures
Moderate	Simplified Environmental and Social Management Plan (ESMP)
Substantial	Detailed Environmental and Social Management Plan

Subprojects with potential for significant adverse impacts will not be financed under the Program.

7.4 Environmental and Social Instruments

Depending on the screening results, the following environmental and social instruments may be required:

1. **Environmental and Social Management Plan (ESMP):** An ESMP will be prepared for subprojects with moderate environmental or social risks. The ESMP will identify: potential impacts; mitigation measures; monitoring arrangements; and responsible institutions.
2. **Contractor Environmental and Social Management Plan (C-ESMP):** For construction activities, contractors will be required to prepare Contractor Environmental and Social Management Plans (C-ESMPs) consistent with the ESMP and the requirements of this ESMF. The C-ESMP will include: occupational health and safety measures; waste management procedures; community health and safety measures; an Emergency and Preparedness Plan (ERP) and SEA/SH mitigation measures.
3. **Resettlement Instruments:** If subprojects result in economic displacement or loss of assets, appropriate resettlement instruments will be prepared in accordance with the relevant project resettlement framework. However, activities involving significant involuntary resettlement, including any type of temporary or permanent physical displacement, are excluded from the Program.

Environmental and social instruments prepared for subprojects will be reviewed and approved before the commencement of works. The review process will involve:

- verification of compliance with this ESMF;
- review by the Program Coordination Unit (PCU);
- approval by the relevant implementing agency.

Where required, the World Bank may review selected environmental and social instruments.

7.5 Labor Management Procedures

The Labor Management Procedures (LMP) for the Project (see Annex F) set out the framework for managing labor and working conditions in accordance with the ESS2 and applicable Mozambican legislation. The LMP is designed as a living document that will be initiated during project preparation and updated throughout implementation as project activities, contractors, and labor requirements are further defined. Its primary objective is to promote fair treatment, non-discrimination, and equal opportunity for all project workers; ensure safe and healthy working conditions; prevent child and forced labor; and provide accessible and effective mechanisms for addressing workplace grievances.

The Project is expected to engage multiple categories of workers. Direct workers will include Project Coordination Unit (PCU) staff and individual consultants hired on part-time or fixed-term contracts to support project management and technical functions. Contracted workers will be employed by contractors and subcontractors engaged in the rehabilitation and construction of basic infrastructure, with an estimated workforce of several hundred workers during peak construction periods. In addition, the Project will engage community workers, particularly under labor-intensive activities such as cash-for-work programs targeting youth, women, and other vulnerable groups. These workers will receive cash payments for temporary employment and will be supervised by contractors. The Project may also involve primary supply chain workers through suppliers of construction materials and equipment. All categories of workers fall within the scope of ESS2 and are therefore covered by the LMP.

The LMP identifies occupational health and safety (OHS) risks as the most significant labor risks associated with the Project. These risks arise primarily from construction and rehabilitation activities and include exposure to heavy machinery, physical hazards, dust and noise, heat stress, electrical hazards, traffic-related accidents, and communicable diseases. The fragile and, in some areas, insecure operating environment in Northern Mozambique also presents risks to worker safety and security, which will be addressed through a Security Management Plan prepared under the Project. In addition, the LMP recognizes risks of exclusion of vulnerable groups from employment opportunities if recruitment processes are not adequately managed, as well as risks related to sexual harassment, sexual exploitation and abuse, and sexual harassment (SEA/SH), particularly given the Project's high GBV/SEA/SH risk rating.

To address these risks, the LMP establishes clear terms and conditions of employment consistent with national labor law and ESS2. These include provisions on working hours, rest periods, wages, leave entitlements, and age of employment. The Project prohibits child labor and forced labor in all forms and requires contractors to verify the age and identity of all workers prior to employment. While Mozambican legislation allows limited employment of minors under strict conditions, the Project commits to applying ESS2 requirements, including restrictions on hazardous work and reduced working hours for young workers where applicable. Contractors are also required to provide written employment information to workers, respect freedom of association and collective bargaining rights, and ensure non-discrimination in recruitment, remuneration, and working conditions.

The LMP clearly defines institutional responsibilities for labor management. The PCU is responsible for implementing the LMP for direct workers; ensuring that contractors prepare and implement contractor-specific labor management procedures and OHS plans; monitoring compliance with labor, OHS, and Code of Conduct requirements; and overseeing the establishment and functioning of grievance mechanisms for project workers. Contractors, in turn, are responsible for managing labor relations for their workforce and subcontractors, including recruitment, training, OHS management, grievance handling, and enforcement of Codes of Conduct. Contractor performance will be monitored through regular reporting, site inspections, and audits, and labor and OHS requirements will be embedded in bidding documents and contracts using the World Bank's Standard Procurement Documents. .

A central element of the LMP is the establishment of a worker-specific Grievance Redress Mechanism (GRM), separate from the project-level GRM for communities. The worker GRM will be accessible to direct, contracted, and community workers and will allow grievances to be submitted through multiple channels, including in person, by phone, text message, email, or anonymously. Grievances will be recorded, acknowledged promptly, and addressed in a timely and transparent manner, with urgent health and safety concerns prioritized for immediate action. The LMP also provides for escalation to national labor authorities where grievances cannot be resolved at the project level. Special, survivor-centered procedures will apply to grievances related to GBV and SEA/SH, with immediate referral to appropriate service providers and strict confidentiality safeguards. .

Overall, the LMP provides a comprehensive framework to manage labor and working conditions under the MozCommunity Project, addressing the complexity of engaging multiple worker categories in a fragile and capacity-constrained context. By applying ESS2 requirements alongside national labor legislation, strengthening contractor oversight, and establishing clear OHS, Code of Conduct, and grievance management procedures, the LMP seeks to mitigate labor risks and ensure that project implementation contributes positively to worker welfare and project sustainability.

7.6 Institutional Roles and Responsibilities

Environmental and social risk management under the MozCommunity Program will be carried out by:

Program Coordination Unit (PCU): The Program Coordination Unit, housed within ADIN, will be responsible for: overall supervision of environmental and social risk management; review of environmental and social screening results; monitoring implementation of environmental and social instruments; and, reporting environmental and social performance to the World Bank. The PCU will include dedicated environmental, social, GBV and security specialists.

Provincial and District Authorities: will support local implementation by facilitating community consultations; supporting grievance redress mechanisms; and, monitoring implementation of subprojects.

7.7 Contractor Responsibilities

Contractors implementing infrastructure activities will be responsible for:

- preparing Contractor Environmental and Social Management Plans (C-ESMPs) consistent with the ESMP developed for the sub-project and with this ESMF;
- implementing occupational health and safety measures;

- complying with environmental and social mitigation measures;
- implementing measures consistent with the LMP, including a Workers' Grievance Mechanism.
- implementing worker codes of conduct, including requirements addressing SEA/SH risks.

Contractors will be supervised by the implementing agencies to ensure compliance with environmental and social requirements.

7.8 Documentation and Record Keeping

All environmental and social documentation related to subprojects will be maintained by the Program Coordination Unit. This includes: sub-projects documentation; screening forms; environmental and social instruments; supervision and site visit reports; monitoring reports; and grievance records. Proper documentation will ensure transparency and facilitate supervision of environmental and social performance.

8. Stakeholder Engagement and Information Disclosure

8.1 Objectives of Stakeholder Engagement

Stakeholder engagement is a central element of the MozCommunity Program and is essential to ensure transparency, inclusiveness, and effective management of environmental and social risks throughout the project lifecycle. The objectives of stakeholder engagement under the Program are to:

- ensure that stakeholders are informed about project objectives, activities, and potential impacts;
- promote inclusive participation in the identification and prioritization of subprojects;
- ensure that vulnerable groups, including internally displaced persons (IDPs), women, youth, and host communities, can meaningfully participate in project processes;
- strengthen trust between communities, local authorities, and implementing institutions;
- establish accessible mechanisms for addressing grievances and resolving concerns related to project activities.

Stakeholder engagement activities will be implemented in accordance with the Stakeholder Engagement Plan (SEP) prepared for the Program.

8.2 Stakeholder Engagement Plan (SEP)

A Stakeholder Engagement Plan (SEP) has been prepared to guide stakeholder engagement throughout project implementation, consistent with Environmental and Social Standard 10 (ESS10) of the World Bank Environmental and Social Framework. The SEP defines:

- key stakeholder groups;
- methods of consultation and information disclosure;
- engagement strategies for vulnerable and disadvantaged groups;
- the structure and procedures of the project-level Grievance Redress Mechanism (GRM);
- monitoring and reporting requirements for stakeholder engagement activities.

The initial SEP will be disclosed prior to project appraisal and will be updated early during implementation to reflect district-specific engagement arrangements and lessons learned during early implementation. The SEP will serve as the primary instrument for managing stakeholder engagement activities under the

Program, while this ESMF provides guidance on integrating stakeholder engagement into environmental and social risk management processes.

8.3 Stakeholder Identification

Key stakeholders for the MozCommunity Program include:

Project-Affected Communities: These include communities living in districts where Program activities will be implemented. These communities include: internally displaced persons (IDPs); returnees; host communities; rural households benefiting from infrastructure investments; and community members participating in labor-intensive public works.

Vulnerable and Disadvantaged Groups: Special attention will be given to vulnerable groups who may face barriers to participation in project activities, including: women and female-headed households; youth and unemployed young people; persons with disabilities; marginalized communities in remote areas; displaced populations and returnees. Specific measures will be adopted to ensure that these groups are meaningfully included in consultations and decision-making processes.

Government Institutions: Relevant government stakeholders include: Ministry of Planning and Development (MPD); Ministry of Public Works, Housing and Water Resources (MOPHRH); Agency for Integrated Northern Development (ADIN); National Administration of Public Works (ANOP); provincial and district authorities. These institutions play key roles in planning, implementing, and supervising Program activities.

Civil Society and Development Partners: Civil society organizations, non-governmental organizations, and development partners operating in Northern Mozambique may support community mobilization, monitoring, and grievance resolution.

8.4 Stakeholder Engagement During Project Preparation

During project preparation, consultations were conducted with a range of stakeholders at national, provincial, and local levels, including:

- provincial and district authorities;
- civil society organizations;
- private sector representatives;
- international development agencies
- community stakeholders in Cabo Delgado, Nampula, and Niassa.

These consultations helped inform project design and highlighted key concerns related to infrastructure gaps, community participation, transparency in beneficiary selection, and coordination among institutions. A summary of each of these consultations can be found in Annex I. Stakeholder consultations will continue during project implementation, including as part of the preparation of site-specific environmental and social management plans for subprojects.

8.5 Information Disclosure

The Program will ensure that relevant information about project activities is disclosed to stakeholders in a timely, culturally appropriate and accessible manner. Information to be disclosed may include:

- project objectives and components;
- planned subproject activities;
- environmental and social mitigation measures;
- grievance redress procedures.

Information disclosure will be carried out through various channels, including: community meetings; public notices in local administrative offices; community radio where appropriate; and engagement through local leaders and community organizations. Environmental and social instruments prepared for subprojects will be disclosed in accordance with national regulations and World Bank requirements.

8.6 Grievance Redress Mechanism

A **Grievance Redress Mechanism (GRM)** will be established under the Program to receive and address complaints related to project activities using the standard GRM form (Annex G) and SEA/SH confidential intake form (Annex H). The GRM will allow project-affected people and other stakeholders to submit grievances regarding:

- environmental and social impacts;
- community health and safety concerns;
- exclusion from project benefits;
- misconduct by project workers or contractors.

The GRM will include multiple entry points to ensure accessibility, including: i) a dedicated GRM email address, a toll-free green line, WhatsApp (as applicable), community-level grievance focal points, district administration offices, and the program coordination units. All grievances will be recorded, assessed, and resolved in a timely manner. In addition, all complaints are confidential, and complainants can choose to remain anonymous.

8.7 SEA/SH-Sensitive Grievance Mechanism

The Program will establish confidential channels for reporting sexual exploitation and abuse and sexual harassment (SEA/SH). SEA/SH complaints will be handled in accordance with survivor-centered principles, ensuring confidentiality, safety, and appropriate referral to specialized support services using the SEA/SH confidential intake form (Annex H). The GRM will include: confidential intake channels; trained focal points for handling SEA/SH complaints; and referral pathways to medical, psychosocial, and legal support services. These procedures are detailed in the SEP and the project's SEA/SH Action Plan to be prepared.

8.8 Monitoring of Stakeholder Engagement

Stakeholder engagement activities will be monitored throughout project implementation to ensure that engagement processes remain inclusive and effective. Monitoring indicators may include:

- number of consultations conducted;
- participation rates of women and vulnerable groups;
- number and type of grievances received and resolved, including those related to SEA/SH;
- satisfaction levels of communities with project engagement processes.

Information on stakeholder engagement will be included in regular project monitoring reports and supervision missions.

9. Capacity Building and Budget

9.1 Institutional Capacity for Environmental and Social Management

Effective implementation of this Environmental and Social Management Framework (ESMF) will depend on the institutional capacity of the Program implementing entities and their ability to manage environmental and social (E&S) risks associated with Program activities. The MozCommunity Program will be implemented under the coordination of the Agency for Integrated Northern Development (ADIN), working in collaboration with relevant national ministries and provincial and district authorities.

Environmental and social risk management will be supported through a dedicated structure within the Program implementation arrangements, including:

- Environmental and Social Specialists within the Program Coordination Unit (PCU);
- E&S focal points within participating provincial and district authorities;
- Technical support from specialized consultants where required;
- Supervision by the World Bank implementation support team.

The PCU will be responsible for overseeing the implementation of the ESMF, ensuring that environmental and social screening procedures are applied to all subprojects and that mitigation measures are effectively implemented.

9.2 Capacity Constraints

Given the fragile and conflict-affected context of Northern Mozambique, institutional capacity to manage environmental and social risks at the district and community levels remains limited. Key challenges include:

- limited technical capacity within district administrations to conduct environmental and social screening;
- limited familiarity with the World Bank Environmental and Social Framework (ESF);
- limited experience among small local contractors with environmental, occupational health and safety, and labor management practices;
- logistical challenges associated with supervision in remote and insecure areas.

To address these constraints, the Program will implement targeted capacity-building measures aimed at strengthening environmental and social risk management at all levels of implementation.

9.3 Capacity Building Program

A structured capacity-building program will be implemented to support effective implementation of the ESMF. Training activities will target:

- Program Coordination Unit staff;
- Provincial and district authorities;
- Community development committees;
- Local contractors and supervising engineers.

Training will focus on practical aspects of environmental and social risk management relevant to the types of activities supported under the Program. The capacity-building plan will be implemented prior to initiating the relevant Project activities involving the PCU staff and Project workers.

Key Training Modules

The capacity-building program may include the following training modules:

Training Topic	Target Participants	Purpose
Introduction to the World Bank ESF	PCU staff, district authorities	Strengthen understanding of ESF requirements. It will include sessions on Labor and working conditions, Security management, Traffic and Road safety, Emergency preparedness and response, Resource efficiency and pollution prevention and management, Biodiversity conservation, Involuntary resettlement; Cultural heritage (chance findings), and Monitoring and reporting.
Environmental and Social Screening	District staff, PCU E&S specialists	Support application of the ESMF screening procedures
Occupational Health and Safety (OHS)	Contractors, supervising engineers	Improve worker safety during construction activities
Community Health and Safety	District authorities, contractors	Manage risks related to construction activities
Stakeholder Engagement and GRM	PCU staff, district authorities	Strengthen grievance handling and consultation processes
SEA/SH Prevention and Response	PCU staff, contractors, community leaders	Prevent and address risks of sexual exploitation and abuse

Training activities will be conducted periodically throughout Program implementation and will be adapted based on emerging needs. In addition, an awareness-raising plan for the affected communities will be developed and implemented covering the following topics: communicable diseases (HIV-AIDS/STD), SEA/SH, road safety, emergency preparedness and response, security management, codes of conduct for project workers, community engagement, grievance mechanisms and project-related employment opportunities.

9.4 Technical Support

Where necessary, additional technical support may be mobilized to strengthen environmental and social management. This may include:

- specialized consultants to support environmental and social screening;
- third-party monitoring arrangements in areas affected by insecurity;
- targeted technical assistance for high-risk subprojects.

These measures will help ensure that environmental and social risks are adequately managed throughout Program implementation.

9.5 Budget for ESMF Implementation

Adequate financial resources will be allocated under the Program to support the implementation of this ESMF. These resources will cover:

- staffing of environmental and social specialists;
- training and capacity-building activities;
- preparation of site-specific environmental and social instruments;
- monitoring and supervision activities;
- operation of the grievance redress mechanism;
- third-party monitoring where required.

A preliminary budget estimate for ESMF implementation is presented below.

Indicative Budget for ESMF Implementation

Activity	Estimated Budget (USD)
1 (one) Full-time each of an Environmental and Health and Safety Specialist, a Social Specialist, a GBV/SEA Specialist, and a Security Specialist	1.500.000.00
Capacity building and training	To be determined
Preparation of site-specific E&S instruments	To be determined
Monitoring and supervision	To be determined
Third-party monitoring (if required)	To be determined
Operation of grievance redress mechanism	To be determined

Detailed budgeting will be finalized during Program implementation planning and reflected in the Program's annual work plans and budgets. It should be noted that the budget for stakeholder engagement implementation is accounted for in the SEP.

10. Monitoring and Reporting

10.1 Objectives of Environmental and Social Monitoring

Environmental and social monitoring is an essential component of the MozCommunity Program to ensure that environmental and social risks and impacts are effectively managed during project implementation.

The objectives of monitoring are to:

- ensure that environmental and social mitigation measures are implemented as required;
- verify compliance with the Environmental and Social Management Framework (ESMF) and site-specific environmental and social instruments;
- identify emerging environmental and social risks during implementation;
- support adaptive management and continuous improvement of environmental and social performance.

Monitoring activities will be conducted throughout the project lifecycle, including during subproject planning, construction, and operation.

10.2 Environmental and Social Monitoring and Reporting Responsibilities

Environmental and social monitoring will be conducted at multiple levels of Program implementation.

The PCU will have overall responsibility for supervising the implementation of environmental and social risk management measures under the Program. As such, they will be supervising the implementation of mitigation measures; preparing environmental and social monitoring reports on a quarterly basis and conducting periodic supervision visits to project sites where security conditions permit.

The Provincial and District Authorities will play an important role in monitoring environmental and social compliance at the local level. Their responsibilities may include monitoring compliance with environmental and social mitigation measures; assisting in the resolution of community grievances; and reporting environmental and social issues to the PCU. Capacity-building activities described in Chapter 9 will strengthen the ability of district authorities to carry out these responsibilities.

Contractors responsible for construction activities will be required to implement the environmental and social mitigation measures defined in site-specific environmental and social management plans. Contractors will be responsible for implementing environmental and social mitigation measures; ensuring compliance with occupational health and safety requirements; maintaining records of environmental and social performance; reporting incidents or accidents in accordance with project procedures and implementing the Workers' GRM. Supervising engineers will verify contractor compliance with environmental and social requirements.

Monitoring activities will focus on key environmental and social performance indicators, including:

- implementation of environmental mitigation measures;
- compliance with occupational health and safety requirements;
- management of construction waste and materials;
- stakeholder engagement activities conducted;
- grievances received and resolved through the GRM;
- incidents related to community health and safety;
- SEA/SH complaints received and addressed.

These indicators will be integrated into the Program's broader monitoring and evaluation framework.

Environmental and social performance will be reported on by the PCU on a quarterly basis as per the ESCP and then contractors, supervising engineers and other implementing agencies will report to the PCU on a monthly basis throughout Program implementation.

In terms of Program-Level Reporting, the PCU will prepare periodic environmental and social monitoring reports summarizing: environmental and social screening results; implementation of mitigation measures; grievance redress activities; environmental and social incidents or accidents; progress in capacity-building activities; status of preparation and implementation of E&S documents required under the ESCP; summary of stakeholder engagement activities carried out as per the SEP; E&S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports, including on grievances; and, number and status of resolution of incidents and accidents reported. These reports will be incorporated into the Program's overall implementation progress reports submitted to the World Bank.

10.3 Incident and Accident Reporting

Environmental and social incidents and accidents associated with Program activities will be reported in accordance with the procedures defined under the World Bank Environmental and Social Framework.

Serious incidents, including those involving fatalities, severe injuries, or significant environmental damage, will be reported to the World Bank within the timelines defined in the Environmental and Social Commitment Plan (ESCP), meaning no later than 24 hours after learning of such an incident.

Incident investigations will be conducted to identify root causes and corrective actions; additional details will be provided upon request. Finally, a Corrective Action Plan must be provided, no later than ten (10) days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.

10.4 Third-Party Monitoring

Given the fragile and conflict-affected context of Northern Mozambique and potential access constraints in some districts, the Program may use Third-Party Monitoring (TPM) arrangements to complement regular supervision activities. Third-party monitoring may be used to:

- verify implementation of environmental and social mitigation measures;
- monitor contractor compliance with environmental and social requirements;
- support community engagement and grievance monitoring;
- provide independent verification of Program implementation in remote or insecure areas.

Third-party monitoring may be conducted by independent consultants, civil society organizations, or specialized monitoring firms, depending on the needs of the Program.

10.5 Adaptive Management

Monitoring results will be used to support adaptive management of environmental and social risks during Program implementation. Where monitoring identifies deficiencies in environmental and social performance, corrective actions will be implemented promptly. Lessons learned during implementation will inform updates to environmental and social management procedures and capacity-building activities.

ANNEX A – Environmental and Social Screening Form

The purpose of the screening process is to determine the **potential environmental and social risks of proposed subprojects** and identify appropriate mitigation measures and environmental and social instruments required prior to implementation.

Screening will be conducted by **district authorities with support from the PCU Environmental, Health and Safety, GBV, Security, and Social Specialists.**

The E&S Screening procedure comprises of two stages-process: (1) Initial screening by using the **Exclusion List** in Annex B of the ESMF; and (2) Screening the proposed activities to identify the approach for E&S risk management. This Screening Form is the second stage of screening process and is to be used for all subproject activities. The completed forms will be signed and kept in the Project ESF file. The World Bank may review a sample of the forms during implementation support visits.

1. Subproject Information:

Subproject Title	
Subproject Location	
Regional Unit in Charge	
Estimated Cost	
Start/Completion Date	
Brief Description of Subproject	

2. Environmental and Social Screening Questionnaires

Questions	Answer		Next Steps
	Yes	No	
ESSI			
1. Is the subproject likely to have significant adverse environmental impacts that are sensitive and unprecedented that trigger the ‘Ineligible Activities’ or other exclusion criteria?			If “Yes”: Exclude from project.
<p>Questions 2 and 3 below are examples. These two are critical questions in the Screening Form, as they will determine whether a sub-project can use pre-prepared ESCOPs included in Annex 2 or needs to prepare a site-specific ESMP. If all the sub-projects are expected to be low risk, then all sub-projects may be able to use the pre-prepared ESCOPs. However, if there are some sub-project activities, such as construction of community bridges, which may propose moderate risk, these may require site-specific ESMPs to be prepared. Think of the sub-project activities in your project and separate those that may be low risk and those that may be moderate risk.</p> <p>2. Does the subproject involve <u>new construction or significant expansion</u> of ponds, solid waste management systems, shelters, roads (including</p>			<p>If “Yes”:</p> <p>1. Prepare a site-specific E&S Assessment and/or ESMP for the proposed subproject, based on the template in Annex C.</p>

access roads), community centers, schools, bridges and jetties?			2. Include E&S risk management measures in bidding documents.
3. Does the subproject involve <u>renovation or rehabilitation</u> of any small-scale infrastructure, such as groundwater wells, latrines, showers/washing facilities, or shelters?			If “Yes”: 1. Apply relevant measures based on the ESCOPs in Annex K (unless one of the questions below raises specific environmental risks and requires a site-specific ESMP). 2. Include E&S risk management measures in bidding documents.
4. Will construction or renovation works require new borrow pits or quarries to be opened?			If “Yes”: 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex C. 2. Include E&S risk management measures in bidding documents.
5. Does the project lead to any risks and impacts on, individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable. ¹			If “Yes”: Apply relevant measures described in the ESMF and SEP.
ESS2			
6. Does the subproject involve uses of goods and equipment involving forced labor, child labor, or other harmful or exploitative forms of labor?			If “Yes”: Exclude from project.
7. Does the subproject involve recruitment of workforce including direct, contracted, primary supply, and/or community workers?			If “Yes”: Apply LMP in Annex F.
8. Will the workers be exposed to workplace hazards that needs to be managed in accordance with local regulations and EHSGs? Do workers need PPE relative to the potential risks and hazards associated with their work?			If “Yes”: Apply LMP in Annex F.
9. Is there a risk that women may be underpaid when compared to men when working on the project construction?			If “Yes”: Apply LMP in Annex F.
ESS3			
10. Is the project likely to generate solid or liquid waste that could adversely impact soils, vegetation, rivers, streams or groundwater, or nearby communities?			If “Yes”: 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex C.

¹ “Disadvantaged or vulnerable” refers to those individuals or groups who, by virtue of, for example, their age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation, gender identity, economic disadvantages or ethnic peoples status, and/or dependence on unique natural resources, may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project’s benefits.

			2. Include E&S risk management measures in bidding documents.
11. Do any of the construction works involve the removal of asbestos or other hazardous materials?			If “Yes”: Apply asbestos guidance provided in the ESCOP
12. Are works likely to cause significant negative impacts to air and / or water quality?			If “Yes”: 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex C. 2. Include E&S risk management measures in bidding documents.
13. Does the activity rely on existing infrastructure (such as discharge points) that is inadequate to prevent environmental impacts?			If “Yes”: 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex C. 2. Include E&S risk management measures in bidding documents.
14. Is there any potential to have impact on soil or water bodies due to agro-chemicals (e.g., pesticides) used in farmlands due to the consequences of the subproject activities (e.g., development of irrigation system, agriculture related activities, seed and fertilizer assistance, procurement of pesticides)?			If “Yes”: Prepare Fertilizer and Pest Management Plan.
ESS4			
15. Is there a risk of increased community exposure to communicable disease (such as COVID-19, HIV/AIDS, Malaria), or increase in the risk of traffic related accidents?			If “Yes”: Apply LMP in Annex F and relevant measures in SEP.
16. Is an influx of workers, from outside the community, expected? Would workers be expected to use health services of the community? Would they create pressures on existing community services (water, electricity, health, recreation, others?)			If “Yes”: Apply LMP in Annex F.
17. Is there a risk that SEA/SH may increase as a result of project works?			If “Yes”: Apply LMP in Annex F.
18. Would any public facilities, such as schools, health clinic, church be negatively affected by construction?			If “Yes”: Apply relevant measures based on the ESCOPs in Annex K (unless one of the other questions in the screening form raises specific environmental and social risks and requires a site-specific ESMP).
19. Will the subproject require the government to retain workers to provide security to safeguard the subproject?			If “Yes”: Prepare a site-specific ESMP for the proposed subproject, including an assessment of potential risks and mitigation measures of using security personnel.
ESS5			

20. Will the subproject require the involuntary acquisition of new land (will the government use eminent domain powers to acquire the land)? ²			If “Yes”: Refer to and apply guidance in Annex J
21. Will the subproject lead to temporary or permanent physical displacement (including people without legal claims to land)?			If “Yes”: Refer to and apply guidance in Annex J
22. Will the subproject lead to economic displacement (such as loss of assets or livelihoods, or access to resources due to land acquisition or access restrictions)?			If “Yes”: Refer to and apply guidance in Annex J
23. Has the site of the subproject been acquired through eminent domain in the past 5 years, in anticipation of the subproject?			If “Yes”: Refer to and apply guidance in Annex J
24. Are there any associated facilities needed for the subproject (such as access roads or electricity transmission lines) that will require the involuntary acquisition of new land?			If “Yes”: Refer to and apply guidance in Annex J
25. Is private land required for the subproject activity being voluntarily donated to the project? ³			If “Yes”: Refer to and apply guidance in Annex J
ESS6			
26. Does the subproject involve activities that have potential to cause any significant loss or degradation of critical habitats ⁴ whether directly or indirectly, or which would lead to adverse impacts on natural habitats ⁵ ?			If “Yes”: Exclude from project.
27. Will the project involve the conversion or degradation of non-critical natural habitats?			If “Yes”: 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex C.

² Environmental and Social Standard 5, Footnote 10: “In some circumstances, it may be proposed that part or all of the land to be used by the project is donated on a voluntary basis without payment of full compensation. Subject to prior Bank approval, this may be acceptable providing the Borrower demonstrates that: (a) the potential donor or donors have been appropriately informed and consulted about the project and the choices available to them; (b) potential donors are aware that refusal is an option, and have confirmed in writing their willingness to proceed with the donation; (c) the amount of land being donated is minor and will not reduce the donor’s remaining land area below that required to maintain the donor’s livelihood at current levels; (d) no household relocation is involved; (e) the donor is expected to benefit directly from the project; and (f) for community or collective land, donation can only occur with the consent of individuals using or occupying the land. The Borrower will maintain a transparent record of all consultations and agreements reached.”

³ Environmental and Social Standard 5, Footnote 10: “In some circumstances, it may be proposed that part or all of the land to be used by the project is donated on a voluntary basis without payment of full compensation. Subject to prior Bank approval, this may be acceptable providing the Borrower demonstrates that: (a) the potential donor or donors have been appropriately informed and consulted about the project and the choices available to them; (b) potential donors are aware that refusal is an option, and have confirmed in writing their willingness to proceed with the donation; (c) the amount of land being donated is minor and will not reduce the donor’s remaining land area below that required to maintain the donor’s livelihood at current levels; (d) no household relocation is involved; (e) the donor is expected to benefit directly from the project; and (f) for community or collective land, donation can only occur with the consent of individuals using or occupying the land. The Borrower will maintain a transparent record of all consultations and agreements reached.”

⁴ Environmental and Social Standard 6, paragraph 23: “Critical habitat is defined as areas with high biodiversity importance or value, including (a) Habitat of significant importance to Critically Endangered or Endangered species, as listed in the IUCN Red List of threatened species or equivalent national approaches; (b) Habitat of significant importance to endemic or restricted-range species; (c) Habitat supporting globally or nationally significant concentrations of migratory or congregatory species; (d) Highly threatened or unique ecosystems; and (e) Ecological functions or characteristics that are needed to maintain the viability of the biodiversity values described above in (a) to (d).”

⁵ Environmental and Social Standard 6, paragraph 21: “Natural habitats are areas composed of viable assemblages of plant and/or animal species of largely native origin, and/or where human activity has not essentially modified an area’s primary ecological functions and species composition.”

			2. Include E&S risk management measures in bidding documents.
28. Will this activity require clearance of mangroves?			If “Yes”: Exclude from project.
29. Will this activity require clearance of trees, including inland natural vegetation?			If “Yes”: 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex C. 2. Exclude from project if more than x hectares of tree and vegetation cutting is expected. 2. Include E&S risk management measures in bidding documents.
30. Will there be any significant impact on any ecosystems of importance (especially those supporting rare, threatened or endangered species of flora and fauna)?			If “Yes”: Exclude from project.
ESS7			
31. Are there any Indigenous Peoples or Sub-Saharan African Historically Underserved Traditional Local Communities present in the subproject area and are likely to be affected by the proposed subproject negatively?			If “Yes”: Prepare an Indigenous Peoples Plan OR Include the requirements of an Indigenous Peoples Plan in the SEP.
ESS8			
32. Is the subproject to be located adjacent to a sensitive site (historical or archaeological or culturally significant site) or facility?			If “Yes”: Apply Chance Find Procedures in Annex D.
33. Locate near buildings, sacred trees or objects having spiritual values to local communities (e.g. memorials, graves or stones) or require excavation near there?			If “Yes”: Apply Chance Find Procedures in Annex D.

3. Conclusion

Based on the result from the screening above, please list the E&S risk management instruments to be prepared / adopt and implemented:

- a)
- b)

Name and title of person who conducted screening:
Date of screening:

ANNEX B – Negative List of Ineligible Activities

The following activities **cannot be financed under the MozCommunity Program** due to potential significant environmental or social impacts:

Environmental Restrictions

- Construction of large dams or reservoirs
- Activities located in critical natural habitats
- Activities within legally protected areas
- Activities involving significant deforestation
- Activities involving large-scale extraction of natural resources

Social Restrictions

- Activities that may cause temporary and/or permanent displacement.
- Activities causing large-scale economic displacement
- Activities involving child labor or forced labor

High Environmental Risk Activities

- Industrial-scale agriculture
- Mining operations
- Large-scale irrigation schemes
- Activities involving hazardous chemical storage or handling

Sub-projects falling under the negative list will **not proceed to screening or assessment.**

ANNEX C – Generic Environmental and Social Management Plan (ESMP)

The Generic ESMP provides standard mitigation measures for **small-scale infrastructure activities** supported under the Program. The following table provides a sample **Environmental and Social Management Plan**. Contractors will integrate these measures into their **Contractor ESMP (C-ESMP)**.

Activity	Potential Impact	Mitigation Measure	Monitoring / Frequency	Supervision / Verification	ESS Ref.
Site establishment and preparation	Loss of vegetation	<ul style="list-style-type: none"> • Limit site clearance strictly to the approved project footprint and minimize vegetation removal to what is absolutely necessary for construction activities. • Demarcate work areas clearly using tape, stakes, fencing, or similar means before any clearing begins, to prevent accidental disturbance of surrounding land. • Ensure that construction, rehabilitation, or expansion activities are not located within conservation areas, protected areas, forest reserves, sanctuaries, wetlands, or other environmentally sensitive areas, as designated by the competent authorities. • Avoid locating works on steep slopes, landslide-prone areas, flood-prone zones, wetlands, or within surface water body buffer zones. Where works in risk-prone areas are unavoidable, implement appropriate engineering measures such as slope stabilization, retaining walls, drainage control, and soil reinforcement to minimize risks. • Do not clear vegetation in wetlands, drainage lines, or water body reserves, and ensure construction activities maintain adequate setbacks from rivers, streams, and other surface water bodies. • Strip and stockpile topsoil separately prior to construction, with stockpiles not exceeding 2 meters in height, and protect them from erosion for later reuse during site reinstatement. • Rehabilitate disturbed areas immediately after completion of works, using reinstatement of topsoil and revegetation with local species or grassing, to restore site stability and ecological function. • Ensure water supply to construction sites is managed responsibly, without creating conflicts with local water users or causing unauthorized or excessive abstraction from community water supply systems. • Conduct site selection and construction planning in consultation with relevant stakeholders, sector authorities, and local communities, and obtain all required approvals from local authorities and government agencies prior to works. 	Visual inspection during site preparation	PCU Environment Specialist / Supervising Engineer	ESS1, ESS3

Activity	Potential Impact	Mitigation Measure	Monitoring / Frequency	Supervision / Verification	ESS Ref.
Earthworks and excavation	Soil erosion; sediment runoff	<ul style="list-style-type: none"> • Schedule excavation and earthworks outside peak rainy periods, where feasible, to reduce erosion risks and instability of excavations. • Install simple and appropriate erosion and sediment control measures—such as silt fences, earth bunds, diversion drains, or check dams—around excavated areas and along drainage paths to control runoff and sediment transport. • Compact and stabilize exposed slopes, trench walls, and embankments promptly to prevent collapse, erosion, and safety hazards. • Backfill and compact trenches immediately after installation of services or as soon as practicable to restore ground stability and minimize exposure to erosion and accidental falls. 	Weekly and after heavy rainfall	Supervising Engineer / PCU Environment Specialist	ESS1, ESS3
Construction works	Dust and air pollution	<ul style="list-style-type: none"> • Apply regular water spraying to unpaved access roads, material stockpiles, and exposed or bare soil surfaces as needed, and increase watering frequency during dry or windy conditions to suppress dust. • Cover and confine dust-generating materials (such as sand, gravel, soil, and cement) during storage using tarpaulins or other suitable covers to prevent wind dispersion. • Cover trucks transporting fine or loose materials to avoid dust emissions during transportation. • Minimize the extent and duration of exposed bare surfaces by sequencing works efficiently and limiting unnecessary clearing or earthworks. • Reschedule earthworks or vegetation clearing, where practicable, during periods of strong winds or when visible dust is blowing off-site. • Establish designated and well-located areas for storage, mixing, and loading of construction materials, away from sensitive receptors, and manage these operations to prevent dust generation. • Restore disturbed areas as soon as practicable after completion of works through backfilling, compaction, and revegetation, to reduce long-term dust sources. 	Daily during construction	Supervising Engineer	ESS1, ESS3

Activity	Potential Impact	Mitigation Measure	Monitoring / Frequency	Supervision / Verification	ESS Ref.
		<ul style="list-style-type: none"> Store cement and other fine powdered materials in enclosed or covered areas to prevent airborne dispersion. 			
Construction works	Noise and vibration nuisance	<ul style="list-style-type: none"> Limit construction activities to normal daytime working hours, in accordance with national regulations and local community practices. Ensure all machinery and equipment are regularly maintained and fitted with appropriate silencers or noise-reduction devices to minimize noise emissions. Avoid simultaneous operation of multiple high-noise equipment near residential areas, schools, health facilities, or other sensitive receptors, where feasible. Plan and schedule particularly noisy activities to minimize duration and disturbance, and implement additional controls where works must occur near communities. Inform nearby residents in advance of planned noisy activities, including expected timing and duration, through appropriate local communication channels. 	Periodic site checks	Supervising Engineer	ESS1, ESS4
Material sourcing and storage	Soil and water contamination	<ul style="list-style-type: none"> Source construction materials only from licensed suppliers and approved borrow pits, and ensure that all borrow areas are rehabilitated after use in accordance with permit conditions. Strip topsoil to a depth of approximately 15 cm prior to construction and remove unwanted materials such as grass, roots, and debris before storage. Store topsoil in clearly defined stockpiles not exceeding 2 m in height, located outside drainage lines, rivers, and low-lying areas vulnerable to flooding. Shape soil stockpiles with stable side slopes (maximum 2:1) to reduce runoff and promote infiltration, and cover stockpiles with plastic sheeting or other suitable material to protect against wind and water erosion. Implement erosion and sediment control measures around stockpiles and disturbed areas, such as diversion channels, silt fences, or berms, where appropriate, to prevent soil loss and sedimentation of nearby water bodies. 	Weekly site inspection	Supervising Engineer / PCU Environment Specialist	ESS1, ESS3

Activity	Potential Impact	Mitigation Measure	Monitoring / Frequency	Supervision / Verification	ESS Ref.
		<ul style="list-style-type: none"> • Store construction materials away from rivers, wells, wetlands, drainage channels, and other sensitive receptors to prevent contamination and erosion. • Locate latrines downstream of drinking water sources and at a safe distance from wetlands and other water bodies, in line with national public health requirements. • Store fuel, oils, and chemicals in sealed and clearly labeled containers within bunded areas designed to contain spills and prevent soil and water contamination. • Immediately clean up any spills using sand, absorbent materials, or other appropriate methods, and dispose of contaminated materials at approved facilities. 			
Waste management (solid and hazardous)	Pollution; health risks	<ul style="list-style-type: none"> • Maintain all construction sites in a clean, orderly, and safe condition through regular housekeeping and effective waste management practices. • Segregate waste at source into inert, recyclable, and hazardous categories to facilitate safe handling, storage, and disposal. • Provide clearly labeled waste bins and designated temporary waste storage areas on site, sized adequately to prevent overflow, littering, or attraction of pests. • Ensure hazardous materials and wastes (including paints, thinners, solvents, oils, and contaminated materials) are stored temporarily in secure, sealed containers and handled in a manner that prevents risks to workers, the public, and the environment. • Dispose of hazardous waste only at district-approved, municipal, or licensed disposal facilities, in accordance with national regulations and local authority requirements. • Dispose of all non-hazardous waste exclusively at authorized municipal or licensed disposal sites; on-site dumping or burning of waste is strictly prohibited. • Ensure regular collection and timely transportation of waste from site to approved disposal facilities to avoid accumulation and associated health or environmental risks. 	Weekly inspection	Supervising Engineer	ESS1, ESS3

Activity	Potential Impact	Mitigation Measure	Monitoring / Frequency	Supervision / Verification	ESS Ref.
Sanitation and wastewater	Soil and water contamination	<ul style="list-style-type: none"> • Provide adequate mobile toilets and handwashing facilities (with water and soap) for workers, proportionate to workforce size and duration of works. • Locate sanitation facilities away from water bodies, drainage lines, and flood-prone areas, and ensure they are safely accessible to workers. • Ensure regular cleaning, maintenance, and emptying of toilets and washstands to maintain hygienic conditions throughout the construction period. • Provide sufficient waste bins of appropriate size at worksites to allow for the collection and temporary storage of solid waste and to prevent overflow, spillage, or attraction of pests. • Ensure regular collection and safe disposal of all waste at an approved disposal site, in accordance with national regulations and local authority requirements. 	Weekly inspection	Supervising Engineer	ESS1, ESS3, ESS4
Occupational health and safety	Worker accidents and injuries	<ul style="list-style-type: none"> • Identify occupational hazards and prepare task-specific Standard Operating Procedures (SOPs) for hazardous activities, at a minimum covering trenching and excavation, working at height (above 1.8 meters), and operation of machinery and tools. SOPs shall include risk controls, safe work methods, and emergency procedures. • Prepare, adopt, and implement a simple, site-specific Occupational Health and Safety (OHS) Plan, proportionate to the scale of works, describing key risks, mitigation measures, roles and responsibilities, incident reporting, and supervision arrangements. • Ensure safe work practices are applied at all times, including safe excavation methods, proper shoring or sloping of trenches, fall-prevention measures for work at height, controlled access to work areas, and safe operation of equipment and machinery. • Provide all workers with appropriate Personal Protective Equipment (PPE) (including helmets, safety boots, gloves, reflective vests, eye and hearing protection as required), ensure PPE is in good condition, and enforce its correct and consistent use on site. 	Daily toolbox talks and weekly inspection	Supervising Engineer / PCU Environment Specialist	ESS2, ESS4

Activity	Potential Impact	Mitigation Measure	Monitoring / Frequency	Supervision / Verification	ESS Ref.
		<ul style="list-style-type: none"> • Deliver regular OHS induction and refresher training to all workers, covering site-specific risks, safe work procedures, correct use of PPE, emergency response, and incident reporting requirements. • Ensure workers are properly trained, qualified, or certified (where applicable) to operate equipment, carry out electrical works, work at height, or handle hazardous materials; untrained personnel shall not be assigned to such tasks. • Apply safe handling and use of chemicals and materials, including preference for non-VOC or low-VOC paints, proper storage and labeling, and provision of training and PPE for workers handling hazardous substances. • Provide adequate welfare facilities at worksites, including access to potable drinking water, gender-appropriate toilets, and hand-washing facilities, in accordance with national regulations and good international industry practice. • Maintain first-aid kits on site and ensure that designated workers are trained in basic first aid; establish clear procedures for referral and access to local health facilities in case of accidents or medical emergencies. • Ensure all workers are covered by valid accident and injury insurance in line with national labor legislation. 			
Labor and working conditions	Unfair labor practices	<ul style="list-style-type: none"> • Engage all workers under written contracts that clearly define terms and conditions of employment, including job description, wages, working hours, and benefits, in accordance with the Project Labor Management Procedures (LMP). • Verify the age of all workers prior to engagement through review of official identification documents and maintain records to ensure compliance with minimum working age requirements under Mozambican labor law and the LMP. • Strictly prohibit child labor and forced labor at all stages of project implementation, and immediately remove any non-compliant labor from the project. 	Monthly review of records	PCU Social Specialist	ESS2

Activity	Potential Impact	Mitigation Measure	Monitoring / Frequency	Supervision / Verification	ESS Ref.
		<ul style="list-style-type: none"> Ensure timely and regular payment of wages, in line with Mozambican labor legislation and contractual arrangements. Inform all workers of their right to access the worker grievance mechanism, including procedures for submitting complaints confidentially and without fear of retaliation. 			
Code of Conduct and SEA/SH prevention	SEA/SH risks; misconduct	<ul style="list-style-type: none"> Require all workers to sign a Code of Conduct before commencing work, clearly setting out expected standards of behavior, including prohibition of sexual exploitation and abuse and sexual harassment (SEA/SH). Provide mandatory induction and periodic refresher training for all workers on acceptable behavior, SEA/SH risks, consequences of violations, and workers' obligations under the Code of Conduct. Enforce a zero-tolerance approach to SEA/SH, with clearly defined and consistently applied disciplinary measures for breaches of the Code of Conduct, in line with national law and contractual provisions. Display the Code of Conduct and SEA/SH reporting channels prominently at worksites, in languages understood by workers and communities, to ensure awareness and accessibility. 	Monthly verification	PCU GBV Specialist	ESS2, ESS4
Community health and safety	Accidents; public exposure to hazards	<ul style="list-style-type: none"> Install clear warning signs, physical barriers, and fencing around all active work areas to restrict unauthorized access and alert the public to construction hazards. Control vehicle movement and speed, particularly near schools, markets, settlements, and other sensitive receptors, through signage, speed limits, and designated access routes. Secure construction sites outside working hours, including locking equipment, closing access points, and maintaining fencing to prevent accidents, vandalism, or unauthorized entry. Maintain safe and clearly marked pedestrian access around worksites, including temporary walkways or crossings where needed, to ensure continued and safe movement of community members. 	Weekly Site inspection	Supervising Engineer	ESS4

Activity	Potential Impact	Mitigation Measure	Monitoring / Frequency	Supervision / Verification	ESS Ref.
Cultural heritage (chance finds)	Damage to cultural resources	<ul style="list-style-type: none"> • Stop all works immediately if any archaeological artifacts, fossils, graves, or other cultural or historical remains are discovered during construction. • Secure and cordon off the discovery area to prevent disturbance, damage, or removal of materials, and promptly inform the supervising engineer and relevant local and national authorities in accordance with applicable regulations. • Resume works only after official clearance or written authorization is provided by the competent authorities and any required mitigation measures have been implemented. 	As required	Supervising Engineer/ PCU Social Specialist	ESS8
Emergency Preparedness	Fires, spills, accidents	<ul style="list-style-type: none"> • Prepare and communicate basic, site-specific emergency response procedures, covering fire, spills, accidents, and medical emergencies, and ensure they are displayed or explained to all workers. • Provide and maintain appropriate emergency equipment on site, including fire extinguishers, spill response kits (e.g. absorbent materials, sand), and basic emergency supplies, and ensure they are easily accessible. • Train workers on emergency response actions and incident reporting procedures, including how to raise alarms, respond safely, and notify supervisors and relevant authorities in the event of an incident. 	Periodic drills / checks	Supervising Engineer	ESS2, ESS4
Site demobilization and closure	Residual environmental impacts	<ul style="list-style-type: none"> • Remove all waste, surplus materials, equipment, and temporary structures from the site upon completion of works and dispose of them at approved facilities. • Restore work areas to safe, clean, and stable conditions, including leveling surfaces, backfilling excavations, and removing hazards to people and livestock. • Rehabilitate access roads and other disturbed areas, as required, to reinstate original conditions or ensure safe and functional use by local communities 	Final Inspection	PCU/Supervising Engineer	ESS1, ESS3

Suggested Format for a Simple Environmental and Social Management Plan (ESMP)

The ESMF emphasizes that an Environmental and Social Management Plan (ESMP) should fit the needs of a subproject and be easy to use. The basic elements of an ESMP are:

- a. A description of the subproject activity
- b. A description of potential Environmental and social impacts;
- c. A description of planned mitigation measures;
- d. An indication of institutional/individual responsibility for implementing mitigation measures (including enforcement and coordination);
- e. A program for monitoring the Environmental and Social effects of the subproject both positive and negative (including supervision);
- f. A time frame or schedule; and
- g. A cost estimate and source of funds.

The Table below is a matrix to be filled out for each subproject that will have a separate ESMP according to its impact level, as indicated by the screening process.

Sub-project Activity	Potential Environmental or Social Impacts	Proposed Mitigation Measures	Responsibilities (including enforcement and coordination)	Monitoring Requirements (including supervision)	Timeframe or Schedule	Cost Estimate

ANNEX D – Chance Finds Procedure

The Program will adopt a **Chance Finds Procedure** to protect physical cultural resources encountered during construction activities.

Procedure

If cultural heritage resources are discovered during construction:

1. **Stop work immediately** in the area of discovery. Work must be suspended within a certain perimeter (50 meters, for example) around the discovered item.
2. **Secure the site** to prevent damage or removal of artifacts.
3. Notify the **supervising engineer and PCU Environmental and Social Specialist**.
4. Inform the **relevant cultural heritage authorities**.
5. Conduct an assessment to determine the significance of the discovery.
6. Prepare an Accidental Discovery Report providing the following information:
 - Date and time of the discovery
 - Location of the discovery
 - Description of the physical cultural property
 - Estimated weight and dimensions of the item
 - Temporary protection measures put in place
 - Expansion or reduction of the area delimited by the company.
7. Resume work only after receiving authorization from the relevant authorities.

Contractors will include this procedure in their **site-specific C-ESMPs and construction contracts**.

ANNEX E – SEA/SH Risk Assessment and Action Plan Guidance and Outline

1. Purpose and Scope

This Annex provides practical guidance to support the assessment, management, and monitoring of risks related to Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) under the MozCommunity Program. It applies to all project activities financed under MozCommunity, including small-scale community infrastructure, rehabilitation works, labor-intensive public works, community-driven development activities, and technical assistance, implemented in fragile, conflict-affected, and displacement-affected areas of Northern Mozambique.

The guidance is intended to support the PCU in conducting a proportionate SEA/SH risk assessment and developing a context-appropriate SEA/SH Action Plan, in line with the World Bank Environmental and Social Framework (ESF), notably ESS1, ESS2, ESS4, and ESS10.

2. Applicable Good Practice Guidance

This Annex draws primarily on the following World Bank guidance documents:

- Good Practice Note on Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Human Development Operations, which provides guidance on SEA/SH risks in community-based, service-delivery, and social protection-type interventions; and
- Good Practice Note on Addressing SEA/SH in Investment Project Financing (IPF) involving Major Civil Works, which provides guidance on SEA/SH risks related to labor influx, contractors, Codes of Conduct, and site-level mitigation measures.

Although the Program does not involve large-scale civil works, the principles and mitigation measures related to contractor management, worker behavior, and community interaction remain relevant, given the use of small contractors, community workers, and labor-intensive public works.

3. SEA/SH Risk Context

The Program will be implemented in a fragile and conflict-affected context characterized by population displacement, high poverty levels, weak institutional capacity, and limited access to services. Project activities will involve direct engagement with vulnerable groups, including women, youth, internally displaced persons (IDPs), and host communities. Key contextual factors contributing to SEA/SH risk include:

- Engagement of contracted workers and community workers in close proximity to communities;
- Power asymmetries between project workers and beneficiaries, particularly in contexts of aid dependence;
- Limited availability of confidential, survivor-centered grievance and referral services in remote districts; and
- Security and mobility constraints that limit oversight and supervision.

4. Conducting the SEA/SH Risk Assessment

SEA/SH risk assessment will be conducted as part of the finalization of the ESMF, and updated as needed during implementation. The assessment should be qualitative, contextual, and proportional, rather than data-intensive.

4.1 Key Risk Factors to Assess

The assessment should consider, at a minimum, the following risk dimensions:

- Project Activity Risks: Type of activities (e.g., small construction, labor-intensive public works, service delivery), duration of works, and frequency of interaction between workers and communities;
- Labor Profile: Use of contractors, community workers, presence of female workers, worker accommodation arrangements (if any), and supervision capacity;
- Community Context: Presence of IDPs, gender norms, prevalence of GBV/SEA risks, and barriers to reporting;
- Institutional Capacity: Ability of implementing agencies and local partners to prevent, identify, and respond to SEA/SH incidents; and
- Availability of Services: Existence and accessibility of GBV/SEA survivor support services and referral pathways.

4.2 Risk Rating

Based on the above factors, SEA/SH risk should be categorized (e.g., Low, Moderate, Substantial) to guide the scope and intensity of mitigation measures. For this Project, the SEA/SH risk is currently considered High.

5. Developing the SEA/SH Action Plan

A SEA/SH Action Plan shall be prepared as part of the ESMF implementation and adapted to specific sub-projects as required. The Action Plan should be practical, concise, and focused on prevention, mitigation, and response. The SEA/SH Action Plan should include the following minimum elements:

- a. Prevention Measures: Mandatory Codes of Conduct for all project workers, including contractors and community workers, with clear SEA/SH provisions; Induction and refresher training on acceptable behavior, SEA/SH risks, and sanctions; Clear communication to communities on expected worker behavior and zero tolerance for SEA/SH.
- b. Mitigation and Risk Management: Integration of SEA/SH requirements into procurement documents and contracts; Supervision arrangements proportionate to risk, including spot checks and community feedback mechanisms; Measures to reduce power asymmetries, including transparent beneficiary selection and information disclosure.
- c. Reporting and Grievance Mechanisms: Establishment of confidential, SEA/SH-sensitive grievance intake channels, aligned with the project GRM; Clear procedures for safe, confidential, and survivor-centered handling of allegations; Referral pathways to available survivor support services, to the extent feasible.
- d. Response and Accountability: Defined roles and responsibilities for incident management and reporting; Application of contractual sanctions for SEA/SH violations; Reporting of serious incidents to the World Bank in line with ESIRT requirements.

6. Monitoring and Updating

SEA/SH risk management is a continuous process. The SEA/SH Action Plan should be reviewed and updated periodically, particularly when new activities are introduced or contextual conditions change. Monitoring should be integrated into regular E&S reporting and supervision.

7. SEA/SH Risk Mitigation: Roles, Responsibilities, and Enforcement Arrangements

The Program will implement a structured set of measures, as part of the SEA/SH Action Plan, to prevent and respond to Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH). These measures will be embedded in project design, procurement, implementation, and supervision arrangements, with clear allocation of responsibilities among the Project Coordination Unit (PCU), contractors, consultants, and service providers.

Institutional Responsibilities

The Project Coordination Unit (PCU) will have overall responsibility for SEA/SH risk management and oversight. In particular, the PCU will:

- Sensitize implementing agencies and project partners on the importance of preventing and addressing SEA/SH, and on the specific mechanisms established under the Project;
- Clearly define SEA/SH requirements, expectations, and minimum standards in all bidding documents and contracts, including mandatory prevention and response measures to be incorporated into Contractors' Environmental and Social Management Plans (C-ESMPs);
- Review and approve C-ESMPs to ensure that appropriate SEA/SH mitigation measures, Codes of Conduct, training provisions, and reporting procedures are adequately included prior to commencement of works;
- Ensure that project workers and relevant community actors receive appropriate training and awareness-raising on SEA/SH risks, acceptable behavior, and reporting mechanisms; and
- Monitor implementation of SEA/SH measures throughout the project lifecycle and take corrective action as needed.

Contractors and consultants will be directly responsible for implementing SEA/SH prevention and mitigation measures at site level. Their responsibilities will include:

- Developing, disseminating, and enforcing worker Codes of Conduct that explicitly prohibit SEA/SH and define sanctions for non-compliance;
- Ensuring that all project workers sign the Code of Conduct prior to commencing work and receive regular refresher training on SEA/SH;
- Integrating SEA/SH measures into day-to-day site management and supervision, including cooperation with PCU monitoring activities.

The Project Grievance Redress Mechanism (GRM) will be responsible for:

- Establishing and maintaining confidential and SEA/SH-sensitive reporting channels, including survivor-centered intake procedures; and
- Ensuring that SEA/SH complaints are handled in a safe, confidential, and timely manner, in line with established protocols.

Local service providers and specialized organizations, where available, will support the Project by providing or facilitating access to medical, psychosocial, legal, and protection services for survivors through agreed referral pathways.

Key SEA/SH Mitigation Measures

To operationalize the above responsibilities, the Program will implement the following core measures:

- Integration of SEA/SH clauses into all contractor and consultant contracts, making compliance a contractual obligation;
- Mandatory Codes of Conduct applicable to all project workers, including direct workers, contracted workers, and community workers;
- Targeted training and awareness-raising for project workers and communities on SEA/SH risks, expected behavior, and available reporting channels;
- Establishment of confidential grievance channels for SEA/SH complaints, linked to the project GRM and designed to protect survivor privacy; and
- Development and maintenance of referral pathways to specialized support services, adapted to local availability and capacity.

Enforcement and Accountability

SEA/SH prevention and response measures will be enforced through a combination of contractual, institutional, and supervisory mechanisms. Compliance with SEA/SH requirements and Codes of Conduct will be a condition of contract performance. Failure to comply may result in contractual sanctions, including warnings, suspension of works, or termination of contracts, as appropriate.

The PCU will monitor SEA/SH risks and mitigation measures through regular supervision, review of contractor reports, GRM monitoring, and, where necessary, third-party monitoring. Findings from supervision and grievance monitoring will be used to strengthen implementation, address gaps, and update mitigation measures over time.

ANNEX F: Labor Management Procedures

The labor management procedures are a living document, which is initiated early during project preparation while no contractors have been hired yet. The document will be reviewed and updated throughout development and implementation of the Project.

1. Overview of labor use on the project

Direct workers: Direct workers include all PCU staff dedicated to the management of the Project. It is expected that direct workers will also include independent consultants, who are specialized in certain disciplines depending of the evolving needs of the Project. These consultants will be hired under individual contracts, on a part-time basis, with specific definition of the assigned tasks and responsibilities. At this stage, it is estimated that there may be a total number 30 direct workers depending of the project phase.

Contracted workers: The construction and rehabilitation works of the basic infrastructure activities will require the use of contractors. Each contractor might need to engage multiple subcontractors. The subcontractors' workforce will be also considered under the category 'contracted workers'. It is estimated

that the Project will engage between 200 and 300 contracted workers. Once the contracts are signed with the various contractors, this number will be better defined and updated.

Community workers: The project will use community workers as Sub-component 1.2 include cash-for-work programs targeting youth and female heads of households. Other sub-components will also support activities focusing on generating temporary employment opportunities through the recruitment of local labor for small works. The numbers of community workers have not been determined yet.

In priority, those belonging to a vulnerable category will be engaged as community workers. Those workers will receive payment in cash for their work, amounts and duration of work are yet to be determined. Though the working hours will respect conditions depicted in section 4 below. Community workers will be under the supervision of the contractors responsible of the works they are involved with and as such will have the same rights in terms of occupational health and safety, adequate trainings to carry their tasks, access to the grievance mechanism. The Third Party Monitor (TPM) to be hired by the PCU will monitor working conditions of the community workers and ensure that agreed payments are made. The risks of child and forced labor for that category of workers is present as it is mainly vulnerable people who will be hired. All the terms and conditions described in section 4 are applicable to community workers.

Primary supply chain workers: The rehabilitation and construction works under the Project will require primary supplies essential for the functions of the basic infrastructure, such as construction materials including aggregates, precast, concrete, bricks, etc. Where the contractor will source such materials directly from primary suppliers on an ongoing basis, the workers engaged by such primary suppliers are deemed “primary supply workers”, as defined in ESS2. The number and type of primary suppliers will be determined during project implementation. The timing of labor use of primary supply workers will only cover the construction stage of the project.

2. Overview of key labor risks

First, the Project faces labor risks linked to the engagement of multiple categories of workers under ESS2, including direct workers (PIU staff, consultants, and assigned civil servants), contracted workers engaged by small and medium contractors, and community-level workers involved in labor-intensive public works. The scale, geographic dispersion, and community-driven nature of subprojects increase the risk of inconsistent application of labor standards across districts, particularly where contractors and local partners have limited familiarity with World Bank labor requirements. These risks are heightened by the fact that many activities will be identified during implementation and executed simultaneously across remote locations.

Second, occupational health and safety (OHS) risks are a central labor concern, given the Project’s focus on small-scale infrastructure rehabilitation, public works, and labor-intensive activities. Workers may be exposed to physical injuries, unsafe worksites, inadequate use of personal protective equipment, and risks related to manual handling and transport of materials. These risks are amplified in remote districts where contractor capacity, supervision, and enforcement of OHS standards are uneven, and where access constraints and insecurity can limit regular site monitoring.

Third, the Project is exposed to risks related to child labor and forced labor, particularly in rural and conflict-affected areas of Northern Mozambique where poverty levels are high and household coping strategies may include reliance on children’s labor. There is also the possibility of child labor among

community-level workers if adequate screening, age verification, and supervision are not applied. The ESMF therefore recognizes the need for clear labor management procedures, consistent contractor oversight, and community awareness to prevent the engagement of underage workers or any form of coercive labor practices. In addition, while unemployment and underemployment are widespread in northern Mozambique if unmitigated, vulnerable/disadvantaged groups of people may be subject to increased risk of exclusion from employment opportunities under the Project. Such groups will include women, IDPs and Persons with Disabilities (PWDs).

Finally, risks of sexual exploitation and abuse and sexual harassment (SEA/SH) are particularly salient in the Project's labor context, due to labor influx, the presence of vulnerable populations including internally displaced persons, and implementation in a fragile and conflict-affected setting. Interactions between project workers, contractors, and community members—especially women and girls—may create opportunities for SEA/SH, including risks of abuse of power, transactional sex, or harassment linked to access to jobs or project benefits. These risks necessitate strong Codes of Conduct, SEA/SH-sensitive worker grievance mechanisms, and clear referral pathways, as reflected in the ESMF.

3. Overview of relevant legislation

At the institutional level, the Ministry of Labor, Gender and Social Action is the central organ of the State, which is responsible for directing, planning and controlling government action in the field of labor, ensuring the execution of the economic and social policies and programs adopted by the State. The right to work and the rights of workers are embedded in the Constitution. The Constitution of the Republic of Mozambique establishes that work is a right and a duty of every citizen (Article 84). Paragraph 3 of the same Article states that compulsory labor is prohibited, with the exception of work performed within the framework of criminal law. Article 86 on freedoms of professional association and trade unions establishes that workers have the freedom to organize themselves into professional associations or trade unions.

3.1. Labour law

The Labor Law (23/2007, August 1) discusses the rights and duties of workers, as well as issues of hygiene, health, and safety at work. The Law defines the general principles and establishes the legal regime applicable to individual and collective subordinate labor relations, provided for hire and reward. The main subjects dealt with in the Law include the sources of labor law, individual employment relationship, Suspension and termination of employment relationship, Collective Rights and Collective Labor Relations, employment and vocational training.

Article 18 defines the **employment contract** as the agreement by which a person or worker, undertakes to provide his or her activity to another person, employer, under the authority and direction of the latter, for remuneration.

Regarding the **work of minors**, Article 23.1 states that "the employer shall, in coordination with the competent union body, adopt measures to provide minors with working conditions appropriate to their age, health, safety, education and vocational training, preventing any harm to their physical, psychological and moral development. Paragraph 2 of the same article states that the employer shall not employ minors under the age of eighteen in unhealthy or dangerous work or work requiring great physical exertion, as defined by the competent authorities after consultation with trade unions and employers' organizations. Paragraph

3 states that the normal working hours of minors between the ages of fifteen and eighteen must not exceed thirty-eight hours per week and seven hours per day.

The law establishes the general **principles of collective rights and collective labor relations**, assuring workers and employers, without any discrimination and without prior authorization, the right to form organizations of their choice and to join them for the defense and promotion of their rights and socio-professional and business interests. Trade unions and employers' associations may form other higher-level organizations or affiliate with them, as well as establish relations or affiliate with similar international organizations (Article 137).

On **social security**, the Law establishes in Article 256(1) that all workers are entitled to social security, to the extent of the financial conditions and possibilities of the development of the national economy. The control of labor legality is performed by the Labor Inspectorate, which is responsible for supervising the compliance with the duties of employers and workers (Article 259, No. 1).

Regarding matters related to **hygiene, safety and health of workers** for companies that present exceptional risks of accidents or occupational diseases, the Labor Law (No. 1, Article 217) requires the creation of Safety Commissions at work, and employers, in collaboration with the unions, must inform the competent local body of the Labor Administration about the nature of accidents at work or occupational diseases, their causes and consequences, after investigating and registering them.

Under the terms of Article 218 of the Labour Law, the general norms of hygiene and safety at work are contained in specific legislation, and special regimes may be established for each sector of economic or social activity through Diplomas issued by the Ministries of Labour, Health, and of the Sector in question, after hearing the representative unions and employers' associations.

3.2 Law for the Protection of the Person, Worker and Job Seeker Living with HIV and AIDS (law No. 19/2014 of August 27 (repeals Law No. 5/2002 of February 5))

This Law establishes the rights and duties of the person living with HIV and AIDS and guarantees the promotion of measures necessary for their prevention, protection and treatment; as well as the rights and duties of the worker applying for employment in the public administration and other public or private sectors and the domestic worker.

Article 6 prohibits the performance of HIV/AIDS tests on workers or job applicants without their prior knowledge and consent. Article 52 prohibits HIV/AIDS testing of workers for training or promotion purposes. Article 56 establishes that a worker who becomes infected with HIV/AIDS in the workplace in connection with his or her occupation is entitled to compensation and guaranteed adequate medical assistance and medication under the terms provided in the Labor Law and other applicable legislation. According to this Law, any worker who is dismissed because he is infected with HIV/AIDS is considered under the Labor Law to have been dismissed without just cause and is entitled to compensation, without embargo for his reintegration.

3.3 Regulation of Work under a Contract Work Regime Between the Civil Construction and Complementary Contractor and the Respective Workers (Decree No. 69/2016 of November 29)

This Law is intended to govern labor relations under a contract work regime between the civil construction and complementary contractors and the respective workers. This regulation applies only to subordinate

labor relations established between the construction and complementary contractor and the respective workers. Relations between the contractor and the owner do not fall within the scope of the regulation.

3.4 Legal Regulations for Occupational Accidents and Occupational Diseases

Decree 62/2013 of December 4 establishes the Legal Regulations for Occupational Accidents and Occupational Diseases. Article 5 obliges the employer to adopt measures prescribed in the laws and regulations concerning the prevention of occupational accidents and diseases, and must, among other measures, train employees on the rules of occupational risk prevention. Article 9 defines an accident at work as an incident that occurs in the workplace and that directly or indirectly causes bodily injury, functional disorder or illness resulting in death or a reduction in the worker's ability to work or earn.

3.5 International conventions

Mozambique has ratified all out of the 8 fundamental conventions of ILO, including the following:

- ILO Convention 29 - Forced labor (2018)
- ILO Convention 87 - Freedom of Association and Protection of the Right to Organize (1996)
- ILO Convention 98 - Right to Organize and Collective Bargaining (1996)
- ILO Convention 100 - Equal Remuneration (1977)
- ILO Convention 105 - Abolition of Forced Labor cNvention (1977)
- ILO Convention 111 - Discrimination in Respect of. Employment and Occupation (1977)
- ILO Convention 138 - Minimum Age (2003)
- ILO Convention 182 - Eradication of the Worst Forms of Child Labor (2003)

3.6 WB ESS2 Labor and working conditions

The World Bank's requirements related to labor are described in ESS2-Labor and Working Conditions. ESS2 recognizes that by ensuring that Project workers are treated fairly, with safe and healthy working conditions, borrowers can promote strong relationships between workers and employers and leverage the benefits of developing a project.

The main objectives of ESS2 are to:

- Promote safe and healthy working conditions;
- Promote fair treatment, non-discrimination, and equal opportunity for project workers;
- Protect project workers, including vulnerable categories of workers such as women, individuals with disabilities, children (of working age in accordance with this ESS) and migrant workers, contract workers, community workers, and primary supply workers;
- Avoid the use of all forms of forced and child labor;
- Support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law; and
- Provide accessible means for project workers to raise workplace concerns.

The scope of application of ESS2 depends on the type of employment relationship between the borrower and project workers. The term "project worker" which include: direct workers; contractor workers, primary supplier workers, and community workers.

ESS2 addresses matters on:

Working conditions and management of labor relations. Terms and conditions of employment, which define hiring requirements, wage payments, termination of contract among others shall be in written and explicit form; non-discrimination and equal opportunities, hiring of project workers will be based on the principle of equal opportunities and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship; workers' organizations, respecting the role of legally established workers' organizations (associations, unions) and legitimate workers' representatives, who will receive the information necessary to conduct meaningful negotiations in a timely manner.

Workforce protection. Child labor and minimum age establish a minimum age of 14 years to work on the Project; forced labor prohibits any kind of involuntary or compulsory labor, such as servitude, slavery or similar labor hiring arrangements.

Grievance mechanism. Ensure that a grievance mechanism is provided to all direct or contract workers to address workplace concerns.

Occupational Health and Safety (OHS). All parties employing or contracting project workers will develop and implement procedures to establish and maintain a safe work environment, including ensuring that workplaces, machinery, equipment and processes under their control are safe and without risk to health, including through the use of appropriate protective measures with respect to physical, chemical and biological substances and agents.

Overall, Mozambique's labor legislation is consistent with the World Bank's ESS2 in most key aspects, with the exception of a few points, namely requirements for employers to develop internal grievance redress mechanism for workers, the category of community-based workers. For the purposes of this Project, the provisions of the World Bank ESS2, stipulated in these labor management procedures will be followed.

Table 1: Gap analysis between ESS2 and Mozambican legislation

Topic	ESS2 requirements	National legislation	Description of gaps
Working conditions and management of labor relations	<ul style="list-style-type: none"> Written labor management procedures applicable to the project; Properly documented terms and conditions of employment Non-discrimination and equal opportunities- Respecting the role of legally established workers' organizations 	Written employment contract, but there is a presumption of employment contract.	All requirements are covered within the Mozambican labor legislation
Workforce protection	<ul style="list-style-type: none"> Prohibition of Child Labor, fixing minimum age (minimum age 14) Prohibition of any form of forced labor such as servitude, slavery or similar labor hiring arrangements. Establishing special working hours for workers who are part of vulnerable groups 	<ul style="list-style-type: none"> Prohibition of Child Labor, setting minimum age (minimum age 15-18) No gaps (Child work prohibited (under 15) and 15-18 with parental permission). 	Despite the strategies defining structured interventions for the most vulnerable groups, there is an absence of procedures on working hours; therefore ESSS 2 should be followed in this Project.
Grievance mechanism	- Requirement to establish a grievance mechanism for all workers (direct or contract)	No specific GRM process for employees working with individuals' employment contracts	Follow ESS2 requirements regarding a GRM
Occupational health and safety	<ul style="list-style-type: none"> Detailed procedure required for each project. Requirements to protect workers, train workers, document incidents, emergency preparedness, address issues; and Monitor OHS performance 		Consistent in requirements to protect workers, incident documentation, and emergency preparedness plan.
Contract workers	- Establish procedures to manage and monitor contractor performance against the requirements of this ESS and incorporate the requirements into contractual agreements with such third parties and any subcontractors	-Specific legislation dealing with contractor and contractor labor issues -Establish procedures to manage and monitor contractor performance against the requirements of this ESS and incorporate the requirements of this ESS into contractual agreements with these third parties and any subcontractors	All requirements are covered within the Mozambican labor legislation
Community workers	Inclusion in the labor management procedures, the terms and conditions under which community labor will be hired	There is no community labor category	Follow ESS2 requirements for community workforce grievance mechanism

4. Terms and conditions

Below is the overview of the key aspects of national Labor Code with regards to terms and conditions of work (ESS2, para 11).

Working hours

The Labor Law establishes general working hours of 8 hours per day and 48 hours per week. Article 9 of the Regulations on Subcontracted Work stipulates that without prejudice to the general regime of eight hours per day and 48 hours per week, by collective bargaining agreement, the normal daily working period may, exceptionally, be increased by up to a maximum of four hours, without the weekly working time exceeding 56 hours, except for extraordinary and exceptional work performed by force majeure. The contractor must communicate the extension of the normal work period to the Ministry that oversees the area of labor and to the competent union association within fifteen days of its adoption, specifying the determining reasons, the number of workers involved and the estimated duration of the measure. The workers subject to the extended work periods are entitled, for the duration of the measure, to a complementary half-day rest period per week, in addition to the normal weekly rest day prescribed in the Labour Law (Article 10 of the regulations governing contract work).

Article 85(3) of the Labour Law states that "By collective bargaining agreement, the normal daily work period may exceptionally be increased up to a maximum of four hours, without the weekly working time exceeding fifty-six hours; only exceptional and overtime work performed for reasons of force majeure shall not count towards this limit". Paragraph 4 of the same article clarifies that the average weekly working time of forty-eight hours must be calculated by reference to periods of not more than six months. And finally, number 5 adds that the calculation of the average weekly working time referred to in the previous number may be obtained by means of compensation for the hours previously worked by the worker, through a reduction in the daily or weekly work schedule.

Age of employment

Mozambican law prohibits anyone under the age of 18 from performing heavy work and under unhealthy conditions. The people to be hired by the Project will be at least 18 years old. However, in case of specific needs and justified and approved by the respective Project Coordinator, people between the ages of 15 and 18 may be hired on the Project, with fewer working hours and with the guardian's permission (and not be involved in any dangerous or hazardous type of work). Contractors will be required to verify the identification and age of all workers. This will require workers to provide official documentation, which may include a birth certificate, national identity card, or passport. If a child under the minimum age is discovered working on the project in non-compliance with labor laws and ESS2, steps will be taken to immediately terminate employment, taking into consideration the best interest of the child, and a report of the incident must be submitted to the World Bank.

Leave

A worker's right to paid leave is inalienable and may under no circumstances be withheld. Workers under contract work and similar contracts for an uncertain term are entitled to paid vacation as follows:

- One day for each month of service provided, during the first year, if the service lasts between three months and one year;
- Two days for each month of actual work, if the contract lasts beyond one year; and
- Thirty days for each year of actual work, if the contract is for more than 3 years.

Exceptionally, vacations may be replaced by additional remuneration, at the convenience of the contractor or the employee, by agreement of both, and the employee must take at least six working days.

5. Responsible staff

The PCU will be responsible for the following:

- Implement these labour management procedures to direct workers;
- Ensure that contractor(s) responsible for the rehabilitation and construction works prepare their labour management procedures, in compliance with these labour management procedures, and an OHS Plan;
- Monitor that the Contractors meet obligations towards contracted and sub-contracted workers as included in the General Conditions of Contract the World Bank Standard Bidding Documents, and in line with ESS2 and national labour code;
- Monitor implementation of contractors' labour management procedures;
- Monitor training of the Project workers;
- Ensure that the GRM for project workers are established and monitor their implementation; and
- Monitor implementation of the workers' Code of Conduct.

The Contractors will be responsible for the following:

- Employ or appoint qualified social, labour and occupational safety experts to prepare and implement project specific labour management procedure, OHS Plans, and to manage subcontractor performance;
- Develop labour management procedures and OHS Plans, which will apply to contracted and sub-contracted workers;
- Contractors will supervise their subcontractors implementation of the labour management procedures and OHS Plans;
- Maintain records of recruitment and employment process of contracted workers;
- Communicate clearly job description and employment conditions to contracted workers;
- Develop, and implement workers' GRM and address the grievances received from the contracted and sub-contracted workers;
- Have a system for regular review and reporting on labour, and OHS performance;
- Deliver regular induction (including social induction) and HSE training to employees; and
- Ensure that all contractor and sub-contractor workers understand and sign the Code of Conduct prior to the commencement of works.

Note: Once the bidding process is completed and the contractors are known, these labor management procedures can be updated to include additional details about companies, as necessary.

6. Policies and procedures

6.1 General policies and procedures

All employers with labor assigned to the Project or subproject must:

- Know and comply with the legal provisions regarding employment and labor, including child labor, and technical and regulatory standards in force;
- Know and comply with the laws regarding the health and safety of workers;
- Have a department, sector or personnel responsible for human resources management and labor relations;
- Document and provide each worker, upon being hired, in a clear and understandable manner, with information regarding their rights under labor legislation, including rights to wages and benefits;
- Respect the terms of collective agreements and the right to organize freely; and
- Document, disseminate and keep visible to workers (on notice boards/strategic locations):
 - The Code of Conduct

- The channels for filing labor and employment complaints
- Internal regulations or similar documents that clarify: hours (in, out and daily breaks); weekly and monthly workload, requirements for overtime benefits, weekly rest and vacation entitlements, sanctions in place (e.g. in case of unjustified absence), etc.
- In accordance with the principle of equal opportunity, gender promotion, and fair treatment, do not do and do not tolerate discrimination in any aspect of the employment relationship (recruitment, hiring, compensation, working conditions and terms of employment, training, promotion, contract termination, and discipline).
- Provide an easily accessible complaint mechanism for workers and their organizations, independent of other legal remedies, to express their concerns about working conditions, with a guarantee of feedback to complainants, without any retaliation.

6.2 Occupational, health and safety policies and procedures

All employers with labor assigned to the Project or subproject must:

- Provide workers with a safe and healthy work environment that takes into account the inherent risks of their particular sector and the specific hazard classes of work areas;
- Take steps to prevent accidents and illness resulting from, associated with, or occurring during the course of work, in accordance with good practices that include: identifying potential hazards to workers, especially those that may be life-threatening;
- Make available preventive and protective measures, including the modification, substitution or elimination of hazardous conditions or substance;
- Provide worker training;
- Document and publicize accidents, occupational illnesses and incidents;
- Have an organization for emergency prevention, preparedness and response;
- Providing the Individual Protection Equipment (PPE) inherent to the risks of the activities;
- Verifying continuous use of PPE during work;
- Promoting awareness/awareness campaigns on HIV/AIDS, and sexually transmitted infections (STIs) and making condoms available free of charge to direct and indirect employees of the works;
- Raise awareness of GBV among all workers to disseminate risks and preventive actions, ways to support and ensure a fully operational GBV GRM that responds confidentially to incidents and uses a survivor-centered approach with safe and ethical reporting standards;
- Maintain the best possible conditions that ensure quality of life and sanitation in employee support facilities, such as living areas, cafeterias, toilets and locker rooms at the construction site;
- Have drinking water in the amount that corresponds to what is necessary, as well as sanitary sewage devices, such as septic tanks;
- Inform the contractor and the competent agencies, in compliance with the legal regulations, of all accidents, incidents, and fatalities associated with the works or involving local communities, covering the safety of the workers and the public, and providing immediate assistance, as needed, to the injured and their families;
- Have a first-aid team on the construction site (when applicable), with the necessary conditions to provide first aid to workers, according to the legislation in force in Mozambique; and
- Comply with the infectious disease prevention procedures as relevant.

6.4 Code of Conduct, policies and procedures

A code of conduct for workers and employers should be developed for the Project, where it should emphasize labor, health and safety, environmental and social issues, including GBV and violence against

children (CCV) (see below for a comprehensive template). The obligations of the code should apply to all Project workers.

The Code of Conduct should be a summary document, written in simple language. It should be available in Portuguese and, if applicable, in English, and should be explained orally to the worker in the local languages of the subproject region prior to signing. It will also be the subject of discussion in internal training/capacity building sessions promoted by the employer.

The individual code should be signed by each employee, preferably at the signing of the contract, and a copy kept by both parties (employee and employer). In the case of workers hired prior to the project, they should sign at the planning and mobilization phase of the subproject, that is, before the practical activities under the Project begin.

By signing the Code of Conduct, the employee confirms that they:

- Received a copy of the Code;
- Have had an explanation of the Code;
- Recognize that adherence to this Code of Conduct is a condition of working on the project;
- Recognize that violations of the Code may result in serious consequences, up to and including dismissal or referral to legal authorities.

7. Grievance redress mechanism

While the Project will have a grievance mechanism in place to address concerns of project-affected parties as indicated in chapter 8, the nature of workplace concerns of workers is usually different. For example, typical workplace grievances include demand for employment opportunities; labor wages rates and delays of payment; disagreement over working conditions; and health and safety concerns in work environment. Therefore, a separate grievance mechanism will be established for Project workers (direct workers and contracted workers), as required by ESS2.

Handling of grievances should be objective, prompt and responsive to the needs and concerns of the aggrieved workers. Different ways in which workers can submit their grievances should be allowed, such as submissions in person, by phone, text message, mail and email. The grievance raised should be recorded and acknowledged within one day. While the timeframe for redress will depend on the nature of the grievance, health and safety concerns in work environment or any other urgent issues should be addressed immediately. Where the grievance cannot be addressed within a reasonable timeframe, the aggrieved worker should be informed in writing, so that the worker can consider proceeding to the national appeal process (see below for more details). The mechanism will also allow for anonymous complaints to be raised and addressed. Individuals who submit their comments or grievances may request that their name be kept confidential.

Direct workers

Considering the limited number of direct workers estimated for the Project, it will have a compact but effective grievance system for direct workers. The PCU, where all the direct workers are concentrated, will hold periodic team meetings to discuss any workplace concerns. The grievance raised by workers will be recorded with the actions taken by PCU. The summary of grievance cases will be reported to the World Bank as part of the regular report. Where the aggrieved direct worker wishes to escalate their issue or raise their concerns anonymously and/or to a person other than their immediate supervisor/hiring unit, the worker may raise the issue with responsible authorities, where relevant.

Contracted workers

The EHS officer (or any other appropriate officers) of the contractor will hold monthly team meeting with all present contracted workers at site to discuss any workplace grievances. Any grievances raised will be recorded with the actions taken by the contractor. The summary of grievance cases will be reported to the PIU as part of contractor's periodic report. Where appropriate and available, the contracted workers should be allowed to utilize an existing grievance mechanism within the contractor. Where the aggrieved workers wish to escalate their issue or raise their concerns anonymously and/or to a person other than their immediate supervisor, the workers may raise their issue with the PCU. The contracted workers will be informed of the grievance mechanism at the induction training session prior to the commencement of work. The contact information of the PIU will be shared with contracted workers.

National appeal process

As per the Labour Law Code, any individual labour dispute can be submitted by any of the parties to the competent district labour inspector for conciliation, where such labour inspector is available. The inspector is mandated to attempt to settle the dispute within 14 days of its submission.

Grievances related to Gender Based Violence (GBV)

To avoid the risk of stigmatization, exacerbation of the mental/psychological harm and potential reprisal, the grievance mechanism shall have a different and sensitive approach to GBV related cases. Where such a case is reported, it should immediately be referred to the appropriate service provider. The GBV/SEA/SH Action Plan that will be prepared will provides details on how such grievances in a working context will be handled.

8. Contractor management

The Project will use the Bank's 2025 Standard Procurement Documents (SPD) for solicitations and contracts, and these include labor and occupational, health and safety requirements. As part of the process to select design and build contractors who will engage contracted workers, the legal and E&S staff from PIU will review the following information:

- Information in public records (examples: violation of applicable labour laws, public inspection from the enforcement agencies;
- Business licences, registrations, permits, and approvals;
- Documents relating to a labour management system, including OHS issues, for examples labour management procedures;
- Identification of labour management, safety and health personnel, their qualifications and certifications;
- Workers certifications/permits/trainings to perform the required work;
- Records of health and safety violations and responses;
- Accidents and fatalities records and notifications to authorities;
- Records of legally required workers benefits and proof of workers' enrolment in related programs;
- Workers payroll records, including hours worked and pay received; and
- Copies of previous contracts with contractors and suppliers, showing inclusion of provisions and terms reflecting requirements of ESS2.

The contracts with selected contractors will include provisions related to labor and occupational health and safety, as provided in the World Bank SPD and Mozambican law.

The PCU will manage and monitor the performance of contractors in relation to contracted workers, focusing on compliance by contractors with their contractual agreements (obligations, representations, and warranties). This may include periodic audits, inspections, and/or spot checks of project locations or work

sites and/or of labor management records and reports compiled by contractors. Contractor's labor management records and reports may include: (a) a representative sample of employment contracts or arrangements between third parties and contracted workers; (b) records relating to grievances received and their resolution; (c) reports relating to safety inspections, including fatalities and incidents and implementation of corrective actions; (d) records relating to incidents of non-compliance with national law; and (e) records of training provided for contracted workers to explain labor and working conditions and OHS for the project.

9. Primary supply chain workers

The PCU will supervise the procurement of goods and equipment and will carry out the appropriate procedures based on the Procurement Regulations, the Guidelines for Prevention and Combating Fraud and Corruption and other provisions stipulated in the Financing Contracts. Child or forced labor is not tolerated. In cases where foreign suppliers are involved, the PCU will investigate (due diligence) whether the supplier has been accused or sanctioned for any of these issues - related to child labor, forced labor and occupational safety.

The contractors, when subcontracting third parties for the supply of materials and equipment, will be responsible for including in their contracting agreements the procurement conditions and specifications on aspects of occupational health and safety, child labor, forced labor, Codes of Conduct, and shall perform due diligence. The work and procedures of the contractors will be supervised by the PCU.

Sample - Code of Conduct

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

- received a copy of the code;
- had the code explained to them;
- acknowledged that adherence to this Code of Conduct is a condition of employment; and
- understood that violations of the Code can result in serious consequences, up to and including dismissal, or referral to legal authorities.

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

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

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

- Not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor’s permission, and ensure that another adult is present if possible;
- Use any computers, mobile phones, video cameras, cameras or social media appropriately, and never to exploit or harass children or access child exploitation material through any media;
- Not use physical punishment on children and women;
- Not hire children for domestic or other labor which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury;
- Comply with code of ethics of the company and all relevant local legislation, including labor laws in relation to child labor and behavior;
- Immediately report concerns or allegations of child and women exploitation and abuse and policy non-compliance in accordance with appropriate procedures;
- Immediately disclose all charges, convictions and other outcomes of an offence, which occurred before or occurs during my association with the Employer that relate to child exploitation and abuse.

When photographing or filming a child or using children’s images for work-related purposes, I must:

- Assess and endeavor to comply with local traditions or restrictions for reproducing personal images before photographing or filming a child;
- Obtain informed consent from the child and parent or guardian of the child before photographing or filming a child. As part of this I must explain how the photograph or film will be used;
- Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive;
- Ensure images are honest representations of the context and the facts;
- Ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form.

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

Signed:

Date

ANNEX G: Sample Grievance registration form

A unique code should be assigned to each grievance at the first time they submit a complaint, and the same code should be used for all future grievance reported by the same person.		
1. INCIDENT INFORMATION		
1.1 Received By:	1.2 Date received:	1.3 Reported by:

<p>1.4 Grievance category - <i>(Circle as appropriate)</i></p> <p><i>(Compensation/Land access/Inadequate Notification/Disruption to business or property/ Property damage/Environmental damage/Safety Risk/Traffic/Boundary Dispute/Other)</i></p> <p><i>Other</i></p> <p>.....</p>		
<p>1.5 Project Related?</p> <p>Yes: <input type="checkbox"/> No: <input type="checkbox"/></p> <p><i>- If the grievance is not related to the project do not continue.</i></p>	<p>1.6 Date of the report to Contractor:</p>	<p>1.7 Date of the report to PCU:</p>
<p>1.8 Case ID:</p>	<p>1.9 Location</p>	<p>1.10 District:</p>
<p>1.11 Contract Number:</p>		<p>1.12 Name of the contractor:</p>
<p>1.13 Risk of retaliation: Yes: <input type="checkbox"/> No: <input type="checkbox"/></p>		
<p>1.14 Description of grievance:</p>		
<p>2. RESOLUTION FEEDBACK</p>		
<p>2.1 Complainant satisfied with process? Yes: <input type="checkbox"/> No: <input type="checkbox"/></p>	<p>Why not?</p>	
<p>2.2 Complainant satisfied with outcome? Yes: <input type="checkbox"/> No: <input type="checkbox"/></p>	<p>Why not?</p>	
<p>2.3 Other relevant information:</p>		
<p>3. ACTION TAKEN TO RESOLVE THE GRIEVANCE</p>		

Reported to	Date Reported	Action Taken
Print name (complainant):		
Signed (complainant)		Date:
Signed (Grievance Focal Point)		Date:
Copied to:		

ANNEX H: GRM confidential incident intake form (SEA/SH-sensitive)

<p>IMPORTANT CONFIDENTIALITY NOTICE This form is to be used only by trained GRM or SEA/SH focal points. Information must be handled in accordance with survivor-centered principles: safety, confidentiality, respect, and informed consent. Completion of this form is voluntary. Evidence and identification are NOT required.</p>	
A. BASIC INTAKE INFORMATION (To be completed by GRM focal point)	
Unique Incident Reference Code:	
Date complaint received: ___ / ___ / _____	
Time received (if relevant): _____	
Mode of intake (check all that apply): <input type="checkbox"/> In person <input type="checkbox"/> Hotline / Phone <input type="checkbox"/> SMS / WhatsApp <input type="checkbox"/> Email <input type="checkbox"/> Complaint box <input type="checkbox"/> Third party <input type="checkbox"/> Anonymous	Location where incident was reported (community / site / district): Name of GRM / SEA-SH Focal Point receiving complaint:
B. COMPLAINANT / SURVIVOR INFORMATION (Optional)	

<p>The survivor is not required to provide personal details. Is the complaint submitted by:</p> <p><input type="checkbox"/> Survivor <input type="checkbox"/> Third party <input type="checkbox"/> Anonymous</p>	<p>Age group of survivor (if known):</p> <p><input type="checkbox"/> Under 18 <input type="checkbox"/> 18 or above <input type="checkbox"/> Unknown / Not disclosed</p>
<p>Sex of survivor (if disclosed):</p> <p><input type="checkbox"/> Female <input type="checkbox"/> Male <input type="checkbox"/> Other <input type="checkbox"/> Prefer not to say</p>	<p>Contact details (only if survivor agrees to be contacted):</p> <p>Phone / Safe contact method: _____</p>
<p>C. INCIDENT CLASSIFICATION (Do NOT probe for details)</p>	
<p>Type of incident (check all that apply):</p> <p><input type="checkbox"/> Sexual Exploitation <input type="checkbox"/> Sexual Abuse <input type="checkbox"/> Sexual Harassment <input type="checkbox"/> Attempted SEA/SH <input type="checkbox"/> Other inappropriate sexual behavior</p>	<p>Relationship of alleged perpetrator to the project (if known):</p> <p><input type="checkbox"/> Project worker <input type="checkbox"/> Contractor / subcontractor <input type="checkbox"/> Consultant <input type="checkbox"/> Community member <input type="checkbox"/> Unknown</p>
<p>D. BRIEF DESCRIPTION OF THE INCIDENT (Optional) <i>Record only information voluntarily shared. Do not ask leading or investigative questions.</i></p>	
<p>E. SAFETY AND IMMEDIATE NEEDS ASSESSMENT</p>	
<p>Is the survivor in immediate danger?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown</p>	<p>Does the survivor request urgent support?</p> <p><input type="checkbox"/> Medical <input type="checkbox"/> Psychosocial <input type="checkbox"/> Legal <input type="checkbox"/> Protection / safety planning <input type="checkbox"/> Not requested at this stage</p>
<p>F. CONSENT FOR REFERRAL (CRITICAL SECTION) <i>Referral to services requires informed consent, unless national law mandates otherwise.</i></p>	
<p>Has the survivor provided consent for referral to services?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Anonymous / Not applicable</p>	<p>If yes, referral made to (check all that apply):</p> <p><input type="checkbox"/> Health services <input type="checkbox"/> Psychosocial support <input type="checkbox"/> Legal assistance <input type="checkbox"/> GBV service provider</p>

Date of referral: ____ / ____ / ____	
G. CONFIDENTIAL HANDLING AND FOLLOW-UP	
Incident logged in confidential SEA/SH register: <input type="checkbox"/> Yes <input type="checkbox"/> No	Access restricted to authorized SEA/SH personnel only: <input type="checkbox"/> Confirmed
Follow-up actions agreed (if any):	
H. SIGNATURE (GRM FOCAL POINT ONLY)	
Name: _____ Signature: _____ Date: ____ / ____ / ____	

ANNEX I: Consultations during Project Preparation

#	Location	Stakeholders	Number of Participants		Date	Summary of Key Issues Discussed
			M	W		
1	Nampula	District Government - Ribaue, Memba, Mecuburi, Malema, Muecate and Erati	42	8	17/02/2026	<ol style="list-style-type: none"> 1. The project that aims to strengthen stability and accelerate development in the province of Nampula was socialized, with an investment of US\$250 million, the initiative proposes long-term interventions aimed at promoting social cohesion, preventing conflicts and improving essential infrastructure. 2. During the socialization of the project, it was emphasized that the districts should take an active role at all stages of the project cycle, with a view to ensuring their institutional ownership and sustainability. 3. As part of the process of assessing the initial conditions for the start of the project, ADIN aims to promote the approximation between local development actors and potential beneficiaries, aligning them with the new approach introduced by the MozCommunity Program. 4. The districts are expected to play a central role in conducting the planning processes from the locality level to the district level, and it is recognized that the district planning technical councils are active and have relevant experience on the applicable procedures. 5. At the end of the meeting with the district governments, a form was shared to collect information on the current state of the communities and their socio-economic infrastructures, and it is hoped that all stakeholders will feel involved, engaged and committed to the implementation of the Project.
2		Civil Society Organizations	41	23	18/02/2026	<ol style="list-style-type: none"> 1. It is expected that the districts will play a fundamental role in the Project, by conducting the processes from the level of the locality to the district level, based on the assumption that the Technical Councils of District

						<p>Planning are active and have consolidated experience in the procedures, namely:</p> <ul style="list-style-type: none"> • Identification of the problems and challenges of the communities. • Identification of priority locations for intervention. • Sharing good practice experiences from previous district planning processes, as well as lessons learned. • Definition of mechanisms for participatory intervention of the different actors in the process of selecting beneficiaries.
3		Private Sector	74	23	18/02/2026	<ol style="list-style-type: none"> 1. The participation of the private sector in the promotion of employment and employability of young people was discussed, necessarily influencing the mentality of young people, that is, the way they position themselves and prepare themselves for the labor market. 2. It was recognized that the employability challenges in Mozambique are interconnected and require a systemic approach: it is not only about creating jobs, but also about strengthening and institutionalizing collaboration platforms that promote applied innovation, consolidate monitoring mechanisms and strengthen shared responsibility between the State, training institutions and the private sector. 3. The strategy of this Incubation Model is essentially focused on changing the mentality of young people, through critical reflection, analysis of opportunities and recognition of local potential as a basis for building sustainable economic trajectories. 4. By acting simultaneously with young entrepreneurs and established companies, it becomes possible to create a resilient employability ecosystem, capable of valuing local talent and generating lasting impact in rural and peri-urban communities in Northern Mozambique.

4	Niassa	Provincial Government				<ol style="list-style-type: none"> 1. The Governor presented the potential of Niassa, having highlighted agriculture as a priority of the province, such as the production of beans, macadamia, strawberries and fruit trees. He presented the challenges, having highlighted the economic infrastructures, such as the roads, of the existing 7729Km, only 900Km are paved. 2. He requested the sharing of the concept note of the Project, for better appropriation. 3. He suggested that the management of the funds be the responsibility of ADIN, since many projects subcontract to third parties and a large part of the funds are used for administrative costs to the detriment of the beneficiaries (Population). 4. He asked about the overall value of the project (how much value will the Province of Niassa benefit?) 5. He suggested that they prioritize the Province of Niassa in the implementation of infrastructure projects, since the distances between the districts are long and the access roads are degraded. 6. He suggested reducing training costs for the construction or rehabilitation of economic and social infrastructure 7. The Provincial Director of Youth and Sports suggested the inclusion of the construction of sports infrastructures at the level of the Province of Niassa, and the inclusion of aspects related to economic empowerment for Youth, such as allocation of self-employment kits for Youth 8. The Director of the Office of H.E. Governor asked about aspects of environmental safeguards. (What aspects of environmental safeguards will the project consider?)
5		District Government -	11	5	19/02/2026	<ol style="list-style-type: none"> 1. The Permanent Secretaries and District Directors were unanimous in stating that the districts have sufficient

		Nipepe, Mecula and Marrupa				<p>Human Resources and experience to manage funds, and competitions if the plans are clear and flexible. Some Districts highlighted the experience they had with the MOZNORTE Project, which was implemented in the same way.</p> <ol style="list-style-type: none"> 2. About improving access to basic services and resilient infrastructure, they suggested that the Project look at the rehabilitation of roads and bridges, as access roads are degraded in all districts of Niassa Province. 3. Regarding the social cohesion component, the SPDs and DDs suggested reducing the number of Members of the Associations that will be covered from 30 Members to 20 or 15, since in Niassa there are no associations composed of 30 Members. They also suggested that this figure should consider local conditions.
6		Civil Society Organizations	44	22	20/02/2026	<ol style="list-style-type: none"> 1. All participants were unanimous in stating that the project reflects the needs of the Province and the Northern Region. 2. For the success of the project there is a need to clarify the selection criterion of the companies (Associations, cooperatives and private) to be covered. 3. Involvement of the different actors (Private Sector, CSOs, community leaders). 4. Decentralization in the implementation of the Project at all levels (From the Province to the Locality). 5. Clarity and transparency in the management of project funds. 6. Dissemination of the project at all levels (Province, District, Administrative Post to the Locality). 7. Creation of synergies between the different actors (Government, Civil Society, Private and the Community); 8. Build on the successful implementation experiences of previous projects (LoCAL, Moz Norte).

						<ul style="list-style-type: none"> 9. Transparency of criteria in the selection of beneficiaries. 10. Transparency of the tenders to be launched. 11. Training of local health professionals so that they can ensure continuous psychosocial support in the various components. 12. Training of activists who can ensure continuity of psychosocial support and who speak the local language. 13. Creation of quotas to serve people with disabilities. 14. Ensuring advisory boards are inclusive. 15. Ensure the involvement of CSOs in the implementation and monitoring of projects through <i>outsourcing</i>. 16. Involve CSOs to support beneficiaries at different stages in project implementation from the preparation of Projects, Business Plans, capacity building of aspects related to social cohesion. 17. Engage CSOs to support the promotion of spaces for dialogue between Communities, Government and the Private Sector.
7		Private Sector	35	10	20/02/2026	<ul style="list-style-type: none"> 1. The Private Sector suggests that consultations for the implementation of the project should also be carried out in the communities. 2. Suggest clarifying the role of the Private Sector in project implementation. 3. The private sector must be integrated into local advisory councils. 4. The Private Sector Suggests Tax Reform for Business Improvement 5. Youth incubators should be built within Private Sector farms, if conditions are created for funding Young People after incubation. 6. They suggest the need to structure the market by linking to an aggregator 7. The private sector suggests improving access routes to allow the flow of products.

						8. It suggests the need to support small entrepreneurs to register their business
8	Pemba	Provincial Government			25/02/2026	<p>During the debriefing with His Excellency the Governor, the main points related to the implementation of the Project and the strategic guidelines for its operationalization were highlighted:</p> <ol style="list-style-type: none"> 1. The need for the appointment of a focal point at the provincial level to facilitate institutional coordination and communication was identified. 2. It was recommended that the inclusion of local ombudsmen who speak the local languages ensure greater effectiveness in communication and community participation. 3. The urgency in the implementation of the project was underlined, given the existing local needs. 4. ADIN should take over the coordination of the project in the northern region and MOPH will provide support in the infrastructure component. 5. Aspects that need clarification were identified, noting that Cabo Delgado does not intend to exclude any entity, prioritizing only quality criteria. 6. The private sector must be expanded and integrated, without excluding other actors, and a specific mechanism must be put in place to ensure its effective participation. 7. The World Bank has proposed holding an integration workshop, involving the three provinces covered, with the aim of establishing a common vision, by the month of May.

9		District Government - Pemba, Ancuabe, Balama, Chiure, Ibo, Macomia, Mecufi, Meluco, Metuge, Mocimboa da Praia, Montepuez, Mueda, Muidumbe, Namuno, Nangade, Palma and Quissanga	87	13	24/02/2026	<ol style="list-style-type: none"> 1. The Permanent Secretaries questioned whether there are similarities between the Program and the MozNorte Project, stressing that the districts covered show human resource capacity for project management. 2. They reiterated the need for the project to benefit all districts of the province, arguing that there should be no exclusions justified by insecurity. 3. They underlined that coordination should be ensured by ADIN, while the planning and management of the program should be conducted at district level, to strengthen local autonomy and respect the principles of decentralization. 4. They suggested holding planning meetings with the districts and, prior to implementation, specific meetings with the Permanent Secretaries and the Finance and Procurement sectors. 5. They stressed that the programs or projects must be aligned with the priorities defined by the districts. 6. The SPF reported that there is human resource capacity in the districts, although challenges remain related to the mobility of technicians, which can reduce the installed capacity. Thus, he proposed that the management of funds be ensured at the provincial level, with integration of district governments, and a gradual decentralization according to local capacities.
10		Civil Society Organizations	29	15	24/02/2026	<ol style="list-style-type: none"> 1. Projects must be implemented in a direct and dynamic manner, considering that, despite the frequent consultation and training, there is a slowness in the implementation phase. 2. It is recommended that consultations be maintained, but the execution of activities must be ensured by local organizations that have in-depth knowledge of the communities. 3. The coordination of the Program must be local, through ADIN, and civil society organizations must be integrated in the implementation of the projects.

					<ol style="list-style-type: none"> 4. The integration of Community-Based Organizations in the funding opportunities made available by the Program must be ensured. 5. It is observed that a significant part of the organizations operating in the province are not formally registered, although they have the structure and capacity for financing. In this regard, it is important to create opportunities for institutional strengthening, including support for legalization. 6. It is necessary to analyze the negative aspects, verified in the MozNorte project, to avoid their recurrence, as well as to identify and reinforce the positive aspects by integrating them into the Moz Communities Program. 7. The program must rescue and strengthen spaces for dialogue and community planning, promoting inclusive participation. 8. It is recommended to avoid the dispersion of resources, considering the size of the project and the number of communities covered, to ensure more significant gains and visible impacts. 9. Priority should be given to projects with potential for economic return, considering the challenges associated with the rural exodus.
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11		Private Sector	23	12	24/02/2026	<ol style="list-style-type: none"> 1. They praised the inclusion of young people as an integral part of the Program's target group. 2. They said that, sometimes, the criteria for access to financing are excessively strict, citing as an example the required contributions, which force entrepreneurs to resort to credit. 3. They pointed out that although the World Bank imposes strict criteria for applying for financing, delays in the disbursement of funds have been observed. 4. They highlighted that challenges persist in hiring local personnel, since, in many cases, candidates do not meet the minimum requirements required. 5. Suggest the integration of young people trained in internship programs, such as Moz Youth, with a view to acquiring professional experience and reducing the number of professionals recruited outside Cabo Delgado province;
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ANNEX J: Applicability and Triggering of ESS5

Under MozCommunity Program, ESS5 is not expected to be triggered at appraisal due to the explicit exclusion of:

- Activities that may cause temporary or permanent physical displacement; and
- Activities that may cause large-scale economic displacement.

However, as confirmed in the A-ESRS and ESCP, ESS5 may still be triggered at subproject level where minor land acquisition, land use restriction, or small-scale economic displacement is identified during screening. Accordingly, the Project adopts a contingent ESS5 management approach, embedded in the ESMF screening procedures, to ensure early identification, avoidance, minimization, and mitigation of any ESS5-related impacts.

Step-by-Step Process When ESS5 Is Triggered

Step 1. Enhanced Screening and Impact Classification

All proposed subprojects shall undergo ESS5 screening as part of the ESMF process to determine:

1. Type of impact:
 - a. Economic displacement only
 - b. Physical displacement (temporary or permanent)
2. Scale of impact:
 - a. Minor / small-scale
 - b. Affecting vulnerable households
3. Land acquisition modality:
 - a. Involuntary land acquisition
 - b. Voluntary land donation (VLD)

Step 2. Avoidance and Minimization Measures (Mandatory First Response)

Before any ESS5 instrument is prepared, the Borrower must demonstrate that all feasible avoidance and minimization measures have been applied, including:

- Adjusting subproject location or footprint;
- Using existing public land where feasible;
- Reducing land take to the minimum technically required;
- Modifying design standards to avoid structures, crops, or livelihoods.

Subprojects that cannot demonstrate avoidance/minimization remain ineligible.

Resettlement Instruments to Be Prepared

Depending on the screening outcome, one of the following instruments shall be prepared, disclosed, and implemented prior to commencement of works.

1. Abbreviated Resettlement Plan (ARP): Required when:
 - Minor land acquisition or asset loss occurs;
 - Fewer than 200 Project Affected Persons (PAPs);
 - No physical displacement of households.

Minimum outline:

- Subproject description and ESS5 applicability
- Legal framework (ESS5 and Mozambican law)
- Census of PAPs and asset inventory
- Eligibility and entitlements matrix
- Valuation methodology (replacement cost)
- Livelihood restoration measures (if applicable)
- Consultation and disclosure summary
- GRM for resettlement-related complaints
- Implementation schedule and budget
- Monitoring and reporting arrangements

2. Full Resettlement Plan (RP): Required when:

- Physical displacement is unavoidable;
- Temporary relocation affects residences or businesses;
- Vulnerable households are significantly affected.

Core RP structure follows ESS5 and national requirements:

- Socio-economic baseline and census
- Replacement housing and relocation assistance
- Livelihood restoration and transitional support
- Special measures for vulnerable groups
- Institutional responsibilities and budget

While large-scale displacement is excluded, this instrument remains available as a contingent safeguard under the ESMF.

3. Livelihood Restoration Plan (LRP): Required when economic displacement occurs without physical relocation (e.g., loss of agricultural land, trees, access to markets).

Key elements:

- Income loss assessment
- Restoration measures (cash compensation, in-kind support, training)
- Time-bound livelihood recovery targets
- Monitoring of income restoration outcomes

Compensation and Assistance Principles (Non-Negotiable)

All ESS5 instruments shall ensure:

- Compensation at full replacement cost, not depreciated or market value;
- Compensation prior to land take or access restriction;
- No forced eviction;
- Livelihoods restored to pre-project levels or better;
- Additional support to women-headed households, IDPs, and vulnerable groups.

These principles are consistent with ESS5 objectives and the Mozambican-ESS5 gap analysis referenced in project documentation.

Voluntary Land Donation (VLD) Protocols

VLD may only be used when the land is free of disputes and encumbrances; the donor is fully informed and acting without coercion; the donation does not result in physical displacement or livelihood loss; and the land is a small proportion of the donor's total holding. These conditions are explicitly required under the ESCP and ESMF screening tools.

The following mandatory VLD steps must be followed:

- Independent verification of land ownership/use rights
- Documentation of informed consent (written and witnessed)
- Confirmation that refusal will not affect project eligibility
- Disclosure of the VLD agreement at community level
- Inclusion of VLD records in project files and monitoring reports

VLD must never be used as a substitute for compensation where ESS5 impacts exist.

Consultation, Disclosure, and GRM

All ESS5-related processes shall:

- Be preceded by meaningful consultation with PAPs;
- Disclose draft instruments in accessible formats and languages;
- Use the Project GRM, with clear procedures for resettlement-specific complaints;
- Ensure confidential handling of grievances involving vulnerable groups.

Institutional Roles and Monitoring

PCU (ADIN): Screening, instrument preparation, implementation

Third-Party Monitor (if engaged): Independent verification of ESS5 and national legislation compliance

World Bank: Prior review and implementation support

Monitoring reports shall confirm that compensation paid prior to impact; livelihood restoration progress; and functionality of GRM.

ANNEX K: Environmental Code of Practice (ESCOP)

To manage and mitigate potential negative environmental impacts, the project applies Environmental Codes of Practice (ESCOPs); outlined in this document. The ESCOPs contain specific, detailed and tangible measures that would mitigate the potential impacts of each type of eligible subproject activity under the project. They are marked as relevant for the planning phase, the implementation phase, or the post-implementation phase of activities. They are intended to be simple risk mitigation and management measures, readily usable to the Borrower and contractors.

The ESCOPs in this section are divided into:

- a. ESCOPs for infrastructure subprojects (general guidelines and technical guidelines)
- b. ESCOPs for livelihood support subprojects
- c. ESCOPs for delivery of food and non-food items

a. ESCOPs for Infrastructure Subprojects

General ESCOP for Infrastructure Subprojects

Issue	Environmental Prevention/Mitigation Measures	Responsible Party
1. Noise during construction	<ul style="list-style-type: none"> a) Plan activities in consultation with communities so that noisiest activities are undertaken during periods that will result in least disturbance. (Planning phase) b) Use when needed and feasible noise-control methods such as fences, barriers or deflectors (such as muffling devices for combustion engines or planting of fast-growing trees). (Implementation phase) c) Minimize project transportation through community areas. Maintain a buffer zone (such as open spaces, row of trees or vegetated areas) between the project site and residential areas to lessen the impact of noise to the living quarters. (Implementation phase) 	
2. Soil erosion	<ul style="list-style-type: none"> a) Schedule construction during dry season. (Planning phase) b) Contour and minimize length and steepness of slopes. (Implementation phase) c) Use mulch, grasses or compacted soil to stabilize exposed areas. (Implementation phase) d) Cover with topsoil and re-vegetate (plant grass, fast-growing plants/bushes/trees) construction areas quickly once work is completed. (Post-Implementation phase) e) Design channels and ditches for post-construction flows and line steep channels/slopes (e.g., with palm fronds, jute mats, etc.). (Post-Implementation phase) 	
3. Air quality	<ul style="list-style-type: none"> a) Minimize dust from exposed work sites by applying water on the ground regularly during dry season. (Implementation phase) b) Avoid burn site clearance debris (trees, undergrowth) or construction waste materials. (Implementation phase) c) Keep stockpile of aggregate materials covered to avoid suspension or dispersal of fine soil particles during windy days or disturbance from stray animals. . (Implementation phase) d) Reduce the operation hours of generators /machines /equipment /vehicles. (Implementation phase) e) Control vehicle speed when driving through community areas is unavoidable so that dust dispersion from vehicle transport is minimized. (Implementation phase) 	
4. Water quality and availability	<ul style="list-style-type: none"> a) Activities should not affect the availability of water for drinking and hygienic purposes. (Implementation phase) b) No soiled materials, solid wastes, toxic or hazardous materials should be stored in, poured into or thrown into water bodies for dilution or disposal. (Implementation phase) c) Avoid the use of waste water pools particularly without impermeable liners. d) Provision of toilets with temporary septic tank. (Implementation phase) 	

	<ul style="list-style-type: none"> e) The flow of natural waters should not be obstructed or diverted to another direction, which may lead to drying up of river beds or flooding of settlements. (Implementation phase) f) Separate concrete works in waterways and keep concrete mixing separate from drainage leading to waterways. (Implementation phase) 	
5. Solid and hazardous waste	<ul style="list-style-type: none"> a) Segregate construction waste as recyclable, hazardous and non-hazardous waste. (Implementation phase) b) Collect, store and transport construction waste to appropriately designated/ controlled dump sites. (Implementation phase) c) On-site storage of wastes prior to final disposal (including earth dug for foundations) should be at least 300 metres from rivers, streams, lakes and wetlands. (Implementation phase) d) Use secured area for refuelling and transfer of other toxic fluids distant from settlement area (and at least 50 metres from drainage structures and 100 metres from important water bodies); ideally on a hard/non-porous surface. (Implementation phase) e) Train workers on correct transfer and handling of fuels and other substances and require the use of gloves, boots, aprons, eyewear and other protective equipment for protection in handling highly hazardous materials. (Implementation phase) f) Collect and properly dispose of small amount of maintenance materials such as oily rags, oil filters, used oil, etc. Never dispose spent oils on the ground and in water courses as it can contaminate soil and groundwater (including drinking water aquifer). (Implementation phase) g) After each construction site is decommissioned, all debris and waste shall be cleared. (Post-Implementation phase) 	
6. Asbestos	<ul style="list-style-type: none"> a) If asbestos or asbestos containing materials (ACM) are found at a construction site, they should be clearly marked as hazardous waste. (Implementation phase) b) The asbestos should be appropriately contained and sealed to minimize exposure. (Implementation phase) c) Prior to removal, if removal is necessary, ACM should be treated with a wetting agent to minimize asbestos dust. (Implementation phase) d) If ACM is to be stored temporarily, it should be securely placed inside closed containers and clearly labeled. (Implementation phase) e) Removed ACM must not be reused. (Implementation and post-implementation phase) 	
7. Health and Safety	<ul style="list-style-type: none"> a) When planning activities of each subproject, discuss steps to avoid people getting hurt. (Planning phase) <p>It is useful to consider:</p>	

	<ul style="list-style-type: none"> • Construction place: Are there any hazards that could be removed or should warn people about? • The people who will be taking part in construction: Do the participants have adequate skill and physical fitness to perform their works safely? • The equipment: Are there checks you could do to make sure that the equipment is in good working order? Do people need any particular skills or knowledge to enable them to use it safely? • Electricity Safety: Do any electricity good practices such as use of safe extension cords, voltage regulators and circuit breakers, labels on electrical wiring for safety measure, aware on identifying burning smell from wires, etc. apply at site? Is the worksite stocked with voltage detectors, clamp meters and receptacle testers? <p>b) Mandate the use of personal protective equipment for workers as necessary (gloves, dust masks, hard hats, boots, goggles). (Implementation phase)</p> <p>c) Follow the below measures for construction involve work at height (e.g. 2 meters above ground (Implementation phase):</p> <ul style="list-style-type: none"> • Do as much work as possible from the ground. • Do not allow people with the following personal risks to perform work at height tasks: eyesight/balance problem; certain chronic diseases – such as osteoporosis, diabetes, arthritis or Parkinson’s disease; certain medications – sleeping pills, tranquillisers, blood pressure medication or antidepressants; recent history of falls – having had a fall within the last 12 months, etc. • Only allow people with sufficient skills, knowledge and experience to perform the task. • Check that the place (eg a roof) where work at height is to be undertaken is safe. • Take precautions when working on or near fragile surfaces. • Clean up oil, grease, paint, and dirt immediately to prevent slipping; and • Provide fall protection measures e.g. safety harness, simple scaffolding/guard rail for works over 4 meters from ground. <p>d) Keep worksite clean and free of debris on daily basis. (Implementation phase)</p> <p>e) Provision of first aid kit with bandages, antibiotic cream, etc. or health care facilities and enough drinking water. (Implementation phase)</p> <p>f) Keep corrosive fluids and other toxic materials in properly sealed containers for collection and disposal in properly secured areas. (Implementation phase)</p>	
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	<ul style="list-style-type: none"> g) Ensure adequate toilet facilities for workers from outside of the community. (Implementation phase) h) Rope off construction area and secure materials stockpiles/ storage areas from the public and display warning signs including at unsafe locations. Do not allow children to play in construction areas. (Implementation phase) i) Ensure structural openings are covered/protected adequately. (Implementation phase) j) Secure loose or light material that is stored on roofs or open floors. (Implementation phase) k) Keep hoses, power cords, welding leads, etc. from laying in heavily traveled walkways or areas. (Implementation phase) l) If school children are in the vicinity, include traffic safety personnel to direct traffic during school hours, if needed. (Implementation phase) m) Control driving speed of vehicles particularly when passing through community or nearby school, health center or other sensitive areas. (Implementation phase) n) During heavy rains or emergencies of any kind, suspend all work. (Implementation phase) o) Fill in all earth borrow-pits once construction is completed to avoid standing water, water-borne diseases and possible drowning. (Post-Implementation phase) 	
8. Other	<ul style="list-style-type: none"> a) No cutting of trees or destruction of vegetation other than on construction site. [Implementing agency] will procure locally sourced materials consistent with traditional construction practices in the communities. (Planning phase) b) No hunting, fishing, capture of wildlife or collection of plants. (Implementation phase) c) No use of unapproved toxic materials including lead-based paints, un-bonded asbestos, etc. (Implementation phase) d) No disturbance of cultural or historic sites. (Planning and implementation phases) 	

Specific ESCOPs for Infrastructure Subprojects

Subproject Type	Environmental Prevention/Mitigation Measures	Responsible Party
<i>Buildings</i>		
In general	<ul style="list-style-type: none"> a) Provide adequate drainage in the building’s immediate surroundings to avoid standing water, insect related diseases (malaria, etc.) and unsanitary conditions. (Implementation phase) b) Include sanitary facilities such as toilets and basins for hand-washing. (Implementation phase) c) Restrict use of asbestos cement tiles as roofing. (Implementation phase) 	

Subproject Type	Environmental Prevention/Mitigation Measures	Responsible Party
	d) Tiled floors are preferred for easier cleaning and more hygienic. (Planning and implementation phases)	
Shelters, community centers, schools, kindergartens.	a) Design of schools, community centres, markets should follow relevant requirements on life and fire safety required by National Building Codes and relevant guidelines from the concerned Ministries. (Planning phase) b) Schools: Maximise natural light and ventilation systems to minimise needs for artificial light and air conditioning; use large windows for bright and well-ventilated rooms. (Planning phase)	
<i>Roads, Bridges and Jetties</i>		
Roads connecting villages, between villages and townships.	General Considerations: a) Control placement of all construction waste (including earth cuts) to approved disposal sites (at >300 m from rivers, streams, lakes, or wetlands). If we do have to dispose spent oil unexpectedly, we should use safe disposal method capable by rural community. For example- burning spend oil as fuel. (Implementation phase) b) Erosion control measures should be applied before the rainy season begins, preferably immediately following construction. Maintain, and reapply the measures until vegetation is successfully established. (Implementation and post-implementation phases) c) Sediment control structures should be applied where needed to slow or redirect runoff and trap sediment until vegetation is established. (Implementation and post-implementation phases) d) Avoid road construction in unstable soils, steep slopes and nearby river banks. Additional measures (see the section below) need to be applied should there be no alternatives for road alignments. (Planning phase)	
	Protect slopes from erosion and landslides by the following measures (Implementation phase): a) Indigenous Species, fast-growing grass on slopes prone to erosion. These grasses help stabilise the slope and protect soil from erosion by rain and runoff. Locally available species possessing the properties of good growth, dense ground cover and deep root shall be used for stabilisation. b) Provide interceptor ditch, particularly effective in the areas of high intensity rainfall and where slopes are exposed. This type of ditch intercepts and carries surface run-off away from erodible areas and slopes before reaching the steeper slopes, thus reducing the potential surface erosion. c) For steep slopes, a stepped embankment (terracing) is needed for greater stability. d) Place a retaining wall at the lower part of the unstable slope. The wall needs to have weeping holes for drainage of the road sub-base, thus reducing pressure on the wall. e) Rocks (riprap) can be used in addition to protect the slope.	

Subproject Type	Environmental Prevention/Mitigation Measures	Responsible Party
	f) Prevent uncontrolled water discharge from the road surface by sufficiently large drainage ditches and to drain water away from the down slope.	
Bridges (less than 20 meters) and Jetties	<p>Erosion protection (Planning and implementation phases):</p> <p>a) The main method of slope and erosion protection is the construction of gabions (gravity walls that support jetties bankment or slopes which have a potential to slip) and ordinary stone pitching.</p> <ul style="list-style-type: none"> • The slope of gabions should be in the ratio of at least 1 vertical: 2 horizontals. Flatter slopes may be adopted depending on the site terrain. • The filling of the gabions should be from strong and competent rock which is laid very closely packed to maximize the weight. • Bracing wire should be used to prevent the gabion bulging out. The bracing wire should be placed at each third of the gabion height. • The gabions should be firmly anchored into the ground by founding the gabions below the expected scour depth level. • In cases where stone pitching is not provided, the top layer should be covered by soil to encourage the growth of grass and the stabilization of the slopes. <p>b) Stone pitching may be provided as the only erosion protection measure in those cases where the erosion potential is deemed minimal. Stone pitching is not very resistant to strong water current and is mainly used as the top finish on gabion walls.</p> <p>Water Quality and Fauna (Implementation phase):</p> <p>a) Restrict duration and timing of in-stream activities to lower flow periods (dry season) and avoid periods critical to biological cycles of valued flora and fauna (e.g., spawning)</p> <p>b) Water flow diversion should be avoided; if it is impossible to avoid, impacts should be assessed and mitigation proposed.</p> <p>c) Establish clear separation of concrete mixing and works from drainage areas and waterways</p>	
<i>Water Supply</i>		
Shallow Groundwater Wells	<p>a) Site wells so that appropriate zone of sanitary protection can be established. (Planning phase)</p> <p>b) Equip with slab around the well for easy drainage, a crossbeam and a pulley to support the use of only one rope and bucket for collecting water. One rope and bucket is more hygienic for the well and water. (Implementation phase)</p> <p>c) Install steel steps/rungs (inside wall of a deep well) for maintenance and in case of emergency. (Implementation phase)</p> <p>d) A groundwater well usually has a wide open water area. It is necessary to provide a cover/roof/wire mesh on top to protect this area from falling leaves or debris. (Implementation phase)</p>	

Subproject Type	Environmental Prevention/Mitigation Measures	Responsible Party
	<ul style="list-style-type: none"> e) Wells should always be located upstream of the septic tank soak-away. Build the soak-away as far away as possible from the well (minimum 15 m/50 feet) as it can influence the quality of the drinking water when it is too close. (Planning and implementation phases) f) Before using a new water source, test water quality and when intended for potable purposes ensure water meets the national drinking water standard. Water quality should also be monitored in the case of all well rehabilitation. (Post implementation phase) 	
Spring	<ul style="list-style-type: none"> a) Every spring capture should be equipped with a filter and a sand trap. Add a wall between the inflow and the outlet pipe to create chamber for settling out sand; build the wall with a notch (lowered section) for controlled flow. Sand must be cleaned out periodically (operation and maintenance). (Implementation and post-implementation phases) b) Collection basin for spring capture needs to have a perforated PVC pipe (holes diameter 2mm) to be used as a screen for the water intake. Alternatively, a short pipe with wire mesh (screen) around the open end should be provided. (Implementation phase) c) Collection basin needs to have a fence to protect the spring from public access and risk of contamination; and a roof/cover over the spring to prevent leaves or other debris from entering the basin. (Implementation phase) 	
Rainwater harvesting	<ul style="list-style-type: none"> a) Rainwater storage reservoir should be intact, connected to roof gutter system, with all faucets and piping intact. (Implementation phase) b) If distribution pipes are attached into the storage reservoir, install the distribution pipes 10cm above the storage/tank bottom for better use of the storage capacity. (Implementation phase) c) Cover must be fitted tightly onto the top of the storage reservoir to avoid overheating and growth of algae (from direct sunlight), and to prevent insects, solid debris and leaves from entering the storage tank. (Implementation phase) d) A ventilation pipe with fly screen should be placed in the cover to help aerate the tank/reservoir which is necessary for good water quality. (Implementation phase) e) Roof gutters need to be cleared regularly, as bird and animal feces and leaf litter on roofs or guttering can pose a health risk if they are washed into the reservoir tank. (Post-implementation phase) f) Reservoir tanks need an overflow so that in time of really heavy rain, the excess water can drain away. The overflow should be designed to prevent backflow and stop vermin/rodents/insects entering the system. A good design will allow the main storage tank to overflow at least twice a year to remove built up of floating sediment on the top of the stored water and maintain good water quality. (Planning and implementation phases) 	

Subproject Type	Environmental Prevention/Mitigation Measures	Responsible Party
Installation / Rehabilitation of pipelines	<p>Preventing contamination at water sources:</p> <ul style="list-style-type: none"> a) Build a structure with roof over the water source to prevent leaves or other debris from entering into the basin. (Implementation phase) b) A fence is needed to protect the water sources (springs particularly) from public access and risk of contamination. (Implementation phase) c) The sand/gravel filter traps sediment before the spring flow enters the collection chamber and has to be changed during periodical maintenance. (Implementation and post-implementation phases) <p>Pipe Laying:</p> <ul style="list-style-type: none"> a) PVC water transmission and distribution piping need to be buried underground (coverage 50cm minimum) to prevent pipe against external damage (e.g. passing vehicles, solar UV radiation, etc.). Exposing PVC pipe to UV radiation causes the plasticiser in the PVC pipe to evaporate causing loss of integrity and brittleness. (Implementation phase) b) Pipe shall be laid in a straight line, over a constantly falling slope. (Implementation phase) c) When conditions do not allow piping to be buried (i.e. pipe is used above ground), then metal pipe must be used, and supported/braced as excessive movement may lead to leaks and breaks. (Implementation phase) d) Outlet pipes and fittings from water storage/basin shall not be PVC pipe due to exposure to solar UV/sunlight. Metal piping and fittings are preferred. (Implementation phase) e) When the distribution pipes are laying via forest area, the following considerations are needed (Planning and implementation phases): <ul style="list-style-type: none"> • The route must be considered with minimum effects of changing the existing situations of the forest as well as the least habitats area of the animals • Setbacks distances from important natural features (e.g. mineral licks, wildlife features such as nest, leks, dens, staging areas, lambing areas, calving areas) to conserve wildlife values should be kept, if necessary. 	
<i>Electrification</i>		
Solar power supply	<ul style="list-style-type: none"> a) Tidy wiring for easy maintenance and reduces the risk of accidents. (Implementation phase) b) Need to raise community awareness on electrical hazards and health and safety concerns, as well as proper maintenance of solar panels (Implementation and post-implementation phases) c) Need to raise community awareness on proper disposal of solar panels, specifically avoiding disposal of panels near water bodies (Post-implementation phase) 	
<i>Access to Sanitation</i>		

Subproject Type	Environmental Prevention/Mitigation Measures	Responsible Party
Public latrines/toilets	<ul style="list-style-type: none"> a) All toilets must have a septic tank made from non-permeable material such as concrete, plastic or fiberglass to provide primary treatment of fecal waste. (Implementation phase) b) PVC pipe used to connect pour-flush toilet to a septic tank must be buried underground or covered over (with cement) for protection and to prevent exposure to sunlight. (Implementation phase) c) Metal pipe is a preferred choice to be used as the gas vent pipe on septic tanks. Never use PVC pipe as it is unable to withstand long-term exposure to sunlight. (Implementation phase) d) A toilet should be at least 20 meters from water sources (well, spring, river). (Planning and implementation phases) 	
<i>Wastewater Systems</i>		
Wastewater sewerage and treatment	<ul style="list-style-type: none"> a) Septic tanks must have a vent pipe to prevent the build-up of gas inside the chamber and shall have a ‘manhole’ that provides access inside the tank if needed. (Implementation phase) b) Ensure that the septic tanks have two chambers: first chamber is for settling of sludge, and the second chamber is for aerobic treatment. These chambers will generally treat wastewater better. Partially treated septic tank effluent can pollute groundwater and surface water. (Implementation phase) c) Do not discharge septic tank effluent to an open drain or other surface water. The effluents need to be treated before final disposal. This may be achieved through: (i) an underground leach field, (ii) a vegetated leach field, or (iii) a pit for soaking away. (Implementation phase) d) Community awareness should be raised so that the community inspects the septic tanks periodically and ensures that the septic tanks are emptied every few years for the tank to continue to function properly. (Implementation and post-implementation phases) 	
Solid Waste Management	<ul style="list-style-type: none"> a) Solid waste depots/disposal need to be located on hard-standing areas that prevent waste entering surface or groundwater. (Implementation phase) b) Waste depots/storage/disposal should be contained, sealed and/or roofed/covered to prevent storm water contamination. Wastes need to be emptied regularly. (Implementation phase) 	

b. ESCOPs for Livelihood Support Subprojects

ESCOPs for Livelihood Support Subprojects

Risk/Concern	Environmental Prevention/Mitigation Measures	Responsible Party
<i>General</i>		
To minimize water	<ul style="list-style-type: none"> a) Avoid any activity causing excessive erosion and turbidity. (Planning phase) 	

pollution	<ul style="list-style-type: none"> b) Keep waste and hazardous materials away from surface water bodies, drinking water sources and do not dispose of waste in creeks or rivers. (Implementation phase) c) Properly dispose contaminated wastewater and hazardous materials, if any, passing through conventional treatment process such as screening, settling, oil-water separation, etc. (Implementation phase) d) Avoid contamination of drinking water source (e.g. well) from inflow of waste materials and pollutants. (Implementation phase) e) Avoid large-scale animal farming and aquaculture activities in water catchment area. (Planning and implementation phases) 	
To minimize air pollution	<ul style="list-style-type: none"> a) Limit burning post-harvest waste material in close proximity to village; choose days with limited wind for burning; limit number and size of areas for burning per day; do not burn non-agricultural waste such as garbage, plastics or animal waste. Rather than burning post-harvest waste, consider alternative good practices such as composting to produce organic fertilizer or utilization as fuel for bioenergy production. (Planning and implementation phases) b) Reduce dust generation through application of water where practical. (Implementation phase) c) Limit idling of vehicles, machineries equipment. (Implementation phase) 	
To minimize noise disturbance	<ul style="list-style-type: none"> a) Repair and maintain machineries for safe and quiet operation. (Implementation phase) b) Avoid emission of continuous/noisy sounds during working. (Implementation phase) 	
To minimize soil pollution	<ul style="list-style-type: none"> a) Store petrol / diesel on impermeable floor (e.g. compacted clay, concrete floor) and surrounded by an embankment or berm. (Implementation phase) b) Storage for hazardous materials including petroleum should be above ground and isolated. (Implementation phase) c) Establishing an appropriate disposal area for hazardous materials and waste where prevents hazardous material from leaching into the soil and surface water. (Implementation phase) d) Do not dispose hazardous wastes anywhere except in areas designated by pollution control agencies. (Implementation phase) 	
To minimize impact from non-agricultural waste generation	<ul style="list-style-type: none"> a) Collect waste systematically, store and dispose at appropriately designated dump sites, far away from households. (Implementation phase) b) Reuse and recycle appropriate and viable materials. (Implementation phase) c) Segregate hazardous and non-hazardous wastes. (Implementation phase) 	
To minimize emergency risks	<ul style="list-style-type: none"> a) Build appropriately designed infrastructure safe from natural hazards. (Planning and implementation phases) 	

	b) Avoid areas prone to natural hazard events (flooding, spring tides, etc.), steep slopes and vulnerable to erosion and landslides, etc. (Planning and implementation phases)	
To secure the safety	<p>a) Proper use and management of hazardous materials and waste. (Implementation phase)</p> <p>b) Awareness of dangers on working area, occupation, health and safety equipment through signage where applicable. (Implementation phase)</p> <p>c) Lock storage of fuels, paints, and chemicals. (Implementation phase)</p>	
Agriculture Support to Farmers		
	<p>a) Use sustainable agricultural practices / approaches / technologies. (e.g., Agroforestry Practices, Polycultures and Crop rotation, Integrated Pest Management (encouraging the predators of crop-eating pest insects such as birds and bats), etc.) (Planning and implementation phases)</p> <p>b) Reduce top-soil losses from erosion and the reduction in soil fertility. (Cover Crops and Mulches (Establishing leguminous ground cover and applying plant residues), Grass Barriers (planting grass in strips along the contour lines), etc.) (Implementation phase)</p> <p>c) Induce conservation and efficient use of water. (Planning and implementation phases)</p> <p>d) Reduce misuse of agrochemicals, contributing to a reduction of toxic substances in soil and water. (Planning and implementation phases)</p> <p>e) Reduce usage of pesticides and promote integrated pest management approaches recommended by DOA. (Planning and implementation phases)</p> <p>f) Reduce, recycle and reuse the agricultural waste (natural, animal, plant waste). (Implementation phase)</p>	

c. ESCOPs for Delivery of Food and Non-food Items

ESCOPs for Delivery of Food and Non-food Items

Risk/Concern	Environmental Prevention/Mitigation Measures	Responsible Party
Food Safety	<p>- Conduct due diligence during the procurement process and the vendor selection that the food commodities to be received will be delivered in good condition and quality control is performed during intake. (Planning phase)</p> <p>- For storage, select storage facilities and locations based on surveying the relevant characteristics, considering factors such as quality of construction, state of repairs, road access, and sustainability. Regularly inspect these warehouse storage facilities for perimeter fencing, cleanliness, ventilation, lighting and fire prevention. (Implementation phase)</p>	

	<p>- Assess the effects of moisture, humidity and temperature in food storage warehouses and for transportation, and take appropriate mitigation and management measures to ensure that food quality and safety are not impacted by these factors. Regularly monitor warehouse storage facilities for temperature, moisture and humidity given the particular inventory of food items stored and regularly inspect warehouses for food quality. Similar minimum measures for food safety should be included in the contracts of transportation services providers and inspected regularly. (Implementation phase)</p> <p>- For pest management, for each warehouse, conduct a site-specific pest (insect and rodent) assessment, prepare a pest control plan, procure and utilize relevant insect and rodent control equipment, as well as procure and apply relevant pest management measures. Regular food storage warehouse inspections should include inspection of the implementation of the pest control regime. (Implementation phase)</p>	
<p>Solid waste management</p>	<p>- Procure food aid commodities with an aim to minimize packaging; minimize the potential for unmanaged waste; and minimize the type of packaging materials that may have adverse impacts on the environment, and on community health and safety, to the extent technically and financially feasible. (Planning phase)</p> <p>- During transportation, storage and distribution processes, collect all solid waste generated, establish a short term covered storage area on site, and store all solid waste, including food packaging, at these storage area sites. Upon completion of distribution in communities and with relevant frequency in storage warehouses, remove waste from the storage area sites and dispose of waste in relevant off-site facilities designated by local township authorities. (Implementation phase)</p> <p>- For possible solid waste generated after distribution (food packaging that will be discarded later), raise community awareness on where and how to dispose of such packaging, in designated covered storage areas in communities or in IDP camps. (Implementation and post-implementation phases)</p>	