



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 12/11/2019 | Report No: ESRSC00995



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
South Asia	SOUTH ASIA	P171269	
Project Name	Plastic free Rivers and Seas for South Asia		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Environment, Natural Resources & the Blue Economy	Investment Project Financing	3/31/2020	5/15/2020
Borrower(s)	Implementing Agency(ies)		
The South Asia Cooperative Environment Programme (SACEP)	South Asia Cooperative Environment Programme		

Proposed Development Objective(s)

The Project Development Objective is to catalyze actions that reduce the flow of plastic pollution into South Asian Seas.

Financing (in USD Million)	Amount
Total Project Cost	40.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

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

The menace of ocean plastics and discarded single use plastics that pollute the land, flow into rivers and deposited into the sea where it remains is significant with environmental, social and economic costs that threaten South Asian prosperity. While several South Asian nations have taken pioneering steps to address parts of the plastic pollution problem, they are often unrecognized, left unshared and not replicated. Moreover, the rivers that carry plastic waste and the regional seas polluted by tens of thousands of pieces of plastic per square mile are themselves transboundary in nature, further amplifying the need for greater understanding of the problem, solutions and the importance of



shared responsibility among nations. The project seeks to catalyze actions that reduce the flow of plastic pollution into South Asian seas. This would be accomplished inter alia by supporting competitive block grants, facilitating/supporting public-private sector partnerships and investments in circular economy transitions and refining policies and incentive structures, bottom-up action, education and behavior change. With the political will across SAR nations rising, as evidence through participation and agreements made at the G7, G20, ASEAN Summit, UN, among others, the time has never been better to mobilize South Asian nations for collective action to address plastic pollution.

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]
This regional project will catalyze action to strengthen and support regional platforms to reduce plastics pollution flow across the South Asia Region’s marine environment. It will support policy formulation and harmonization, regional coordination, research and monitoring for improved management of plastic debris; regional and community-based awareness, behavioral changes and capacity building; collection of plastics in oceans, beaches and rivers; and adoption of innovative technologies and solutions to reduce, reuse, recycle and repurpose plastics through leveraging private sector engagement and financing. At this stage, there are no country-specific activities identified.

D. 2. Borrower’s Institutional Capacity

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The project will be implemented by a Financial Agent (FA) on behalf of and who will be contracted by the PIU. The FA will be responsible primarily for procurement, financial management and environmental and social screening and E&S risk management of project activities. The selection of the FA will be done during preparation through a public bidding process. The bidding documents for the FA will require qualified E&S staffing for the bidders and will spell out E&S requirements and arrangements for various project activities.

Two bona fide Regional Organizations will be directly involved in carrying out the project activities. (i) South Asia Cooperative Environment Programme (SACEP) which will serve as the Implementing Agency and convener of technical line Ministers such as the Ministers of Environment; and (ii) the Indian Ocean Rim Association (IORA) which will have the mandate to convene the Ministers of Foreign Affairs and Heads of State. SACEP will house the Project Implementation Unit (PIU). SACEP is an inter-governmental organization established by Afghanistan, Bangladesh, Bhutan, India, Maldives, Nepal, Pakistan and Sri Lanka in 1982 to promote and support protection, management and enhancement of the environment of the region and IORA, on one hand, is an inter-governmental organization aimed at strengthening regional cooperation and sustainable development with the Indian Ocean region through its 20 member states and nine dialogue partners. Preliminary institutional assessment and SWOT analysis revealed that both institutions have limited ability to handle funds above \$1M and do not have experience with World Bank-supported operations.

A detailed E&S capacity assessment for SACEP and IORA and the chosen FA will be conducted during preparation and a capacity building program, as required, will be developed and supported by the project. An assessment of capacity to adequately perform relevant E&S functions for sub-contracted tasks will be part of the procurement process. The



implementation of the capacity building program will be documented in the Environmental and Social Commitment Plan (ESCP) of the implementing agencies.

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

A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Moderate

The proposed project supports TA-type activities such as policy formulation and harmonization, regional coordination, research, awareness raising and capacity building. The project will also support investments in innovative and environment-friendly and sustainable technologies, through competitive block grants and private sector engagement, in order to implement practical solutions to reduce, reuse and recycle plastics. The overall impact of the project will be positive and beneficial as there will be reduction in the generation, use and dumping of plastic wastes in waterways that end up in coastal areas and oceans in SAR.

At this point specific types of innovative technologies and solutions to reduce, reuse and recycle plastics that will be supported by the project are not known yet although the project design will ensure that only investments that are resource efficient, environment-friendly and sustainable will be supported. Those that are pollutive, non-sustainable and resource intensive will be in the negative list and ineligible for project financing. That said, environmental risks still exist, specifically for residual wastes or those plastics that cannot be reused, recycled and repurposed, which will have to be disposed and managed properly. But given the project's focus on 3R's residual plastic should be minimal. Other innovative methods of collecting plastics from the oceans may still have risks and impacts, which will need to be properly screened and/or assessed. There might also be health risks and impacts to those working in the recycling/ repurposing due to potential exposure to harmful materials and chemicals during the recycling process, if proper health and safety measures in work places are not implemented and depending on the technology adopted to recycle and repurpose plastics. Resource use patterns will also need to be assessed in these facilities to ensure resources (energy, water and raw materials) are used in an efficient and sustainable manner.

The E&S capacity of the implementing agencies, inter-organizational and cross-regional coordination is weak. Capacity strengthening will be supported by the project.

Based on the project design that will exclude from project financing any resource intensive, non-environment-friendly and unsustainable practices and technologies, the environmental risk of the project is rated Moderate. This will be revisited during preparation and during implementation and revised, if necessary, in accordance with an adaptive management approach.

Social Risk Rating

Moderate

The proposed project will stimulate partnerships among civil society organizations, youth groups and other stakeholders to support regional and community-based behavior change and awareness raising; provide funding for innovative solutions; and support youth-led movements, among other things. The presence of informal workers is common in waste management and currently there is a lack of clarity regarding how this and other forms of labor will be managed in the community-level activities to be carried out; the innovative technologies and solutions to be deployed; and the coordination arrangements to be established.



The project will include a range of stakeholders across the region: public sector organizations, social enterprises, community groups, and private sector entities. Specific criteria for the management of the challenge grants will need to be prepared and applied to ensure fair access to funding, especially by women's organizations and youth groups. Special attention to gender is required to address specific challenges these may face in adopting alternatives to single use plastics, as well as promote household behavior change for waste sorting on women. There is a lack of clarity as to whether the project will be implemented in cultural heritage areas or in areas with Indigenous or Tribal Peoples, so this will need to be assessed during project preparation. The project is not expected to involve any land acquisition or resettlement. For all the aforementioned reasons, and considering also the potential social benefits of such a project across the region--including through the generation of income and employment--the social risk rating is proposed to be Moderate.

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

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The proposed project is expected to have positive and beneficial impacts for SAR and its oceans as a whole as the combination of supporting the enabling environment, coordination and capacity building, and innovation and support to the 3Rs is expected to have positive long-term effects in reducing the dumping of plastic wastes in waterways that end up in coastal areas and oceans. That said, the standard is still relevant to the project as innovative and environment-friendly and sustainable technologies and solutions to collect and recycle, reuse or repurpose plastics may still pose risks to marine life, waste workers and waste pickers, and communities although risks and impacts are expected to be moderate. Any residual plastics that cannot be recycled, reused or repurposed will need to be properly disposed and managed. In addition, TA activities, such as, policy formulation, data collection, research and monitoring will be screened for environmental and social risks and impacts and, where warranted, E&S risk management will be integrated into the TORs and products of these TA activities

An Environmental and Social Assessment (ESA) will be undertaken during preparation to assess the risks and impacts of: (a) supporting enabling policies to reduce the use and dumping of plastic wastes; (b) innovative and environment-friendly and sustainable technologies and solutions to clean up the oceans and rivers on marine life and the recycling, reuse and repurposing of these plastic materials on the health and safety of informal waste workers and community groups; (c) residual plastic waste that cannot be recycled, reused or repurposed; and (d) E&S capacity assessment of the chosen Implementing Agencies while embedding E&S risk management and capacity building in the project design. The ESA will also assess women's participation in waste management, especially in plastic recycling and production of reusable items. The assessment should identify women's organizations that are active in this area in addition to issues that these face that can be addressed as part of the project. Finally, the ESA will also develop an ESMF that will spell-out the screening process to exclude any resource-intensive, non-environment friendly and unsustainable technologies and practices of 3Rs.

A Stakeholder Engagement Framework will be developed during preparation to promote broad, inclusive stakeholder engagement and participation in all phases of the project. Labor Management Procedures will also be developed



proportional to the level of risks and impacts involved. Finally, an Environmental and Social Commitment Plan will also be prepared by the implementing agencies.

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

The use of Borrower Frameworks will not be considered for this regional project. ESF requirements will apply.

ESS10 Stakeholder Engagement and Information Disclosure

The project will promote and support circular economy plastic waste streams which will involve a range of stakeholders across the region, including public sector organizations, community groups, and private sector entities. Project activities will include strengthening stakeholder platforms; collaborating with civil society groups to reduce plastics leakage at the community level; behavior change and awareness raising campaigns and challenge grant competitions; and development of regionwide youth-led movements for change, among other things. Given the project's implementation arrangements and activities, a Stakeholder Engagement Framework will be developed during preparation to promote broad, inclusive stakeholder engagement and participation in all phases of the project. This Framework will identify the key apex organizations working in the area of marine plastics as well as the mechanisms these use to engage with other downstream organizations. One or more Stakeholder Engagement Plans will be developed during project implementation to guide the engagement of stakeholders involved in the community-focused activities such as the behavior change, innovation grants, or beach cleanups.

B.2. Specific Risks and Impacts

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

ESS2 Labor and Working Conditions

The project will employ direct workers such as project staff, consultants, etc. to help implement the project and may also involve community workers (workers who volunteer to cleanup the ocean, beaches and rivers) as well as contracted workers who may work on recycling centers and plastic collections. Labor Management Procedures proportional to the project's labor and working condition risk and impacts will be developed to meet the requirements of this standard. OHS risk to workers will be assessed in the ESA and an OHS plan will be developed following the World Bank's EHS Guidelines. Grievance redress system for workers will also be developed and implemented.

ESS3 Resource Efficiency and Pollution Prevention and Management

Based on the limited information at hand and the given project objectives and activities, this standard is deemed relevant especially because the recycling plants will be required to use resources sustainably during recycling/repurposing work. The project will also proactively support resource efficiency, waste minimization, plastic pollution prevention and plastic reduction. Any technology or practice of 3Rs that will be resource-intensive, non-

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environment friendly and unsustainable will be screened out and rendered ineligible for project financing. The TORs for developing policies and capacity building and investments will promote resource efficiency, recycling and reuse. The relevance of GHG emissions from the project will be assessed during preparation and calculations will be done accordingly if significant emissions are expected.

ESS4 Community Health and Safety

The relevance of this standard to the project will be assessed and confirmed during preparation. The clean up-focused actions that help to alleviate existing clogging of drains and waterways with plastics should result in improvements in community security from better flood management.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The project is not expected to require any land acquisition having adverse impacts on people's lands and land-based assets. Should land be required for any of the innovative technologies that are ultimately supported, the project will pursue ways of acquiring the needed land through means that do not involve physical or economic displacement or resettlement, such as voluntary land donations.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

This standard is deemed relevant as project activities will benefit coastal and marine ecosystems as well as oceans and pelagic systems. The innovative technologies and solutions suggested to cleanup the oceans and rivers may have risks & impacts on marine life. The ESA will assess the impacts and benefits of the project on coastal and marine biodiversity as well as ocean ecosystems and mitigation hierarchy will be applied to manage the risks and impacts.

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

The relevance of this standard to the project will be assessed and confirmed during preparation. The ESA will include an upstream assessment. Screening and site-specific assessments will be included in the ESMF as needed.

ESS8 Cultural Heritage

It is not envisioned that this project will involve civil works that will have impact on cultural heritage. Plastic recycling, repurposing centers will be existing facilities, however, the relevance of this standard will be assessed and confirmed during preparation through the ESA. The ESA will include an upstream assessment, screening and site-specific assessments, if and as needed.

ESS9 Financial Intermediaries

The standard is not currently relevant. The relevance of this standard to the project will be assessed during preparation.



B.3 Other Relevant Project Risks

Inter-country and inter-organizational coordination will be a real challenge that could pose an implementation risk to the project. All project activities will have a regional lens and should be coordinated with each country and through World Bank teams working with government partners on linked activities at the national level.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

Yes

Project component 2 focuses on community-based actions along three major international waterways and the ocean and the shared marine areas such as the Bay of Bengal and by more than one country. This policy is therefore triggered. Riparian countries will be notified formally about the project and the project details. to comply with OP7.50 requirements.

OP 7.60 Projects in Disputed Areas

No

The project is not expected to work on the ground in any disputed territories and proposed to include the avoidance of this as a criterion in any sub-project site selection.

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered?

No

Financing Partners

No financing partner is identified at this stage.

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

Actions to be completed prior to Bank Board Approval:

The following actions are expected to be completed by project appraisal:

- Environmental and Social Assessment of the TA and innovative technologies and solutions to collect, reduce, recycle, reuse and repurpose plastics, including E&S capacity assessment and capacity building of the Implementing Agencies; and ESMF for oceans clean up and innovative technologies and solutions to recycle, reuse and repurpose plastic waste;
- ToRs for the FA to be procured by, SACEP and IORA
- Stakeholder Engagement Framework (SEF); and
- Environmental and Social Commitment Plan (ESCP).

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

- E&S staffing of the selected Implementing Agency(-ies), with capacity building actions specified;
- Implementation of SEF, including the preparation of one or more Stakeholder Engagement Plans;
- Preparation of Labor Management Procedures proportional to ESS2-related risks and impacts;
- TORs of various TA activities that embed E&S considerations into their design and implementation; and

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-OHS Plan.

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

31-Mar-2020

IV. CONTACT POINTS

World Bank

Contact: Karin Shepardson Title: Lead Environmental Specialist

Telephone No: 5720+13645 / Email: kshepardson@worldbank.org

Contact: Pawan G. Patil Title: Senior Economist

Telephone No: 473-2276 Email: ppatil@worldbank.org

Borrower/Client/Recipient

Borrower: The South Asia Cooperative Environment Programme (SACEP)

Implementing Agency(ies)

Implementing Agency: South Asia Cooperative Environment Programme

V. FOR MORE INFORMATION CONTACT

The World Bank

1818 H Street, NW

Washington, D.C. 20433

Telephone: (202) 473-1000

Web: <http://www.worldbank.org/projects>

VI. APPROVAL

Task Team Leader(s): Karin Shepardson, Pawan G. Patil

Practice Manager (ENR/Social) David Seth Warren Recommended on 11-Dec-2019 at 02:39:5 EST

Safeguards Advisor ESSA Charles Ankisiba (SAESSA) Cleared on 11-Dec-2019 at 16:37:45 EST

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