Kingdom of Cambodia

Ministry of Labor and Vocational Training

Skills for Better Jobs Project （P179159）

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

September 2023

LIST OF ACRONYMS

AP	Affected Person
CERC	Contingent Emergency Response Component
CHS	Community Health and Safety
DED	Detailed Engineering Designs
EIA	Environmental Impact Assessment
E&S	Environmental and Social
ESCP	Environment and Social Commitment Plan
ESCoP	Environment and Social Codes of Practice
ESIA	Environmental and Social Impact Assessment
ESF	Environment and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESRS	Environmental and Social Risk Summary
ESS	Environment and Social Standard
FPIC	Free Prior and Informed Consent
GBV	Gender-Based Violence
GRM	Grievance Redress Mechanism
HIV/AIDS	Human Immunodeficiency Virus / Acquired Immune Deficiency Syndrome
JC	Job Center
IDA	International Development Association
IDP	Industrial Development Policy
ILDPs	Industrial-linkages development plans
IP	Indigenous Peoples
IPF	Investment Project Financing
LMI	Labor market management information
LMIS	Labor management information system
MEF	Ministry of Economy and Finance
MLVT	Ministry of Labor and Vocational Training
MoE	Ministry of Environment
NEA	National Employment Agency
NGO	Non-Government Organization
OHS	Occupational Health and Safety
POM	Project Operations Manual
PPE	Personal protective equipment
RGC	Royal Government of Cambodia
RSA	Rapid Social Assessment
SA	Social Assessment
SBD	Standard Bidding Document
SDF	Skill Development Fund
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SOP	Standard Operating Procedures
SSC	Sector Skills Council
TA	Technical Assistance
TI	Training Institution
TVET	Technical and Vocational Education and Training
UXO	Unexploded ordnance
VAC	Violence Against Children
WBG	World Bank Group

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EXECUTIVE SUMMARY

Project Description

The Cambodia Skills for Better Jobs Project (hereafter as the Project) will support building the skills of the upcoming and existing workforce in response to industry needs and to provide labor market management information (LMI) and career orientation for better jobs. The proposed project will focus on delivering quality skills that are in demand by industry to respond to the challenges faced in developing skills among the workforce. The proposed project will comprise five components: (a) Strengthening TVET to upskill and respond to industry needs; (b) Information and orientation for better jobs; (c) Strengthening sector associations for EESD and expanding skills development; (d) Project management and monitoring; and (e) Contingent emergency response component (CERC).

Purpose of the ESMF

This ESMF sets out the principles, rules, guidelines and procedures to assess the environmental and social risks and impacts of the project The Environment and Social Management Framework (ESMF) contains measures and plans to reduce, mitigate and/or offset adverse risks and impacts, provisions for estimating and budgeting the costs of such measures, and information on the agency or agencies responsible for addressing project risks and impacts, in line the World Bank's Environment and Social Framework (ESF).

The ESMF sets out the following:

- Project description;
- RGC Legislative Framework guiding the project and the WB ESF, including a gap analysis;
- Potential Environment and Social Risks and Impacts, and Mitigation Measures;
- ESMF Procedures for Screening and Preparation of Environmental and Social Codes of Practice (ESCoP) or Environment and Social Plan (ESMPs), including institutional arrangements;
- Institutional Arrangements and Capacity assessment to implement the ESMF and other instruments;
- Consultation and Stakeholder Engagement;
- Grievance Redress Mechanism;
- Monitoring and Reporting; and
- Indicative Budget.

The ESMF, together with a Stakeholder Engagement Plan (SEP) and Environmental and Social Commitment Plan (ESCP), have been prepared, consulted and disclosed in June 2023.

Potential Impacts and Mitigation Measures

Since the specific locations of the training institutions (TIs) and job centers (JCs) have not yet been identified in this project preparation stage, it is difficult to provide accurate details regarding the potential environmental and social impacts of the Project. However, based on similar projects implemented in Cambodia and the overall social and environmental context of the country, a Rapid Social Assessment, partial environmental assessment, and stakeholder interviews were conducted from April to June 2023. In addition, a consultation workshop was conducted in June 2023 to prepare for this project. These activities will help in making some assumptions, including the initial environmental and social impact assessment, which will be updated once the TIs and JCs are identified.

Based on the World Bank's ESS1, the Project will follow a mitigation hierarchy to:

a) Anticipate and avoid risks and impacts;
b) Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels;

c) Once risks and impacts have been minimized or reduced, mitigate; and
d) Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible.

The primary project beneficiaries are individuals in the upcoming and existing workforce in Cambodia who enrol and/or complete vocational training and seek opportunities for better jobs. Both the upcoming workforce and the existing workforce will have access to the training programs and labor market services supported by the project. The beneficiaries will have a choice to take skills assessment and receive certification at various levels, enabling them to secure jobs in higher value chains and improve their earnings. In addition, the project will directly benefit, through capacity building activities, (a) managerial staff, teachers, and trainers of the project-financed training institutions with improved knowledge and skills; (b) employers who benefit from upskilled workforce and trainings designed to meet their needs; (c) jobseekers who receive job counselling and career orientation; (d) government officials, job counsellors, staff of sector skills councils (SSCs) involved in service delivery; and (e) labor management information system (LMIS) users. The project will also promote greater inclusion among disadvantaged groups such as women and others.

The social risk associated with the project is assessed as moderate. Based on potential construction and rehabilitation/renovation works, the Project should address potential risks and impacts in the following areas: a) Occupational Health and Safety (OHS), b) Small-scale labor influx, c) Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), and Violence against Children (VAC), d) Child labor and e) Forced Labor. In addition, f) Discrimination and exclusion of disadvantaged/vulnerable Groups is also a project risk associated with all project activities, not just rehabilitation works.

In the case of the current project, the Environmental Risk Rating is designated as moderate at this stage, and potential environmental impacts are mainly related to: (a) generation of package wastes/e-wastes and OHS risks associated with information and communications technology (ICT) upgrades for selected learning facilities and the LMIS; and (b) generation of noise, dust, minor hydrocarbon spills, waste and sedimentation as well as OHS risks during civil works from renovation/rehabilitation and new constructions for selected TIs and JCs. Construction waste streams may include hazardous materials such as asbestos containing materials or lead containing paints.

In accordance with the World Bank's Environmental and Social Framework (ESF) and Environmental and Social Standards (ESS), the project has developed relevant mitigation measures to address potential environmental and social impacts. To ensure effective implementation of these measures, the project has developed two ESF instruments, including ESCoP for rehabilitation/renovation works and subproject-specific Environmental and Social Management Plan (ESMP) for new construction works, which serve as comprehensive tools to identify, assess, and manage environmental and social risks throughout the project cycle. The ESF instruments include various components, such as an environmental and social screening process, grievance redress mechanisms, stakeholder engagement plans, and monitoring and reporting procedures, among others. By utilizing the ESF instruments, the project aims to ensure that its activities are carried out in an environmentally and socially responsible manner, and that potential risks and impacts are effectively identified and managed.

ESMF Procedures

The purpose of the ESMF is to manage potential adverse impacts by establishing a guidance document that will inform MLVT and its project management unit (PMU) as well as PIU-SDF. The ESMF is also a guidance document which outlines the process for conducting future, site-specific ESMPs, once subprojects are identified.

As an overarching guideline document, the ESMF seeks to ensure that:

- Sub-projects consider potential environmental and social issues, especially for different populations who would be directly impacted (positively or adversely) by the sub- projects;
- Sub-projects consider socio-cultural and gender sensitivities and environmental issues prevailing in areas where the proposed sub-projects would be implemented;
- Environment and social instruments are compliant with the World Bank ESF as well as national legislation;
- Subprojects take into consideration the guidance in this ESMF and the mitigation hierarchy for environment and social impacts;
- Screening mechanism is determined for Environment and Social (E&S) risks and impacts once subprojects sections are identified;
- Procedures and responsibilities for the development of site-specific ESMPs are established.

The ESMF describes procedures for screening and scoping, as well as detailed steps to prepare ESMPs if they are needed, including the information required, responsibilities and capacity needs and training necessary for project staff in charge of ESMP monitoring. Institutional arrangements for the project at the MLVT, SDF, and government-level, as well as for consultants and contractors, is also described in Section 6 of this report.

Consultations and Stakeholder Engagement

The Project will conduct consultation activities and stakeholder engagement as per the project's stakeholder engagement plan (SEP), which was separately prepared in June 2023. The SEP seeks to ensure the project stakeholders both direct and indirect are informed and involved in all the stages of the Project. The Project recognizes the need to seek representative and inclusive feedback and the SEP looks to establish the role of women and vulnerable groups firmly within the consultation process. The SEP aims to be responsive and accessible to vulnerable groups including Indigenous Peoples to ensure they can access project benefits. The project also recognizes the importance of ensuring affected people are involved in mitigation measures, OHS program, as well as continuing monitoring of project activities.

Grievance Redress

The grievance redress mechanism (GRM) seeks to resolve concerns promptly, using an understandable process that is culturally appropriate and readily accessible at no cost. Grievances can be submitted if someone believes the Project is having a detrimental impact on the community, the environment, or on their quality of life. Stakeholders may also submit comments and suggestions. The GRM is described in full in the project's SEP, as well as in Section 8 of this report.

Monitoring and Reporting

Monitoring is the method of ensuring mitigation measures are being implemented and are effective. Monthly, quarterly- and semi-annual monitoring reports will need to be undertaken in order to:

- Improve environmental and social management practices;
- Ensure the efficiency and quality of the environmental and social assessment processes;
- Establish evidence- and results-based environmental and social impact assessment; and
- Provide an opportunity to report the results of the implementation of mitigation measures in future ESMPs and other project related documents.

During the implementation, the E&S officer of the PMU set at MLVT and PIU-SDF will conduct monthly internal monitoring activities on the ESMPs to determine how mitigation measures are being implemented and the extent of their effectiveness. The monitoring report will be reviewed by the project PMU & PIU-SDF and submitted to the World Bank for their review. The E&S officer will be assisted by the E&S consultants.

The E&S officer and E&S consultants will monitor that the required mitigation measures of the ESCoP/ESMP and other applicable documents are considered and implemented by the contractors of select TIs and JCs in charge of construction.

The E&S officer and E&S consultants will also monitor grievance redress, ensuring indigenous peoples and other vulnerable groups are able to access benefit benefits, and the implementation of the SEP consultation and disclosures activities. Meanwhile, monitoring of environmental impacts should focus on ensuring that all environmental mitigation measures are implemented as per the ESCoP/ESMP.

Budget

ESMF implementation cost will include the development of the specific site-specific environment and social instruments, including staff costs, travel, consultation workshops, translation and trainings. The total indicative cost has been estimated at project preparation stage and will be updated and finalized during project design and implementation. Funds will be sourced by a combination of WB and counterpart financing, from the project management component. This budget is indicative only and should be further refined during the preparation of site-specific ESMPs.

1 PROJECT DESCRIPTION

1.1 Overview

1. The Cambodia Skills for Better Jobs Project (the Project) will support building the skills of the upcoming and existing workforce in response to industry needs and to provide labor management information (LMI) and career orientation for better jobs which is aligned with the Objective four of the Country Partnership Framework (CPF) of the World Bank Group (WBG) for the period of FY2019-FY2023 (Report No. 136500-KH) as extended to FY2024[1]: Enhance quality and alignment of education with labor demands under Focus Area II Fostering human development. The proposed project will also contribute to the twin goals of the WBG —eliminating extreme poverty by 2030 and boosting shared prosperity. The skills agenda is fundamental to economic diversification with a view to supporting Cambodia as it moves to an economy built on higher-skilled and more productive jobs. Given that Technical and Vocational Education and Training (TVET) tends to attract trainees from poorer backgrounds, the project will support the poor and bottom 40 percent in building their capabilities and skills, allowing them to obtain better jobs that have higher earnings. Specific training programs targeted to women and girls will encourage female participation in training and promote female employment. The Ministry of Labor and Vocational Training (MLVT) is the implementation agency.

2. The Project is preparing this Environmental and Social Management Framework (ESMF) according to the Environmental and Social Framework (ESF) of the World Bank, which came into effect in October 2018. A summary of the project components is presented below.

1.2 Detailed Description of Components

3. The proposed project will focus on delivering quality skills that are in demand by industry to respond to the challenges faced in developing skills among the workforce. The proposed project will comprise five components: (a) Strengthening TVET to upskill and respond to industry needs; (b) Information and orientation for better jobs; (c) Strengthening sector associations for EESD and expanding skills development; (d) Project management and monitoring; and (e) Contingent emergency response component (CERC). More details are available in the Project Information Document: https://projects.worldbank.org/en/projects-operations/project-detail/P179159.

Component 1 – Strengthening TVET to upskill and respond to industry needs

4. This component will focus on promoting the quality and relevance of TVET by alleviating constraints of both industry and training providers to effectively collaborate. The focus is on facilitating partnerships between individual training providers and associated industry, by providing a mix of capacity building and financing – including results-based financing to training institutions - to improve both their willingness and ability to effectively interact. This will be complemented with improvements in the quality of training through strengthening key inputs such as curricula, teachers, and infrastructure; and with support to a broader group of stakeholders to also improve industry-provider collaboration at the national and sectoral levels.

Sub-component 1.1 – Sector-wide improvements in industry engagement and quality – in select sectors

[1] World Bank; International Development Association; International Finance Corporation; Multilateral Investment Guarantee Agency. 2022. Performance and Learning Review of the Country Partnership Framework for Kingdom of Cambodia for the Period FY19-FY24. World Bank, Washington, DC. © World Bank. https://openknowledge.worldbank.org/handle/10986/37758 License: CC BY 3.0 IGO.

5. This subcomponent will support (i) the establishment of SSCs in priority sectors and help build their capacity by engaging them in project implementation; (ii) quality improvements through curricula development and capacity building of staff at TVET institutions. The project will support the design of new STPs for occupations and levels that are considered crucial for expanding the priority economic sectors. Curriculum development will extend to the revision and improvement of Basic Competencies to ensure good coverage of 21st century skills; (iii) the training of teachers in the new curricula.

Sub-component 1.2 – Improvements in industry engagement and quality in select training institutions

6. This sub-component will improve the quality and relevance of training provision by promoting industry-provider collaboration for a select number of training institutions, through the results-based financing of ILDPs. The sub-component will finance: (a) TA to support the training institution and firms to establish Industry-School Committees (ISCs) and to develop, implement, and monitor Industry Linkage Development Plan (ILDP); (b) ILDP implementation, including: (b1) civil works (in some cases), (b2) equipment; (b3) incentives for various forms of industry partnerships, e.g., joint curriculum adaptation, guest lecturers from industry, teacher training by industry, and internships. Training providers supported by this subcomponent will be selected based on their potential to deliver high quality and relevant training in priority sectors.

Component 2 – Information and Orientation for Better Jobs

Sub-Component 2.1 – Labor market information system (LMIS)

7. This sub-component will finance: (a) An LMIS roadmap, (b) The preparation, implementation, analysis, and dissemination of labor market surveys; (c) Review and possible upgrade of the job matching; (d) The digitization of self-assessment tools for career orientation; and (e) Modernization of the LMIS website, with IT upgrades, to integrate the results of (b), (c), and (d).

Sub-Component 2.2 – Job search support and career guidance

8. This sub-component will finance improvements in career orientation activities undertaken by the NEA along with the refurbishment of existing job centers and possibly the purchase of mobile job centers. This sub-component will finance: (a) Revising and strengthening job search support and career guidance and conducting Training of Trainers (ToT) for staff to provide these services as well as short trainings on job search support or to increase job retention; (b) Expansion of these services, including through hiring of contract staff; and (c) Rehabilitation of select job centers, including renovations in seven job centers with equipment upgrades and the purchase of a mobile job center.

Component 3 – Strengthening sector associations for EESD and expanding skills development
Sub-component 3.1 – Strengthening sector associations for EESD – in select sectors

9. This sub-component will provide technical assistance to sector associations in priority sectors to increase the associations' capacity to support their members in EESD. The TA will cover how to**:** (a) Identify and anticipate growing occupations and critical skills needs; (b) Define and identify most suitable training options to fill the skills gaps, in particular in terms of sector-wide training for which sector associations can apply to the SDF; and (c) Participate effectively in SSCs. The type of support provided will depend on the sector since sector associations' activities in relation to EESD can differ depending on: (a) The sector's skill needs, including occupations' skill level and composition, in particular the mix between general, sector- and firm-specific skills; and (b) The sector's distribution in terms of firm size.

Sub-component 3.2 – Expanding skills development – in select sectors

10. This sub-component will support the enhancement and expansion of training delivery through demand-driven training, with financing of training proposals through the SDF as well as institutional

strengthening of the SDF. The institutional strengthening includes: (a) Communication and awareness campaigns to relevant stakeholders, and especially firms and TIs, about the SDF and skills development; (b) Capacity building and technical support to enhance the SDF's capacity in fund and training management; and (c) IT investments.

Component 4 – Project management and monitoring

11. This component will support the establishment and maintenance of the project implementation arrangements, the operation of an effective project management unit, stakeholder engagement activities, monitoring and evaluation, and the operations of a grievance redress mechanism (GRM).

Component 5 – Contingent Emergency Response Component (CERC)

12. This component is designed to provide swift response in an event of an Eligible Crisis or Emergency[2], by enabling Royal Government of Cambodia (RGC) to request the World Bank to re-allocate uncommitted project funds to support emergency response and reconstruction.

Project Beneficiaries

13. The primary project beneficiaries are individuals in the upcoming and existing workforce in Cambodia who enrol and/or complete vocational training and seek opportunities for better jobs. Both the upcoming workforce and the existing workforce will have access to the training programs and labor market services supported by the project.

14. In addition, the project will directly benefit, through capacity building activities, (a) managerial staff, teachers, and trainers of the project-financed training institutions with improved knowledge and skills; (b) employers who benefit from upskilled workforce and trainings designed to meet their needs; (c) jobseekers who receive job counselling and career orientation; (d) government officials, job counsellors, and LMIS users. The project will also promote greater inclusion among disadvantaged groups such as women and others.

1.3 Purpose and Scope of the ESMF

15. This ESMF sets out the principles, rules, guidelines and procedures to assess the environmental and social risks and impacts of the project. The ESMF contains measures and plans to reduce, mitigate and/or offset adverse risks and impacts, provisions for estimating and budgeting the costs of such measures, and information on the agency or agencies responsible for addressing project risks and impacts, in line with Environment and Social Standard (ESS) 1, Assessment and Management of Environmental and Social Risks and Impacts, of the World Bank's Environment and Social Framework (ESF). The ESMF will also provide guidance for environmental and social (E&S) screening for sub-project risks and impacts and the needs for further development of instruments/activities during the project operation once sub-project locations are identified.

16. Specifically, this ESMF was prepared with the specific objectives to: (a) outline expected environmental and social risks and impacts of the proposed subprojects/activities, and describe the mitigation approach which will effectively address these risks and impacts; (b) to establish clear procedures for the E&S screening and assessment, review, approval, and implementation of subprojects,

[2] "Eligible Crisis or Emergency" is defined as "an event that has caused, or is likely to imminently cause, a major adverse economic and/or social impact associated with natural or man-made crises or disasters", Paragraph 12, Bank Policy: Investment Project Financing, Projects in Situations of Urgent Need of Assistance or Capacity Constraints. It may include extreme climate event (e.g. flood), nature disasters (e.g. earthquake), public health emergency (e.g. COVID-19), and any natural disaster or man-made crisis.

Technical Assistance (TA), and other activities to be financed under the Project including through the preparation of site-specific environmental and social management plan (ESMP) where applicable; (c) to specify appropriate roles and responsibilities, and outline the necessary reporting procedures, for managing and monitoring E&S issues/ concerns related to subprojects, TA, and activities; (d) to determine the training, capacity building and technical assistance needed to successfully implement the provisions of the ESMF; (e) to address mechanisms for public consultation and disclosure of project documents as well as redress of possible grievances; and (f) to establish the budget requirement for implementation of the ESMF. The ESMF will be applied to all the projects activities, TA, and other investment activities to be financed under this project.

1.4 Scope of the ESMF

17. The ESMF was developed based on desk reviews of the government's relevant laws and regulations as well as available documents containing social and environmental information in the project provinces, field surveys to some of the potential project sites, and meetings with related stakeholders. The ESMF also follows the requirements of the ESF and ESSs, the WB's Guidance Note for Borrowers on the Application of the ESSs, the guideline for preparation of an ESMF for WB financing project in Royal Government of Cambodia, the World Bank Groups (WBG's) General Environmental Health and Safety Guidelines.

18. This ESMF is structured as below:

i. Project Description;
ii. Policy, Legal, and Administrative Framework with gap analysis;
iii. Initial baseline information of the project area;
iv. The potential E&S risks and impacts and proposed mitigation measures;
v. Procedures for screening, review, clearance, and implementation of subproject and Project activities;
vi. ESMF Implementation Arrangements;
vii. Capacity building, training, and technical assistance;
viii. Monitoring and Reporting;
ix. ESMF Implementation Budgeting;
x. Grievance redress mechanism; and
xi. ESMF consultation and disclosure.

19. This ESMF includes Annexes with followings:

i. Ineligible/negative List;
ii. E&S Screening and Scoping forms;
iii. Rapid Social Assessment;
iv. E-waste Management Plan;
v. Labour Management Procedures (LMP) including Occupational Health and Safety (OHS), Workers' Grievance Procedure and grievance checklist and sample registration form;
vi. Codes of Conduct;
vii. Environment and Social Code of Practice (ESCoP) for generic rehabilitation related impacts;
viii. ESMP Outline;
ix. CERC Manual; and
x. Chance Find Procedures for Physical Culture Resources.

20. This ESMF has been prepared with active participation from stakeholders through public consultations and findings incorporated.

1.5 Application and Revision/Modification of the ESMF

21. The ESMF will be integrated into the preparation and implementation stages of the project. It must be followed through the entire project cycle from planning, including site identification, design, implementation and operation/maintenance, to attain the above outlined purpose and objectives. The ESMF will be a 'live document' enabling revision, when and where necessary. Any unexpected situations and/or relevant changes in the design of the project would be assessed and appropriate management measures would be incorporated by updating the ESMF. Revisions will require the Non-Objection from the World Bank.

2 INSTITUTIONAL AND LEGAL FRAMEWORK

22. The Royal Government of Cambodia (RGC) has a number of laws and other legal instruments relevant to the environmental and social issues concerning the Project. These are presented below, first those concerning environmental matters, then those concerning social matters, followed by a discussion of institutional responsibilities.

2.1 Royal Government of Cambodia Environmental Laws, Regulations, Guidelines and Standards

2.1.1 Constitution of the Kingdom of Cambodia

23. The **Constitution of the Royal Kingdom of Cambodia (1993)** is the overarching legal framework for the country and guarantees all Khmer citizens the same rights regardless of race, color, language and religious belief. It specifically prohibits all forms of discrimination against women (article 45). On environment, article 59 requires the State to protect the environment and balance of abundant natural resources and establish a precise plan of management of land, water, air, wind, geology, ecological system, mines, energy, petrol and gas, rock and sand, gems, forests and forestry products, wildlife, fish and aquatic resources and it is within this constitutional context that the Ministry of Environment (MoE) was established.

24. Aside from the Constitution, the Government of Cambodia has established specific laws and regulations for forests, protected areas, and land law to ensure sustainable development. Law on Environmental Protection and Natural Resources Management (1996).

25. In 1996, the **Law on Environmental Protection and Natural Resources Management (NS/RKM/1296/36)** came into force. The law requires the government to prepare national and regional environmental plans and sub-decrees concerning a wide range of environmental issues, including EIAs, pollution prevention and control, public participation, and access to information. The Law on Environmental Protection 020 and Natural Resource Management (1996) is the enabling legislation which allows the MoE to pass sub-decrees and regulations to protect the environment.

2.1.2 Sub-Decree on Environmental Impact Assessment Process #72 ANRK.BK[3] (1999)

26. The **Sub-Decree on Environmental Impact Assessment Process #72 ANRK/BK (1999)** sets out the current statutory requirements for EIA process for private or public projects, including providing avenues for public participation (in particular Prakas on Public Participation in the EIA Process 2017). It sets out the minimum requirements for the nature and size of projects and activities (both existing and proposed) that shall be subject to EIAs. Prakas No.021 BRK, dated on 03 February 2020 on the Categorization of Environmental Impact Assessment for Development Project[4] also listed for building construction project with the total land size equal or in between 3,000 square meters to 15,000 square meters required for Environmental and Social Management Plan (ESMP) as the impact is considered minimum, site specific and manageable through applying good construction practices and the mitigation measures. It is not required for either Initial Environmental and Social Management Plan (IESIA) or Environmental and Social Impact Assessment (ESIA). In the building construction project, IESIA is required for a project with total land bigger than 15,000 square meters but smaller than 45,000 square meters while ESIA is required for project with total land bigger than 45,000 square meters. The guidance for preparing IESIA/ESIA report is

[3] http://www.cambodiainvestment.gov.kh/sub-decree-72-anrk-bk-on-environment-impact-assessment-process- pdf_990811.html

[4] http://www.cambodiainvestment.gov.kh/KM/%E1%9E%94%E1%9F%92%E1%9E%9A%E1%9E%80%E1%9E%B6%E1%9E%9F%E1%9E%9F%E1%9F%92%E1%9E%8F%E1%9E%B8%E1%9E%96%E1%9E%B8-%E1%9E%85%E1%9F%86%E1%9E%8E%E1%9E%B6%E1%9E%8F%E1%9F%8B%E1%9E%90%E1%9F%92%E1%9E%93%E1%9E%B6.html

provided in the Prakas on General Guideline for Preparing IESIA and ESIA, 2009 N. 376 BRK.BST. The Guidelines also list the specific content required in EIA reports, including: (i) introduction (ii) legal framework, (iii) project description, (iv) description of the baseline environment, (v) public participation/stakeholder engagement, (vi) assessment of impacts and mitigation measures, (vii) environmental management plan, (viii) economic assessment and valuation of environmental damages and losses, (ix) conclusion and recommendations.

27. The Project Proponents/Owner (public or private) is required to submit the necessary project document (IESIA / ESIA Report) to the MoE for review and approval. The IESIA/ESIA report shall be prepared by a registered company authorized by the MoE on behalf of the Project Proponent/Owner.

2.1.3 Guidelines on the Delegation of Power to Municipal/Provincial Departments of Environment (2005)

28. The **Guidelines on the Delegation of Power to Municipal/Provincial Departments of Environment (2005)** stipulate that the provisional and municipal authorities shall review EIAs for all investment capital less than US$2 million as well as "follow up, monitor, and take appropriate measures to ensure that Project's Owner will follow the EMP during project construction, operation and closure as stated in the EIA report approved."

2.1.4 Sub-Decree on the Control of Air Pollution and Noise Disturbance, #42 ANK/BK[5] (2000)

29. The **Sub-Decree on the Control of Air Pollution and Noise Disturbance, #42 ANK/BK (2000)** outlines the measures for protecting environment quality and public health from air pollutants and noise disturbance through monitoring, curbing and mitigating activities. It lists air quality standards and noise emission levels. For dust control, there should be no visible emissions from stockpiles of materials, crushers or batching plants. All vehicles should be well maintained and comply with the air quality regulations. The noise regulations do not stipulate a level of noise from construction sites but refer to mixed commercial and/or industrial and residential property or type of land use in the immediate vicinity that may be affected by noise (see Tables 1 and 2).

Table 1. Ambient Air Quality Standard

No.	Parameter	1-Hour Average (mg/m3)	8-Hour Average (mg/m3)	24-Hour Average (mg/m3)	1-Year Average (mg/m3)
1	Carbon monoxide	20.0	-	-	
2	Nitrogen dioxide	-	0.1	-	
3	Sulphur dioxide	-	0.3	0.1	
4	Ozone	0.2	-	-	-
5	Lead	-	-	0.005	-
6	Total Suspended Particulate	-	-	0.33	0.1
7	PM10	0.05			
8	PM2.5	0.025			

Source: Prakas on the Implementation of the Term of Reference for Infrastructure and Tourism Development Project, 11 April 2018

[5] http://www.bigpond.com.kh/Council_of_Jurists/a00-Anukret/ANK00_07_42_E.htm80

Table 2. Maximum Permitted Ambient Noise [dB(A)]

Area	Period of Time (hours)		
	16:00-18:00	18:00-22:00	22:00-06:00
Quiet areas: hospitals, libraries, school, kindergarten	45	40	45
Residential area: hotels, administration offices, houses	60	50	45
Commercial and service areas and mix	70	65	50
Small industrial factoring intermingling in residential areas	75	70	50

Source: Prakas on the Implementation of the Term of Reference for Infrastructure and Tourism Development Project, 11 April 2018.

2.1.5 Sub-Decree on Water Pollution Control #27 ANRK.BK[6] (1999)

30. The **Sub-Decree on Water Pollution Control #27 ANRK.BK (1999)** regulates water pollution control measures in order to prevent and reduce the water pollution of the public water areas. As a minimum, all discharges of liquid wastes from construction camps, work sites or operations, to streams or water courses should conform to standards listed in Table 3. Also see Sub-Decree on Solid Waste Management, which gives details of classifications of what are defined as hazardous wastes and substances. Any hazardous waste and substances must be stored correctly and only disposed in a manner approved by MoE.

Table 3. Selected Effluent Standard for Pollution Sources Discharging Wastewater to Public Areas or Sewer Access

No.	Parameter	Unit	Allowable limits for pollutant substance discharging to	
			Protected public water area	Public water area and sewer
1	Biochemical oxygen demand	mg/l	<30	<80
2	Chemical oxygen demand	mg/l	<50	<100
3	Total suspended solids	mg/l	<50	<80
4	Detergent	mg/l	<5.0	<15
5	Total dissolved solids	mg/l	<1,000	<2,000
6	Temperature	°C	<45	<45
7	pH	6-9	5-9	
8	Oil and grease	mg/l	<5.0	<15
9	Dissolved oxygen	mg/l	>2.0	>1.0

Source: Prakas on the Implementation of the Term of Reference for Infrastructure and Tourism Development Project, 11 April 2018.

2.1.6 Sub-Decree on Solid Waste Management (No. 36 ANRK.BK 2009)

31. Under Article 7 of **the Sub-Decree on Solid Waste Management**, "the disposal of waste in public sites or anywhere that is not allowed by authorities shall be strictly prohibited"[7]. Waste management will be implemented by target TIs and JCs.

32. Technical guideline on waste electrical and electronic equipment in Cambodia was prepared and officially for use in 2016. The guideline aims to assist the government, private sector, learning institutions among others to manage e-waste in a manner that enhances the environmental and human health protection and resources recovery.

[6] http://www.cambodiainvestment.gov.kh/wp-content/uploads/2011/09/Sub-Degree-27-on-Water-Pollution-Control_990406.pdf

[7] While the Sub-Decree on Waste Management has no quantitative parameters, sensible practice is expected. Such practices would include (i) all general waste and food waste should be removed to a government approved landfill; (ii) all demolition waste must be removed to a government-approved location; (iii) all waste oil and grease should be disposed by a registered sub-contractor; (iv) the final destination of the oily wastes should be established.

2.2 RGC Laws, Regulations and Standards on Social Aspects and Indigenous People

2.2.1 Constitution of the Kingdom of Cambodia

33. The highest law of the land, the **Constitution of the Kingdom of Cambodia (1993),** stipulates in Article 31.2 that:

> "Khmer citizens shall be equal before the laws and shall enjoy the same rights, freedom and duties, regardless of their race, color, sex, language, beliefs, religions, political tendencies, birth of origin, social status, resources, and any position."

34. While Article 65 guarantees quality education for all:

> "The State shall protect and promote citizens' rights to quality education at all levels and shall take all measures, step by step, to make quality education available to all citizens."

35. The constitution includes protections for social, indigenous, gender rights and equality (articles 36, 45). It also includes provisions for the protection of workers (article 75) and worker's rights to establish associations (article 42) and representative unions (article 36).

2.2.2 Law on the Protection and Promotion of the Rights of Persons with Disabilities 2009 (Royal Kram NS/RKM/ 0709/010))

36. The goal of the **Law on the Protection and Promotion of the Rights of Persons with Disabilities 2009** is to protect and promote the rights of persons with disabilities in the country, and prevent, reduce and eliminate discrimination against persons with disabilities. The law also seeks to ensure that persons with disabilities are able to participate fully and equally in activities within society and provide equal opportunities for employment.

2.2.3 National Policy on the Development of Indigenous Peoples (IP)

37. The guiding document to address Indigenous Peoples' issues in Cambodia is the **National Policy on the Development of Indigenous Peoples**. The Policy, prepared starting in 1994, was approved by the Council of Ministers on April 24, 2009, and sets out government policies related to indigenous peoples concerning culture, education, vocational training, health, environment, land, agriculture, water resources, infrastructure, justice, tourism, industry and mines and energy. The Policy provides principles for formal registration of indigenous communities as legal entities with their own bylaws and enables their participation in economic development that affects their lives and cultures. It states:

> "Indigenous Peoples shall be fully entitled to express their comments and opinions and to make any decisions on the development of the economy, society and their cultures towards growth in the society."[8]

38. Of particular importance to the Project is that the Policy states the following:

> "The State organizes a complete educational system and an appropriate approval according to the needs of indigenous peoples in order to create an appropriate educational opportunity for children, young men, women and citizens of indigenous peoples. The State increasingly pays attention to the studies of indigenous peoples via the programs concerning physical materials, studying curriculum reform that is beneficial to society, the provision of dormitories, study scholarships, sponsorships and the deployment of teachers to teach in areas where there is either a shortage or a complete absence

[8] RGC, National Policy on the Development of Indigenous Peoples (2009), Chapter 1: General Policy, paragraph 9.

of teachers in order for them to pursue their studies at secondary school, vocational training and at higher education schools."[9]

39. The policy promotes use of local languages in multilingual primary education:

"Literacy textbooks will be developed in two languages, being Khmer and the indigenous peoples' languages, to grade 4 levels at the highest in aiming at providing indigenous peoples with the opportunity to gain access to education."[10]

40. Furthermore, in terms of consultations concerning any construction or infrastructure project in the indigenous peoples' community, as might be done under component 1 of the Project, the policy stipulates that "The studies and assessments of impacts on the environment, economy, social affairs, cultures and natural resources shall be conducted before the commencement of the infrastructure project and the outcomes of the studies shall be dealt with and comprehensively disseminated to the local communities using Khmer and each indigenous peoples' language wherever this is possible."[11]

41. And that "Development projects in the living areas of indigenous peoples can function only if there has been an environmental and social impact assessment and publicity to relevant indigenous peoples' communities in advance in order for those people to have an opportunity to provide input about their need"[12].

42. Together with the Land Law (2001), this policy gives recognition to the rights of indigenous peoples to traditional lands, culture and traditions.

2.2.4 Policy on Registration and Right to Use of Indigenous Communities and Sub-Decree No.83 on Procedures of Registration of Land of Indigenous Communities (2009)

43. **Policy on Registration and Right to Use of Indigenous Communities** in Cambodia was approved by the Council of Ministers on April 24, 2009, and a Sub-Decree on procedures of registration of Land of Indigenous communities was signed on June 9, 2009 by the Prime Minister. This policy takes as its basis the recognition in the Land Law of 2001, of the right of indigenous communities to possess and use land as their collective ownership. The policy states that the registration of indigenous communities as collective ownership is different from the registration of individual privately owned land parcels because the land registration of the indigenous communities is the registration of all land parcels belonging to the communities as a whole, consisting of both State Public Land and State Private Land in accordance with the articles 25, 26, and 229 of the Land Law and related Sub-decrees. These land parcels are different in size and can be located within the same or different communes/sangkat.

44. Therefore, the registration of land parcels of indigenous communities requires a separate Sub-decree supplementing existing procedure of sporadic and systematic land registration. In addition to establishing the principle, procedure, and mechanism to register the indigenous community land as collective ownership of the indigenous community, assuring the collective tenure is intended to preserve the identification, culture, custom, and proscriptions of the indigenous people.

[9] Ibid, Chapter 2: Multi-sector Policy, Section 2: Education and vocational training sector, paragraph 2-2.
[10] Ibid, paragraph 2-3
[11] Ibid, Chapter 2: Multi-sector Policy, Section 7: Infrastructure sector, paragraph 7-2
[12] Ibid, paragraph 7-3

2.2.5 Cambodia Industrial Development Policy (IDP) 2015 – 2025

45. This IDP is aimed to provide a vision and policy and implementation frameworks including needed institutional arrangement to promote industrial development in Cambodia. The core objective of this policy is to address structural challenges and to invest in key industrial infrastructure, both hard and soft, to be in line with the potentials, competitive advantage and development of the Cambodian industry. The IDP is aimed as well at defining various interconnected measures at the macro and sectoral level and at specific interventions in response to actual needs. The policy spans the period from 2015 to 2025 and must be updated every 5 years. To realize the vision and achieve above stated objectives, the RGC has set three targets, namely: transforming and strengthening the industrial structure in the national economy; increasing and diversifying export products; and strengthening and promoting of SMEs. These targets are reflected through structural transformation and important performance indicators as follows:

- Transforming and strengthening the industrial structure in the national economy by increasing the GDP share of the industrial sector.
- Increasing and diversifying export products.
- Strengthening of the management mechanism and development of small and medium-size enterprises (SMEs) by promoting their official registration including large enterprises and promoting good corporate governance with proper accounts and balance sheets.

2.2.6 National Technical and Vocational Education and Training (TVET) Policy 2017–2025

46. Cambodia's National Technical and Vocational Education and Training (TVET) Policy 2017–2025, formally approved by the government on 16 June 2017, lays out the necessity framework to develop a strategy in technical vocational education and training (TVET) for workforces which better responds to the labor market demand; especially, the policy contributes to industrial development and the creation of decent employment while ensuring high quality and productivity of workforces to better compete with other countries in the region.

47. The policy provides guides for the formulation and implementation of strategies for skills development and facilitates better coordination among those involved in skills development in Cambodia.

48. The policy's **Strategy 2: To increase equitable access to Technical Vocational Education and Training (TVET) for employment generation,** contains requirements to ***expand opportunities for people to obtain life skills by paying special attention to the needs of women, marginalized groups, poor youth, school dropout, migrant workers, and indigenous people***, through:

- Giving priority to women, marginalized groups, poor youth, school dropout, ethnic groups, migrant workers, and unemployed to study in TVET through providing adequate scholarships, allowances and dormitories;
- Enhancing access to skills training and certification, especially for low-paid migrant workers; and
- Promoting gender awareness, and implementing gender equity and equality mechanisms in TVET institutions and relevant stakeholders.

49. And the policy's **Strategy 3: To promote Public-Private Partnerships and aggregate resources from stakeholders to support for sustainable development of TVET** contains requirements to ***develop a student fees policy for TVET providers and offer scholarships for poor students, and particularly women and indigenous people***, by:

- Continuing to encourage both public and private TVET institutions to charge fees for skills training aligned with National Skills Standards (NSS);

- Encouraging institutions to utilize a portion of fee revenue for scholarship programs to poor students identified by line ministries and relevant agencies;
- Developing coordination mechanisms with relevant institutions to provide loans for students to study in TVET sector;
- Encouraging TVET institutions to prepare agreements with industries to provide training programs in industries or institutions; and
- Encouraging Development Partners (DPs), Non-Governmental Organizations (NGOs), private companies and donors to seek feasibility in providing scholarships to poor youth who study TVET programs.

2.2.7 Law on Road Traffic, PREAH REACH KRAM NS/RKAM/0115/001, 2015

50. The **Law on Road Traffic (2015)** is intended to ensure road traffic safety and order, and protection of human and animal health and lives, properties and environment. Its establishment a requirement for all motor vehicles, trailers, and semi-trailers moving on the road to obtain a technical inspection certificate. It also outlines road safety requirements.

2.2.8 Occupational Safety & Health Standards or codes

51. Labor Law, Law on Social Security schemes and 18 ministerial regulations (Prakas) relating to OSH have been issued under the Ministry in charge of Labour.

52. The Labour Law of the Kingdom of Cambodia, which had been adopted on 10 January 1997 by the National Assembly during its 7th session of its first legislature and promulgated on 13 March 1997: Chapter VIII, Health and safety of Workers, articles 228 to 247: Article 228 concerning the Scope of Application; Articles 229 to 232 concerning General Provisions; Articles 233 to 237 concerning Inspection; Articles 238 to 247 concerning Labour Health Services.

53. In accordance with the Labour Law, the Ministry of Labour and Vocational Training has issued regulations concerning the OSH as follows:

- Prakas No 052 dated 10 February 2000 concerning the sanitary toilet;
- Prakas No 053 dated 10 February 2000 concerning the seating arrangement at the work place;
- Prakas No. 054 dated 10 February 2000 concerning the provision of the safe drink;
- Prakas No. 330 dated 6 December 2000 concerning the Creation of Enterprise Inrmary;
- Prakas No. 124 dated 15 June 2001 concerning the heavy object lifting by hand;
- Prakas No. 125 dated 15 June 2001 concerning the air ventilation and sanitation;
- Prakas No. 139 dated 28 June 2001 concerning Conditions and Missions of the Enterprise Physicians;
- Prakas No. 147 dated 11 June 2002 concerning the Temperature Ambiance at the Workplace;
- Prakas No. 138 dated 22 April 2003 concerning the Noise at the Workplace;
- Prakas No. 139 dated 22 April 2003 concerning the Work at the Conned space;
- Prakas No. 484 dated 23 December 2003 concerning the Light and the Lighting;
- Prakas No. 106 dated 28 April 2004 concerning the prohibition of working children from the dangerous work place;
- Prakas No. 086 dated 03 May 2006 concerning The Creation of the HIV/AIDS Committee in Enterprises and Establishments and Managing HIV/AIDS in the Workplace;
- Prakas No. 305 dated 14 December 2007 concerning the Maritime Fishing;
- Prakas No. 306 dated 14 December 2007 concerning the Working and Living Conditions in Plantations;

- Prakas No.308 dated 14 December 2007 concerning the Working and Living Conditions in Salt Fields;
- Prakas No. 309 dated 14 December 2007 concerning the Working and Living Conditions in Brick Enterprises;
- Prakas No.307 dated 14 December 2007 concerning the Occupational Health and Safety Conditions in Garment and Shoes Factories;
- Prakas No.077 dated 30 March 2011 concerning the Information at the Construction Site.

54. The **Labor Law (1997)** is the overarching legal instrument that regulates and protects workers in Cambodia. The law governs relations between employers and workers. The Law considers that the rules, obligations and rights are the same for casual or permanent workers. The law prohibits discrimination in any form, including by sex, religion, social origin, or ethnicity (art 12). Employers are required to make available a copy of the Law to workers at all business locations/ operations (art 15) and forced compulsory or the hiring of workers to pay off debts is prohibited (art 16). Article 106 reaffirms equal conditions and wage for all work regardless of origin, age and sex for the same types of work. The Law establishes the limit for working hours to 8 hours per day and 48 hours per week as well as rates for working overtime and on public holidays.

55. The allowable minimum age for wage employment is set at 15 years (art 177). Children from 12-15 years of age can be hired to do light work (see Section 2.2.9 of ESMF) provided that (a) the work is not hazardous to their health or mental and physical development, and (b) the work will not affect their regular school attendance, their participation in guidance programmes or vocational training approved by a competent authority. The Law recognizes statutory maternity leave on half wages (art 183), and for the performance of light duties for a further two months. Employers are prohibited from laying off women during their maternity leave (art 182).

56. Chapter eight of the Labor Law covers the health and safety of workers and requires maintaining standards of hygiene and sanitation in working environments and requirements for individual protective instrument and work clothes, lighting and noise levels (art.229). Machinery, mechanisms, transmission apparatus, tools, equipment and machines must be installed and maintained in the best possible safety conditions. All enterprises and establishments covered by this Law and employing at more than fifty workers must have a permanent infirmary on the premises/workshop/ or work sites (art.242). Workplaces/ sites with more than 200 workers must have areas for hospitalising injured or sick workers before transferring to a health facility and must be able to handle two per cent of the workers at the site. The Law requires that every manager of a workplace shall have someone take all appropriate measures to prevent work related accidents (art. 248). The Law also mandates that a general insurance system obligatory for workers shall be set up and this system shall be managed under the insurance of the National Social Security Fund (art. 256).

2.2.9 Prakas on Light Work (2008)

57. Outlines 15 categories of light work that children between 12-15 years are allowed to do, limited to 12 hours per week outside of school time and 35 hours during periods of school holidays. It prohibits hazardous labor as noted above.

2.3 Prakas on the Prohibition of Hazardous Child Labour (Ministry of Social Affairs, Labor, Vocational Training and Youth Rehabilitation, #106, April 28, 2004)

58. The Prakas prohibits the employment of anyone under the age of 18 in any of the 38 scheduled hazardous works / activities listed in the Prakas. Nine of the 38 are likely related to some aspects of construction including:

i. Operating cranes, hoists, scaffold winches or other lifting machines;
ii. Lifting, carrying, handling and moving of heavy loads;
iii. Operating or assisting to operate transportation equipment such as bulldozers, pile driving equipment, trailers, road rollers, tractor lifting appliances, excavators, loading machines, trucks, buses, and taxis;
iv. Maintenance of heavy machinery;
v. Work carried out at construction sites, except in designated and safe areas for a child as permitted by a labour inspector;
vi. Demolition work;
vii. Work carried out on a ladder or scaffold at a height of over 2.5 meters;
viii. Work involving exposure to harmful chemical, physical, electromagnetic or ionizing agents, including tar, asphalt or bitumen;
ix. Operating power-driven spinning and winding machine.

2.3.1 Law on the Prevention of Domestic Violence and the Protection of Victims, (NS/RPM/1005/031), 2005

59. The objective of the law is to prevent domestic violence, protect victims, and strengthen the culture of non- violence.

2.3.2 Laws and regulations on Gender based violence (GBV)

60. Article 948 of the Civil Code of Cambodia prohibits child marriage, by setting the age of 18 as the age at which men and women may marry, and the age of 16 as the youngest age at which parents or guardians may consent to a marriage.

61. In terms of GBV, the 2009 Criminal Code prohibits and penalizes rape (Articles 239-245), indecent assault (Articles 246-248), indecent exposure (Articles 249), sexual harassment (Articles 250- 252) and procuring persons for prostitution (Articles 284-295). The 2005 Domestic Violence Law defines domestic violence and details the responsibilities of relevant authorities in preventing and dealing with cases. In addition, the 2008 Law on Suppression of Human Trafficking and Sexual Exploitation, which prohibits trafficking and sexual exploitation through prostitution, pornography and indecent acts.

62. The Royal Government of Cambodia has established guidelines and policies such as the 2017 Media Code of Conduct for Reporting on Violence Against Women; the 2016 Referral Guidelines for Women and Girl Survivors of Gender-Based Violence; the 2014-2018 Second National Action Plan to Prevent Violence Against Women (NAPVAW 2); and the 2014-2018 Neary Rattanak IV Strategic Plan for Gender Equality and Empowerment of Women. These policies and guidelines aim to prevent and manage GBV risks.

2.3.3 HIV/AIDS Policy

63. Since 2019, Cambodia has been implementing the 5th National Strategic Plan for comprehensive and multisectoral response to HIV and AIDS (NSPV) with the engagement of key stakeholders in health and non-health sectors to get involved on AIDS response. The RGC is committed to adopt the UN Political Declaration on HIV and AIDS: Ending Inequalities and Getting on Track to End AIDS by 2030.

64. The Law on HIV Prevention and Control, 2002 has the objective to determine measures for the prevention and control of the spread of HIV/AIDS in the Kingdom of Cambodia. The Law requests multi-sectoral response to be undertaken by the State in order to:

- Promote nationwide public awareness, through extensive Information, Education & Communication (IEC) activities and mass campaigns, about the fact of HIV/AIDS such as

modes of transmission, consequences, means of prevention and control of the spread of the disease;

- Prohibit all kinds of discrimination against those persons suspected or known to be infected with or affected by HIV/AIDS;
- Promote the universal precaution on those methodologies and practices, which carry the risk of HIV transmission;
- Appropriately address all determinants which drive the HIV/AIDS epidemic;
- Promote potential role of People living with HIV/AIDS (PLWA) for their greater involvement by disclosing information and sharing their own experiences to the public; and
- Mainstream HIV/AIDS prevention and control programs, and make it priority in the national development plan.

2.4 Institutional Responsibilities on Legislation

65. There are a number of different government departments responsible for the areas highlighted in the legislation above. The Ministry of Labor and Vocational Training (MLVT) is the leading ministry in charge of labor and workforce-related matters, including minimum age of workers, wages and rights of labor. The Ministry of Education, Youth and Sport (MoEYS) has responsibility for education. The MoE is responsible for approving EIAs and monitoring compliance on environmental matters, as well as enforcing environment-related legislation such as on protected area management.

66. Meanwhile the Ministry of Women's Affairs (MOWA) is the leading agency responsible for promoting gender equality and preventing violence against women[13], but other departments may also play a role, such as the Cambodian National Council for Women (CNCW).

67. There will also need to be coordination with elected government representatives, such as Commune and Village chiefs, who are an important link between the national, provincial and district-level government departments and the local communities. For instance, the commune and village level will be essential for the effective management of issues that may directly affect communities, such as those related to Gender-Based Violence (GBV) and Violence Against Children (VAG), among others. At the commune level there may also be various important committees, such as the Commune Committee for Women and Children who are responsible for the welfare of women and children in their commune. Civil society and NGOs may also play a role in supporting the project and the government to implement some of the mitigation measures, in particular those that would involve indigenous peoples. The project's SEP analyses these stakeholders and outlines the approaches, and timing, to engage them (a summary is provided in Section 6 of this ESMF).

68. The MoE is the primary agency tasked to promote environmental protection and conservation of natural resources, thus contributing to improvement of environmental quality, public welfare, and the economy. The Environmental Impact Assessment (EIA) Department of the MoE oversees and regulates the EIA process, quality control on EIA report and coordinates the implementation of projects in collaboration with project executive agencies and concerned ministries. The MoE has the following responsibilities:

- Review, evaluate, and approve submitted environmental impact assessments in collaboration with other concerned ministries; and
- Monitor to ensure a project owner (the executing agency of the project) satisfactorily implements the Environment Management Plan (EMP) throughout pre-construction phase, construction phase and operational phases of the projects.

[13] See National Action Plan to Prevent Violence Among Women (2014-18).

69. The project's institutional arrangements are further described in Section 5 of this ESMF.

70. International environmental conventions/agreements/treaties that the country has ratified and are relevant to the implementation of the project are summarized in Table 4.

Table 4. International environmental conventions/agreement/treaties relevant to the project

Agreements/Conventions	Status	Objectives/Relevance
A. ENVIRONMENT		
Basel Convention	In force	It is a convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal.
Rotterdam Convention	In force	It is an international environmental convention on Prior Informed Consent (PIC) Procedure for Certain Hazardous Chemicals and Pesticides in International Trade.
Stockholm Convention on Persistent Organic Pollutants (POPS)	In force	It is for control and management of persistent organic pollutants.
EU Directive 2002/95/EC (for reference)	In force	It requires heavy metals including lead, mercury, cadmium, and hexavalent chromium and flame retardants, such as polybrominated biphenyls (PBB) or polybrominated diphenyl ethers (PBDE), to be substituted by safer alternatives.
B. SOCIAL AND CULTURAL		
Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) 1979	In force	The Convention defines what constitutes discrimination against women and mandates actions on a national level to put an end to discrimination.
International Covenant on Economic, Social and Cultural Rights (ICESCR)	In force	This could protect the rights of minority ethnic groups.
The Convention on the Rights of the Child	In force	The Convention on the Rights of the Child (CRC) is an international agreement that sets forth universal standards and ethical principles regarding the treatment and well-being of children within society.
The International Convention on the Protection of the Rights of All Migrant Workers and Members of their Families	In force	The Convention concerning Migration for Employment (No. 97) and the Convention concerning Migrations in Abusive Conditions and the Promotion of Equality of Opportunity and Treatment of Migrant Workers aim to protect the rights of migrant workers and ensure that they are treated fairly and with dignity.
The Convention on the Rights of Persons with Disabilities	In force	The Convention is to promote, protect, and ensure that persons with disabilities fully and equally enjoy all human rights and fundamental freedoms, and to foster respect for their inherent dignity.

71. RGC is signatory to certain International Labour Organization (ILO) Conventions, the details for which are provided in Table 5.

Table 5. RGC Ratification to ILO Conventions

Convention	Date	Status
C029 - Forced Labour Convention, 1930 (No. 29)	24 February 1969	In force
C098 - Right to Organise and Collective Bargaining Convention, 1949 (No. 98)	23 August 1999	In force
C100 - Equal Remuneration Convention, 1951 (No. 100)	23 August 1999	In force
C111 - Discrimination (Employment and Occupation) Convention, 1958 (No. 111)	23 August 1999	In force

C138 - Minimum Age Convention, 1973 (No. 138) Minimum age specified: 15 years	23 August 1999	In force
C182 - Worst Forms of Child Labour Convention, 1999 (No. 182)	14 March 2006	In force
C155 - Occupational Safety and Health Convention, 1981 (No. 155)	N/A[14]	N/A

2.5 Applicable World Bank Environment and Social Standards (ESS)

72. At this stage of project preparation, without specific subprojects as yet selected, the key Environmental and Social Standards (ESS) that are deemed likely relevant to the project (and that may require specific instruments to be prepared) are:

- ESS1 – Assessment and Management of Environmental and Social Risks and Impacts
- ESS2 – Labor and Working Conditions
- ESS3 – Resource Efficiency and Pollution Prevention and Management
- ESS4 – Community Health and Safety
- ESS7 – Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
- ESS10 – Stakeholder Engagement and Information Disclosure.

73. The following ESS are not relevant to the project:

- ESS5 – Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
- ESS6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources
- ESS8 – Cultural Heritage
- ESS9 – Financial Intermediaries.

74. As a result of this assessment, at this stage of project preparation MLVT is required to prepare the following instruments in accordance with the World Bank's Environmental and Social Framework (ESF):

- Environment and Social Management Framework;
- Stakeholder Engagement Plan (SEP); and
- Environmental and Social Commitment Plan (ESCP).

75. This ESMF is an integral part of compliance with the ESF. At this stage of project planning the World Bank has assessed the potential for environment and social risks and impacts as moderate for environment and moderate for social.

2.6 Project Environment and Social Risks (referenced by WB ESS)

2.6.1 ESS1: Assessment and Management of Environmental and Social Risks and Impacts

76. Overall environmental risk is rated moderate at this stage and are mainly associated to: (a) generation of package wastes/e-wastes and OHS risks associated with ICT upgrades for selected learning facilities and the LMIS; and (b) generation of noise, dust, minor hydrocarbon spills, waste and sedimentation as well as OHS risks during civil works from new constructions and renovation/rehabilitation of selected TIs and JCs. Construction waste streams may include hazardous materials such as asbestos containing materials or lead containing paints.

77. There will not be any land acquisition and associated minor civil works (new construction and renovation/rehabilitation) will be limited within the existing premises of beneficiary institutions. Therefore, no key environmental and social risks related to physical and geographical issues, biodiversity, land access, and cultural heritage, have been identified. Other possible impact during the minor civil work

[14] Cambodia has not ratified this convention. See more details at: https://www.ilo.org/dyn/normlex/en/f?p=1000:11210:0::NO:11210:P11210_COUNTRY_ID:103055

is use of finite resources (construction materials, power, water, etc.). Overall, the environmental risks and impacts are not anticipated to be significant. They will be limited, localized, site specific, and temporary, which would be easily mitigated during project implementation.

78. In addition, the project will incorporate technically and financially feasible measures to improve energy efficiency (EE) in this ESMF and project operations manual (POM) as per the World Bank Group (WBG) Environmental, Health, and Safety (EHS) Guidelines and relevant GIIPs.

79. In case of rehabilitation of physical facilities, social risks would include a potential influx of labour force, which can be minimized by hiring local labour. The project's labor management procedure (LMP) will ensure there is equitable opportunities for unskilled labour, that there is no child labour, that suitable worker's camps are set up (if needed), that appropriate precautions to prevent COVID are taken for both workers and the nearby community and that risks of GBV/SEA in the workforce and the community, including TVET students, are well managed during civil works and operations of the institutions. The OHS risks for the workforce and potential for additional Community Health and Safety risks, such as due to traffic in/out of the TVET center, have been assessed and will be managed as part of the ESMP of subprojects to be selected during project implementation.

80. While the project is expected to bring benefits to project stakeholders, there are also social risks concerning social inclusion, particularly of disadvantaged groups such as Indigenous peoples. Considerations of people living with disabilities are also taken into account. The Rapid Social Assessment has examined these risks and suggested steps to maximize project benefits, which have been incorporated in the Stakeholder Engagement Plan (SEP).

81. To mitigate the project Environmental and social risks and impacts, MLVT has prepared and Environmental and Social Management Framework (ESMF), which describes the overall key environmental and social considerations, and procedures for the management of E&S risks during implementation. The ESMF includes (i) Ineligible List, (ii) E&S Screening forms, (iii) Rapid Social Assessment, (iv)E-waste management plan, (v) Labour Management Procedures (LMP) including Occupational Health and Safety (OHS), Workers' Grievance Procedure and grievance checklist and sample registration form, (vi) Codes of Conduct on sexual exploitation and abuse (SEA) and mitigation measures to prevent and control COVID -19 infection and outbreak, (vii) Environment and Social Code of Practice for generic rehabilitation related impacts; (viii)ESMP Outline, and (ix)CERC Manual. Operation implementation manual (OIM) will also include description of technically and financially feasible measures to improve energy efficiency (EE) in the POM as per the World Bank Group (WBG) Environmental, Health, and Safety (EHS) Guidelines and relevant GIIPs.

2.6.2 ESS2: Labor and Working Conditions

82. Most activities supported by the project will be conducted by MLVT and SDF workers, i.e. civil servants employed by the Government of Cambodia, as well as professional consultants working for MLVT and TVET staff working in training institutions, as well as training providers. However, some contracted and subcontracted workers are also expected to be hired to conduct upgrading works and there may be some primary supply workers (such as those supplying construction equipment/materials, i.e. brick).

83. Rehabilitation activities in particular would include risks to workers, both due to OHS and working conditions (salaries, facilities, etc.) during small civil works. There may also be risks relating to labor conditions in the supply chain, in particular due to concerns of forced labor in the brick supply chain and underage labor. Training and capacity building activities may exclude marginalized groups such as Indigenous peoples. There may also be risks as a result of GBV/SEA/SH though these have been assessed as low.

84. Labour practices in Cambodia are governed by the Labor Law (1997), which includes provisions on health and safety in the workplace and non-discrimination in employment and wages. The ESMF has included annexes on Occupational Health and Safety (OHS, Annex 5.1) and Labor Management Procedures (LMP, see Appendix 5), including Worker Grievance Procedure, to identify and address any gaps between the national law and ESS2.

85. Since the national Labor Law defines 12 years old as the minimum working age, a specific provision on minimum working age in line with the ESF (i.e. 18 years) has been included in the LMP and will be included in the bidding documents to ensure no persons under 18 years are hired by the project. The LMP also takes into account the latest COVID-safe guidelines mandated by the government and/or best practice in the country, in order to maintain a safe working environment for workers and for the community and minimize the risk of COVID transmission. This includes hygiene practices, use of PPE and ensuring sick workers can self-isolate and access pay.

2.6.3 ESS3: Resource Efficiency and Pollution Prevention and Management

86. Dismantled electronic equipment and materials/wastes generated during ICT upgrade and minor civil works may cause risks to human health and the environment if not disposed of in an environmentally sound and safe manner. Where obsolete equipment and materials cannot be reused, they will be recycled or disposed of by licensed contractors. The relevant provisions have been included in the package and e-waste management plan.

87. Also, environmental impacts envisaged during the civil works for rehabilitation and new constructions will include generation of noise, dust, minor hydrocarbon spills, construction wastes and sedimentation. Possible waste streams may include hazardous materials such as asbestos containing materials or lead containing paints. The civil works limited within the existing premises of beneficiary institutions so will not impact terrestrial biodiversity. Other possible impact during the minor civil work is use of finite resources (construction materials, power, water, etc.). Overall, the environmental risks and impacts are anticipated to be limited, localized, site specific, and temporary, which would be easily mitigated during project implementation. The ESMF incorporated ESMP outline will be prepared at project implementation to mitigate the impacts for new constructions, while ESCoP with consideration for OHS is incorporated for mitigating the impact of rehabilitation civil works.

88. The project will also include description of technically and financially feasible measures to improve energy efficiency (EE) in the POM as per the World Bank Group (WBG) Environmental, Health, and Safety (EHS) Guidelines and relevant GIIPs.

2.6.4 ESS4: Community Health and Safety

89. ICT equipment will be installed within the existing footprint of facilities. The risk of improper handling and disposal of electronic waste could pose risks to community health and safety; therefore, Community Health and Safety (CHS) considerations have been included in the e-waste management plan (see Appendix 4).

90. Also, environmental risks and impacts on community health and safety are mostly linked to the civil works activities of rehablitation and new constructions for selected TIs and JCs. These impacts include generation of noise, dust, minor hydrocarbon spills, construction wastes and sedimentation. Possible waste streams may include hazardous materials such as asbestos containing materials or lead containing paints. The ESMP (with consideration for CHS) will be prepared at project implentation to mitigate related impacts for new construction civil works activities, while ESCoP (with consideration for CHS) will be implemented as part of the ESMF to mitigate impacts during the civil works activities for rehablitation.

91. The project may have some manageable and localized impacts to community health and safety as a result of some project activities, in particular if there are any upgrading works. Potential risks would be dependent on the type of constructions needed, but could include safety, noise, dust and disturbance from upgrading works if there are communities in the vicinity of the TVET institutions and potential risks of GBV or VAC from an outside labour force, though these are likely to be low. There may also be risks related to exposure to COVID-19 and traffic accidents from going in/out of site. Health and safety risks of trainees and job seekers may occur during training activities and in dormitories, including potential risk of SEA/SH and GBV, and communicable diseases (waste, water and air borne diseases, ongoing COVID-19 outbreak). The Social Assessment, part of the ESMF, has assess these risks based on experience in the country. Project supported TVET facilities will also consider accessibility aspects, to ensure they are inclusive of needs of people with disabilities.

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

92. The project is nation-wide in scope but specific TVET institutions to be supported have not yet been identified. There are 37 formal public TVET institutions in Cambodia, including at least one in every province associated with high prevalence of ethnic groups (Mondulkiri, Ratanakiri, Stung Treng and Kratie). While the project is not expected to negatively impact Indigenous peoples, it is important that these groups can benefit from opportunities to enhance their skills.

93. The potential exclusion of ethnic groups needs to be addressed in project preparation and implementation stages. This risk arises due to the social and economic vulnerability that some ethnic groups experience, which can make it difficult for them to access the benefits of the project. This marginalization can stem from a variety of factors, such as traditional social norms, linguistic barriers, and cultural differences.

94. The ESMF and SEP have included measures to enhance inclusion of Indigenous groups consistent with ESS7.

2.6.6 ESS10: Stakeholder Engagement and Information Disclosure

95. The project is expected to involve different groups of stakeholders, including government line agencies and the private sector. The project's stakeholders mainly include: (a) MLVT, SDF and the National Employment Agency, (b) TVET (public) and private institutions such as for the garment sector, (c) private sector, in particular potential sector employers, (d) Indigenous groups and organizations, and (e) representatives of other vulnerable groups such as people living with disabilities, among others.

96. There is a risk that different groups of stakeholders, particularly the local residents, may not receive sufficient information regarding rehabilitation works. Also, there may be a lack of information with vulnerable groups, excluding them from project benefits.

97. The ESMF and SEP have included measures to identify and engage various stakeholders consistent with ESS10.

98. Both new construction and rehabilitation/renovation activities under the Project will be limited to the current TVET compounds, and therefore, there will be no need for land acquisition, involuntary resettlement, or any other activity that may trigger ESS5– Land Acquisition, Restrictions on Land Use and Involuntary Resettlement. Additionally, since the civil works in existing TVET compounds will not involve any modification or alteration to the natural environment, there will be no impact on biodiversity or any living natural resources, which means that ESS6– Biodiversity Conservation and Sustainable Management of Living Natural Resources will not be triggered. Moreover, since the new construction and/or

rehabilitation/renovation will not affect any cultural heritage sites, ESS8– Cultural Heritage will also not be applicable. Finally, the Project will not involve the use of any financial intermediaries, and hence, ESS9– Financial Intermediaries will not be triggered.

2.7 Gap Analysis: WB ESF and RGC Legislation

99. Highlighted below are the summaries of key differences between the WB's environmental and social impact assessment (ESIA) process and RGC's environmental impact assessment (EIA) requirements and action to be adopted by the proposed Project.

Table 6. Summary of the World Bank (WB) ESIA and National EIA Processes and proposed gap mitigation for the Project

EIA Process Stage	WB (stipulating in the ESF and ESSs)	**Cambodia (**Sub-Decree on Environmental Impact Assessment Process, MoE's Prakas No. 021 on Project Classification**)**	Project Gap Filling Measures
Objectives	Borrowers are responsible for E&S risk and impact assessment, management and monitoring	Investment projects are required to submit ESIA or IESIA for approval	WB ESF will be applied.
Screening	The WB will classify all projects into one of four classifications: high risk, substantial risk, moderate risk or low risk. To determine risk level of a project, the followings are considered: type of investments, location, sensitivity, and scale of the project; the nature and magnitude of the potential E&S risks and impacts; and the capacity and commitment of the Borrower (including any other entity responsible for the implementation of the project) to manage the E&S risks and impacts in a manner consistent with the ESSs. An Environmental and Social Risk Summary (ESRS) is prepared to specify the E&S instruments to be prepared. ESRS at Concept Stage is disclosed.	The project types and project scope are indicated in Appendix of Ministry of Environment's Prakas No. 021 PRK.BST dated 03 February 2020 on Environmental Impact Assessment Classification for Development Projects. Basic technical parameters such as location, size, capacity, land area, are taken into account. The project owner shall prepare ESIA or IESIA or Contract on Environment Protection based on Appendix of Prakas No. 021 or in consultation with MoE if needed.	The ESF and national laws and specific WB's ESS requirements as agreed with WB will be applied.
ESA instrument	Depending on the project risks and impact, a range of instruments and procedures required to meet the ESSs' objectives, these include: Environmental and Social Impact Assessment (ESIA), ESMF, ESMP; sectoral and regional ESIA; SESA, hazard of risk assessment, environmental and social audit, cumulative impact assessment; and social and conflict analysis. The WB provides general guidance for implementation of each instrument. Based on information provided by the Borrower, the WB will conduct E&S due diligence for all projects requesting for WB support. The Borrower will be required to prepare, submit, and disclose the Environmental and Social Commitment Plan (ESCP), and Stakeholder Engagement Plan (SEP) before appraisal.	The type of EA instruments such as ESIA, IESIA or EMP is decided based on Appendix of MoE's Prakas No. 021.	Preparation of an ESMF, ESMP/ESCoP, ESCP, and SEP for the Project will be required to meet the ESSs1, 2, 3, 4, 7, and 10.

EIA Process Stage	WB (stipulating in the ESF and ESSs)	**Cambodia (**Sub-Decree on Environmental Impact Assessment Process, MoE's Prakas No. 021 on Project Classification**)**	**Project Gap Filling Measures**
Public consultation, stakeholder engagement, and GRM	During the ESA process, the Borrower consults project affected groups and interested parties about the project's environmental aspects and takes their views into account. In line with ESS10, preparation of a Stakeholder Engagement Plan (SEP), information disclosure, and establishment and operations of a GRM are required to ensure adequate consultation and transparency. Consultation/stakeholder engagement is carried out throughout project life. ESS2 also require the preparation of the labor management procedures (LMP) and an establishment and operation of a GRM for project workers. If ethnic minority is presence and adversely impacts, free, prior, and meaningful consultation (FPIC) is required. For meaningful consultations, the Borrower provides relevant project documents in a timely manner prior to consultation in a form and language that are understandable and accessible to the group being consulted. Minutes of the public meetings are included in the reports.	The project owner shall consult with relevant stakeholder such as community level (local people, local authorities), provincial level (relevant provincial departments, local NGOs, local communities), and National level (Ministry of Environment as a chairman, relevant ministries) in order to minimize the negative effects of the project on the environment, and community health. The project owner sends ESIA/IESIA/EMP reports to MoE for their review, comments and approve.	Conduct EIA consultation as per RGC regulation taken into account the WB requirements, including following the COVID-19 quarantine protocol, in presenting the ESMF, ESCP, SEP, and during consultation. The results from consultation will be incorporated into the ESMF or can be submitted as a standalone report. If consultation with ethnic minority is required, consultation with WB specialist will be made to ensure that the consultation is adequate.
Disclosure	The Borrower disclose E&S documents at project sites; The WB will disclose documentation relating to the E&S risks and impacts of high risks and substantial risks projects prior to project appraisal. The WB disclose E&S documentation based on the Borrower's authorization. Once the WB officially receives the report, it will make the EA report in English available to the public through the Bank external website.	After an ESIA/IESIA/EMP report is approved, the project owner shall disclose publicly.	Follow RGC requirements and WB requirements. All ESMF, ESMPs/ESCoPs, ESCP, and SEP will be publicly disclosed

EIA Process Stage	WB (stipulating in the ESF and ESSs)	**Cambodia (**Sub-Decree on Environmental Impact Assessment Process, MoE's Prakas No. 021 on Project Classification**)**	**Project Gap Filling Measures**
Clearance procedure	Review and clearance of E&S documents will follow upfront agreements between the Borrower and the WB. If the Bank is not satisfied that adequate capacity exists on the part of the Borrower, all High Risk and, as appropriate, Substantial Risk subprojects will be subject to prior review and approval by the Bank until it is established that adequate capacity.	The Ministry of Environment (MoE) shall assess and approve the ESIA/IESIA/EMP reports on projects prescribed in Appendix of Prakas No. 21. Ministries, ministerial agencies shall assess and approve the ESIA/IESIA/EMP reports on projects under their competence in approval for investment, except for projects holding IESIA/EMP report. The line agencies from provincial departments and local authorities shall be consulted. However, project with investment budget of less than USD 1 million, Provincial Department of Environment can approve on the reports.	RGC's approval of the ESIA/IESIA, or EMP will be required. WB's review and clearance of the ESMF, ESMP, ESCP, and SEP, will be required before implementation of the Project and subprojects.
Supervision	During project implementation, ensuring compliance is the responsibilities of the Borrowers. Borrowers shall carry out E&S requirements and monitoring E&S compliance in accordance with project legal agreement (including the ESCP) and providing regular monitoring report to the Bank. The Bank carry out E&S monitoring proportionately to the potential E&S risks and impacts. The Bank carry out regular implementation support mission including E&S implementation monitoring. The E&S monitoring and reporting is based on provisions and arrangement specified in the loan agreement and described in the other project documentation, to determine whether the Borrower's compliance with environmental covenant (primarily with EMP) is satisfactory. Based on the result of monitoring, any corrective and preventive actions will be identified and incorporated into an amended ESCP in a manner acceptable to the Bank. The borrower will implement, monitor and report on these actions following the amended ESCP.	The Provincial Department of Environment (DoE)E is entrusted to supervise the environmental compliance of the project. The DoE and Environmental Police carry out inspections to major polluters or when there are issues such as complaints, environmental accidents, pollution etc. is entrusted to supervise the environmental compliance of the project. By the end of project construction stage, the DoE will coordinate with Construction Management Agencies to supervise the compliance of environmental management activities stated in EIA study.	Follow the ESCP and the approved ESMF, ESMP/ESCoP and SEP of the Project/Subprojects.

100. The table below summarizes the main gaps between RGC's Legislation and WB's ESS, and develops the measures to address the differences identified.

Table 7. Summary of Main Gaps Between RGC's Legislation and WB's ESS

Items with Difference	**RGC**	**WB's ESF**	**Measures to Address Differences**
Assessment of project impacts	RGC legislation focuses on project impacts from an environmental point of view and does not consider social, gender and labor impacts, among others, as well as cumulative and transboundary impacts. Also does not consider the specific needs of vulnerable people (the poor, elderly, women- headed households, people living with a disability, etc.)	ESS1 is comprehensive and considers the full scope of project impacts from an environmental and social perspective, integrating all these aspects. In addition, the ESF has particular standards that deal with labor, gender and community health and safety, among others, as well as ensuring disadvantaged and vulnerable people/ groups are not disproportionately affected by projects' adverse impacts or disadvantaged in sharing development benefits.	This ESMF covers both direct, indirect and cumulative environment and social risks/impacts and proportionate mitigation measures, taking a holistic approach to the project and looking at impacts in an integrated way, including considering the needs of disadvantaged and vulnerable persons or groups. Future ESMPs will also detail how to conduct detailed impact and risk assessment and the definition of proportionate mitigation of measures.
Mitigation hierarchy	There is no mitigation hierarchy in RGC legislation.	WB ESF, in particular ESS1 (but also ESS 5), discusses the need to have a mitigation hierarchy when planning projects, in order to avoid, minimize or, if not possible, mitigate project impacts. Having a mitigation hierarchy allows project planners to plan their projects with potential for environment and social impacts in mind.	This ESMF discusses a mitigation hierarchy to be followed by project planners when choosing Technical Training Institute (TTI) location for construction and rehabilitation of existing TIs and JCs and conducting detailed engineering designs.

Minimum working age	Minimum working age in Cambodia is 15, though according to the legislation children between 12-15 years can perform light work that does not conflict with schooling. No hazardous work is permitted for children under 18. However, stricter enforcement is needed.	ESS 2 para 19, and footnote 13, notes that a child under the age of 18 may be employed or engaged in connection with the project if there is no hazardous work, an appropriate risk assessment is conducted prior to the work commencing, and the Borrower conducts regular monitoring of health, working conditions, hours of work.	This ESMF will propose a minimum working age of 18 years under the Project due to the potential for hazardous work related to TI and JC improvement and construction. The ESMF provides monitoring guidelines and requirements of the Borrower and contractors (see LMP in Appendix 5).
Traffic safety	No regulations in infrastructure projects to consider traffic safety.	Ensuring the safety of the community, including relating to traffic accidents to pedestrian, is under the provisions in ESS4.	The ESMP will suggest measures to ensure traffic safety during construction of new buildings in TIs, including undertaking construction safety trainings and public awareness activities.
Procedures For implementing Indigenous Peoples Plan	No detailed regulations on how to avoid impacts to Indigenous Peoples or how to include them in project benefits.	Among others, WB ESS7 seeks to ensure that projects respect the rights and culture of IPs, adopt a mitigation hierarchy to impacts, ensure benefits to IPs and conduct meaningful consultation and FPIC when necessary and/or desirable.	A stakeholder engagement plan (SEP) has been prepared on the basis of WB ESS7 and ESS 10 and considering relevant Cambodian policies and regulations. The SEP details clear procedures for meaningful/culturally appropriate consultations and engagement with IPs as needed.
Protecting intangible cultural heritage	No provisions in the legislation to protect intangible cultural heritage	WB ESS8 also covers intangible cultural heritage, which includes practices, representations, expressions, knowledge, skills—as well as the instruments, objects, artefacts and cultural spaces, that communities associate as part of their cultural heritage.	No impacts are expected as all project activities will be implemented within the existing TIs and JCs. However, screening criteria has been included in Appendix 2.

Stakeholder Engagement	While there are provisions for stakeholder engagement in various legislation, including EIA and Standard Operating Procedures (SOP) on land acquisition and resettlement (LAR), there are gaps in maintaining stakeholder relations during the length of the project cycle, ensuring appropriate disclosure of information, meaningful consultations and means to grievance redress.	WB ESS 10 stresses the importance of stakeholder engagement at all stages of the project cycle. Stakeholders must be meaningfully consulted and engaged, have opportunities to provide inputs to projects and be informed how this their concerns were considered, have avenues to voice their grievances and seek resolution, and receive information disclosed in an appropriate manner, place and language.	A standalone Stakeholder Engagement Plan (SEP) has been developed following the guidelines of ESS10.
Grievance Redress Mechanism	There is not GRM described in the environment legislation or as a requirement in the labor legislation. On land acquisition, Appendix 8 of the SOP provides the structure and details on the operating guidelines and procedures of an effective functioning Grievance Redress Mechanism. It provides a 3-step process including, the registration and recording of complaints and the judicial process if, the complaints remain unresolved at the administrative level. The detailed procedures for at each step are also provided in the SOP.	ESS10 requires a Grievance Mechanism in place for all project as part of the SEP, including covering areas such as environmental impacts, worker's grievances, grievances of IPs and grievances on land acquisition.	A standalone SEP has been developed which details a GRM for the project covering all project aspects, including concerns about environmental and social impacts. This is included in Section 6 and 7 of this ESMF. The LMP (Appendix 5) in this ESMF also describes a specific GRM for workers that contractors must have in place. All GRMs must be accessible to all APs, in particular women vulnerable and other disadvantaged groups.

Consultations and Stakeholder Engagement	There are some provisions for consultations on environmental impacts as part of the EIA regulations. On land acquisition, the SOP details steps to carry out consultations at various stages of the land acquisition process and compensation. SOP also discusses disclosure of project documents.	ESS10 requires that stakeholder engagement with affected and interested stakeholders will be throughout the project cycle in line with the project's Stakeholder Engagement Plan (SEP), including ongoing consultations and document disclosure. This applies to all aspects of the project including environment, social impacts, land acquisition and indigenous peoples, among others.	This ESMF discusses the requirements of the SEP in terms of consultations and disclosure. A standalone SEP consistent with ESS 10 has been prepared for the proposed project.

Table 8. Additional Areas for Strengthening

Items for Strengthening	**RGC Legislation**	**WB's ESF**	**Clarifications**
Gender, Gender-Based Violence (GBV), Violence to Children (VAC) and HIV/AIDs	There are regulations in Cambodia that protect the rights of women, violence against women and children, and the information dissemination on HIV/AIDS. However, this is not directly required in school rehabilitation and new construction projects.	ESS2, for workers, and ESS4 for the wider community, protect the rights of all community members, but in particular women and children and the vulnerable, from violence and other forms of abuse, as well as the risks of sexually transmitted diseases. These issues are relevant both for the construction projects that might have an influx of labor, as well as more generally in schools (between teachers, between students, and teachers-students).	This ESMF provides guidelines on how to address the identification and mitigation measures associated with these issues. Specific guidelines will be provided in terms of Labor Management Procedures and Staff Code of Conduct (see Appendix 5 and Annex 6). Training and related activities are included in project design.
Forced labor	Regulations against forced labor exist in Cambodia. However, there are claims that this is not strictly enforced, and there are particular "hotspot" areas such as brick kilns.	WB ESS2 strictly prohibits any form of forced labor. ESS2 and ESS4 requirements are embedded in the Standard Bidding Document (SBD) of the Bank, requiring contactors to comply with.	The ESMF provides provisions to monitor compliance by contractors and of their primary suppliers in bidding documents and supervision contracts.

3 POTENTIAL E&S RISKS AND IMPACTS, AND MITIGATION MEASURES

3.1 Initial Baseline Description of Project Location

101. At this stage of project preparation, since specific TVET locations and the extent of rehabilitation have not been identified, it is not possible to accurately detail the extent of environment and social impacts that the project may have. Nevertheless, based on similar projects in the country, the general environment and social context of Cambodia, the analysis of secondary data and a partial environmental and social assessment, all of which were conducted to inform the preparation of this ESMF, plus the results of the consultation workshop carried out for the preparation of this project, it is possible to make some assumptions which will need to be updated once subprojects are selected during project implementation.

102. Based on the World Bank's ESS1, the project will follow a mitigation hierarchy to:

- Anticipate and avoid risks and impacts;
- Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels;
- Once risks and impacts have been minimized or reduced, mitigate; and
- Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible.

103. The E&S risks associated with the project are assessed as moderate. The project is expected to yield significant social and economic benefits, as well as positive skill development outcomes for the target beneficiaries and the country as a whole. The potential risks associated with the project activities have been summarized in Section 3.1 for social risks and Section 3.2 for environmental risks.

Geography and Topography

104. Cambodia lies in the southwestern part of the Southeast Asian peninsula. International borders are shared with Thailand to the west, the Lao People's Democratic Republic to the north, and the Socialist Republic of Vietnam on the east and southeast. The country is bounded to the southwest by the Gulf of Thailand.

105. The topography of Cambodia is described as "bowl-shaped" and expands about 181,035 km^2. The central plains form 75% of the country and consist of the alluvial plains of the Mekong River and the Tonle Sap basin.

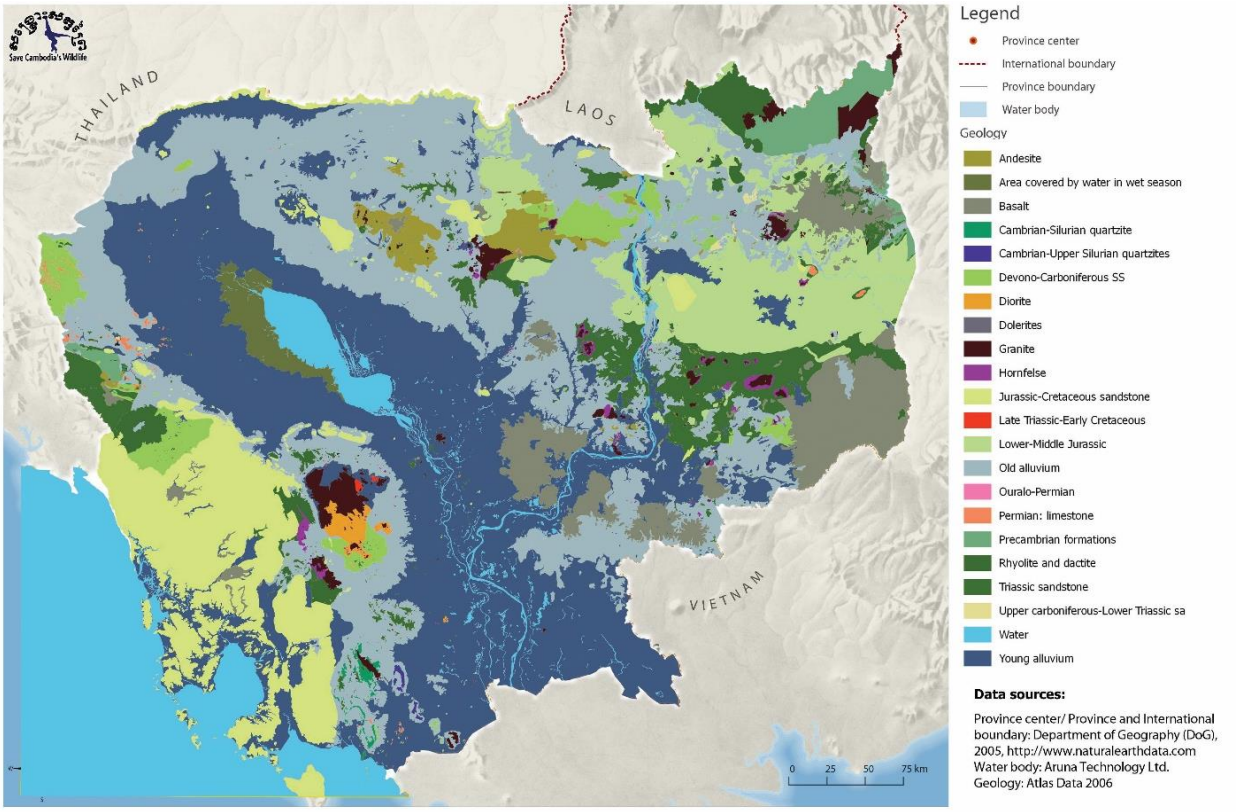
106. The central region of the country or the bottom of the bowl is represented by Tonle Sap Lake and the surrounding floodplain. The floodplain of Tonle Sap merges with the floodplain of the Mekong River to the southeast of Cambodia, which forms the Cambodian plain covering 25,069 km^2. Knolls and low hills are scattered in the vast alluvial plains of the country. This means that the whole of northwest Cambodia acts as a catchment area ultimately draining into Tonle Sap. The country is classified into four environmental regions, i.e. Plain, Tonle Sap, Coastal, and Plateau and Mountainous. The capital city Phnom Penh and the provinces of Tboung Khmum, Kandal, Prey Veng, Svay Rieng are situated in the Plain Region; Kratie, Mondulkiri, Ratanakiri, Stung Treng and Preah Vihear Provinces are in the Plateau and Mountainous Region; Kampot in the Coastal Region; and Banteay Meanchey, Battambang, and Pailin Provinces are in the Tonle Sap Region. Cambodia faces high disaster risks from flood and drought, due both to high levels of exposure and vulnerability.

Geology of Cambodia

107. Cambodia is situated in Southeast Asia and has a diverse geology, with three main regions: the north, central and southern regions. The north is predominantly mountainous. The central region is known as the Cambodian Basin. The southern region comprises the coastal plain and offshore islands. The country is also intersected by several major river systems, including the Mekong River, which has played

a significant role in shaping Cambodia's geology and landscape over millions of years. The figure below shows the geology of Cambodia.

Figure 1. Geology of Cambodia



Climate

108. Cambodia is situated in a tropical zone, between 10 and 14-degree latitude north of the equator. The tropical monsoon climate of Cambodia has two distinct seasons: (i) the dry season, which lasts approximately from November to April and is associated with the northeast monsoon, providing drier and cooler air; (ii) the wet season, lasting from May to October and during which rainfall mostly comes from the southwest monsoon, drawn inland from the Indian Ocean and providing hotter air. The wet season accounts for 90% of annual precipitation. The two prevailing wind directions are from the southwest and from the north-northeast.

109. In lowland areas, annual rainfall ranges from 1,000 mm to 1,700 mm[15]. Daily cumulated rainfall height measurements and intensity-duration-frequency (IDF) curves were acquired from the Ministry of Water Resources and Meteorology (MOWRAM) and show that every month from June to October, average rainfall height varies between 180 and 330 mm. For the rest of the year, the average monthly rainfall height stays below the 180 mm threshold.

110. The mean maximum temperature is 28°C, and the mean minimum temperature is 22°C. Maximum temperatures above 32°C are common before the start of the rainy season and may rise to more than 38°C. According to temperature data recorded at the meteorology station in Sisophon (2010-2012), which

[15] GSSD 2015. Cambodia's Second National Communication Under the United Nations Framework Convention on Climate Change. General Secretariat, National Council for Sustainable Development/Ministry of Environment, Kingdom of Cambodia, Phnom Penh.

is approximately 45 km away, the average annual minimum temperature is 23.6°C, and the average annual maximum temperature is 32.3°C.

Climate Change

111. Meteorological data indicates that there are shifts in the regular timing and intensity of the wet and dry seasons, with longer, drier dry seasons and shorter more intense wet seasons. This results in more frequent and intense floods and droughts.

112. The changing climactic pattern brings enormous implications for agriculture and fisheries, with the potential to threaten food and water security.

Flood and Natural Hazard

113. Storms, flooding and drought are the disasters that affect the largest number of people in Cambodia, and they also bring the highest cost. Climate change is likely to make things worse, with drier dry seasons predicted and more rainfall and violent storms in the wet season.

114. Flooding: A significant part of Cambodia takes the form of a vast floodplain, and localized flooding is common each year in the wet season (approximately May–October). There are advantages to this, such as improved soil moisture and fertility, recharging surface and underground water stores(storage), and some benefits to fisheries.

115. Serious flooding causes serious problems, however. The National Committee for Disaster Management (NCDM) estimated that flooding in 2013 caused more than $355 million in damage across agriculture, infrastructure and people's homes. NCDM reported that the floods affected 377,354 households and 1.8 million individuals living in 20 provinces. The floods killed 168 people, the majority of whom were children.

116. In the worst flooding cases, public services such as education and health care delivery cannot function properly. Infrastructure such as road, water and irrigation systems and electricity distribution (where they exist) can be damaged or destroyed, adding to long-term impacts. Shrinking agriculture production after the 2013 floods was estimated to have reduced Cambodia's GDP growth by over half a percentage point.

117. Storms and lightning deaths: While there is an overlap between disasters caused by flooding and storms, storms cans also cause particular sorts of damage such as destruction of homes by strong wind and rain and deaths by lightning.

118. In 2016, storms destroyed 1,997 people's homes and opened the roofs of 8,147 others. There were 21 deaths (from home collapses, falling trees and sinking boats) and 193 injuries.

119. Drought: Drought is second only to flooding in the damage and losses it can cause. Drought is cause by a late, short or erratic rainy season, or lower than average rainfall overall. This century there have been especially serious droughts in 2002, 2003, 2004 (the longest and most damaging until 2006) 2006 and 2016. The drought in 2016 was regarded the most severe for many decades, however, affecting almost the whole country. In March 2016, for example, the Mekong River was 30–50% lower than its average level for that time of year. In May 2016, the National Committee for Disaster Management said that 2.5 million people in Cambodia were directly affected by drought.

Land Use and Vegetation Coverage

Land Use

120. According to the Statistical Yearbook of Cambodia 2021, Cambodia has a total land area of 181,035 km2 in the southwestern part of the East Asia peninsula. Out of this, the land area covers 176,515

square kilometers, while the water area accounts for 4,520 square kilometers. Additionally, there is approximately 3,536 square kilometers of irrigated land in Cambodia, as shown in Table 9.

Table 9. Cambodia Land Use

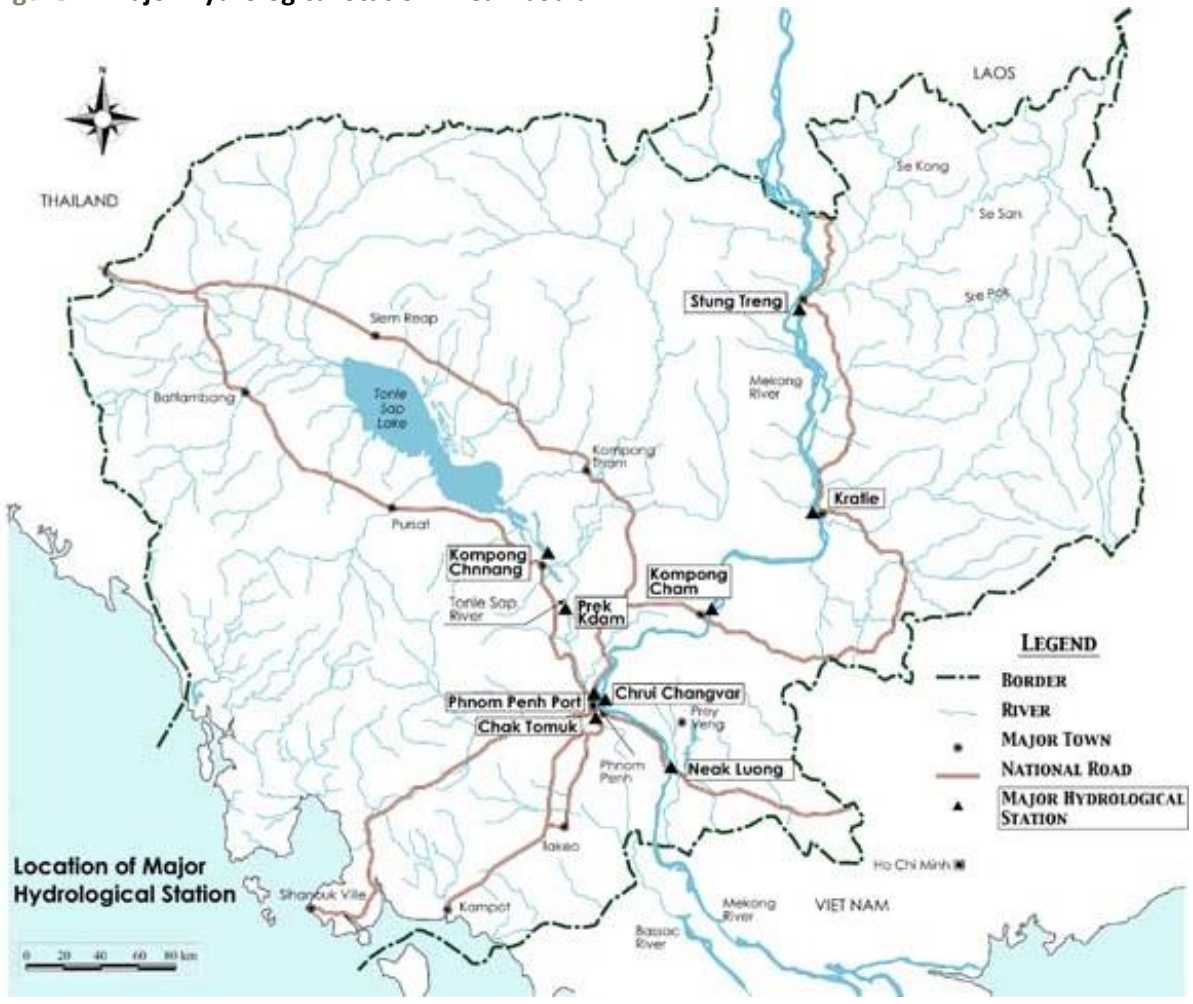
Item	Square Kilometers	Percentage
Total Area	181,035	100%
Land Area	176,515	97.5%
-of which, Irrigated Land	3,536	1.95%
Water Area	4,520	2.5%

Source： *Cambodia geography, maps, climate, environment and terrain from Cambodia | - CountryReports*.

Basin Hydrology

121. The Cambodian floodplains, in particular Phnom Penh areas, are located in one of the strategic areas in terms of water management along the lower Mekong mainstream. At present the Mekong River Commission has been formulating the water utilization rules for reasonable and equitable water use among the member countries.

Figure 2. Major Hydrological Station in Cambodia



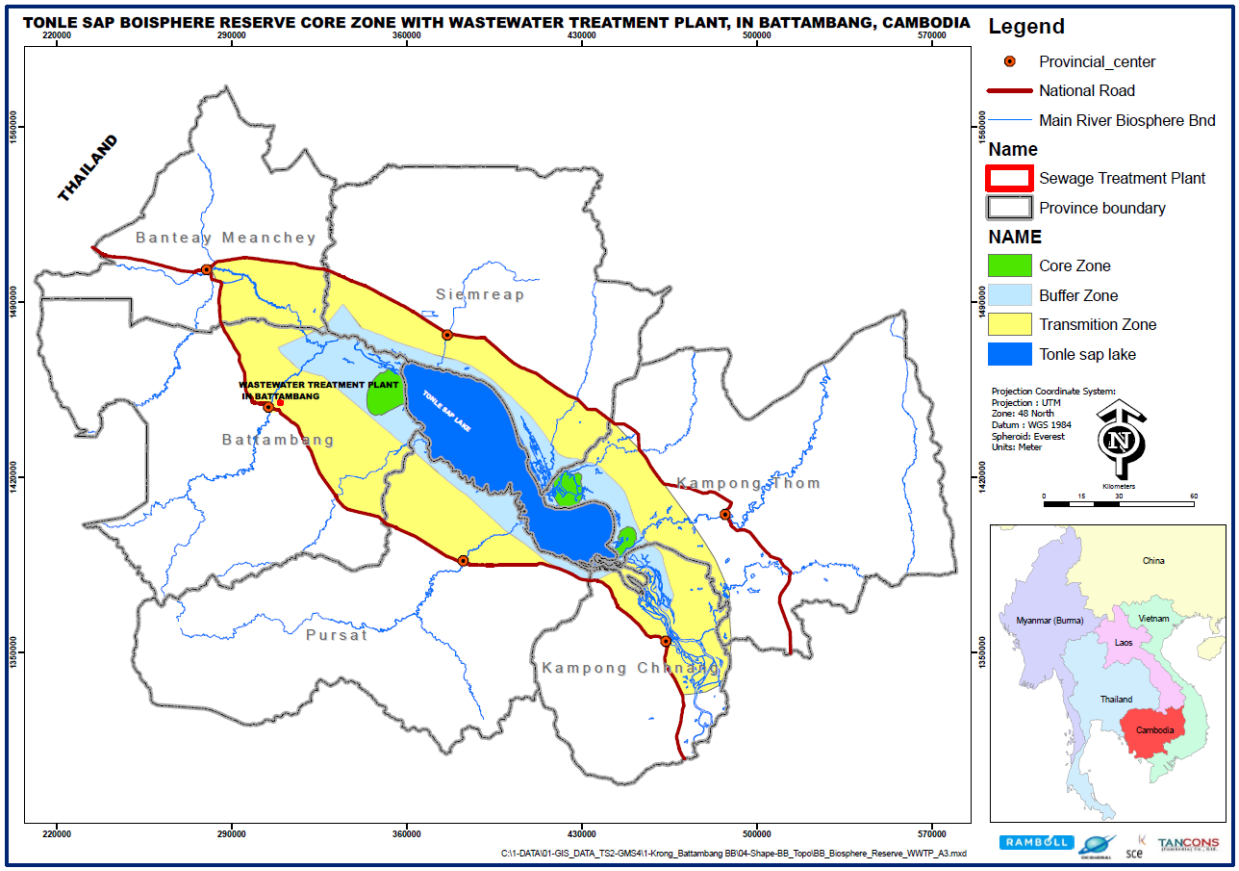
Protected Areas

122. There are 23 Protected Areas in Cambodia, the nearest to the project site is the Tonle Sap Biosphere Reserve (TSBR) which is located in Kampong Chhnang, Pursat, Battambang, Siem Reap, Banteay

Meanchey, and Kampong Thom provinces. The TSBR is classified as a multiple use zone and covers an area of 316,250 ha. It has three core zones which are strictly controlled for biodiversity and conservation. These are not within the area of influence and will not be impacted by the project; the nearest core zone is Battambang province, approximately 40 km in the downstream part from Battambang Town.

123. The Tonle Sap Authority was established by the Royal Government of Cambodia in 2009. It is mandated to coordinate the management, conservation and development of the Tonle Sap Lake region and TSBR. A map showing the TSBR and 03 core zones in shown in Figure below. The subproject will not be located in the transition zone of TSBR.

Figure 3. Tonle Sap Biosphere Reserve (TSBR)



Source: IEE, Second Urban Environmental Management in Tonle Sap, 2021.

Environmental Infrastructures and Service (sewages, mines, power plans, drainages, landfills, etc.)

124. Sanitation (wastewater treatment plant and landfill), water supply infrastructures in the provincial towns around Tonle Sap Lake, Mekong River and coastal area are under construction through loan projects from Development Partners (ADB, World Bank, JICA, EDCF and other).

125. The Cambodian Government decided to decentralize the operational tasks of waste management to local levels in 1999, but some local authorities are still unaware of all of their duties and struggle to fulfil their role in waste management. In the major cities, private companies operate the waste collection and transport services. However, some towns still do not have any waste management services at all. Besides, most municipalities do not have the financial resources or land available to invest in appropriate landfill sites. The lack of qualified staff within existing waste management operators is also a barrier. As a result, all too often households and local businesses manage their own waste by burning

rubbish or by disposing it of in public spaces, waterways and vacant areas. The lack of education, particularly in rural areas where the population can be illiterate, makes the challenge of changing behaviours even more difficult. Recognizing this looming problem, local authorities are implementing several initiatives to raise awareness, although most are still at an early stage. Some municipalities have introduced a loudspeaker system to inform households about the environmental and health risks of dumping waste along the roadside; others, such as in the coastal town of Kep, have installed billboards.

126. Hazardous waste generation is increasing along with the growth of the industrial sector and the consumption of goods that contain hazardous substances. Hazardous waste is only collected, transported and disposed of in Phnom Penh and Kandal Province, where the service is provided by Sarom Trading. In the rest of the country, no specific company or public body currently operates to collect and transport general waste. As a result, it is often mixed with industrial and municipal waste. Many factories do not conduct proactive waste segregation at source, and hazardous waste therefore often ends up in open dump sites.

127. The development of the Cambodian consumer economy has led to a significant increase in e-waste; particularly TVs, PCs, refrigerators, air conditioners, ICT equipment and washing machines. An informal network of waste pickers plays an important role in collecting recyclable materials from e-waste. Valuable waste components are collected and exported, often from open dump sites, whereas non valuable waste is disposed in landfills.

3.2 Social Impacts and Risks

128. A Rapid Social Assessment (RSA) has been conducted on the basis of similar projects in the country, the general environment and social context of Cambodia, the analysis of secondary data and the results of the consultation workshop carried out for the preparation of this project. The RSA includes information on the socio-economic context, including specific to education, as well as information on gender, indigenous peoples and people with disabilities. See more details in Appendix 3.

129. Based on potential rehabilitation works, the Social Assessment has found that potential risks and impacts need to be addressed in the following areas: a) Occupational Health and Safety (OHS), b) Limited scale of labor influx, c) Sexual Exploitation and Abuse, Sexual Harassment, and Violence against Children, d) Child labor and e) Forced Labor. In addition, f) Discrimination and exclusion of disadvantaged/vulnerable groups is also a project risk associated with all project activities, not just rehabilitation works.

Discrimination and exclusion of disadvantaged/ vulnerable groups (related to ESS7)

130. These groups may face prejudice or limited opportunities when attempting to access the project's benefits, such as skill training programs, job counseling services, scholarships, and employment opportunities, which could lead to their social exclusion. To mitigate this risk, the project should incorporate inclusive and transparent measures to ensure that all eligible individuals, regardless of their background or circumstances, have equal access to the project's benefits. These measures aim to promote fairness and equity in the distribution of the project's resources and opportunities.

131. In addition, vulnerable/disadvantaged people, such the poor, indigenous peoples, women, etc., may be excluded from accessing temporary employment opportunities, such as those offered by construction contractors. A project grievance redress mechanism (GRM, see section 8) will be established and kept functional during project implementation and operation to ensure discrimination and exclusion of disadvantaged/ vulnerable groups from participation in and benefit from the project, if any, can be avoided or addressed in a timely and socially and culturally appropriate manner.

Small-scale labor influx (related to ESS2 and ESS4)

132. In terms of new constructions and rehabilitation/renovation works in existing compounds of TIs and JCs, it is likely that project contractors will bring in their own staff, such as project managers, technicians and skilled workers on a small-scale, for the civil works. Contractors should hire local labor as much as possible, in particular for unskilled work. Labor influx can cause several potential issues, including conflicts with local communities, increased health risks such as the spread of communicable diseases like COVID-19, HIV/AIDS, and other sexually transmitted diseases (STDs), as well as an increased risk of traffic accidents, particularly for those living near the civil works and those traveling near the TVET facility while trucks are driving in and out during the civil works. It is important to identify and mitigate these risks to ensure the safety and well-being of all involved in the project.

Sexual Exploitation and Abuse, Sexual Harassment, and Violence against Children (related to ESS2 and ESS4)

133. The presence of outside workers at each subproject runs risks of sexual abuse and exploitation (SEA), sexual harassment (SH), and Violence against Children (VAC), both to the local population and to camp followers. However, **the SEA/SH risk associated with the civil works related to the expansion of TVET training facilities is assessed to be low**. This is because the project activities and venues that may generate SEA/SH risks, such as skill training, job counselling services, and employment, will primarily take place in urban areas (the capital city and other urban centers) that are easy to reach and monitor. Moreover, the project areas have an established national referral pathway protocol for gender-based violence (GBV) service provision. Existing mechanisms are in place for students, trainers, and workers to report instances of violence that may occur at the TVET centers or be caused by someone from outside the training venues. Measures and instruments, including GBV measures, have been prepared to mitigate these risks in accordance with relevant ESSs of World Bank.

Child Labor and Forced Labor (related to ESS2)

134. Although the national Labor Law sets the minimum working age at 15 years old, ESS2 stipulates the minimum working age at 18 except under very specific conditions. The minimum age for workers in this project is to be 18. Therefore, there is a risk of contractors engaging children under the age of 18, mostly as unskilled workers.

135. Forced or compulsory labor is forbidden under both national law and ESS2. Hiring people to work off their debts, a practice sometimes found in Cambodia, is considered forced labor, and is forbidden under this project, along with all other forms of forced or compulsory labor.

136. Local people, recruited as unskilled workers by project contractors, may not be offered a written working contract. As a result, there is a possibility that they may be underpaid for the nature, scope, and quantity of work that they undertake.

Occupational Health and Safety (related to ESS2)

137. Another social risk associated with the project is occupational health and safety (OHS) in workplaces and venues where trained job seekers are employed and during training sessions. Relevant measures will be taken to ensure that these workplaces are safe for employees and trainees, and that appropriate OHS measures are in place to prevent accidents and injuries.

138. Workers may also be asked to work under conditions that are hazardous to them, such as working without personal protective equipment as required for such work. Worker camps may not have adequate sanitation, clean water, or other facilities.

139. The project will not involve large-scale construction of new facilities. The civil works associated with this project will mainly involve rehabilitating existing TVET training facilities.

140. Social issues related to civil works will be addressed through the application of a social code of conduct (CoC) that will be included as part of the works contract.

Community Health and Safety (related to ESS4)

141. There could be some minor community disturbances as a result of civil works (noise, dust, air, odour from wastewater, possible accidents from transport of construction materials). With an influx of labor during construction, there is the risk of SEA/SH of local residents though this has been assessed as low. In addition, ICT equipment will be installed within the existing footprint of facilities. The risk of improper handling and disposal of electronic waste could pose risks to community health and safety.

142. However, the expected impacts and the risks associated with CHS are expected to be site-specific and manageable. To mitigate associated impacts and risks, Community Health and Safety (CHS) considerations have been included in the e-waste management plan (see Appendix 4), ESCoP (Appendix 7) and ESMP Outline (Appendix 8).

3.3 Environmental Impacts and Risks

143. In the case of the current project, **the Environmental Risk Rating is moderate** at this stage, and potential environmental impacts are mainly related to: (a) generation of package wastes/e-wastes and OHS risks associated with ICT upgrades for selected learning facilities and the LMIS; and (b) generation of noise, dust, minor hydrocarbon spills, waste and sedimentation as well as OHS risks during civil works from renovation/rehabilitation and new constructions for selected TIs and JCs. Construction waste streams may include hazardous materials such as asbestos containing materials or lead containing paints.

Package/electronic waste (related to ESS3)

144. The first identified environmental risk and impact is related to the **disposal and recycling of package and electronic wastes** from ICT upgrades of some learning facilities and LMIS. The ICT tools to be financed by the Project will eventually end-up in the waste stream as electrical and electronic waste (e-waste). E-waste is a very complex waste stream, as it encompasses a wide range of items, metals and chemicals of which some are valuable, and others are hazardous. Valuable metals include gold, silver, copper and iron/steel; and hazardous waste include heavy metals such as lead, cadmium and mercury. Plastic cabinets often contain flame retardants such as polybrominated biphenyls (PBB) and polybrominated diphenyl ether (PBDE), which are considered persistent organic pollutants by the Stockholm Convention. These chemicals are considered potentially bio accumulative and toxic to humans and wildlife. Consequently, the use of these compounds has been restricted internationally. Cathode ray tube (CRT) glass which is used in computer monitors contain lead and at present, there is no effective way to deal with leaded glass. Improper disposal and recycling of these wastes can lead to pollution and the release of hazardous chemicals and gases into the environment. E-waste has potential impacts relate to (i) leaching of toxic substances such as lead, mercury, cadmium in soil and groundwater from landfill disposal; (ii) air pollution from burning of e-wastes leading to release of dioxins, furans, etc. causing respiratory problems and other health issues in nearby communities; (iii) energy consumption required for recycling leading to greenhouse gas emissions and climate change; (iv)valuable and precious metals (copper, silver, gold. Platinum) resource consumption which if not recovered would lead to additional mining and extraction impacts; (v) illegal dumping leading to contamination of the local environment and health impacts, etc.

145. Therefore, it is crucial to implement a package/electronic waste management plan to mitigate the risks and impacts associated with the disposal and recycling of these wastes.

Utilizing energy efficiency (EE) ICT Supplies (related to ESS 3)

146. To improve the energy efficiency of the project, the ESMF includes a description of technically and financially feasible measures, such as the use of energy-efficient equipment. The project also includes provisions for improving energy efficiency in the POM as per the World Bank Group (WBG) Environmental, Health, and Safety (EHS) Guidelines and relevant Good International Industry Practices (GIIPs). Incorporating these measures into the project's design and scope can help reduce the project's carbon footprint and promote sustainable development.

Noise, dust, minor hydrocarbon spills, waste, sedimentation, and OHS risk (related to ESS2 and ESS3)

147. The second identified environmental risk and impact is related to the generation of noise, dust, minor hydrocarbon spills, waste, and sedimentation during civil works from the rehabilitation and new constructions of selected TIs and JCs. During construction stage, there are risks and impacts associated with civil works including : i) generation of dust, noise, vibration and gas emissions due to the operation and movement of construction vehicles and machinery; ii) improper disposal of construction waste and asbestos (if present) or minor operational or accidental spills of fuel and lubricants from the construction machinery; iv) pollution from temporary increase in suspended solids in the water and impact on downstream users during construction; v) improper restoration of construction sites, including cleaning and closing of old unhygienic outdoor pits and trenches at the end of the civil works, (v) Occupational health and safety is also crucial related accident at constructing sites and campsite. These activities can lead to air and water pollution and can have adverse effects on the local ecosystem. It is essential to implement measures to mitigate the risks associated with these activities, such as using environmentally friendly construction materials and techniques, proper waste management, and sedimentation control measures. The Environmental and Social Management Plan (ESMP) for mitigating the impacts for the new constructions, while Environmental and Social Code of Practice (ESCoP) with consideration for OHS will be implemented to mitigate impact during the rehabilitation civil works.

3.4 Generic E&S Impacts and Mitigation Measures for the Project

Mitigation Measures for Social Impacts/Risks

148. Applying the principle of proportionality, considerations relating to Indigenous Peoples will be mainstreamed into project design, following relevant requirements in this ESMF (including recommendations of RSA) and SEP, particularly meaningful consultations with Indigenous Peoples as well as opportunities for them to benefit from the project activities. Project design should include engagement with Indigenous group organizations as well as organizations working with people with disabilities, as well as other vulnerable groups, to better understand their needs and how the project could potentially benefit them.

Labor and Working Conditions (ESS2)

149. The LMP will be an integral part of the bidding documents and construction contracts. The LMP will ensure there is equal opportunity for jobs, in particular for unskilled labour, and that women and other vulnerable community members, including Indigenous groups, are encouraged to apply to jobs in civil works. The LMP will also ensure jobs provide equal pay regardless of the sex of the worker and that the needs of women workers are taken into account to provide a safe working environment (such as different sex toilets in working sites). The ESMF includes Codes of Conduct (CoC, Appendix 6) and guidelines for Worker's Camps (Part B of Appendix 7) with explicit guidance to address GBV/SEA/SH risks. The LMP is also relevant for consultants and other experts hired to work in the project's Technical Assistance activities.

Indigenous groups (ESS7)

150. If project activities take place in provinces where Indigenous groups live, special efforts should be made to consult them and ensure they can access project benefits. Moreover, nation-wide activities should consider the needs of Indigenous groups by engaging with Indigenous organizations, to better understand, for example, constraints in accessing TVET, cultural sensitivity in the curriculum (including linguistic barriers), and opportunities for Indigenous teachers, among other things. These are aspects are discussed in the Rapid Social Assessment, as well as barriers faced by Indigenous groups. On this basis, inclusion actions have been included in the ESMF.

151. The project's SEP puts in place measures to ensure that project activities in areas where indigenous peoples are present will consult with them in a culturally appropriate manner and that Indigenous peoples have opportunities to benefit from the project activities. In addition to this, in order to ensure that Indigenous Peoples are not disadvantaged in accessing project benefits due to language or culture, the SEP has included measures to engage and consult with them. The ESMF and SEP have included measures to enhance inclusion of Indigenous groups consistent with ESS7.

Stakeholder engagement (ESS10)

152. Stakeholder engagement is important to ensure that project communities, as well as other project stakeholders[16], are informed and involved in all the stages of project preparation and implementation. MLVT has prepared a Stakeholder Engagement Plan (SEP), with assistance of E&S consultants. The SEP also includes a Project Grievance Mechanism and measures to ensure disclosure to project-affected peoples and groups and other stakeholders. The SEP will be implemented, updated, and re-disclosed if needed, throughout the different phases of the project life cycle. The consultation's report/minutes are included in Annex 2 of the SEP. The ESMF, ESCP, and the SEP were disclosed publicly on the website of MLVT in June 2023.

Environmental Impacts/Risks (ESS1 and ESS3)

153. The e-waste management plan (see Appendix 4) aims to address the proper dismantling, storage, handling, and final disposal of e-waste in accordance with internationally recognized practices and includes the monitoring of the types/quantities of waste electrical and electronic equipment disposed of and document evidence of proper management (e.g., recycled, refurbished, discarded, exported). The package/e-waste management plan has been included in the ESMF. In addition, the project will incorporate technically and financially feasible measures to improve energy efficiency (EE) in this ESMF and POM as per the World Bank Group (WBG) Environmental, Health, and Safety (EHS) Guidelines and relevant GIIPs. Incorporating these measures into the project's design and scope can help reduce the project's carbon footprint and promote sustainable development.

154. There are potential impacts and risks linked to generation of noise, dust, minor hydrocarbon spills, waste and sedimentation as well as OHS risks during civil works from renovation/rehabilitation and new constructions for selected TIs and JCs. Although the risk of unexploded ordnance (UXO) in the construction area for the new building is low, there is still a potential risk that needs to be considered. These risks and

[16] Project stakeholders are (a) trainees of selected institutions who will benefit from improved TVET facilities and training programs; (b) industry associations targeted under the project; (c) workers accessing the Labor Market Information System (LMIS) who will benefit from the improved job information and orientation service; (d) employers who employ the graduates of project-supported training programs; (e) trainers and administrators of training institutes and job centers who will receive training and mentoring; (f) training providers benefiting from project support; (g) vulnerable groups who may also benefit from these activities; (h) construction workers involved in the construction or rehabilitation of facilities and (i) communities nearby to training centers being constructed/renovated.

impacts will be mitigated through the implementation of the ESMP for mitigating the impacts for the new constructions, while ESCoP with consideration for OHS will be implemented to mitigate impact during the rehabilitation civil works. Additionally, any necessary UXO clearance shall be undertaken at site by authorized agency prior to commencing civil works for the construction of new buildings.

Community Health and Safety (ESS4)

155. To mitigate associated impacts and risks, CHS considerations have been included in the e-waste management plan (see Appendix 4), ESCoP (Appendix 7) and ESMP Outline (Appendix 8).

3.4.1 Managing Environmental and Social Risks and Impacts for Civil works

156. Table 10 summarizes the major environmental and social impacts and risk and mitigation measures for civil works under components 1 and 2.

Table 10. Environmental and social impacts and risk and mitigation measures for civil works

Civil works under Component 1:	**Sub-component 1.2** – Improvements in industry engagement and quality in select training institutions: implementation of industrial-linkages development plans (ILDPs) will involve civil works in some cases and equipment installation. New construction and rehabilitation/renovation of training facilities will be conducted in select TIs, to ensure *an appropriate physical environment for ILDPs.*		
Civil works under Component 2:	**Sub-Component 2.2** – Job search support and career orientation: this sub-component will finance improvements in career orientation activities undertaken by the National Employment Agency (NEA) along with the refurbishment of existing JCs and possibly the purchase of mobile JCs. Rehabilitation of select JCs will include renovations to seven JCs with upgrades to equipment and the purchase of five mobile JCs.		
Activities/Possible Sources	**Impacts/Issues/risks**	**Mitigation Measures**	**Responsibilities**
a. Environmental			
Pre-construction phase: The potential impacts/concerns mainly occur during site clearance activities and demolition of the existing facilities			
Site preparation Recruitment of labour Setting up of construction camp	Dust generation	-Implement continuous water spraying or install dust screen enclosures to minimize dust emission during site clearing; -Regularly clear debris from surrounding roads and paths to minimize dust buildup; -Strictly prohibit open burning of construction or waste material on the site; and -Hand-held, portable monitoring meters for dust measures shall be in place for daily monitoring.	Implemented by: Contractors and Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU
	Noise generation	-Comply with local regulations and limit construction noise to specific times agreed upon in the permit; -Install sound barriers or acoustic enclosures around construction equipment to reduce noise levels; -Implement a noise monitoring program to ensure compliance with established noise limits; -Regularly maintain and repair equipment to reduce noise pollution; -Utilize electric or battery-powered equipment where feasible to reduce noise levels; -Incorporate noise-reducing features in the building or infrastructure design, such as sound-absorbing materials and double-glazed windows; and	Implemented by: Contractors and Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU

		-Lightweight, hand-held, portable monitoring meters for noise measures shall be in place for daily monitoring.	
	Loss of topsoil	-Implementation of erosion control measures such as silt fences, sediment basins, and straw bales to prevent soil erosion.	Implemented by: Contractors and Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU
	Loss of vegetation	-Replanting of vegetation as soon as possible after construction is complete to mitigate the impact of vegetation loss.	Implemented by: Contractors and Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU
	UXO contamination at sites for constructing new buildings	Confirm all relevant areas are clear from UXO. - The Cambodian Mine Action Centre (CMAC) will be responsible for conducting UXO clearance in areas where it is deemed necessary. Prior to the commencement of construction, CMAC will clear the designated areas and provide evidence of clearance to the PMU. - A Certificate of UXO Clearance will be obtained to certify that the site is free from any UXO risks.	Contractors to engage CMAC Monitored by: E&S Consultants and E&S Focal Persons of PMU
Construction Phase: The potential impacts/concerns mainly occur during new construction and rehabilitation/renovation works of training facilities			
Removal of existing vegetation on the construction sites Earthworks Excavations and Bedding Operation of construction machinery	Soil erosion	-Implement soil erosion control measures to prevent soil degradation; -Implement strict monitoring and enforcement mechanisms to ensure compliance with environmental regulations. -Establish appropriate erosion and sediment control measures such as hay bales and/or silt fences to prevent sediment from moving off site and causing excessive turbidity in the water courses.	Implemented by: Contractors and Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU
	Surface water and groundwater contamination	-Establish appropriate erosion and sediment control measures such as hay bales and/or silt fences to prevent sediment from moving off site and causing excessive turbidity in the water courses.	Implemented by: Contractors and Selected TIs and JCs

Movement of earth materials within and around site and from exposed surfaces around the site Stockpiling of earth materials Haulage of construction materials		-The approach to handling sanitary waste and wastewater from building sites (installation or reconstruction) must be approved by the local authorities; -Before being discharged into receiving waters, effluents from individual wastewater systems must be treated in order to meet the minimal quality criteria set out by national guidelines and WBG EHS on effluent quality and wastewater treatment. -Put in place a temporary latrine and septic tank to be used by the workers during construction until the final latrine is built.	Monitored by: E&S Consultants and E&S Focal Persons of PMU
	Loss of vegetation due to building construction	-Before cutting any trees, permission from management of selected TIs is needed. -- Replanting of vegetation as soon as possible after construction is complete to mitigate the impact of vegetation loss.	Implemented by: Contractors and Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU
	Noise pollution	-Comply with local regulations and limit construction noise to specific times agreed upon in the permit; -Install sound barriers or acoustic enclosures around construction equipment to reduce noise levels; -Implement a noise monitoring program to ensure compliance with established noise limits; -Regularly maintain and repair equipment to reduce noise pollution; -Utilize electric or battery-powered equipment where feasible to reduce noise levels; -Incorporate noise-reducing features in the building or infrastructure design, such as sound-absorbing materials and double-glazed windows; and -Lightweight, hand-held, portable monitoring meters for noise measures shall be in place for daily monitoring	Implemented by: Contractors and Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU
	Dust pollution and Air pollution	-Implement continuous water spraying or install dust screen enclosures to minimize dust emission during site clearing; -Regularly clear debris from surrounding roads and paths to minimize dust buildup; -Strictly prohibit open burning of construction or waste material on the site;	Implemented by: Contractors and Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU

		-Minimize excessive idling of construction vehicles at the site to reduce exhaust emissions; - Using PPE, such as dusk masks, should be used where dust levels are excessive; and -Hand-held, portable monitoring meters for dust measures shall be in place for daily monitoring.	
	Improper waste handling and disposal	-The contractor will segregate mineral construction wastes from other types of waste through on-site sorting and store them in appropriate containers. -The contractor will minimize the generation of waste as much as possible. -Construction waste will be collected and disposed of properly by authorized waste collection authorities or companies. -Records of waste disposal will be maintained as evidence of proper management. -Viable materials will be reused and recycled, with the exception of asbestos, which must be disposed of at an approved dumping site by the local authorities or the Ministry of Environment.	Implemented by: Contractors and Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU
	Asbestos management	-The project is not expected to involve any demolition of existing buildings, and the use of asbestos in new construction and rehabilitation/renovation will be avoided. However, contractors will be required to adhere closely to the World Bank Group's Good Practice Note on Asbestos (May 2009) in cases where asbestos may be encountered on the project site. -If asbestos is found on the site, it will be clearly marked as hazardous material to prevent exposure; -Whenever possible, the asbestos will be contained and sealed to minimize the risk of exposure; -Before removal (if removal is necessary), the asbestos will be treated with a wetting agent to reduce the amount of asbestos dust produced; -Asbestos removal will be carried out by skilled and experienced professionals, and all waste materials will be securely enclosed and appropriately marked if temporarily stored; -The removed asbestos will not be reused or repurposed; and	Implemented by: Contractors and Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU

		-Ensure compliance with the asbestos management procedures outlined in Part D of Appendix 7.	
	Toxic/hazardous waste management	-All hazardous or toxic substances will be stored on site in appropriate containers that are clearly labelled with information on their composition, properties, and safe handling procedures; -Containers holding hazardous substances will be placed inside secondary containment systems to prevent leaks and spills; -The transportation and disposal of hazardous waste will be handled by licensed carriers and facilities in compliance with applicable regulations; and -Paints containing toxic ingredients, solvents, or lead will not be used in any construction activities.	Implemented by: Contractors and Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU
	E-waste issues	-E-waste from replacing old ICT equipment shall be properly managed through implementation of e-waste management plan.	Implemented by: Contractors and Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU
	Increased traffic and road traffic related accidents	-Flagmen to be in place to manage the traffic -Transporting vehicles shall be controlled with 20-30km/hour -The truck driver shall have driving licenses and experiences of driving trucks -Avoid transporting construction material during rush-hour or passthrough schools. -Traffic signs shall be in place to alert the travellers.	Implemented by: Contractors and Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU
	Destruction of archaeological chance finds	-If archaeological chance finds are found, actions to be taken as described in Appendix 10: Chance Finds Procedures. -Stop the construction activities in the area of the chance find; -Delineate the discovered site or area; -Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard shall be arranged until the responsible local authorities take over; - Notify the Supervisor who in turn should notify the responsible local authorities immediately (within 24 hours or less); and	Implemented by: Contractors and Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU

		-Resume construction work after permission is given from the responsible local authorities concerning safeguard of the heritage.	
Operation Phase			
Replacement of old ICT equipment with new ones	E-waste issues	E-waste from replacing old ICT equipment shall be properly managed through implementation of e-waste management plan	Implemented by: Selected TIs and JCs Monitored by: E&S Focal Persons of PMU
Decommissioning			
Decommissioning of construction site Removal of construction machinery from site	Dust generation Noise generation	-Selectively removing potential hazardous air pollutants, such as asbestos (if any), from existing infrastructure prior to demolition -Implement continuous water spraying or install dust screen enclosures to minimize dust emission during site clearing; -Strictly prohibit open burning of construction or waste materials on the site; and -Using PPE, such as dusk masks, should be complied with where dust levels are excessive	Implemented by: Selected TIs and JCs Monitored by: E&S Focal Persons of PMU
b. Social			
Pre-Construction Phase: Things to take into account during project design			
Inclusion and accessibility	Design of new facilities and/or rehabilitation of existing facilities	Where possible, ensure that accessibility is taken into account when designing new buildings and/or applicable rehabilitation works. This may include, for instance, access ramps, inclusive toilets and other necessary design considerations.	PMU & PIU-SDF E&S officer Assisted by E&S consultants
Construction Phase: The potential impacts/concerns mainly occur during new construction and rehabilitation/renovation works of training facilities			
Improper labor and working conditions	Occupational Health and Safety of workers, trainees/staff	Notify local construction and environmental authorities and communities in advance of upcoming activities; Provide adequate worker accommodation with proper sanitation, hygiene, and housekeeping facilities; Ensure that workers wear appropriate personal protective equipment (PPE) in accordance with international best practices, including hard hats, masks, safety glasses, gloves, harnesses, and safety boots as necessary; Provide workers with protective equipment such as masks and hand sanitizer or soap and water to prevent the spread of COVID-19, in accordance with guidelines from the Ministry of Health and the World Health Organization;	Implemented by: Contractors and Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU &PIU-SDF

		Clearly post signs at the worksite informing workers of key rules and regulations that must be followed; Educate workers, trainees, and staff at TIs and JCs on the worksite and COVID-19.	
Various construction disturbance	Community Health and Safety of neighbouring residents	The local community will be notified of the works through appropriate notification in the media and/or at publicly accessible sites (including the site of the works); All work will be carried out in a safe and disciplined manner designed to minimize impacts on neighboring residents and the environment; Safety signs will be prominently displayed, and active workplaces/construction sites will be fenced off; Children will not be allowed within the construction area of the worker's camp; Explicit signs will be installed to forbid children from playing at the construction sites.	Implemented by: Contractors and Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU
Various construction disturbance	Direct or indirect hazards to public traffic and pedestrians	Implementation of traffic management measures, including clear signposting, warning signs, barriers, and traffic diversions, to ensure the site is visible and potential hazards are identified to the public; Provision of safe and convenient passages for pedestrians, including safe crossings where construction traffic interferes, to reduce the risk of accidents; Adjustment of working hours to local traffic patterns, such as avoiding major transport activities during rush hours, to minimize disruption to traffic flow and reduce congestion; Active traffic management by trained and visible staff at the site, if required, to ensure safe and convenient passage for students and the public; Ensuring safe and continuous access to buildings of training institutions, JCs, office facilities, shops, and residences, if they remain open to the public, by implementing appropriate traffic management measures.	Implemented by: Contractors and Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU
Mixed gender at workplaces	Gender based violence and discrimination based on gender	Explicitly prohibiting gender-based violence and discrimination amongst the work-force and with communities; Providing training for work-force on gender-based violence and discrimination;	Implemented by: Contractors and Selected TIs and JCs

		Establishing reporting mechanisms that allow for anonymous and confidential reporting of gender-based violence and discrimination; and Ensuring there is access to support services, such as counselling and legal aid, for survivors of gender-based violence and discrimination.	Monitored by: E&S Consultants and E&S Focal Persons of PMU and PIU-SDF
Insufficient understanding, awareness, and supervision of SEP Insufficient funding and capacity	Lack of meaningful consultation/citizen engagement	Hold regular community meetings to inform and consult with local residents about upcoming construction activities and potential impacts on their daily lives; Develop and distribute information materials, such as brochures and fact sheets, to inform the public about the project and its goals, as well as potential risks and mitigation measures; and Ensure the GRM is functional, to allow community members to voice their concerns and provide feedback on the construction process if desired.	Implemented by: E&S Focal Persons of PMU/PIU-SDF and Selected TIs and JCs Assisted by: E&S Consultants
Insufficient understanding, awareness, and supervision of Environmental and Social mitigation measures Insufficient funding and capacity for implementation of environmental and social mitigation measures	Compliance with Environmental and Social mitigation measures	Appointment of environmental and social officer to oversee compliance with the ESMP/ESCoP and facilitate stakeholder engagement; Hiring of E&S consultant to work with the above E&S officer; Regular monitoring and reporting of environmental and social impacts, as well as the implementation of mitigation measures, to relevant authorities and stakeholders; Implementation of training programs for construction workers on environmental and social issues, and the importance of compliance with mitigation measures; Ensure funds for Environmental and Social mitigation measures are disbursed in a timely and fully manner; Conduct regular monitoring to ensure the project's compliance with environmental and social regulations, and take corrective action if necessary; and Establish an effective grievance mechanism to receive, investigate, and resolve complaints related to the project's environmental and social impacts.	Implemented by: Contractors and Selected TIs and JCs and PMU Monitored by: E&S Consultants and E&S Focal Persons of PMU 7 PIU-SDF
Operation Phase:			
Lack of access and poor use of protective clothes	OSH issues	Implement OSH management measures during the operation and maintenance phase, including regular training and awareness sessions for staff and users;	Implemented by: Contractors and Selected TIs and JCs

No proper water and sanitation practices at workplaces Fire prevention and control		Provide sufficient PPE to staff and users, and ensure its proper use and maintenance; Conduct regular OSH inspections and risk assessments to identify and address potential hazards and risks in the facilities; Ensure the functionality of a GRM for addressing OSH concerns raised by staff, trainees, and users of the facilities.	Monitored by: E&S Consultants and E&S Focal Persons of PMU & PIU-SDF

3.4.2 Managing Environmental and Social Risks and Impacts for Non-Civil Works

157. Table 11 summarizes the major environmental and social impacts and risk and mitigation measures for non-civil works under components 1 and 2.

Table 11. Environmental and social impacts and risk and mitigation measures for non-civil works

Non-Civil works under Component 1:	**Sub-component 1.1 – Sector-wide improvements in industry engagement and quality – in select sectors:** (a) provide TA to strengthen SSCs in their role as facilitators of effective collaboration between industry and training institutions; (b) conduct information campaigns and build capacity among staff of TVET providers and industry on establishing effective partnerships; and (c) to curriculum development by modernizing and developing curricula and standard training packages for priority occupations in the target sectors as well as for basic 21st century skills. **Sub-component 1.2 – Improvements in industry engagement and quality in select training institutions**: (a) TA to establish ISCs; (b) TA to support the training institution and firms to develop, implement, and monitor ILDPs; (c) incentives for various forms of industry partnerships, e.g. joint curriculum development, guest lecturers from industry, for teachers to train from industry, and for internships.		
Non-Civil works under Component 2:	**Sub-Component 2.1 – Labor market information system (LMIS):** (a) TA to develop an LMIS roadmap, (b) preparation, implementation, and analysis of labor market surveys; (d) TA to training institutions on the TVET MIS; and (e) IT systems. **Sub-Component 2.2 – Job search support and career orientation**: TA to revise and strengthen career guidance and job counselling and conduct Training of Trainers (ToT) for Government staff to provide the counselling.		
Non-Civil works under Component 3:	Enhancing industry's capacity for EESD and expanding access to quality and relevant training. This would support the expansion of demand-driven training and new forms of training. Access to quality and relevant training can be increased by providing financing to a broad range of providers that are able to deliver training that benefits from strong employer engagement. This includes the training institutions, other actors including public and private training providers, as well as employers and employer associations. This component would complement sub-component 1.2 in two ways: (a) Build capacity of industry associations that can play an important role in sector skills councils (SSCs); and (b) allow the expansion of training options, including through private training providers, employers, and industry associations.		
Activities/	**Impacts/Issues/risks**	**Mitigation Measures**	**Responsibilities**

Possible Sources			
a. Environmental			
Use of IT systems and technology for LMIS and other activities	Increased energy consumption and greenhouse gas emissions	Implement energy-efficient measures in the design and operation of IT systems and technology, such as using low-power equipment and optimizing data center cooling; Encourage the use of renewable energy sources for powering IT systems and technology, where possible; Develop policies and guidelines for staff to reduce energy consumption and greenhouse gas emissions, such as turning off equipment when not in use and minimizing travel; Conduct regular energy audits to identify areas for improvement and track progress towards reducing energy consumption and greenhouse gas emissions; Promote telecommuting and virtual meetings as alternatives to in-person meetings, where appropriate, which can help reduce travel-related emissions.	Implemented by: Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU & PIU-SDF
Establishment and operation of new training facilities, courses, and industry partnerships	Increased consumption of natural resources, such as water and electricity	Developing and implementing water conservation measures, including the use of water-efficient fixtures and fittings and the use of recycled water for non-potable purposes; Developing and implementing energy conservation measures, including the use of energy-efficient lighting, heating, and cooling systems, and the installation of renewable energy systems, such as solar panels or wind turbines; and Promoting awareness among staff, trainees, and industry partners on the importance of environmental sustainability, and providing training on how to reduce resource consumption and waste generation.	Implemented by: Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU & PIU-SDF
Development, printing, and dissemination of information campaigns and curriculum materials	Waste and potential impacts on air and water quality	Instead of relying solely on print materials, consider utilizing digital dissemination methods such as electronic publications, online courses, and webinars to reduce paper waste and emissions from transportation; Establish proper waste management practices, such as recycling and composting programs, to reduce the amount of waste generated and minimize the potential impacts on air and water quality;	Implemented by: Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU & PIU-SDF

		Regularly monitor and report on environmental performance, including waste generation and disposal, energy consumption, and water usage, to identify areas for improvement and track progress towards sustainability goals; and When developing curricula and training materials, consider the potential environmental impacts and incorporate sustainability principles and practices where possible. This could include topics such as resource conservation, pollution prevention, and environmental regulations and compliance.	
Travel to conduct information campaigns and training sessions	Transportation-related emissions and impacts on local air quality	Encourage the use of low-emission transportation modes such as electric vehicles or public transportation for project-related travel; Use virtual meeting and training platforms to reduce the need for physical travel; Where physical travel is necessary, consider scheduling multiple meetings or training sessions in one trip to reduce the number of trips required; Select venues that are easily accessible by public transportation or offer carpooling options for participants; and Encourage participants to carpool or use public transportation when attending project-related events.	Implemented by: Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU & PIU-SDF
Waste from food stores in the TIs and JCs	Waste and potential impacts on air and water quality	The burning of waste is strictly prohibited; Waste will be collected and disposed of properly by a waste collection authority or company approved by the MoE; Records of waste disposal will be maintained as evidence of proper management as designed; Littering and illegal dumping of waste on the premises and in its surroundings are prohibited.	Implemented by: Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU & PIU-SDF
b. Social			
Insufficient social inclusion in the training programs and industry partnerships	Limited opportunities for participation of indigenous peoples	Develop and implement communication and targeted outreach strategy to reach out to indigenous peoples and encourage their participation in the training programs and industry partnerships; Conduct training for TVET staff and industry partners on issues related to diversity and inclusion, including cultural sensitivity of indigenous peoples;	Implemented by: Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU & PIU-SDF

		Establish monitoring and evaluation mechanisms to track the participation of indigenous peoples in the training programs and industry partnerships, and to identify and address any barriers or challenges they may face.	
Insufficient social inclusion in the training programs and industry partnerships	Limited opportunities for participation of people with disabilities	Develop and implement communication and targeted outreach strategy to reach out to people with disabilities and encourage their participation in the training programs and industry partnerships; Provide special accommodations and/or support services, where appropriate, such as sign language interpretation, Braille materials, and assistive technology as available, to ensure that people with disabilities can participate in the training programs and industry partnerships; Conduct training for TVET staff and industry partners on issues related to diversity and inclusion, including accessibility for people with disabilities; Ensure compliance with relevant accessibility standards for public buildings in the process of constructing, rehabilitating or renovating TVET TIs or JCs; Establish monitoring and evaluation mechanisms to track the participation of people with disabilities in the training programs and industry partnerships, and to identify and address any barriers or challenges they may face.	Implemented by: Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU & PIU-SDF.
Insufficient gender equality in the training programs and industry partnerships, and access to decent work and economic opportunities	Limited opportunities for women to participate in and benefit from project activities	Gender-responsive program design: Ensure that project activities are designed to be inclusive and responsive to the needs and priorities of women. This could involve targeted outreach and engagement strategies to encourage women's participation in training and industry partnerships; Gender-sensitive training and curriculum development: Ensure that training programs and curricula are gender-sensitive and incorporate topics relevant to women's economic empowerment, such as entrepreneurship, leadership, and financial management; Women's economic empowerment initiatives: Incorporate initiatives to promote women's economic empowerment, such as mentoring and networking programs, access to finance and markets, and support for women-owned businesses; and	Implemented by: Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU & PIU-SDF.

		Gender mainstreaming in industry partnerships: Ensure that industry partnerships are inclusive and equitable, and provide opportunities for women's participation and leadership. This could involve setting targets for women's participation and monitoring progress towards achieving these targets.	
Mixed gender at workplace or during training sessions	Gender-based violence (GBV) risks	Prohibiting gender-based violence and discrimination amongst the workforce and with communities; Providing training and education for staff, employees, and community members on gender-based violence and discrimination; Establishing reporting mechanisms that allow for anonymous and confidential reporting of gender-based violence and discrimination; and Ensure there is access to support services, such as counselling and legal aid, for survivors of gender-based violence and discrimination.	Implemented by: Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU & PIU-SDF.
Hazardous occupations or without proper protective equipment and training	Occupational health and safety (OHS) risks for workers in the training institutions and industries	Developing and implementing comprehensive OHS policies and procedures for all project activities, including training institutions and industry partnerships; Providing OHS training to all workers, including teachers, trainers, and industry personnel, to ensure that they are aware of the risks and how to minimize them; Conducting regular OHS assessments and inspections to identify hazards and ensure compliance with regulations and best practices. Providing appropriate protective equipment and ensuring that it is used properly; Establishing a reporting system for OHS incidents and near misses, and ensuring that they are investigated and addressed promptly; and Encouraging the adoption of safer technologies and processes in the target industries and supporting their transition towards more sustainable and safer practices.	Implemented by: Contractors and Selected TIs and JCs Monitored by: E&S Consultants and E&S Focal Persons of PMU & PIU-SDF.
Insufficient understanding, awareness, and supervision of SEP or insufficient funding and capacity	Lack of meaningful consultation/citizen engagement	Ensure that project information and documentation are easily accessible and disseminated to all stakeholders in a timely and transparent manner;	PMU & PIU-SDF E&S officer Assisted by E&S consultants

		Conduct regular focus group discussions or public consultation meetings to gather feedback and input from stakeholders on project activities and plans; Ensure the grievance redress mechanism functional to address any concerns or complaints raised by stakeholders; and Finance capacity building and technical assistance and capacity building support to the implementing agencies to strengthen their capacity to implement SEP effectively.	
Insufficient understanding, awareness, and supervision of Environmental and Social mitigation measures Insufficient funding and capacity for implementation of environmental and social mitigation measures	Compliance with Environmental and Social mitigation measures	Appointment of environmental and social officers to oversee compliance with the ESMP/ESCoP and facilitate stakeholder engagement; Hire an E&S Consultant to work with the above E&S officer; Work collaboratively with MLVT staff working on project design and TVET facilities; Regular monitoring and reporting of environmental and social impacts, as well as the implementation of mitigation measures, to relevant authorities and stakeholders; Ensure funds for Environmental and Social mitigation measures are disbursed in a timely and fully manner; Conduct regular monitoring to ensure the project's compliance with environmental and social regulations, and take corrective action if necessary; and Establish an effective grievance mechanism to receive, investigate, and resolve complaints related to the project's environmental and social impacts.	Implemented by: Contractors and Selected TIs and JCs and PMU & PIU-SDF Monitored by: E&S Consultants and E&S Focal Persons of PMU & PIU-SDF

4 CONTINGENCY EMERGENCY RESPONSE COMPONENT (CERC)

158. RGC is prone to a variety of natural disasters, in particular tropical storms/cyclones, floods, droughts, and thunderstorms. These phenomena cause damages to properties, infrastructure, and livelihoods; they impede and set back development efforts, divert development funds and above all loss of lives.

159. The Contingent Emergency Response Component (CERC) enables the project to provide a swift response in the event of an Eligible Crisis or Emergency.[17] This is done by redirecting a portion of the undisbursed project resources, from other components of the project to address immediate post-crisis and emergency financing needs (World Bank, 2017). The implementing agency for the CERC will be the MLVT.

160. In the event of an emergency, it is not anticipated that a reallocation of project funds will cause serious disruption to project implementation. The CERC is activated without needing to first restructure the original project, thus facilitating rapid implementation. Once the requirements for activating the CERC are met, uncommitted funds from the project are reallocated to the CERC and made available for crisis or emergency response. To facilitate a rapid response, formal restructuring is deferred to within three months after the CERC is activated.

161. Activities under this Component will be governed by the World Bank Directive *CERC* (World Bank, Oct, 2017). Disbursement of emergency financing under the CERC will be contingent upon:

i. the recipient establishing a nexus between the disaster event and the need to access funds to support recovery and reconstruction activities (an “eligible event”); and
ii. submission to and no objection granted by the World Bank of an Emergency Action Plan (EAP). The EAP will include a list of activities, procurement methodology and safeguards procedures.

162. The preparation of the EAP will have to take into consideration the current ESMF and any additional safeguard instruments. The additional safeguard instruments will require World Bank approval prior to commencement of activities. Importantly, the EAP will need to include procedures for:

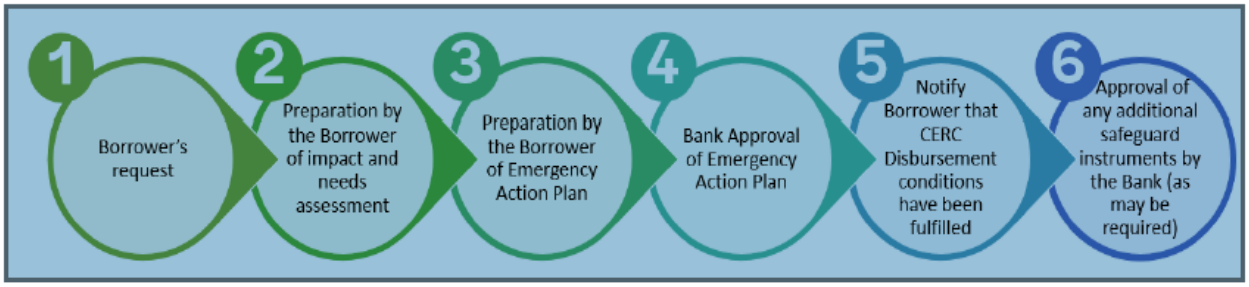
- Consultation and disclosure;
- Integration of mitigation measures and performance standards into contracts; and
- Supervision/monitoring and reporting measures to ensure compliance.

4.1.1 Activating the CERC

163. The sequence for activation of the CERC includes the following steps as outlined in the figure below:

[17] This is an event that has caused, or is likely to imminently cause, a major adverse economic and/or social impact associated with natural or man-made crises or disasters, (OP/BP 8.00, *Rapid Response to Crises and Emergencies.)*

Figure 4. CERC activation sequence



4.1.2 ESSs

164. All activities financed through the CERC are subject to World Bank ESSs. The CERC will rely as much as possible on the original Project's environmental and social assessments and safeguard instruments, ensuring that as much as possible is known regarding risks and management measures in anticipation of an emergency response.

165. The EAP will require consideration of safeguard implications for any proposed emergency supplies procurement or reconstruction activities. The World Bank, through the no objection process, will closely examine the nature of the proposed activities, particularly those involving civil works, to ensure that:

i. they are not prohibited under the negative list and
ii. the recipient is aware of the required safeguard compliance documentation before initiating the process by which the proposed works will be prepared and implemented.

166. Emergency activities financed under the CERC will involve financing provision of critical goods or emergency recovery and reconstruction works and it is likely these will fall into the "Moderate Risk" or "Low Risk" Category. Activities that fall under "Low Risk" could involve procurement of emergency supplies such as medicine and water and do not require the application of safeguard instruments, post-screening or assessment. Other emergency supplies, such as fuel products, will require safeguard instruments (such as Environmental Codes of Practice or EMPs) to ensure procurement, storage and dispensing procedures are adequate.

167. In order to ensure that CERC sub-project activities comply with the requirements of the Bank's environmental and social framework, a positive and negative list has been developed to provide guidance on critical supplies and/or for emergency works, goods or services which may be eligible for financing. See (CERC Manuals – Annex 9) for details.

4.1.3 Monitoring and Evaluation

168. In crisis/emergency response projects, effective monitoring is essential for providing performance feedback during implementation, and data on results are vital for learning and managing post-disaster recovery and reconstruction efforts. However, in such a situation, monitoring and evaluation is often severely constrained by many factors. The following monitoring modalities will be applicable for this project. See (CERC Manuals – Appendix 9) for details.

5 ENVIRONMENT AND SOCIAL MANAGEMENT PROCEDURES

169. The purpose of the ESMF is to effectively manage potential adverse impacts by establishing a guidance document that informs MLVT and SDF of the agreed-upon sets of environmental and social procedures and measures for the project. This ESMF identifies potential environmental and social risks and outlines corresponding mitigation measures. Furthermore, this ESMF serves as a guidance document that delineates the necessary process for conducting site-specific ESMPs in future, if deemed necessary, once subprojects have been identified.

170. As an overarching guideline document, the ESMF seeks to ensure that:

- Project activities consider potential environmental and social risks and impacts, especially for different populations directly impacted by sub- projects, both positively or adversely;
- TVET locations consider socio-cultural and gender sensitivities and environmental issues specific to the areas where the proposed sub-projects will be implemented;
- Training, mentoring and support programs for TVET institutions take into account the needs of the most vulnerable and at-risk groups, such as poor students, indigenous peoples, students with disabilities, and teachers who are IP or otherwise considered a minority, to ensure they are able to benefit from project activities;
- Environmental and social management instruments, such as ESMP, are suitably prepared and followed as needed to address potential risks and impacts;
- The Stakeholder Engagement Plan (SEP), including provisions for grievance mechanisms, are applied to all sub-projects;
- All environment and social instruments are compliant with the World Bank ESF as well as national legislation;
- Project design takes into consideration the guidance in this ESMF and the mitigation hierarchy for environment and social impacts;
- The screening mechanism is applied to identify and assess E&S risks and impacts once subproject locations are identified; and
- Procedures and responsibilities for developing generic ESMPs are established.

5.1 Proposed Sub-Projects

171. The proposed sub-projects under this project are not fully identified and known, however listed below are some of the known sub-projects. Other sub-projects will be known and identified at project implementation:

Component 1

1. incorporating OHS training under "*Designing joint training programs in order to respond to industry needs" project activities;*
2. *New constructions for training facilities; and*
3. *Installing ICT equipment under Mutually reinforcing project activities.*

Component 2

1. *Installing ICT for LMIS (Component 2.1);*
2. Rehabilitation of 7 JCs *(Component 2.2);*
3. Supply of ICT equipment *(Component 2.2); and*
4. Purchase of 5 mobile job centres *(Component 2.)*

5.2 Screening, Approval and Scoping

172. Since the specific details and locations of sub-projects and activities to be financed under the project are not known at this time, the environmental and social screening process is necessary for the review and approval of various sub-projects to be funded. Therefore, while identifying and designing sub-projects, alternatives will be examined and assessed. The MLVT's PMU and PIU-SDF will collect information on the environmental and social setting, identify possible beneficiaries and assess potential environmental and social impacts of different alternatives. The general public should be made aware of the potential environmental and social impacts associated with the project activities.

5.3 Environmental and Social Categorization of Sub-projects

173. Primarily, the environmental screening exercise will be undertaken to determine the key environmental issues/concerns and the nature and magnitude of the potential impacts associated with the proposed sub-projects. The major environmental and social issues to be identified will be determined by the type, location, sensitivity and scale of the sub-project. The results/findings from this exercise are/will be used to determine:

i. Identify potential environmental or social impacts, either direct or indirect of proposed sub-projects;
ii. Determine the appropriate environmental category for the sub-project (High, Substantial, Moderate or Low risk);
iii. Based on the assessment of these impacts, determine what World Bank ESSs will be applicable to the sub-project and any related activities;
iv. Determine additional documentation needed to assure compliance with the ESF and the level of environmental work and the type of any follow-up instruments instrument required, such as an ESMP, and others, or whether no additional environmental work is required; and
v. The possibility of exclusion.

5.4 Sub-projects Environmental and Social Screening

174. Each of the sub-projects to be financed will be subject to an environmental and social screening process before it is selected for inclusion in the project. The screening process establishes the level of environmental and social assessment required and intends to identify relevant possible environmental and social concerns as well as suggest any further investigation and assessment as necessary.

5.4.1 Desk Appraisal of Identified Sub-Project.

175. This section describes the process for ensuring that potential environmental and social impacts are adequately addressed from the site selection stage onwards. The first step of the process is to consult the schedule to the Environment Act which lists all types of projects and activities that are subject to Environmental Impact Assessment (EIA). If the project is in the list the next step is to determine the level of EIA work required.

176. The environmental and social screening process for environmental and social impacts helps to:

- Assess whether sub-projects are likely to have potential negative environmental and social impacts;
- Determine appropriate mitigation measures for activities with significant adverse impacts, for incorporating them into the sub project design;
- Review and approve sub-project proposals; and
- Monitor environmental and social parameters during project implementation.

177. The extent of environmental and socials work required, to mitigate adverse impacts for the sub-projects, will depend on the outcome of the screening process. The environmental and social screening will be done by completing the Environmental and Social Screening Form attached as Annex 2. Under the Guidance of the Social Specialist and the Environmental Specialist, the PMU & PIU-SDF will facilitate the completion of the Environmental and Social Screening Form and the preparation of an ESMP as the situation may require. Once all the requisite documentation has been compiled, PMU & PIU-SDF will make recommendations for approval.

5.4.2 Specifically for Rehabilitation and Construction Works

178. MLVT will conduct an environmental and social screening for all construction and rehabilitation activities according to this ESMF. This screening will identify potential risks and impacts and determine whether site-specific ESMPs are necessary to mitigate or compensate for any adverse effects arising from sub-projects. For example, new training building construction with major construction works requires a site-specific ESMP.

179. Following the initial list of eligible TVET institutions for construction and rehabilitation, MLVT will use the screening form in Appendix 2 to identify potential environmental and social risks and impacts. Based on the results, the appropriate E&S instruments, ESCoP or ESMP, will be selected and implemented to avoid, minimize, or mitigate adverse impacts. The SEP will guide consultation with stakeholders and ensure the implementation of appropriate mitigation measures. The LMP will guide how to ensure working condition requirements are met.

180. After MLVT provides the list to the World Bank and receives No-Objection, MLVT will adopt a mitigation hierarchy to TVET rehabilitation and construction which will:

i. Anticipate and avoid risks and impacts;
ii. Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels;
iii. Once risks and impacts have been minimized or reduced, mitigate, and
iv. Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible.

5.4.3 Specifically for ICT Equipment Installation and Mobile Job Center

181. MLVT and SDF will conduct an E&S impact screening and assessment to identify the potential risks and impacts associated with the use of ICT equipment and mobile JCs. This assessment will take into account factors such as energy consumption, electronic waste disposal, and potential hazards to workers and local communities.

182. Based on the results of the E&S impact assessment, MLVT and SDF will identify and prioritize appropriate mitigation measures. These measures may include strategies such as energy-efficient equipment, proper e-waste disposal protocols, and training programs for workers and local communities on OHS risks and hazard mitigation. It is important to consult with stakeholders throughout this process, including workers, local communities, and relevant government agencies, to ensure that the mitigation measures selected are effective, feasible, and culturally appropriate. More details are summarized in section 3.4.

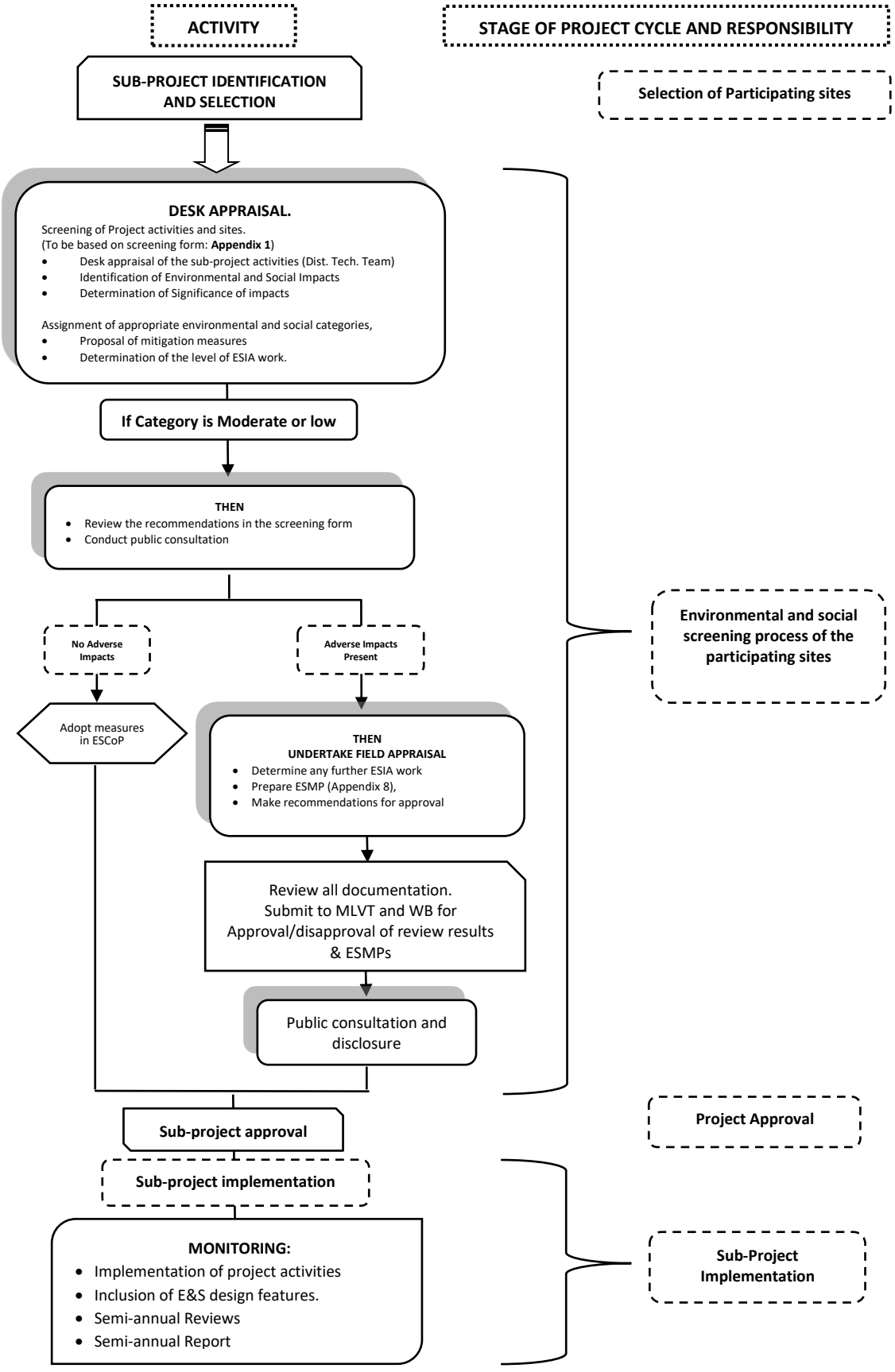
183. Once the appropriate mitigation measures have been identified and cleared, MLVT and SDF will incorporate them into the design and operation of the ICT equipment and mobile JCs. Regular monitoring and reporting will be conducted to ensure that the mitigation measures are effective in reducing the identified risks and impacts. This process should be iterative, with ongoing review and adaptation of mitigation measures as necessary to ensure ongoing E&S performance.

5.4.4 Specifically for Technical Assistance Activities

184. Soft activities, such as technical assistance, capacity building, and training programs, are also core components of TVET projects and require careful consideration of their potential impact on society. Despite not involving physical construction or rehabilitation, they can still have significant implications for social inclusion, particularly for marginalized groups such as women, ethnic minorities, and people with disabilities. Therefore, it is important to conduct a screening process to identify potential risks related to social exclusion, gender-based violence (GBV), labor and working conditions, and waste management of goods, etc.

185. To ensure that soft activities are socially inclusive and do not lead to unintended negative impacts on society and the environment, MLVT and SDF will take proactive measures. These measures will include stakeholder engagement set in SEP, implementation of ESMF, particularly the agreed mitigation measures outlined in section 3.4.

Figure 5. Flowchart of Sub-projects identification, screening, submission, evaluation and monitoring



5.4.5 Approval of Environmental and Social Work

186. The completed screening form along with any additional planning reports, will be forwarded to the review authority. The review team of PMU and PIU-SDF will be assisted by the E&S officer and consultants to ensure that all the requirements are in place to avoid delays. The first step in the approval process is to determine if all the relevant information has been provided, and that it is adequate. The PMU and PIU-SDF (E&S officer and consultants) will also check if the technical team has thoroughly considered all environmental and social issues with regards to the identification of potential adverse effects arising from the sub-project as well as mitigating measures to adequately address negative impacts.

187. Based on the desk appraisal (Screening Form), PMU and PIU-SDF will refer the application to the World Bank Safeguards Specialists for approval with recommendations for approval conditions and implementation supervision (e.g. pollution control, waste management, human safety). Final approved package will be forwarded to the World Bank for "No Objection Request".

5.4.6 Sub-Project E&S Approval

188. Once all the documentation regarding a sub-project have been compiled—the screening form, and any further ESIA work—then they are attached to the approved sub-project application forms and submitted for approval and certification for the project to proceed. Final approved package will be forwarded to the World Bank for "No Objection Request".

5.4.7 Disclosure

189. The relevant environmental and social instruments developed for a particular sub-project (sub-project specific ESMP reports) will be made available to the public as follows:

- Disclosure through the MLVT and SDF Website and/or Disclosure Notices in local newspaper
- Disclosure through the World Bank Website

5.4.8 Sub-Project Implementation

190. Once the sub-project has been given the certificate to proceed, then implementation can start in earnest. The implementation will involve the application of all the relevant environmental and social standards and instruments that would have been developed for the sub-project.

Table 12. Overview of ESMF Tools

ESMF Tool	Applicability	Objective
Environmental and Social Code of Practices (ESCoP) for small civil works for rehabilitation only	Proposals for small civil works to renovate or rehabilitate training facilities	Prevent, minimize or mitigate construction work related environmental and social risks and impacts
Environmental and Social Management Plan (ESMP) for civil works for new construction within TEVT institutions or JCs (if any)	Proposals for civil works to construct new buildings within TEVT institutions or JCs	Prevent or minimize/mitigate construction work related environmental and social risks and impacts
Ethnic considerations are incorporated in the SEP	Apply to all Project activities/subprojects that can create adverse impacts to or involve exclusion risks of vulnerable groups, including Indigenous peoples	Ensure that vulnerable groups, including Indigenous peoples will have access and opportunity to benefits from the Project

ESMF Tool	Applicability	Objective
Labour Management Procedures (LMP)	All project workers for all project components	Prevent occupational injuries and illnesses, ensure worker's rights are respected
Emergency Action Planning	Training institutions/job centres supported by the project	To prevent or minimize loss of life, harm or damages due to emergencies

6 INSTITUTIONAL ARRANGEMENTS

191. The project institutional and implementation arrangements are designed to ensure the successful implementation of project activities in order to achieve the expected results and the project development objective (PDO). To this end, the project will support a Project Steering Committee (PSC), a Technical Working Group (TWG), and a Project Management Unit (PMU) hosted by MLVT as the Executive agency (EA), and Skill Development Fund(SDF) is an implement agency (IA) for Component 3. The terms of reference for the PSC, TWG and PMU will be specified in the Project Operations Manual (POM).

The project executive agency is the MLVT which will have overall responsibility for project implementation. The MLVT will host PMU to manage the day-to-day operation and administration. The Department General of Vocational Education and Training (DG TVET) and the NEA of the MLVT will implement the activities under Components 1 and 2 respectively. The SDF will establish a Project Implementation Unit (PIU-SDF) to manage the activities of Component 3. Component 4 will be executed by the PMU to support the project management and M&E. In the event that the CERC component is activated, the RGC will execute the CERC in accordance with the CERC Annex of the POM.

192. **The Project Management Unit (PMU) hosted at MLVT will manage day-to-day implementation and management of the project.** The PMU will comprise technical teams led respectively by DG TVET for Component 1, NEA for component 2 and PIU-SDF for Component 3. Both the PMU and the PIU-SDF will take the responsibility for procurement, FM and disbursement, M&E, E&S, GRM and administration and make efforts in ensuring compliance with the ESF requirements and the grievance address. Consultants for key positions not limited to FM, procurement and E&S will be recruited to support implementation. The PMU and the PIU-SDF will prepare work plans and budgets, update the Procurement Plan, semi-annual progress reports, and coordinate with the World Bank implementation support. The PMU and the PIU-SDF will coordinate with the World Bank implementation support missions twice a year, prepare work plans, and the project midterm review (MTR) report and the Government completion report..

6.1 MLVT, PMU and E&S Focal Point

193. The MLVT will serve as the executive agency for the project, responsible for overseeing project implementation and ensuring compliance with the provisions outlined in this ESMF. The MLVT will act through the Department General of Vocational Education and Training (DG TVET) and the National Employment Agency (NEA) to establish and operate a Project Management Unit (PMU) responsible for day-to-day project operations. Both the PMU and the PIU-SDF will take the responsibility for procurement, FM and disbursement, M&E, E&S, GRM and administration and make efforts in ensuring compliance with the ESF requirements and the grievance address. **The project will be carried out in accordance with the arrangements and procedures set out in the POM.** The content will include, but not be limited to, the description of (a) institutional and implementation arrangements; (b) procurement procedures and the preparation and successive updates of the Procurement Plan; (c) FM, disbursement arrangements, and audit procedures; (d) project monitoring, reporting and evaluation arrangements; (e) the implementation of ESCP and other E&S instruments; and (f) personal data collection and processing. The roles and responsibilities of the PSC, TAG, MLVT, SDF, PMU and the PIU are elaborated in the POM. The POM is a living document and will be updated as need be by the MLVT, with the prior written agreement of the World Bank. The appointed E&S Officer, with support from consultants, will also supervise the compliance with generic ESMPs/ESCoP of selected TIs and JCs and conduct necessary site visits to sub-project locations during construction.

194. The E&S Officer, with support from E&S consultants, has the following role and responsibilities:

Project preparation stage:

- Identify and assess environmental and social risks and impacts of project activities and work with relevant units at PMU to address the anticipated impacts;
- Lead the development of ESF instruments, including project-specific ESMP, SEP, GRM, etc., and disclose all instruments before the appraisal;
- Oversee the quality of ESF instruments before disclosure by working with E&S consultants;
- Ensure that project activities are inclusive of the needs of vulnerable groups and particularly Indigenous Peoples;
- Provide support to E&S consultants during the development of ESF instruments, including office space, field visit coordination, meeting arrangements, etc.;
- Organize consultative workshops on the draft reports/E&S instruments with the WB, all relevant departments of MLVT, and other key stakeholders; and
- Liaise with the WB E&S team and Task Team/TT and seek advice on the development of ESF instruments, as well as capacity development for E&S related staff and others.

Project Implementation stage:

- Together with the E&S consultant, screen all sub-projects following guidance in this ESMF and Annex 2 to determine the appropriate E&S instruments that need to be prepared;
- Ensure that all ESF instruments are made available, translated, and disseminated to all relevant stakeholders, including selected TIs and JCs, engaged industrial organizations, and contractors, to comply with the WB ESF requirements;
- Develop a detailed semi-annual monitoring plan, including budget, for the monitoring of E&S instruments;
- For civil works components, together with the E&S consultant, ensure required E&S instruments are including in bidding documents;
- For civil works components, together with the E&S consultant, ensure the contractor implements their ESCoP/ESMP according to guidance in this ESMF and compliance with WB ESS;
- Assess the capacity gaps in ESF understanding and capacity need among E&S staff from selected TIs and JCs and contractors, and seek support from the PMU to address such gaps;
- Lead capacity development on ESF instruments to be provided to selected TIs and JCs, and contractors;
- Ensure that project activities are inclusive of the needs of vulnerable groups and particularly Indigenous Peoples;
- Provide ESF updates during the ESMF implementation, including the status of agreed actions, challenges in ESMF implementation at subproject level, and the way forward;
- Ensure that GRM is functioning properly, with all complaints recorded in the logbook and resolved, and seek urgent intervention and advice from PMU where needed;
- Conduct regular monitoring visits to sub-project sites to ensure that ESCoP/ESMP is effectively implemented for managing impacts from subprojects and reporting; and
- Document good and bad lessons learned during the MTR for improving the project's E&S performance until the end of the project.

6.2 E&S Consultants

195. During the implementation phase of the project, the PMU and PIU-SDF will enlist the services of two E&S consultants (including one for social matters and another for environmental matters) to ensure that the E&S mitigation measures for the project are effectively implemented, monitored and reported

on. The E&S consultants will work closely with the E&S officer of PMU and PIU-SDF to provide technical support and guidance on E&S management compliance. They will also conduct regular site visits to verify that mitigation measures are being implemented effectively and provide feedback to the PMU and PIU-SDF. In cases where corrective action is required, the E&S consultants will assist in developing and implementing an appropriate plan. The ultimate goal of this collaboration is to ensure that the project is in full compliance with relevant environmental and social standards, as well as World Bank policies and procedures.

196. The E&S consultants to be recruited during project implementation have the responsibility to assist the PMU and PIU-SDF in monitoring and reporting on the ESF implementation performed by the TIs and JCs selected and contractors. Their roles and responsibilities include:

- Assisting the E&S officer of PMU& PIU-SDF to screen and assess risks and potential environmental and social impacts for each subproject;
- For civil works components, together with the E&S officer, ensure required E&S instruments are including in bidding documents;
- Facilitating the building capacity on ESF instrument implementation and monitoring and reporting, including periodic provision of on-the-job training to TIs and JCs selected and contractors, on the implementation and management of E&S risks and impacts at subproject level;
- Reviewing and commenting the draft ESCoP/ESMPs of subprojects to ensure they are compliant with this ESMF and cover all risks and potential impacts identified in specific subproject, particularly risks related to OHS, CHS, SEA/SH/GBV/VAC taking into account socially sensitive and culturally appropriative practices in prevention and management of these risks;
- Reviewing and ensuring that subproject-specific ESMP has an actionable plan to address identified risks and potential impacts, including allocation of resources to implement fully such actions;
- Making recommendations for improvement before PMU's &PIU-SDF's approval(s) of ESMP of subprojects;
- Conducting site visits to construction sites and worker camps to make the above assessments as part of their reviewing, monitoring and reporting responsibility; and
- Participating in and supporting E&S Officer in semi-annual E&S monitoring and reporting.

6.3 TIs and JCs to be Selected

197. Under the leadership and guidance of PMU at MLVT, TIs and JCs to be selected during project implementation stage will implement project activities at subproject level, through (i) ensuring that every effort is made by institutional staff to support the implementation of the project; and (ii) complying with the planning, financial, and reporting requirements of the project.

198. The TIs and JCs selected are expected to implement most, if not all, of the measures recommended in the ESMPs/ESCoP to mitigate environmental and social risks and impacts. Specifically, the TIs and JCs selected will:

- Develop and submit a management plan to the PMU/MLVT for review and approval. This plan should outline how it will comply with the ESMP/ESCoP and other project documents (if required, the SEP).
- Provide adequate funding and human resources to comply with the ESCoP for rehabilitation/renovation works, as well as to implement site-specific ESMPs for new construction with major civil works.

- Ensure proper and timely implementation of required pre-construction and construction mitigation measures as outlined in the ESMP/ESCoP.

199. The TIs and JCs will receive training on technical construction specifications and ESF instruments for managing E&S risks and impacts, primarily before and during the construction phase. The PMU will develop the necessary ESF training manuals, including a user-friendly ESMP booklet for managing risks and impacts from civil work activities.

6.4 Contractors

200. Fully compliance with ESF instruments, including but not limited to the provisions of PPE and Covid 19 prevention measures based on government Covid-19 guidelines and recommendations of the World Health Organization (WHO) and WB, will be part of the biding documents for engaging contractors. Contractors performing contraction and rehabilitation/renovation works will ensure that environmental and social management requirements are implemented effectively during civil works. It is the responsibility of the contractors to ensure that all environmental and social requirements are adhered to during the implementation of the civil works. This includes the implementation of ESCoP/ESMP. The contractors must ensure that these plans are integrated into their work plans, and that all personnel are aware of their roles and responsibilities with regard to environmental and social management. They should also report the implementation status of the ESCoP/ESMP to TIs and JCs and E&S officer/consultants and take corrective actions in case of non-compliance. By working closely with the project team and other stakeholders, contractors will help to ensure that the civil works are carried out in an environmentally and socially responsible manner.

6.5 Capacity Assessment and Needs

201. MLVT and SDF has no experience with implementing the Environmental and Social Framework (ESF) and lack strong understanding of the World Bank's operational procedures, including fiduciary and ESF. To ensure successful implementation of the ESF, the MLVT and SDF has recognized the need for external support from local and international consultants who possess the required expertise in ESF and World Bank operational procedures. These consultants will work closely with the MLVT's PMU and PIU-SDF to provide guidance throughout the project preparation and implementation stages. Their primary role will be to assist the MLVT and SDF in ensuring that all project activities adhere to the ESF and other relevant safeguard policies.

202. To ensure that the project team at PMU of MLVT and PIU-SDF is fully equipped to implement the ESF, relevant training programs will be provided to them by E&S consultants and World Bank E&S specialists. The training will cover various topics, including fiduciary and ESF, labor procedures, occupational health and safety, gender-based violence, and other relevant topics related to subproject screening, assessment, approval, implementation, monitoring and reporting. This training will ensure that the project team has a thorough understanding of the ESF and can effectively implement it throughout the project's duration.

203. During the project implementation stage, it is envisioned that training delivered by the E&S consultants to the E&S officer and selected TIs and JCs will need to be holistic and cover all aspects of the project, including but not limited to:

- Implementing the ESCoP/ESMP;
- Monitoring E&S compliance, including reporting;
- Gender-Based Violence, if any, including how to conduct awareness raising on this topic;
- Violence Against Children, if any, including how to conduct awareness raising on this topic;
- HIV/AIDS awareness, including how to conduct awareness raising on this topic;

- Occupational Health & Safety, including how to monitor and enforce this aspect;
- Labor Management Procedures, including how to monitor and enforce this aspect;
- Grievance Redress, including how to oversee and implement the GRM; and
- Stakeholder engagement, particularly with the Indigenous Peoples and other venerable groups.

204. Training for the E&S officer and selected TIs and JCs on the topics above will commence as soon as E&S consultants are engaged/mobilized. Additional support by E&S consultants will be needed on a regular basis, likely on a monthly or bimonthly basis during construction, and quarterly or biannually during operation. This will need to be decided based on the selected subprojects and the extent of environment and social impacts and risks. An indicative budget for capacity training is described in Section 9. Site-specific ESMPs (and other instruments) will include a training plan for the E&S officers with specific dates, location, topics and budget requirements.

7 CONSULTATION AND STAKEHOLDER ENGAGEMENT

205. The Project has developed a standalone Stakeholder Engagement Plan (SEP) in accordance with the ESF's ESS10: *Stakeholder Engagement and Information Disclosure*. The Plan has been developed as a separate document, but it forms an integral part of the ESMF.

206. The Project will conduct consultation activities and stakeholder engagement as per the project's SEP. The SEP seeks to ensure that project communities, as well as other project stakeholders, are informed and involved in all the stages of the project. The project recognizes the need to seek representative and inclusive feedback and the SEP looks to establish the role of women and vulnerable groups firmly within the consultation process. The Project also recognizes the importance of ensuring affected people are involved in mitigation measures, OHS/CHS programs, as well as continuing monitoring of project activities.

207. The objectives of the SEP are:

- To identify all project stakeholders including their priorities and concerns, and ensure the project has ways to incorporate these;
- Identify strategies for information sharing and communication to stakeholders, including project information on social risks and impacts, as well as consultation of stakeholders in ways that are meaningful and accessible throughout the project cycle;
- To specify procedures and methodologies for stakeholder consultations, documentation of the proceedings and strategies for feedback;
- To establish an accessible, culturally appropriate and responsive grievance mechanism, and
- To develop a strategy for stakeholder participation in the monitoring of project impacts.

208. The SEP is a living document and will continue to be updated as the project progresses from pre-civil works to civil works and operation.

209. In general, there are two kinds of stakeholders, affected and interested stakeholders:

Affected Stakeholders: Those who will be likely impacted by the project positively or negatively. These stakeholders are:

- **Trainees of TIs selected and target industry association** who will benefit from improved TVET facilities and training programs, particularly those with disabilities, from socially marginalized groups, or from other vulnerable groups;
- **Workforces accessing to LMIS** who will benefit from the improved job information and orientation service in JCs selected;
- **Employers** who employ the graduates of project-supported training programs;
- **Trainers and administrators of Tis, JCs and target industry association** selected who will receive training and mentoring to enhance their skills;
- Workers involved in the new construction and rehabilitation/construction of TIs and JCs; and
- Nearby communities and residents affected by the new construction and rehabilitation/construction of TIs and JCs, from noise, traffic, dust, etc., or impacts from workers' camps.

Interested Stakeholders: Those who are not impacted by the project but who may be interested in the project outcomes and who may have an influence in the project. These stakeholders may include:

- **Development partners** in related fields, such as skills training, employment assistance, poverty reduction, working with indigenous communities, etc.;

- **Local and international NGOs** working in related fields, such as skills training, employment assistance, poverty reduction, working with indigenous communities, etc.;
- Government authorities working in relevant areas;
- **The media**; and
- Local residents who do not benefit directly from the project.

7.1 Disclosure of Information

210. Disclosure of information refers to making information accessible, and in a manner that is appropriate and understandable to interested and affected parties. During all stages, project information will be disclosed in a way that is appropriate to the different range of stakeholders and in both English and Khmer as appropriate. For IP groups and communities, disclosure will also be in a language and manner accessible to them, as deemed necessary and based on guidance in the SEP for those groups.

211. The guiding principles will be to:

- Be transparent;
- Present information in a straight-forward manner;
- Disclose documents as early as feasible;
- Use disclosure to support consultation activities;
- Provide meaningful and useful information; and
- Ensure information is accessible.

212. The ESMF, SEP and the ESCP were initially disclosed by MLVT on June 8, 2023 and redisclosed on June 27, 2023 after public consultation.

7.2 Consultations During Project Preparation

213. The public consultation workshop took place on June 23, 2023 at the National Technical Training Institute (NTTI), Phnom Penh City. The objective of the consultation was to brief participants on the project's objectives, scope, and environmental and social risks and impacts. The agenda included presentations on the project background, World Bank's Environmental and Social Framework and Standards, as well as the Environmental and Social Management Framework (ESMF), Stakeholder Engagement Plan (SEP), and Environmental and Social Code of Practice (ESCP).

214. The consultation was conducted in a hybrid format, allowing both physical and virtual participation. A total of 85 participants attended, with 40 participants present physically and the remaining representatives joining virtually from TTIs in the provinces. The participants included representatives from the General Directorate of TVET, Ministries and TTIs under MLVT. The consultation facilitated a discussion session where participants raised questions and made comments regarding various aspects of the project.

215. Some of the key questions and comments raised during the consultation included concerns about the inclusion of facilities for disabled individuals in project buildings, the selection criteria for TTIs, the preparation of safeguards documents during project implementation, the timeline of the project, prevention of child labor during construction and rehabilitation works, and the identification of vulnerable groups in Cambodia.

216. The MLVT officials and safeguards consultant provided responses and clarifications, assuring participants that the project design would consider facilities to support disabled individuals, explaining the criteria for TTI selection, addressing the preparation of safeguards documents during implementation,

providing an overview of the project timeline, emphasizing the project's aim to engage vulnerable groups, and discussing measures to prevent child labor.

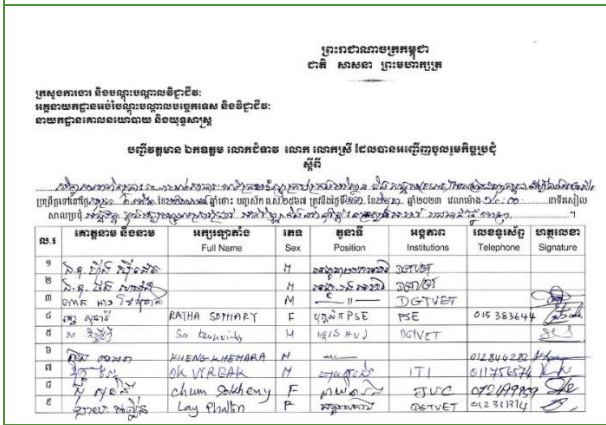
217. As a result of the successful hybrid public consultation, the participants expressed their support the project and satisfaction with its inclusive approach. They expressed their hope that the project would commence implementation as planned in early 2024. During the consultation workshop, there were no major concerns regarding the E&S impacts of the proposed project. The participants demonstrated understanding and support for the identification and mitigation measures for the E&S impacts/risks in E&S instruments.

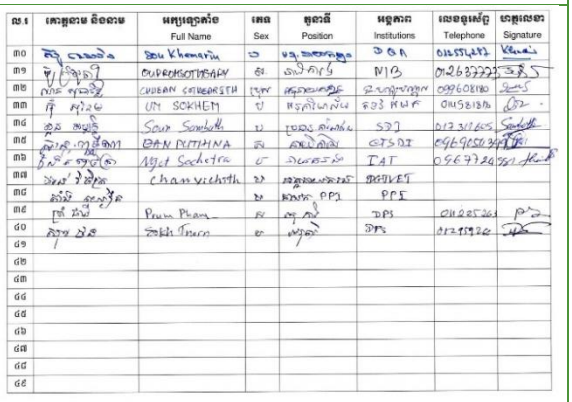
218. To foster continued engagement, participants were invited to join a Telegram Group where they can share questions and suggestions. Additionally, based on the inputs received during the consultation, the safeguards documents, including the ESMF, SEP, and ESCP, will be updated. The revised documents will be redisclosed on the MLVT's website.

219. More details and the minutes of the public consultation workshop can be found in the Annex 2 of Stakeholder Engagement Plan (SEP).

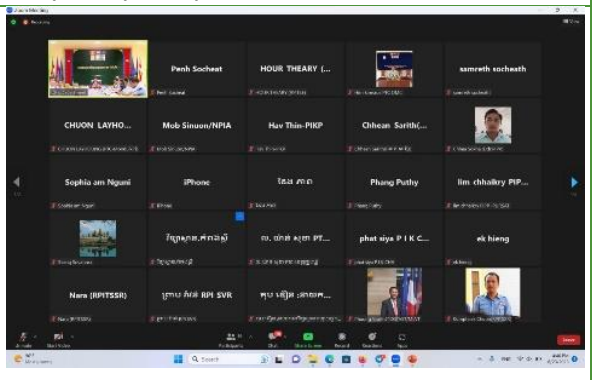
Figure 6. Public Consultation Workshop Organized on June 23, 2023

Participants list (Physical participation)





Participants list (Virtual participation)



Discussion and Consultation

Discussion and Consultation

7.3 Reporting Back to Stakeholders

220. The method of reporting back to stakeholders will depend on the stakeholder itself. There are essentially two main methods:

- For National-level stakeholders, an email and/or official letter will be sent after workshops on how comments/suggestions were considered;
- For local stakeholders, follow-up meetings/consultations will be conducted to let stakeholders know on how comments/suggestions were considered;

- For ethnic minorities, if relevant, ongoing consultations in line with this SEP and will ensure that their views are incorporated and that they are informed of this.

8 GRIEVANCE REDRESS MECHANISM

221. The grievance redress mechanism (GRM) seeks to resolve concerns promptly, using an understandable process that is culturally appropriate and readily accessible at no cost. Grievances can be submitted if someone believes the Project is having a detrimental impact on the community, the environment, or on their quality of life. Stakeholders may also submit comments and suggestions. The GRM is described in full in the project's SEP.

222. As a general policy, the MLVT (as the executive agency) and SDF (as implementing agency), will work proactively toward preventing grievances through the implementation of impact mitigation measures to the anticipated impacts and address potential issues before they become grievances. Also, information of the GRM should be included in the public information campaign of the project.

223. The PMU at MLVT will take an overall responsibly to supervise and manage grievances from beneficiaries of the project. Social marketing efforts will communicate the role of the PMU.

224. The PMU will provide a number of formal and informal channels through which comments and/or complaints on the project activities can be received. These include:

- **TVET Website**: Provide a homepage with a "Contact us" link which members of the public can submit an email for feedback and/or grievances to the PMU and TIs and JCs selected.
- **SDF Website**: Provide a homepage with a "Contact us" link where members of the public can submit an email for feedback, comments and/or grievances.
- **On-site contacts**: A notice board will be posted at each TTI or Job Center with the name and contact details of the contractor, site engineer and institution responsible staff. These notice boards will be placed in a visible area known to the public and should be presented in the local language (Khmer).

225. Any affected person (AP) will be able to submit a grievance with PMU at MLVT and PIU-SDF if they believe that activities connected to the implementation of the project, specifically during the construction phase, is resulting to serious impact on the community, the environmental, or on the quality of life. Grievances could include:

- Discrimination on women, indigenous peoples, people with disabilities, and other vulnerable groups;
- Negative impacts on a person or a community (i.e. noise pollution, dust emissions, disruption of classes);
- Dangers to health and safety or to the environment;
- Damage to infrastructure such as road degradation;
- Failure to comply with E&S standards or legal obligations;
- Violence of labor law or labor management procedures;
- Harassment of any nature and improper conduct or unethical behaviour, including SEA/SH/GVA/GAC; and
- Threat to the peace and security in the public TI, JC, and local community.

8.1 Steps in Grievance Redress

226. The following steps outlined the procedures on receiving and facilitating the resolution of AP's concerns, complaints and grievances during the implementation phase of the project.

227. **1st Level Grievance: Field-Level Resolution.** In case of grievances that are immediate and urgent in the perception of the complainant, the contractor and/or site engineer will provide the most easily

accessible or first level contact for quick resolution of grievances. A meeting may be held among the AP, Contractor, officials or community relations officer of TI and JC, village council chief to discuss the whereabouts of the complaint. Immediate remedial action on the AP is expected from the contractor and/or TI/JC. The resolution of the complaint should be done within one week. For appeal or complains that not relating to civil works, the AP can skip to the 2nd level grievance redress at the PMU of MLVT and PIU-SDF.

228. **2nd Level Grievance:** If no understanding or amicable solution can be reached within seven days from filing the complaint, the AP can elevate the complaint to the E&S officer of the PMU and PIU-SDF. Resolution of the complaints should be done within 15 days.

229. **3rd Level Grievance:** If no understanding or amicable solution can be reached within fifteen days from filing the complaint, the AP can elevate the complaint to the MLVT and SDF directly. The MLVT and SDF in consultation with appointed officers/specialists will resolve the complaints within 30 days.

230. Complaints concerning GBV/SH/SEA may require a different process, depending on the AP. The AP can first raise the matter anonymously with a person with whom they feel confident with, and then have it taken up either under the project GRM or raised directly with the PMU & PIU-SDF. Alternatively, local communities and residents might have their own system, and the project will have to take this into consideration with the TTI and JC. This will need to be defined during project implementation, in consultation with stakeholders.

8.2 Recording Grievances

231. Established and managed by the E&S officer at PMU & PIU-SDF, a complaints register will be established as part of the project to record any concerns raised by any stakeholder during the implementation of this project. Any serious complaints that require immediate attention (such as a criminal act or that causes harm to persons), will be advised to the World Bank within 24 hours of receiving the complaint. A summary list of complaints received, and their disposition, along with key statistics on the number of complaints and duration taken to close out, must be clearly reported. Grievances will be recorded in a Grievance Logs (see Table 13). This information will include:

- Name of person who make complaints and contact details (if not anonymous)
- Details of the nature of the grievance;
- Date received, manner in which it was responded to, and
- How it was submitted, acknowledged, responded to and closed out.

232. Grievances can be submitted anonymously or the aggrieved person can also request their name be kept confidential. Responsibility for the Grievance Log will be with the E&S officer and Directors/Managers in TIs and JCs selected.

Table 13. Sample Grievance Logs based on SEP

Grievance Log							
Names of complainants (or note if complaint made anonymously)	Date Received	Contact Information	Details of grievance	Actions to resolve grievance	Method of reporting actions to resolve	Accepted by complainant or not	Date settled, or reported to next stage

9 MONITORING AND REPORTING

233. The Monitoring, Evaluation and Reporting (MER) on the E&S risk management and the implementation of the ESCP is part of component 4: Project Management, Monitoring and Evaluation (M&E). In specific, the project's M&E activities will be the responsibility of the MLVT and the SDF while the day-to-day monitoring and reporting will rest with the PMU and PIU-SDF. The project aims to assist the MLVT and the SDF in developing and implementing a strong M&E system and framework that can gather the necessary data to report on the results framework and progress toward the project development objective (PDO).

234. The PMU at MLVT will be responsible for compiling overall project progress reports to be submitted to the WB for review and clearance. The project progress reports will summarize the implementation of the ESF instruments implementation and status of compliance with the ESCP and SEP.

235. With guidance and support of E&S officer and consultants at PMU, the TIs and JCs supported by the project will be responsible for day-to-day supervision and monitoring and for regular reporting back to the PMU of MLVT.

236. Monitoring is the method of ensuring mitigation measures are being implemented and are effective. Monthly, quarterly- and semi-annual monitoring reports will need to be undertaken in order to:

- Improve environmental and social management practices;
- Ensure the efficiency and quality of the environmental and social assessment processes;
- Establish evidence- and results-based environmental and social impact assessment; and
- Provide an opportunity to report the results of the implementation of mitigation measures in future ESMPs and other project related documents.

237. During the implementation, the E&S officer at the PMU of MLVT, assisted by E&S consultants, will conduct regular internal monitoring activities on the ESCoP/ESMPs to determine how mitigation measures are being implemented and the extent of their effectiveness. The monitoring report will be reviewed by the PMU and submitted to the World Bank for their review.

238. The E&S officer will monitor that the required mitigation measures of the ESCoP/ESMPs and other applicable documents are considered and implemented by the TIs and JCs selected. During the project implementation phase, compliance monitoring activities will focus on ensuring effective ESMF and updated ESMP implementation –i.e., ensuring that all mitigation measures described (as indicated in section 3.4) are being adhered to.

239. The E&S officer will also monitor grievance redress, ensuring adequate scoping for indigenous peoples in the subproject location and preparation of required documents if need and the implementation of the SEP consultation and disclosures activities.

240. Monitoring and evaluation of social and environmental indicators should be addressed in terms of (i) performance, (ii) activities, and (iii) impacts. Social indicators should include at least the following, but not limited to:

- Impacts and benefit sharing with vulnerable groups, including Indigenous Peoples, people with disabilities, and others applicable as per this ESMF and SEP;
- Number of women working on civil works and non-civil works of TIs and JCs selected;
- Number of trainings provided to women and vulnerable groups, and the impacts of these trainings (i.e. whether knowledge on a topic was enhanced, on HIV/AIDS and GBV for example);
- Efficacy of the grievance redress mechanism (for the community and for workers);
- Efficacy of OHS measures;
- Incidence of GBV and whether community members feel grievance redress methods are

appropriate;

- Age of workers and that all workers have contracts in place with adequate pay that is at least the minimum wage; and
- Other monitoring indicators as may be described in the ESMP or other related project documents.

241. Meanwhile, monitoring of environmental impacts should focus on ensuring that all environmental mitigation measures are implemented as per the ESCoP/ESMPs.

242. Data should be gender disaggregated as much as possible. The ESCoP/ESMPs will need to define how and when monitoring indicators will be measured. Quarterly reports on monitoring should be provided by E&S officer of the PMU with the support of E&S consultants. A sample monitoring checklist is provided in Appendix 8.

Table 14. Proposed Monitoring Measures

Parameter to be monitored	Location	Means of Monitoring	Schedule/Frequency	Responsible Agency for Monitoring
Completion of construction design in accordance with ESMF and SEP requirements including the preparation of required generic ESMPs and updating of the SEP as needed	Phnom Penh	Review of detailed design documentation	Prior to approval of detailed design	E&S officer E&S consultants PMU of MLVT
Implementation of all mitigation measures specified in the ESMP (based on guidance of those specific in the ESMF in section 3.4)	All project TI and JC locations	This will need to be defined in the ESMP but is expected to be conducted by conducting site visits to check TI and JC facilities, environmental management practices, reviewing worker's arrangements, conducting focus groups with women workers, conducting focus groups in the community, etc.	This will need to be defined in the ESMPs but some measures are expected to be conducted prior to the start of works (such as E&S screening and assessment), while others will be throughout the construction periods.	E&S officer E&S consultants PMU of MLVT
Implementation of the SEP	All project TTI and Job Center locations	As defined in the SEP	As defined in the SEP	E&S officer E&S consultants PMU of MLVT PIU-SDF

Table 15. Example of Monitoring in ESMP

Monitoring Plan			
Mitigation Measure being Monitored	Location	When	Who
Example: Watering of access roads 2x per day to minimize dust	Province / District / Village	Monthly – X Month	MLVT

10 INDICATIVE BUDGET

243. ESMF implementation cost will include the development of the specific site-specific environment and social instruments, including staff costs, travel, consultation workshops, translation and trainings. The total indicative cost reviewed by the World Bank and MLVT is estimated at USD150,000 (see Table 16) plus the costs of specific mitigation measures in the ESMPs (if applicable). Funds will be sourced by a combination of WB and counterpart financing, from the project management component. This budget is indicative only and should be further refined during the preparation of site-specific ESMPs.

Table 16. Estimated Budget for the ESMF

Item	Estimated Cost (to be updated in the ESMPs)
Training for the E&S Officer and TIs and JCs on: Implementing the ESMPs; Monitoring E&S compliance, including reporting; Gender-based violence, Violence Against Children, and HIV/AIDS awareness including how to conduct awareness raising on this topic; Occupational Health & Safety including how to monitor and enforce this aspect; Grievance Redress, including how to oversee and implement GRM; Consultation and engagement with Indigenous Peoples.	US$ 10,000
Budget for E&S Officer travel to TIs and JCs to conduct monitoring training activities, etc.	US$ 20,000
Translation of E&S documents, printing and/or materials for consultations or training	US$ 5,000
National consultation in Phnom Penh and additional local consultation throughout the project	US$ 15,000
National E&S Consultants	US$ 80,000
Construction phase mitigation measures of ESMPs	To be calculated in ESMPs
Budget to implement GRM including associated training and any additional staff that may be required	US$10,000
Contingency (10%)	US$10,000
Total	US$ 150,000 + cost of mitigation measures in ESMPs to be estimated

APPENDIX 1 – Ineligible/Negative Criteria

To avoid adverse impacts on the environment and people, the following would be excluded from project financing:

- Activity involving civil works outside the compound of a training institution or job center;
- Activity that would require conductance of an Initial Environmental Examination or an Environmental Impact Assessment under the Law on Environmental Protection and Natural Resources Management (NS/RKM/1296/36);
- Activity that requires involuntary relocation of people, residential/commercial houses and/or land acquisition or land use restrictions[18];
- Activity that may create adverse impacts on vulnerable groups, including Indigenous Peoples;
- Activity that may cause adverse impacts on cultural sites;
- Activity that may create adverse impacts on critical habitats or biodiversity;
- Activity that involves primary production or harvesting of living natural resources;
- Activity that would cause, or have the potential to result in, permanent and/or significant damage to nonreplicable cultural property, irreplaceable cultural relics, historical buildings and/or archaeological sites;
- Activity that will negatively affect rare or endangered species;
- Activity that do not meet minimum design standards with poor design or construction quality;
- Activity that involve sand mining or land reclamation;
- Activity that require a higher proportion of funding than is available; and
- Activity that block the access to or use of land, water points and other livelihood resources used by others.

Any proposal that falls within any one of the above exclusion criteria will be closed out and will not be considered for funding under the Project.

The screening checklist is attached in Appendix 2.

[18] Before commencing construction activities on any property, the Project Management Unit (PMU) under MLVT will conduct a thorough screening to identify any occupants or users of the land, whether they have legal or illegal status. If it is found that a TVET institution has an occupant residing on the premises who needs to be relocated as a result of the project, the institution will be deemed ineligible for funding. This applies to cases such as shops located within the premises or individuals temporarily residing there. In such instances, the TVET institution will be encouraged to reconsider the site selection and potentially revise the design of the new buildings to ensure that there are no involuntary resettlement impacts.

APPENDIX 2 – Environment & Social Screening and Scoping

This is essentially the screening checklist that agencies will use when projects have been identified and they need to assess what ESS are relevant and what ESF documents need to be prepared.

This Appendix provides guidance on the screening for eligibility of Project activities (Table 2-1), followed by a generic screening for environmental and social (E&S) risks and mitigation measures that are typically appropriate for the expected type and nature of Project activities including small civil works (Table 2-2). The E&S screening is made according to the six Environmental and Social Standards (ESSs) of the World Bank's Environmental and Social Framework (ESF) that are relevant to the Project.

PMU of the MLVT in close consultation with the management of the relevant ministries and implementing agencies (IAs) are responsible for ensuring that the screening for Project eligibility and for E&S risks is carried out according to this annex and that the relevant mitigation measures are implemented.

Table 2-1 will be used to determine if the proposed activities are eligible for funding and support under the Project.

Table 2-1 Ineligible activity

ID	Screening Question	Yes/No	Decision Guidelines
1	Will the activity require involuntary relocation of local people and/or land acquisition or land use restrictions, causing the involuntary physical or economic displacement of any persons, for instance, a shop located inside the TTI or JC?	Yes ___ No ___	If Yes to any of the 13 questions, reject or redesign the proposed activity As a rule, the Project will not fund activities that: - involve construction work outside the boundaries of the TTI/JC compound - result in involuntary relocation of people, - result in involuntary land acquisition - create adverse impacts on local vulnerable groups, - cause adverse impacts on local cultural sites, or - adversely affect vulnerable ethnic groups
2	Will the activity create adverse impacts on local vulnerable groups, including Indigenous Peoples?	Yes ___ No ___	
3	Will the activity cause adverse impacts on local cultural sites?	Yes ___ No ___	
4	Will the activity create adverse impacts on local critical habitats or biodiversity?	Yes ___ No ___	
5	Will the activity involve primary production or harvesting of living natural resources?	Yes ___ No ___	
6	Will the activity include construction outside the existing TVET compound?	Yes ___ No ___	
7	Will the activity be located less than 200 meters from the national protected area (NPA)?	Yes ___ No ___	
8	Will the activity cause, or have the potential to result in, permanent and/or significant damage to nonreplicable cultural property, irreplaceable cultural relics, historical buildings and/or archaeological sites?	Yes ___ No ___	-
9	Will the activity negatively affect rare or endangered species?	Yes ___ No ___	-
10	Will the activity have poor design or construction quality that lower than the minimum design standards?	Yes ___ No ___	-
11	Will the activity involve sand mining or land reclamation?	Yes ___ No ___	-

ID	Screening Question	Yes/No	Decision Guidelines
12	Will the activity require a higher proportion of funding than is available?	Yes ___ No ___	-
13	Will the activity block the access to or use of land, water points and other livelihood resources used by others?	Yes ___ No ___	-

Table 2-2. E&S Screening Form

Activity/Subproject Name	
Activity/Subproject Location and Scope of Activities	
Activity/Subproject Proponent	
Estimated Investment	
Start/Completion Date	

Questions	Answer		ESS relevance	Due diligence / Actions	Remarks/ Brief description
	Yes	No			
(1) Does the activity/ subproject involve civil works including new construction of buildings in TTI or Job Center?			ESS1	If Yes, prepare subproject-specific ESMP following relevant procedures and requirements in this ESMF, ensuring application of the mitigation measures provided in this ESMF as agreed with WB, including incorporation of relevant LMP aspects.	If clarification is required, consult WB
(2) Does the activity/ subproject only involve small civil works including renovation or rehabilitation of existing buildings?			ESS1	If Yes, include ESCoP in Appendix 7 in works contract, including incorporation of relevant LMP aspects.	If clarification is required, consult WB
(3) Does the activity/ subproject involve (a) the use of energy, water, and raw materials, (b) generation of hazardous and non-hazardous wastes, (c) generation of emissions or short and long-lived climate pollution, and/or creation of risks and impacts associated with pesticide use, during construction or operations?			ESS3	If Yes, include ESCoP in Appendix 7 in works contract, ensuring application of the mitigation measures provided in this ESMF as agreed with WB	If clarification is required, consult WB
(4) Does the activity/ subproject involve recruitment of workers including direct, contracted, primary supply, and/or community workers?			ESS2	If Yes, apply SEP and LMP (see Appendix 5) and ensure that all contractor's staff and workers sign the social Codes of Conduct (SCOC) (see Appendix 6) in this ESMF.	SEP and LMP can be updated over time in close consultation with WB
(5) Does the activity/ subproject have a potential for OHS risks to workers?			ESS2	If Yes, include ESCoP in Appendix 7 in works contract, ensuring application of the mitigation measures provided in this ESMF as agreed with WB	If clarification is required, consult WB

Questions	Answer		ESS relevance	Due diligence / Actions	Remarks/ Brief description
	Yes	No			
(6) Are there any indigenous groups present in the activity/ subproject area and are they likely to be affected by the proposed activity/ subproject negatively or positively?			ESS7	If Yes, apply SEP and measures addressing issues on vulnerable groups (see Section 3.4) in the main text of this ESMF	If clarification is required, consult WB
(7) Is there potential for present considerable Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) risk in the activity/ subproject area during and after construction or sub-project/ activity implementation?			ESS1	If Yes, apply SEP and prepare LMP per Appendix 5 of this ESMF. Small civil works will apply ESCoP per Appendix 7 of this ESMF. All workers must be trained and signed the Codes of Conduct	If clarification is required, consult WB
(8) Does the activity/ subproject carry risk that disadvantaged and vulnerable groups may have inequitable access to project benefits?			ESS1	If Yes, apply ethnic group engagement in the SEP (see Section 3.4 in the main text of this ESMF).	If clarification is required, consult WB

APPENDIX 3 – Rapid Social Assessment

Rapid Social Assessment

Skills for Better Job Project
(P179159)

Prepared for:

THE WORLD BANK GROUP

Prepared by:

E&S Consultants

In April 2023

1. INTRODUCTION

1.1 Project Description

1. The skills agenda is fundamental to economic diversification with a view to supporting Cambodia as it moves to an economy built on higher-skilled and more productive jobs. Cambodia's National Technical and Vocational Education and Training (TVET) Policy 2017–2025, formally approved by the government on 16 June 2017, lays out the necessity framework to develop a strategy in technical vocational education and training (TVET) for workforces which better responds to the labor market demand; especially, the policy contributes to industrial development and the creation of decent employment while ensuring high quality and productivity of workforces to better compete with other countries in the region. The policy provides guides for the formulation and implementation of strategies for skills development and facilitates better coordination among those involved in skills development in Cambodia.

2. The policy's **Strategy 2: To increase equitable access to Technical Vocational Education and Training (TVET) for employment generation,** contains requirements to expand opportunities for people to obtain life skills by paying special attention to the needs of women, marginalized groups, poor youth, school dropout, migrant workers, and indigenous people. And the policy's **Strategy 3: To promote Public-Private Partnerships and aggregate resources from stakeholders to support for sustainable development of TVET** contains requirements to develop a student fees policy for TVET providers and offer scholarships for poor students, and particularly women and indigenous people.

3. The Royal Government of Cambodia (RGC) through the Ministry of Labor and Vocational Training (MLVT) has requested the World Bank (WB) to provide Investment Project Financing (IPF) for the Project, which will support building the skills of the upcoming and existing workforce in response to industry needs and to provide labor management information (LMI) and career orientation for better jobs.

4. Given that TVET tends to attract trainees from poorer backgrounds, the Project will support the poor and bottom 40% in building their capabilities and skills, allowing them to obtain better jobs that have higher earnings. Specific training programs targeted to women and girls will encourage female participation in training and promote female employment.

5. The Project will focus on delivering quality skills that are in demand by industry to respond to the challenges faced in developing skills among the workforce. The proposed project will comprise four components: (a) skilling-up to respond to industry needs; and (b) information and orientation for better jobs; (c) project management; and (d) contingent emergency response component (CERC).

1.2 Description of Components

6. The proposed project will comprise four components:

7. **Component 1: Skilling-Up to Respond to Industry Needs** will provide incentives and strengthen capacity to expand and improve effective collaboration between training providers and industry. It will support sector- wide activities to promote effective collaboration between industry and training institutions; strengthening select sector skills councils; capacity building among both employers and the management and teachers of training institutions on the benefits of employer engagement in skills development (EESD), and updating curricula to meet current skill demand. It will also improve industry engagement and quality of training delivery in select training institutions, through establishment of industry-school committees (ISC), financial incentives for EESD activities, capacity building of training institutions, and upgrading of equipment and facilities.

8. **Component 2 - Information and Orientation for Better Jobs** will support labor market information and expand services on job search and orientation. It will support a Labor market information system (LMIS) with the functions of labor market intelligence, job matching, and career guidance. It will also support services of job search and career orientation, and rehabilitation and equipment of select JCs.

9. **Component 3: - Enhancing industry's capacity for EESD and expanding access to quality and relevant training.** This would support the expansion of demand-driven training and new forms of training. Access to quality and relevant training can be increased by providing financing to a broad range of providers that are able to deliver training that benefits from strong employer engagement. This includes the training institutions, other actors including public and private training providers, as well as employers and employer associations. This component would complement sub-component 1.2 in two ways: (a) Build capacity of industry associations that can play an important role in sector skills councils (SSCs); and (b) allow the expansion of training options, including through private training providers, employers, and industry associations.

10. **Component4 – Project Management** will support the establishment and maintenance of the project implementation arrangements, the operation of an effective project management unit, stakeholder engagement activities and the operations of a grievance redress mechanism (GRM).

11. **Component 5 – CERC** will provide swift response in the event of an Eligible Crisis or Emergency.

12. Specific subprojects will only be identified, assessed and selected during project implementation, following relevant requirements in OIM and this ESMF.

13. The project development objective (PDO) level indicators of the project include:

i. Percentage of Employers satisfied with the skills of graduates of project-supported training programs;
ii. Percentage of graduates of project-supported training programs in good jobs six months after completion of training, disaggregated by gender and by upcoming and existing workforce;
iii. Percentage of graduates of project-supported training programs receiving certification, disaggregated by gender and by upcoming and existing workforce;
iv. Number of individuals completing training, disaggregated by gender and by upcoming and existing workforce; and
v. Number of individuals receiving career orientation (online and offline), disaggregated by gender and by types of users (upcoming workforce/students; existing workforce looking to upskill and change occupation; jobseekers).

1.3 **Methodology and Objectives of Social Assessment**

14. The Rapid Social Assessment (RSA) for the Project was conducted in March and April 2023 and involved the collection of secondary data, as well as public consultations in April and May 2023. The RSA required the collection of primary and secondary data. Qualitative data were collected using qualitative methods, such as consultation meetings with MLVT staff. Secondary data was also collected from different sources such as MLVT and other government agencies.

15. The SA focuses on the project's target groups, who are likely to be impacted, positively or negatively, by the Project. These groups include indigenous peoples (IP), poor families, vulnerable groups such as women and girls, people with disabilities (PWD), and those living in remote and difficult-to-access areas. The purpose of the SA is to achieve several objectives, including: (i) identifying the likely social risks of the project, in line with the World Bank's Environment and Social Standards (ESS); (ii) understanding the challenges faced by IP and other disadvantaged and vulnerable communities in accessing TVET and job information and orientation services in their respective areas; and (iii) developing a Grievance Redress

Mechanism (GRM) that is appropriate for the project. The focus will be on identifying barriers to accessing these services and the potential exclusion of vulnerable groups from project benefits.

16. The RSA's outcomes facilitate the Project's design by providing recommendations for mitigation and enhancement measures and inform the project design. Capacity development will also be provided to MLVT staff at national and sub-national levels to implement these measures effectively. The ultimate goal is to ensure that the target and vulnerable groups, including IPs, are not excluded from project benefits and activities related to TVET and job information and orientation service.

2. LEGAL FRAMEWORK

2.1 **Legal Framework of TVET in Cambodia**

17. Cambodia's National Technical and Vocational Education and Training (TVET) Policy 2017–2025, formally approved by the government on 16 June 2017, lays out the necessity framework to develop a strategy in technical vocational education and training (TVET) for workforces which better responds to the labor market demand; especially, the policy contributes to industrial development and the creation of decent employment while ensuring high quality and productivity of workforces to better compete with other countries in the region.

18. The policy provides guides for the formulation and implementation of strategies for skills development and facilitates better coordination among those involved in skills development in Cambodia.

19. The policy's **Strategy 2: To increase equitable access to Technical Vocational Education and Training (TVET) for employment generation,** contains requirements to expand opportunities for people to obtain life skills by paying special attention to the needs of women, marginalized groups, poor youth, school dropout, migrant workers, and indigenous people, through:

- Giving priority to women, marginalized groups, poor youth, school dropout, ethnic groups, migrant workers, and unemployed to study in TVET through providing adequate scholarships, allowances and dormitories;
- Enhancing access to skills training and certification, especially for low-paid migrant workers; and
- Promoting gender awareness, and implement gender equity and equality mechanisms in TVET institutions and relevant stakeholders.

20. And the policy's **Strategy 3: To promote Public-Private Partnerships and aggregate resources from stakeholders to support for sustainable development of TVET** contains requirements to develop a student fees policy for TVET providers and offer scholarships for poor students, and particularly women and indigenous people, by:

- Continuing to encourage both public and private TVET institutions to charge fees for skills training aligned with National Skills Standards (NSS) under CQF;
- Encouraging institutions to utilize a portion of fee revenue for scholarship programs to poor students identified by line ministries and relevant agencies;
- Developing coordination mechanisms with relevant institutions to provide loans for students to study in TVET sector;
- Encouraging TVET institutions to prepare agreements with industries to provide training programs in industries or institutions; and

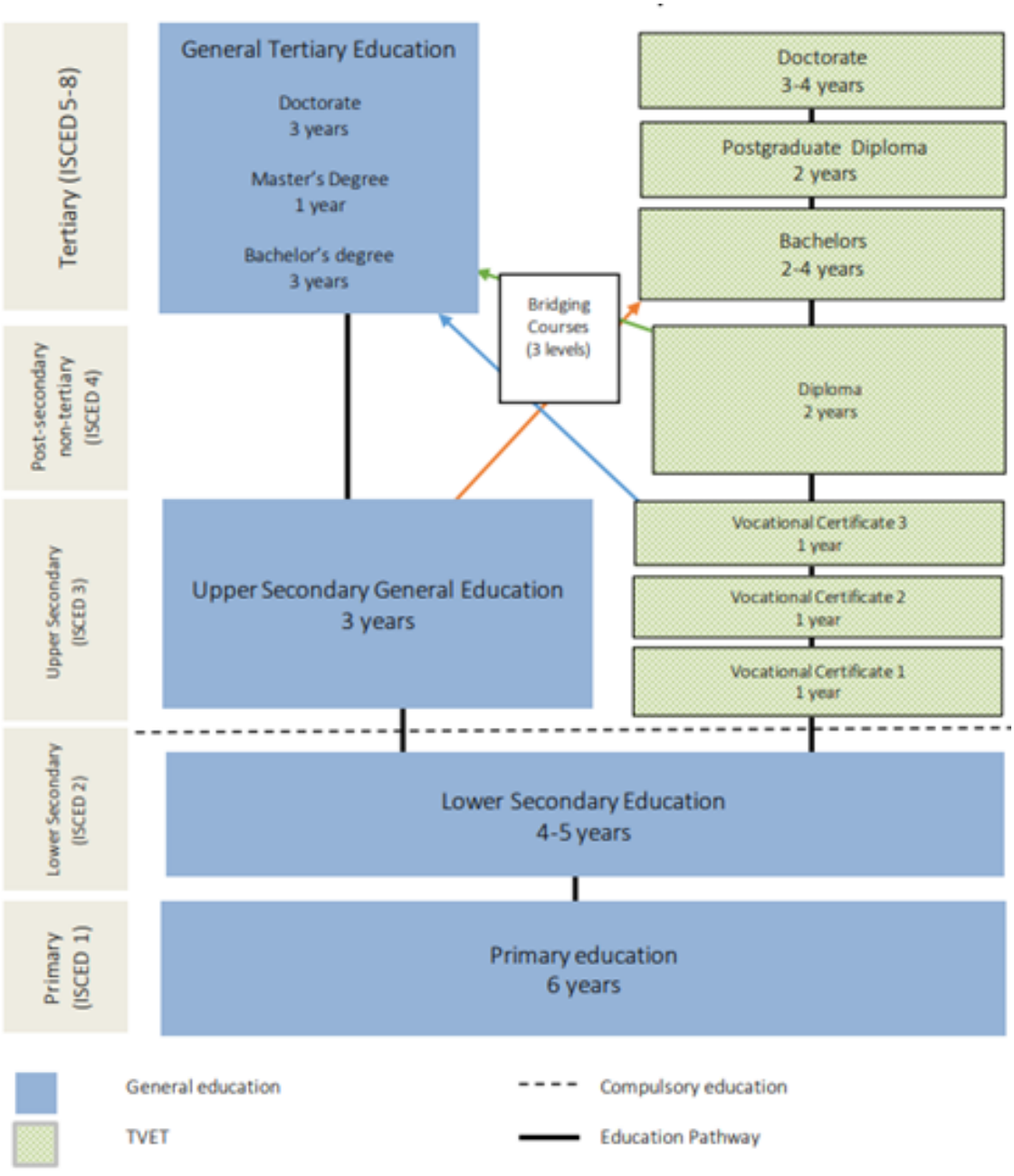
- Encouraging Development Partners (DPs), Non-Governmental Organizations (NGOs), private companies and donors to seek feasibility in providing scholarships to poor youth who study TVET programs.

21. **The TVET sector in Cambodia is dominated by public training institutions and rather centralized, with the Ministry of Labor and Vocational Training (MLVT) tasked to lead and manage the TVET sector.** Of the 119 training providers reporting to MLVT, 37 are public, and these cater to a majority of the reported learners.[19] There are several reputable NGO-run training institutions, such as Don Bosco and Pour un Sourire d'Enfant (PSE), as well as private training institutions, such as the Cambodia Garment Training Institute (CGTI), created by the Garment Manufacturers Association of Cambodia (GMAC), which is considered to deliver quality and relevant training. Besides the MLVT, eleven other ministries also provide TVET training programs including, among others, the Ministry of Education, Youth and Sports (MoEYS), the Ministry of Tourism, and the Ministry of Women Affairs. Despite the existence of the National Training Board (NTB), which was established in 1996 to set the direction for TVET policy and to coordinate the sector, inter-ministerial coordination and information sharing continues to be challenging, and each ministry oversees their own training institution using different mechanisms for quality assurance.

22. **Decision-making in public TVET institutions is relatively high with respect to pedagogical decisions but limited when it comes to financing and hiring.** Public training providers operate in a rather centralized environment, with the exception of the National Polytechnic Institute of Cambodia (NPIC), which is a Public Administrative Institution (PAI) and thus has autonomy in terms of budget control and management. They operate based on annual plans that are approved by the MLVT, which also provides most of the financing, and recruits and directly pays the wages of the majority of teachers. While they can establish a technical committee including private sector representatives, these committees are to be chaired by MLVT and are not yet operational in most schools. A number of TVET institutions aspire for more autonomy and autonomy has been outlined in the TVET Strategic Action Plan 2019-2023. However, there is a need to better understand the appropriate financial and operational model of increased autonomy while ensuring quality as well as equity. Autonomy can increase result-orientation among TVET institutions, to better track employment outcomes among graduates, and aim for increased employer satisfaction, in particular if accompanied by improvements in monitoring at both the institution- and system-level.

[19] MLVT's TVET Statistics for 2020-2021. Data for the first semester of the year 2020-2021. 50 training institutions reported data: All 37 public institutions under the MLVT reported data. The percentage of students in public institutions among institutions that reported data is 92 percent. When assigning the mean values of enrolment in private and NGO-run institutions that reported information (which is 329) to those private and NGO-run institutions with missing data, the proportion of students in public institutions is still the majority, at 62 percent.

Figure 1: TVET in Cambodia's education system



Source: TVET Country Profiles

2.2 World Bank Environment and Social Standards (ESS)

23. The WB's new Environment and Social Framework (ESF), which was officially endorsed and launched in October 2018, is applied to the proposed project. The ESF objective goes beyond the traditional 'do no harm' approach to maximize development gains. WB's Environment and Social Standards (ESS) set out the requirements for its clients relating to the identification and assessment of environmental and social risks and impacts associated with projects supported by the Bank through Investment Project Financing. The ESSs are designed to assist WB clients to fulfill the ESS requirements on the identification and management of environmental and social risks. The ESSs are also designed to

support WB clients in their goal to reduce poverty and increase prosperity in a sustainable manner for the benefit of the environment and their citizens, especially in: (i) achieving good international practice relating to environmental and social sustainability; (ii) fulfilling their national and international environmental and social obligations; (c) enhancing non-discrimination, transparency, participation, accountability and governance; and (d) enhancing the sustainable development outcomes of projects through ongoing stakeholder engagement. Where applicable, the following 10 ESSs are applied through the project life cycle:

- ESS 1: Assessment and Management of Environmental and Social Risks and Impacts
- ESS 2: Labor and Working Conditions
- ESS 3: Resource Efficiency and Pollution Prevention and Management
- ESS 4: Community Health and Safety
- ESS 5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement
- ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
- ESS 7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
- ESS 8: Cultural Heritage
- ESS 9: Financial Intermediaries
- ESS 10: Stakeholder Engagement and Information Disclosure.

24. At this stage of project preparation, without specific subprojects as yet selected, the key Environmental and Social Standards (ESS) that are deemed likely relevant to the project (and that may require specific instruments to be prepared) are:

- ESS1 – Assessment and Management of Environmental and Social Risks and Impacts;
- ESS2 – Labor and Working Conditions;
- ESS3 – Resource Efficiency and Pollution Prevention and Management;
- ESS4 – Community Health and Safety;
- ESS7 – Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities; and
- ESS10 – Stakeholder Engagement and Information Disclosure.

25. The following ESS are not relevant to the project:

- ESS5 – Land Acquisition, Restrictions on Land Use and Involuntary Resettlement;
- ESS6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources;
- ESS8 – Cultural Heritage; and
- ESS9 – Financial Intermediaries.

3. SOCIO-ECONOMIC CONTEXTS

3.1 **Demography**

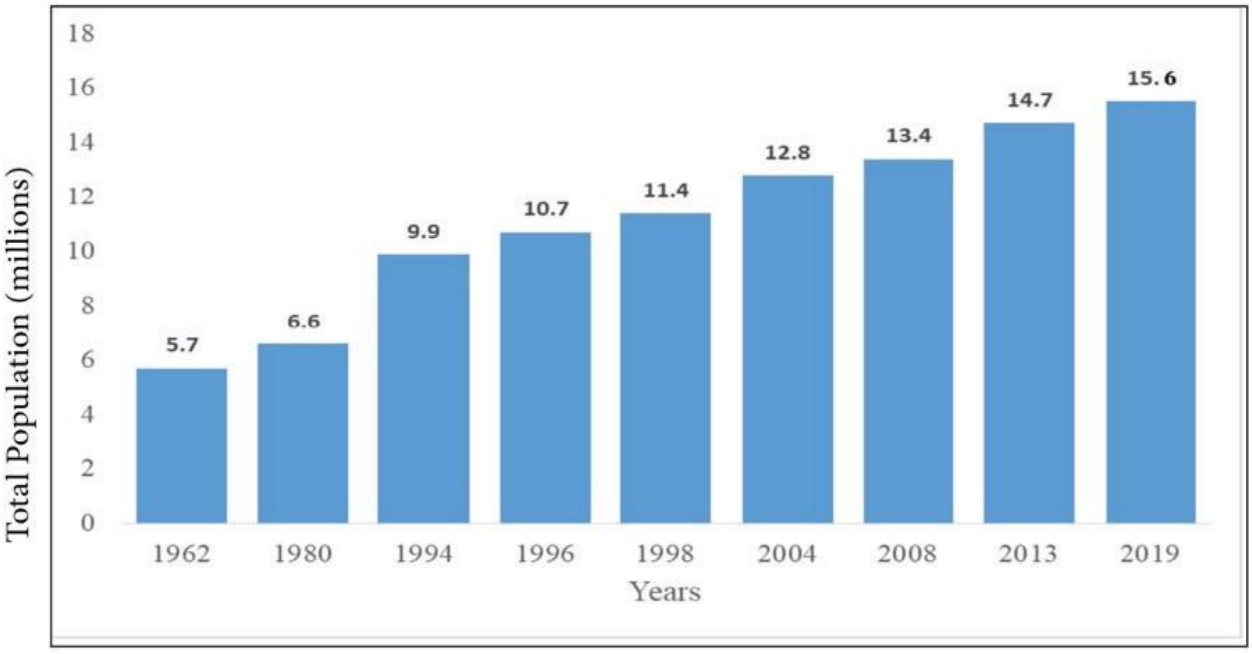
26. In terms of geography, Cambodia lies mostly in the basin of the Mekong River with the large lake Tonle Sap in its western part. The Mekong River, which runs through Cambodia, is a vital resource for the country and supports many aspects of life including agriculture, transportation, and fishing.

27. The General Population Census of Cambodia of 2019 (GPCC) show that the total de facto population of Cambodia on March 3rd, 2019 stood at 15,552,211. This is the population that spent the night at the place of enumeration, thereby excluding those who were abroad. The total de facto population increased from a total of 13,395,682, which was recorded in the 2008 Census. Thus, the population has grown by 2,156,529 persons, which represents 16.1 percent, over the 11-year period from

2008 to 2019. The male population was 7,571,837 (48.7 percent), while the female population stood at 7,980,374 (51.3 percent). See more details in the figures and tables below.

28. This rapid population growth in recent decades (figure 2) has resulted in a substantial increase in the number of young workforces in Cambodia, which has led to a sustained need for vocational education and employment opportunities.

Figure 2: Cambodian total population in millions, 1962-2019*



**Note: These figures exclude migrants working abroad. According to the Report of Annual General Meeting 2018, Ministry of Labour and Vocational Training, the destination countries were: Thailand: 1,146,685, Republic of Korea: 49,095, Japan: 9,195, Malaysia: 30,113, Singapore: 831, Hong Kong: 45 and Saudi Arabia: 16.*

Source: General Population Census of Cambodia of 2019 (GPCC).

29. Table 1 presents the gender and location distribution of Cambodia's population in 2019. The total population was 15,552,211, with males accounting for 7,571,837 (48.7%) and females accounting for 7,980,374 (51.3%). Of the total population, 6,135,194 (39.4%) lived in urban areas, while 9,417,017 (60.6%) lived in rural areas. It is important to note that the majority of the population lives in rural areas, where access to modern vocational and technical education and non-agricultural employment opportunities is limited.

Table 1: Distribution of total population by area, region, province and sex, Cambodia, 2019*

Area/Region/Province	Male	Female	Total
(1)	(2)	(3)	(4)
Total	7,571,837	7,980,374	15,552,211
Urban	2,993,339	3,141,855	6,135,194
Rural	4,578,498	4,838,519	9,417,017
Central Plain	3,676,211	3,968,084	7,644,295
Tonle Sap	2,380,256	2,472,708	4,852,964
Coastal and Sea	533,560	538,908	1,072,468
Plateau and Mountains	981,810	1,000,674	1,982,484

**Note: These figures exclude migrants working abroad.*

Source: General Population Census of Cambodia of 2019 (GPCC).

30. Table 2 and Figure 3 reveal that Cambodia's population has been slowly aging over the past 11 years. However, the population remains relatively young, with an increasing proportion of working-age individuals (15-59 years old) and a decreasing age dependency ratio. The proportion of the population aged 0-14 has decreased, while the proportion aged 60 and over has increased. This suggests a significant demographic dividend for the country, as there are fewer dependents per working-age person. The median age has increased, but remains relatively low compared to many other countries. The sex ratio has remained relatively stable, with a slight urban-rural difference. Overall, these demographic changes suggest a positive impact on the country's economic growth and structural transformation, as the population is becoming more conducive to labor force participation and productivity.

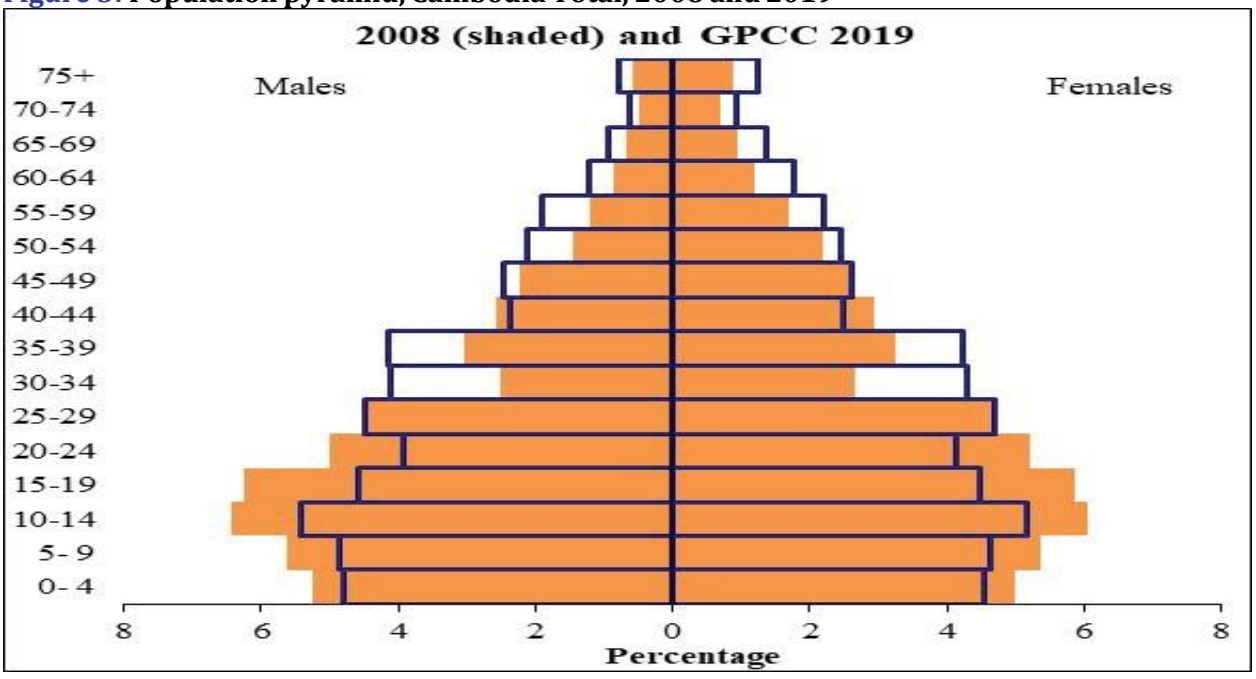
Table 2: Distribution of population by broad age group, dependency ratio, median age and sex ratio, Cambodia, 2008-2019*

Age Structure and Sex Ratio	2008			2019		
	Total	Urban	Rural	Total	Urban	Rural
(1)	(2)	(3)	(4)	(5)	(6)	(7)
Total	100	100	100	100	100	100
0-14	33.7	25.4	35.7	29.4	25.6	31.8
15-59	60.0	69.1	57.8	61.7	66.2	58.9
60 +	6.3	5.5	6.5	8.9	8.2	9.3
Overall Age Dependency Ratio 15-59	66.8	44.8	73.1	62.0	51.2	69.9
Median Age	22	24	21	27	28	26
Sex Ratio	94.7	92.4	95.3	94.9	95.3	94.6

**Note: These figures exclude migrants working abroad.*

Source: General Population Census of Cambodia of 2019 (GPCC).

Figure 3: Population pyramid, Cambodia Total, 2008 and 2019



Source: General Population Census of Cambodia of 2019 (GPCC).

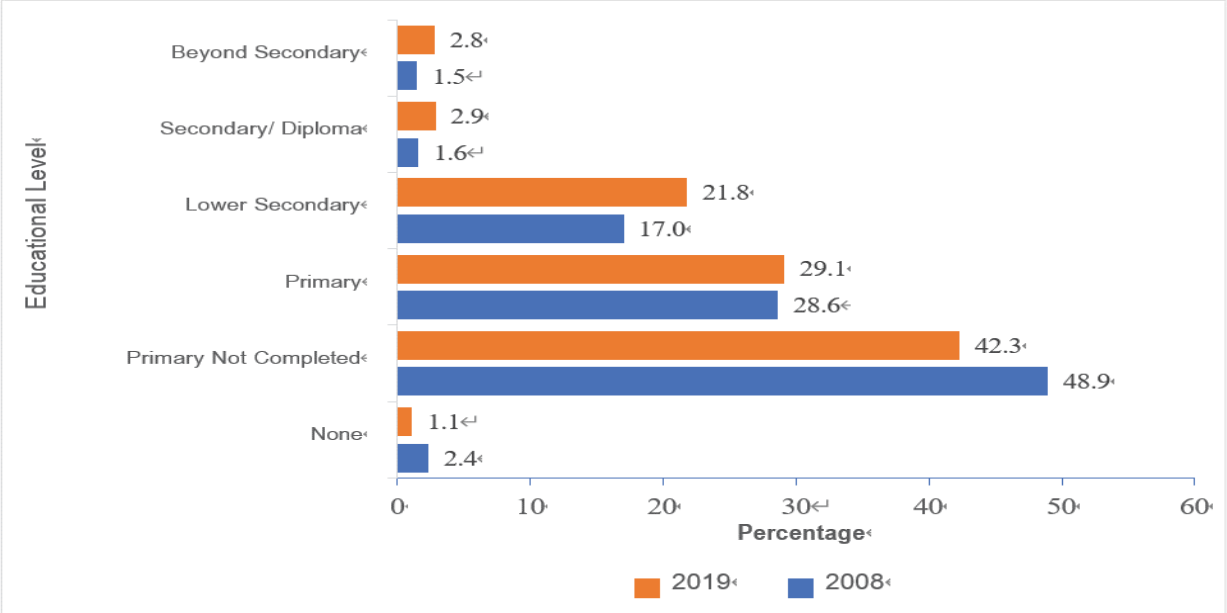
3.2 Educational and literacy levels

32. The figure and table below reveal that a significant proportion of Cambodia's population aged 7 and above have not completed primary education, with 42.3% falling under this category. A further 29.1% have only completed primary education, while 21.8% have finished lower secondary education. The

proportion of those with secondary/diploma education and education beyond secondary level is low at 2.9% and 2.8%, respectively. Gender-wise, there are slight differences in educational attainment between males and females. The proportion of males with no education is slightly higher at 1.2% compared to females at 1.1%. Conversely, more females (44.8%) than males (39.7%) have not completed primary education. Moreover, the proportion of males who completed lower secondary education is higher at 23.4% compared to females at 20.2%.

33. The data presented in the figure and table below also highlights the overall low level of educational attainment among the Cambodian population. This poses a significant challenge to the implementation of TVET programs like the Project, as it requires a basic level of education to build upon. Therefore, in designing TVET programs, it is important to consider the low educational levels of the workforce and provide practical and operational skills that are easily understood and applied by this segment of the population. It is also important to avoid overly emphasizing theoretical knowledge and academic courses, and instead focus on on-the-job training and other practical learning approaches. By doing so, the Project can better cater to the needs of those with lower levels of educational attainment and help them acquire the skills necessary to improve their employability and contribute to the economic growth of Cambodia. In addition, it is recommended that the Project collaborate with local education institutions to design and implement training programs that cater to the needs of the labor market. These programs could focus on providing relevant skills and training that are in high demand by employers, as well as encouraging greater enrolment rates in lower secondary education.

Figure 4: Educational attainment of literate population aged 7+ years by educational level, Cambodia, 2008-2019



Source: General Population Census of Cambodia of 2019 (GPCC).

Table 5: Educational attainment of literate population aged 7+ years by age group, educational level, sex and residence Cambodia, 2019*

Residence	Number	Percentage Distribution by Educational Level						
		Total	None	Primary Not Completed	Primary	Lower Secondary	Secondary/ Diploma	Beyond Secondary
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
2019								
Total	11,488,934	100	1.1	42.3	29.1	21.8	2.9	2.8

Male	5,732,187	100	1.2	39.7	29.1	23.4	3.2	3.5
Female	5,756,747	100	1.1	44.8	29.2	20.2	2.5	2.2
Urban	4,879,712	100	0.9	32.9	28.0	27.7	4.8	5.7
Male	2,414,609	100	0.9	30.0	27.1	29.7	5.3	6.9
Female	2,465,103	100	0.8	35.7	28.9	25.8	4.3	4.4
Rural	6,609,222	100	1.3	49.2	29.9	17.3	1.4	0.8
Male	3,317,578	100	1.4	46.8	30.5	18.8	1.6	1.0
Female	3,291,644	100	1.2	51.7	29.4	15.9	1.2	0.6

**Note: Percentage is calculated after excluding those with missing data on educational level and other variables.*
Source: General Population Census of Cambodia of 2019 (GPCC).

3.3 **Economic Development**

34. Over the two decades before COVID-19 struck in 2020, Cambodia blossomed economically. Having reached lower middle-income status in 2015, it set its sights on attaining upper middle-income status by 2030. Thanks to garment exports and tourism, Cambodia's economy grew at an average annual rate of 7.7 percent between 1998 and 2019, making it one of the fastest-growing economies in the world[20].

35. GDP contracted by 3.1 percent in 2020, with tourism, manufacturing, and construction sharply affected by the COVID-19 pandemic. However, GDP had already recovered in 2021 with GDP growth of 3 percent. In 2022, Cambodia's economy grew by 5.1 per cent, driven by a 9.4 per cent increase in the manufacturing sector, 15.2 per cent in hotels and restaurants, 6.1 per cent in transportation and 4.5 per cent in wholesale and retail trades, according to the National Bank of Cambodia's (NBC) "Macroeconomic and Banking Sector Development in 2022 and Outlook for 2023" report published on January 11, 2023.

36. Cambodia's economy continued to recover in 2022. The recovery of the services sector is strengthening, driven largely by pent-up consumer demand. The economic growth for 2023 is projected to reach 5.2 percent. Over the medium term, the economy is expected to trend back to potential, growing at 6 percent. Goods and services exports and strong FDI inflows are expected to be bolstered by the newly ratified free trade agreements, a substantial increase in private and public investment, especially under public-private partnership, in key physical infrastructure such as seaports and roads that the country experienced during the COVID-19 period and beyond, and structural reforms.

37. This growth has benefitted the poor, with a sharp decline in poverty rates from 33.8 to 17.8 percent between 2009 and 2019/2020, with a decline by 1.6 percentage points a year, mostly driven by workers moving into non-farm wage jobs, including 1 million foreign direct investment (FDI)-driven jobs in manufacturing. Macroeconomic stability, openness to trade and benefits of regional (Association of Southeast Asian Nations - ASEAN), global (World Trade Organization - WTO), and preferential access to the EU market under the "Everything but Arms" agreement, helped Cambodia attract high inflows of FDI that have had broad benefits in terms of employment.

38. While this is remarkable progress and structural change away from agriculture, most workers in Cambodia still work in low skilled, low productivity jobs. Cambodia had very high labor force participation (LFP) and very low unemployment, pre-COVID. Thus, the challenge in Cambodia is not the availability of jobs but rather the quality of these jobs. In 2019, 4 in 10 jobs were non-farm wage jobs, still the minority of jobs. While, again, this is remarkable progress given that this figure was 2 in 10 a decade earlier, the majority of jobs are still low-skilled (elementary occupations, craft and related workers, service workers, and market sales workers) Labor productivity is low in Cambodia, when compared to its income level, and it has been stagnant in manufacturing and services. Furthermore, stagnant or modest increases in

[20]See: Overview: Development news, research, data | World Bank

productivity have been outpaced by increases in wages, in particular in the apparel sector and manufacturing, making unit labor costs (as a share of value added) very high among comparators.

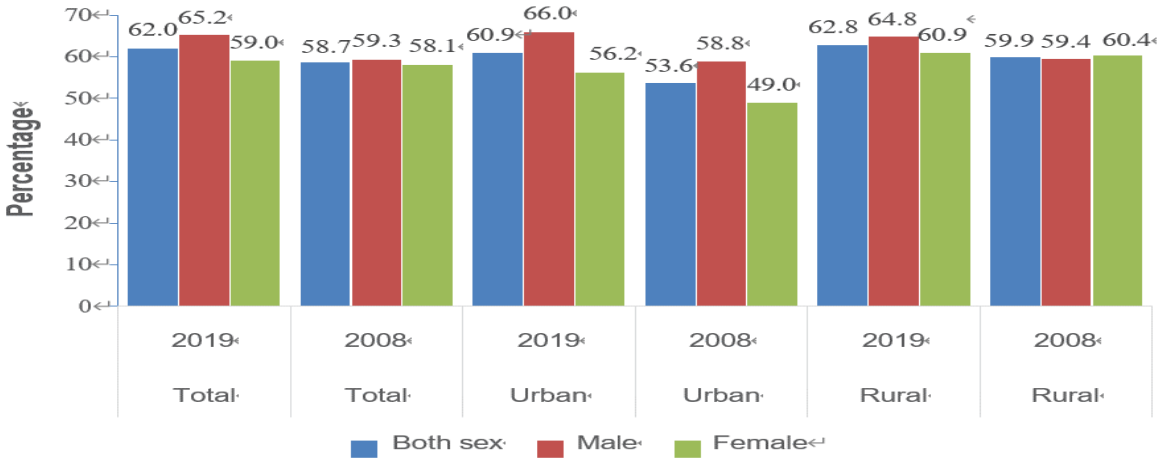
39. The low-skilled and low-productivity jobs reflect the low education among Cambodia's workforce: Despite significant improvements over the past decades, less than 14 percent of the Cambodian workforce has completed secondary education. The low skills among the workforce pose a challenge for firms, which report challenges in finding qualified workers, in particular in key sectors of the Cambodian economy, such as tourism, logistics and transport, and finance and insurance; with most of these shortages being in medium-skilled occupations. While education levels have increased among younger cohorts, still, enrolment rates even in lower secondary education remain low, at 47 percent. In other words, half a cohort enters the labor market every year without any qualification and very low skills.

41. Developing effective TVET and employment promotion services in Cambodia requires addressing the challenges posed by the prevalence of low-skilled and low-productivity jobs. To tackle this issue, the Project could focus on providing practical, job-specific skills training that is tailored to the needs of specific industries and sectors. On-the-job training and apprenticeships could be prioritized to help workers develop practical skills and gain work experience, while close collaboration with employers could help identify their specific training needs. Encouraging entrepreneurship and self-employment as viable alternatives to low-skilled, low-productivity jobs could also be considered, with training and support provided to help individuals start and grow their own businesses. By promoting high-quality jobs and sustainable economic growth, the Project can contribute to a brighter future for Cambodia's workforce and economy.

3.4 **Labor and Employment**

42. The economically active population includes the population working in the production of material goods and services. The economically inactive population includes people who are not working and not seeking work during the reference period. The percentage of the economically active population increased from 58.7% in 2008 to 62.0% in 2019, with higher increases observed among males (from 59.3% to 65.2%) compared to females (from 58.1% to 59.0%). The percentage of the employed population also increased from 57.7% to 61.2%, with higher increases among males (from 58.4% to 64.4%) compared to females (from 57.0% to 58.1%). The percentage of the unemployed population remained relatively stable, ranging from 0.8% to 1.1%. The proportion of the population who are not economically active is higher among females (41.0 percent) than among males (34.8 percent) in Cambodia, as shown in Figure 5 and Table 6. Overall, the data suggests an increase in the active and employed population in Cambodia between 2008 and 2019, with higher increases among males.

Figure 5: Distribution of active population aged 5+ years by sex and area, Cambodia 2008- 2019



Source: General Population Census of Cambodia of 2019 (GPCC).

Table 6: Population aged 5+ years by usual activity status, sex and area, Cambodia, 2008-2019

Usual Status	2008			2019		
	Both Sexes	Male	Female	Both Sexes	Male	Female
(1)	(2)	(3)	(4)	(5)	(6)	(7)
Percent*						
Total						
Active Population	58.7	59.3	58.1	62.0	65.2	59.0
Employed	57.7	58.4	57.0	61.2	64.4	58.1
Unemployed	1.0	0.9	1.1	0.9	0.8	0.9
Inactive Population	41.3	40.7	41.9	38.0	34.8	41.0
Urban						
Active Population	53.6	58.8	49.0	60.9	66.0	56.2
Employed	51.2	56.7	46.3	59.8	64.9	55.0
Unemployed	2.4	2.1	2.7	1.1	1.1	1.2
Inactive Population	46.4	41.2	51.0	39.1	34.0	43.8
Rural						
Active Population	59.9	59.4	60.4	62.8	64.8	60.9
Employed	59.3	58.8	59.8	62.1	64.1	60.2
Unemployed	0.6	0.6	0.6	0.7	0.7	0.7
Inactive Population	40.1	40.6	39.6	37.2	35.2	39.1

****Note**: Percentage of usual activity status for those aged 5+years is calculated after excluding those for whom usual activity status was not reported.*

Source: General Population Census of Cambodia of 2019 (GPCC).

43. Table xx indicates that the Labour Force Participation Rates (LFPR) increased from 2008 to 2019 in Cambodia, with higher LFPRs for males than females and for rural areas compared to urban areas. There were also differences in LFPR by age group, with higher LFPRs for those aged 25-59 and lower LFPRs for those aged 60 and over.

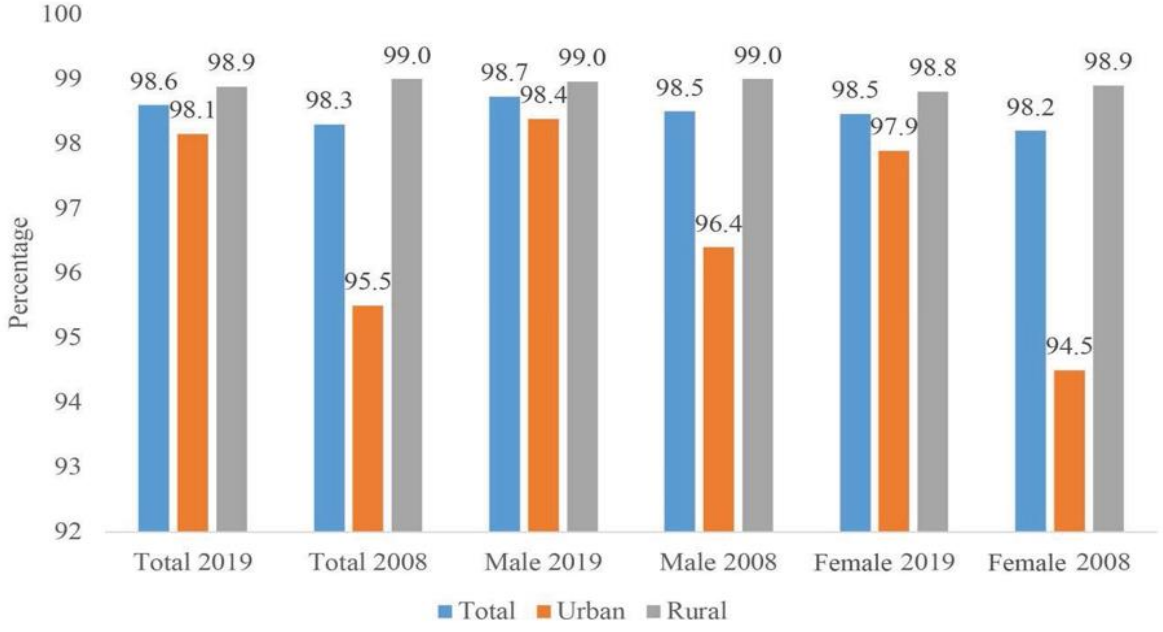
Table 7: Age-specific Labour Force Participation Rates (LFPR) by age group, sex, and area, Cambodia, 2008-2019

Age Group	LFPR								
	Total			Urban			Rural		
	Both Sexes	Male	Female	Both Sexes	Male	Female	Both Sexes	Male	Female
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
2008									
5 +	58.7	59.3	58.1	53.6	58.8	49.0	59.9	59.4	60.4
15 +	78.3	80.8	76.0	65.8	73.4	59.1	81.8	82.9	80.8
5 - 14	3.1	3.0	3.2	1.8	1.5	2.1	3.3	3.3	3.4
15 - 24	60.1	57.1	63.2	50.3	46.4	53.8	63.2	60.1	66.4
25 - 59	91.7	96.8	87.3	79.6	92.7	67.6	95.1	98.0	92.5
60 +	62.6	75.5	53.7	37.9	54.7	26.8	67.7	79.6	59.4
2019									
5 +	62.0	65.2	59.0	60.9	66.0	56.2	62.8	64.8	60.9
15 +	79.1	84.4	74.3	74.7	81.8	68.1	82.2	86.3	78.6
5 - 14	2.1	2.5	1.6	1.7	2.0	1.4	2.3	2.8	1.8
15 - 24	58.4	58.9	57.9	55.8	55.9	55.7	60.3	61.1	59.4
25 - 59	90.7	96.3	85.4	86.4	94.4	78.7	93.8	97.8	90.2
60 +	60.7	72.5	52.8	48.2	62.0	38.9	67.9	78.7	60.8

Source: General Population Census of Cambodia of 2019 (GPCC).

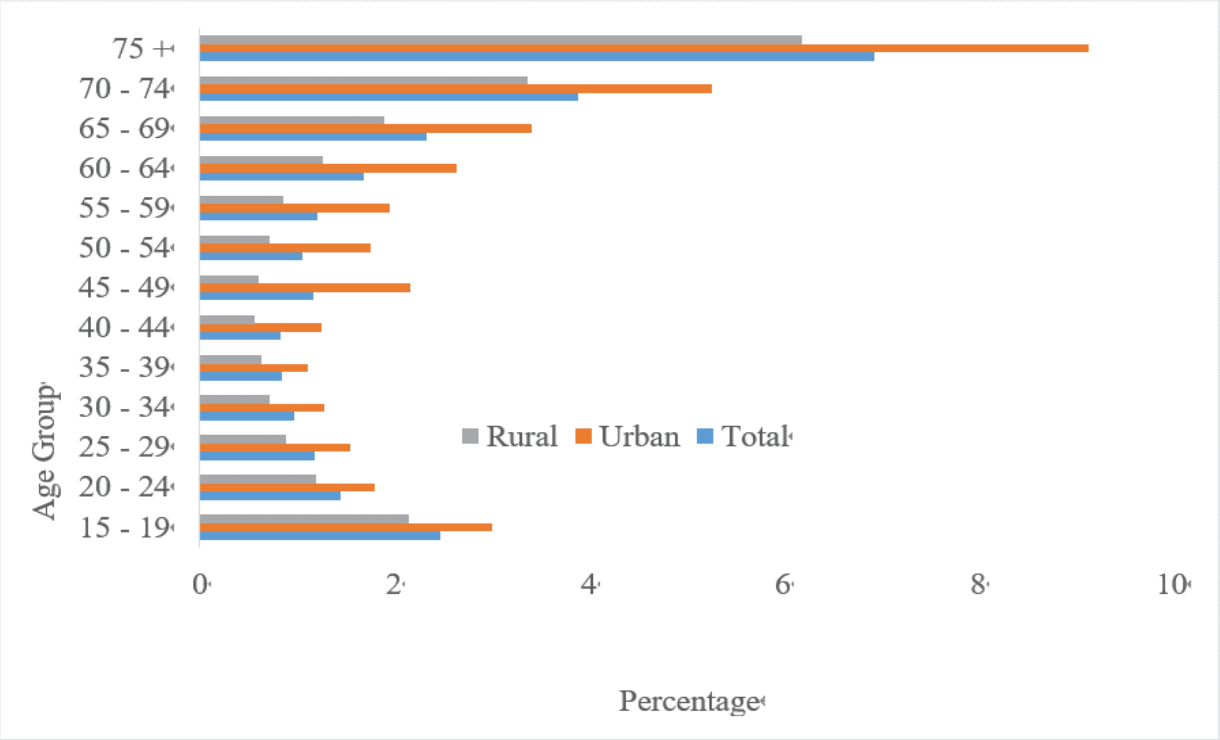
44. From 2008 to 2019, Cambodia experienced an overall increase in employment rates and a decrease in unemployment rates (Figures 6 and 7). In 2008, the overall employment rate was 98.3%, while in 2019, it was 98.6%. The employment rate for urban residents increased from 95.5% to 98.1%, while the employment rate for rural residents decreased slightly from 99% to 98.9%. Both male and female employment rates increased, with the greatest increase in urban female employment rates, which rose from 94.5% in 2008 to 97.9% in 2019, a larger increase than for urban male employment rates. This data suggests that Cambodia has made progress in expanding employment opportunities, particularly for urban women.

Figure 6: Employment rates for population aged 5+ years by sex and area, 2008-2019



Source: General Population Census of Cambodia of 2019 (GPCC).

Figure 7: Age-specific unemployment rates by age group and area, Cambodia, 2019



Source: General Population Census of Cambodia of 2019 (GPCC).

45. As shown in Table 8, the total number of employed persons aged 5 years and above was 8,626,777, with males accounting for 51% of the total and females accounting for 49%. Among them, 31.5% were paid employees, 42.7% were own account workers, 25.0% were unpaid family workers, and only 0.6% were employers. The majority of employed persons (90%) were in the age group of 15-59 years. Those aged 60 years and above made up 9.4%, while those under 15 years accounted for 0.7%. Regarding employment status, there is a significant gender gap, with males being more likely to be paid employees or own account workers, while females are more likely to be unpaid family workers. In terms of area, the data showed that rural areas had a much higher proportion of own account workers and unpaid family workers than urban areas.

46. Overall, the data suggests that Cambodia's employment sector is characterized by a high proportion of vulnerable employment, as reflected in the high percentage of own account workers and unpaid family workers. Additionally, the low percentage of employers indicates a lack of formal job opportunities. The data also highlights the gender and regional disparities in the quality of employment, which may require targeted policy interventions to improve the situation.

Table 8: Distribution of employed persons aged 5+ years by employment status, sex and area, Cambodia, 2019

Sex, Age Group, and Area	Employed Persons	Employment Status					
		Total	Employer	Paid Employee	Own Account Workers	Unpaid Family Worker	Other
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Total 2019							
Both Sexes	8,626,777	100	0.6	31.5	42.7	25.0	0.2
Under 15	59,845	100	0.7	23.0	30.1	42.7	3.5
15 – 59	7,754,372	100	0.6	33.9	40.3	25.0	0.2

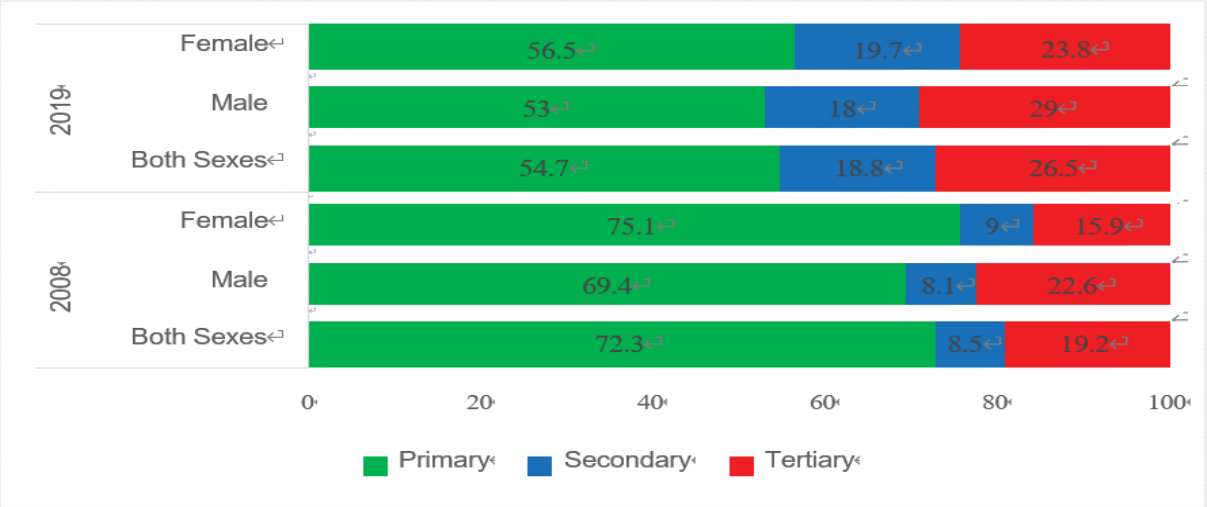
60+	812,560	100	0.6	8.9	65.9	24.3	0.2
Male	4,396,850	100	0.7	33.6	50.3	15.1	0.3
Under 15	37,388	100	0.7	19.7	35.6	38.6	5.4
15 – 59	3,969,675	100	0.7	35.8	47.7	15.6	0.2
60+	389,787	100	0.8	13.3	77.7	7.9	0.3
Female	4,229,927	100	0.5	29.3	34.7	35.4	0.1
Under 15	22,457	100	0.8	28.4	21.0	49.6	0.2
15 – 59	3,784,697	100	0.5	32.0	32.5	34.8	0.1
60+	422,773	100	0.4	4.9	55.1	39.5	0.1
Urban							
Both Sexes	3,362,357	100	0.8	53.1	33.7	12.2	0.2
Under 15	16,008	100	1.0	46.9	29.2	20.7	2.1
15 – 59	3,112,884	100	0.8	55.6	31.6	11.8	0.2
60+	233,465	100	1.0	19.3	62.3	17.1	0.3
Male	1,771,174	100	0.9	54.8	36.5	7.6	0.3
Under 15	9,594	100	0.9	39.7	36.8	19.3	3.3
15 – 59	1,639,260	100	0.9	57.0	34.2	7.7	0.2
60+	122,320	100	1.2	26.6	66.5	5.4	0.3
Female	1,591,183	100	0.7	51.2	30.6	17.4	0.1
Under 15	6,414	100	1.1	57.7	17.9	22.9	0.4
15 – 59	1,473,624	100	0.7	54.1	28.6	16.4	0.1
60+	111,145	100	0.7	11.3	57.8	30.1	0.2
Rural							
Both Sexes	5,264,420	100	0.5	17.7	48.4	33.3	0.2
Under 15	43,837	100	0.7	14.2	30.4	50.8	4.0
15 – 59	4,641,488	100	0.5	19.4	46.2	33.8	0.1
60+	579,095	100	0.5	4.7	67.4	27.2	0.2
Male	2,625,676	100	0.5	19.4	59.6	20.2	0.3
Under 15	27,794	100	0.6	12.8	35.1	45.2	6.2
15 – 59	2,330,415	100	0.5	20.9	57.2	21.2	0.2
60+	267,467	100	0.6	7.2	82.9	9.0	0.3
Female	2,638,744	100	0.4	16.1	37.2	46.2	0.1
Under 15	16,043	100	0.7	16.7	22.2	60.3	0.1
15 – 59	2,311,073	100	0.4	17.9	35.0	46.6	0.0
60+	311,628	100	0.4	2.6	54.1	42.9	0.1

***Note**: Excluding those for whom employment status was not reported.*

Source: General Population Census of Cambodia of 2019 (GPCC).

47. The data shows a decrease in the share of employment in the primary sector and an increase in the share of employment in the secondary and tertiary sectors over time. There has been a rapid shift in employment from the primary sector to the secondary and tertiary sectors over time in Cambodia. This trend is likely to continue in the future, especially in urban areas where the percentage of employed people in the secondary and tertiary sectors is higher.

Figure 8: Distribution of employed population aged 5+ years by industrial sectors and sex, Cambodia, 2008-2019



Source: General Population Census of Cambodia of 2019 (GPCC).

Table 9: Distribution of employed population aged 5+ years by industrial sectors, sex and area, Cambodia, 2008-2019*

Industry Sectors	Total			Urban			Rural		
	Both Sexes	Male	Female	Both Sexes	Male	Female	Both Sexes	Male	Female
2008									
Total	100	100	100	100	100	100	100	100	100
Primary	72.3	69.4	75.1	14.0	13.6	14.6	84.9	82.6	87.0
Secondary	8.5	8.1	9.0	25.3	22.1	28.9	4.9	4.7	5.1
Tertiary	19.2	22.6	15.9	60.7	64.3	56.6	10.2	12.7	7.9
2019									
Total	100	100	100	100	100	100	100	100	100
Primary	54.7	53.0	56.5	21.4	21.3	21.4	75.9	74.3	77.6
Secondary	18.8	18.0	19.7	31.1	28.6	34.0	11.0	10.8	11.2
Tertiary	26.5	29.0	23.8	47.5	50.1	44.6	13.1	14.9	11.3

Source: General Population Census of Cambodia of 2019 (GPCC).

48. Based on the data in Table 10, the top 5 largest employment groups in Cambodia are: (i) Skilled agricultural, forestry, and fishery workers (2,263,258); (ii) Craft and related trades workers (1,807,321); (iii) Services and sales workers (1,688,269); (iv) Elementary occupations (778,830); and (v) Plant and machine operators, and assemblers (395,518). These 5 groups account for a total of 6,934,196 employed individuals, which is approximately 87.9 % of the total employed population (7,883,106) in Cambodia in 2019. Informal employment is dominant across all occupations. The data also shows that the percentage of informal employment is highest among skilled agricultural, forestry and fishery workers at 98.6%, followed by elementary occupations at 94.8%, Services and sales workers at 92.6%, and Plant and machine operators, and assemblers at 92.1%.

49. This highlights the importance of providing vocational training and formal employment opportunities to workers in these sectors. It suggests that the Project could focus on providing vocational training and formal employment opportunities to workers in the top 5 largest employment groups, particularly in sectors with the highest percentages of informal employment. This will not only improve the livelihoods of workers, but also contribute to the overall economic development of Cambodia. The Project could work with local vocational training institutions and businesses to develop training programs

that are tailored to the needs of these sectors. In addition, the project could provide support for businesses to transition from informal to formal employment practices, such as through access to financing and technical assistance.

Table 10: Informal and Formal Employment, by Occupation in 2019

Occupation	Informal Employment	Formal Employment (number)	Total	Informal Employment	Formal Employment	Total
Managers	81,038	47,090	128,128	63.2	36.8	100.0
Professionals	196,968	130,390	327,358	60.2	39.8	100.0
Technicians and associate professionals	204,690	86,657	291,347	70.3	29.7	100.0
Clerical support workers	91,499	32,503	124,002	73.8	26.2	100.0
Services and sales workers	1,562,658	125,611	**1,688,269**	**92.6**	7.4	100.0
Skilled agricultural, forestry and fishery workers	2,232,412	30,846	**2,263,258**	**98.6**	1.4	100.0
Craft and related trades workers	1,448,077	359,245	**1,807,321**	80.1	19.9	100.0
Plant and machine operators, and assemblers	364,279	31,239	**395,518**	**92.1**	7.9	100.0
Elementary occupations	738,351	40,479	**778,830**	**94.8**	5.2	100.0
Armed forces	40,086	38,988	79,074	50.7	49.3	100.0
Total	6,960,060	923,046	**7,883,106**	88.3	11.7	100.0

a The occupational categories listed in this column are derived from the International Standard Classification of Occupations, 2008 (ISCO-08). Note: Totals may not add up due to rounding.

Source: Cambodia Labour Force Survey 2019 data.

4. PROJECT BENEFICIARIES AND SOCIAL BENEFITS

50. The project will benefit various groups in the country's workforce. The primary beneficiaries are the students and trainees who will complete the TVET training and seek employment for the first time, and the existing workforce who will upgrade their skills to improve their earnings by increasing their productivity on the job or by moving to better jobs. These individuals will have access to improved training programs, work-based learning opportunities, and counselling services that will increase their employability and income, which is particularly important given that the majority of TVET students come from low-income families.

51. The project will also provide direct benefits to the managerial staff, teachers, and trainers of the project-financed training institutions and JCs. They will have access to enhanced knowledge and skills, allowing them to improve the quality of their training programs and better meet the needs of their students. Through partnerships with industry, they will have opportunities for continuous professional development, enabling them to upgrade their industry-relevant skills. This will not only benefit the trainers and staff themselves but also the students/trainees they work with, as they will receive higher-quality training and support.

52. Employers will also benefit from the upskilling of the workforce and the training programs designed to respond to their needs, leading to a more productive and competitive business environment. This will increase their capacity to expand their operations and access new markets. Industries and enterprises will benefit from the project as they will be able to find and hire higher-skilled workers. This will help to bridge the gap in demand for skilled labor and improve overall economic development in Cambodia.

53. Jobseekers will receive job counselling and career orientation services that will help them identify suitable job opportunities and develop their career plans. This will increase their chances of finding suitable employment and improve their long-term career prospects.

54. Government officials, job counsellors, staff of Sector Skills Councils (SSCs) involved in service delivery, and LMIS users will also benefit from the project, as it will provide them with more accurate and comprehensive information on labor market trends and skills demand.

55. In addition, the project will foster greater inclusion among disadvantaged groups such as women, Indigenous peoples and others. It will provide measures to ensure that training programs are accessible to women and other underrepresented groups, and will include gender-sensitive approaches to promote equal opportunities in the labor market. This will contribute to reducing gender disparities and enhancing social and economic inclusion in Cambodia.

5. SOCIAL RISKS AND ASSESSMENT RESULTS

56. The data collected from secondary data sources and public consultation during project preparation were analysed and categorized. The section below provides the key themes central to the SA.

5.1 **Challenges in access to TVET**

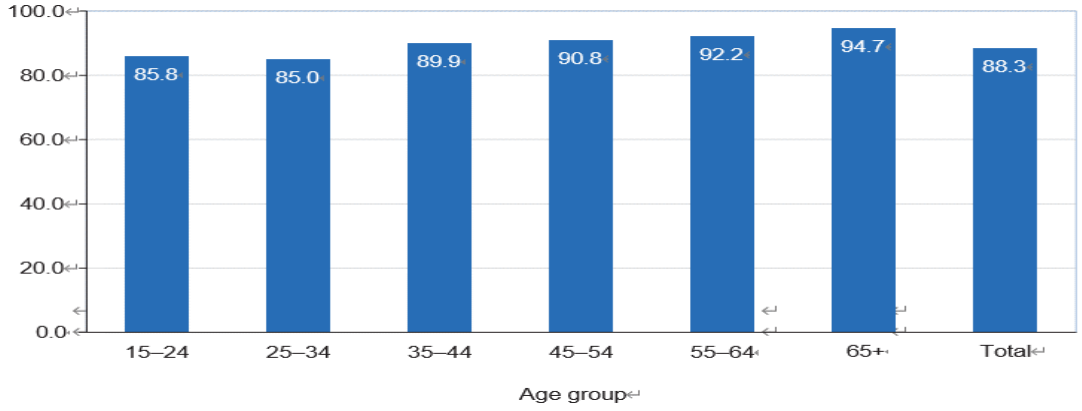
57. According to the National Census 2019, a small proportion of the population aged 15-59 (0.7 percent for males and 0.6 percent for females) had completed a TVET program. These proportions are much smaller than those with upper-secondary education (3.2 percent for males and 2.5 percent for females) and a bachelor's degree (3.5 percent for males and 2.4 percent for females). In terms of enrolment, in 2021/2022, a total of 37,998 trainees were enrolled in the 37 formal public TVET institutions. Even if, in the absence of complete data on the private and NGO-run institutions, one assumes just as much provision by other TVET institutions (private, NGO, and under other ministries), this is a small number when compared to 375,788 students enrolled in upper-secondary schools in general. Furthermore, TVET trainees are concentrated in a few fields, and may not respond to emerging economy needs: currently, over 60 percent of students are concentrated in four fields: electricity (31 percent), civil engineering (13 percent), automobile (9 percent), and information technology (8 percent). In terms of quality, employers indicate not being fully satisfied with workers' skills and mention gaps in all of basic and advanced cognitive (e.g. oral communication), socioemotional (e.g. team work), digital (e.g. basic computer literacy), and technical skills.

58. As analysed in the project concept note (PCN) of the Project, some of these challenges are related to the characteristics of TVET trainees, who are often from vulnerable backgrounds and tend not to select TVET based on their preferences and aptitude for technical training but rather as the result of "negative selection" when they do not qualify for general education. As a result, TVET trainees have lower learning levels and possibly motivation than those in general education. Furthermore, virtually all certificate-level students and a majority of higher diploma students are scholarship students. This has benefits from an inclusion perspective, indicating, as elsewhere in the world, that TVET can play a role in Cambodia to support poor and vulnerable individuals. However, these individuals may need support to catch-up with foundational skills in order to be successful in the labor market.

5.2 **Relevance and quality issues**

59. Both a symptom and cause of challenges in TVET, employer engagement in skills development (EESD) in Cambodia is low when compared to best practice; impeded by poaching concerns and a lack of familiarity and know-how among key stakeholders on EESD benefits and best practices. Successful skills development systems, such as in Central Europe (Germany, Switzerland, etc.) as well as in Korea, rely on strong EESD. In other countries, examples whereby new trainings, in which industry is involved from the beginning to design all dimensions of the training, have also shown success. Consultations with employers indicate poaching concerns that disincentivize seeking training avenues for their employees to upgrade their skills. When they train, they tend to do so in-house. When they want to engage with TVET institutions, they lack understanding of how to do so. Among firms that report wanting to organize training but face challenges, 36 percent report a lack of courses and trainers; 27 percent report a low quality of courses; and 20 percent mention lacking information on courses. Employers indicate they find the training in TVET to be too generic to respond to their needs and they also do not perceive that teachers and TVET institution leaders see themselves as service providers for employers. On the side of TVET institutions, leaders and teachers often lack the capacity to reach out to employers in a strategic manner. All in all, there seems to be lack of trust among employers about training providers' willingness and ability to provide demand-responsive and high-quality training.

Figure 9: Informal employment, by Age Group



Source: Cambodia Labour Force Survey 2019 data.

5.3 **Gender disparities**

60. The low proportion of females enrolled in formal TVET in Cambodia is a persistent issue that needs to be addressed. Women in Cambodia face several challenges in accessing TVET courses. Gender stereotypes perpetuate the belief that technical and vocational fields are male-dominated. Formal TVET programs in Cambodia have traditionally focused on male-oriented skill areas such as mechanics and construction. This has resulted in a lack of diversity in the workforce, with women being underrepresented in technical and vocational fields. Parents often do not favour technical skill development for their daughters. They may believe that such skills are not necessary for women, and may prioritize investing in their sons' education instead. This further perpetuates the gender gap in TVET enrolment and limits opportunities for females to develop valuable technical skills.

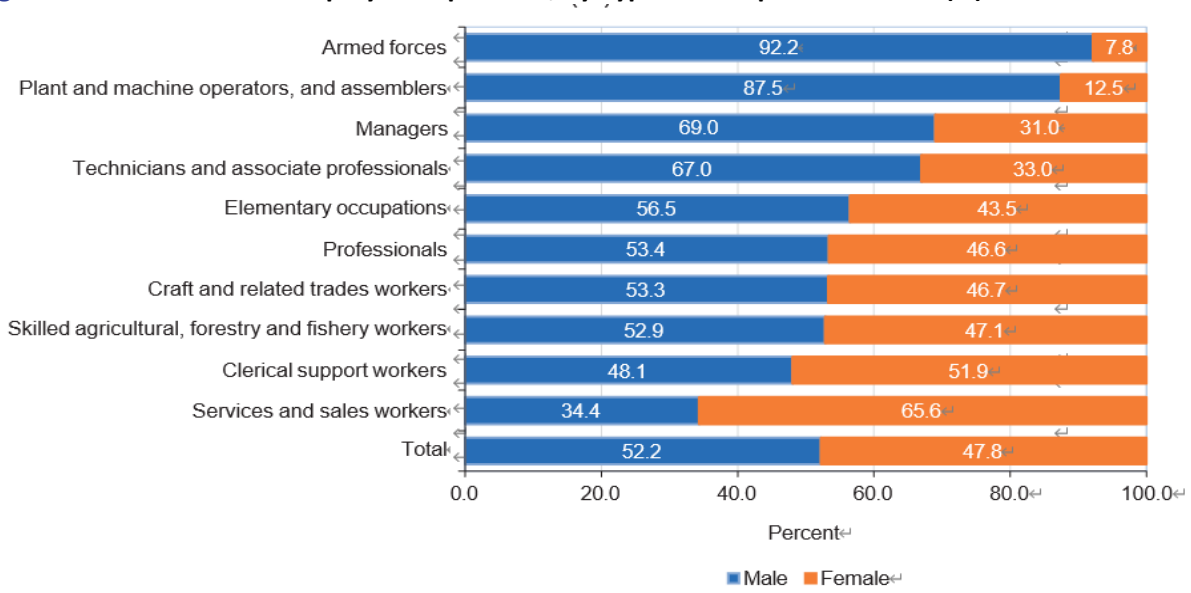
61. Furthermore, the limited range of courses offered in TVET institutions often does not cater to the specific needs and interests of women, which further hinders their participation.

62. Another challenge is the physical distance between TVET institutes and women's homes. Women in rural areas may not have access to transportation or may be discouraged from traveling alone, making it difficult for them to attend TVET courses that are located far away from their homes. This is

compounded by the lack of gender-responsive infrastructure in TVET institutions, such as inadequate separate restrooms and changing rooms, which can make women feel uncomfortable and discourage them from participating.

63. In Cambodia's labor market, women face greater vulnerability compared to men. Figure 10 illustrates a notable gender disparity in the distribution of occupations. Women comprise over half of service and sales workers (65.5%) and clerical support workers (51.9%), but only around one-third of managers (31%) and technicians and associate professionals (33%) are women. This highlights the need to address gender biases and provide equal opportunities for women in diverse fields to promote a more inclusive and diverse workforce.

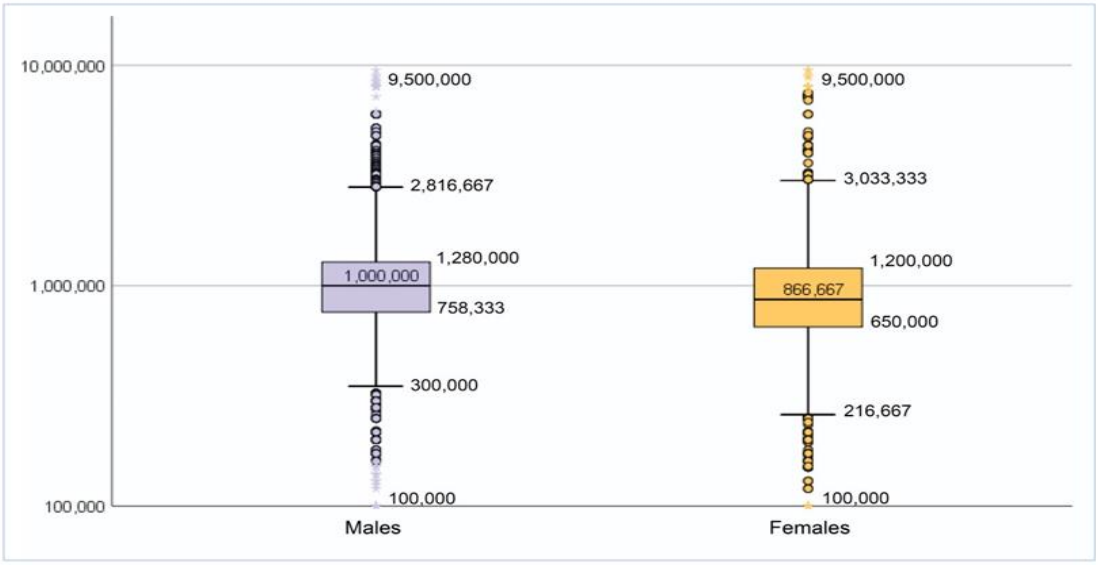
Figure 10: Distribution of Employed Population, by Type of Occupation and Sex (%) in 2019



Source: Cambodia Labour Force Survey 2019 data.

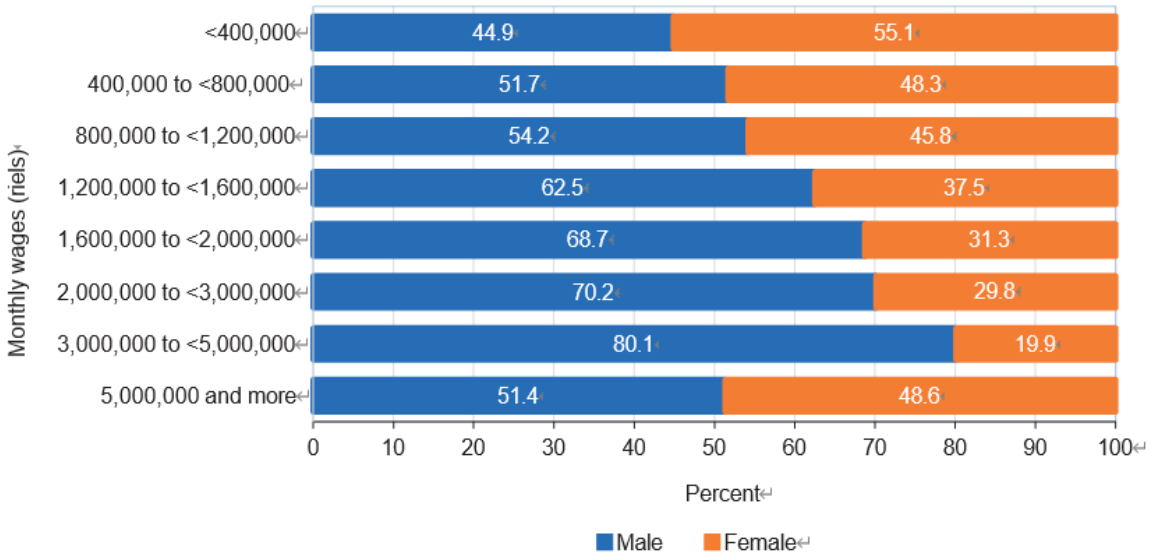
64. The distribution of monthly wages from main jobs in Cambodia shows that both males and females earned salaries ranging from KR300,000 ($75) to around KR3,000,000 ($750) in 2019 (Figure 11). However, there was a gender gap in median monthly salaries, with males earning a median salary of about KR1,000,000 ($250) compared to females who earned a median salary of KR866,667 ($217). In addition, the proportion of females in higher income brackets continues to decline. For example, in the group earning from KR3,000,000 ($750) to KR5,000,000 ($1,250) per month, women only accounted for 19.9% of the total (Figure 12). This suggests that there is still a significant gender pay gap in Cambodia, where males earn higher salaries on average than females.

Figure 11: Distribution of Monthly Wages, by Sex (KR)



Source: Cambodia Labour Force Survey 2019.

Figure 12: Share of Monthly Wages, by Sex (%)



Source: Cambodia Labour Force Survey 2019.

65. It is notable that the average monthly wages of women in both urban and rural areas are lower than those of men, with the largest gap observed in the urban areas. However, when comparing between areas, rural women have the lowest average monthly wages among all groups, with an average of KR934,335 ($234) compared to KR998,719 ($250) for rural men (Table 11). This highlights the significant income disparity faced by rural women in Cambodia.

Table 11: Average and Median Monthly Wages, by Area and Sex (KR)

Average Monthly Wages				Median Monthly Wages		
Area	Both Sexes	Male	Female	Both Sexes	Male	Female
Urban	1,252,092	1,353,226	1,114,925	1,000,000	1,200,000	1,000,000

Rural	970,549	998,719	934,335	866,667	866,667	840,000
Overall	1,078,595	1,136,707	1,002,341	910,000	1,000,000	866,667

KR = riels (Cambodian national currency).
Source: Cambodia Labour Force Survey 2019 data.

66. To narrow down these gender disparities in employment and earning, the Project will need to adopt a gender-responsive approach to program design and implementation. This could include promoting gender equality and women's rights in all aspects of the project, as recommended below:

- Gender-responsive program design: Ensure that project activities are designed to be inclusive and responsive to the needs and priorities of women. This could involve targeted outreach and engagement strategies to encourage women's participation in training and industry partnerships;
- Gender-sensitive training and curriculum development: Ensure that training programs and curricula are gender-sensitive and incorporate topics relevant to women's economic empowerment, such as entrepreneurship, leadership, and financial management;
- Women's economic empowerment initiatives: Incorporate initiatives to promote women's economic empowerment, such as mentoring and networking programs, access to finance and markets, and support for women-owned businesses; and
- Gender mainstreaming in industry partnerships: Ensure that industry partnerships are inclusive and equitable, and provide opportunities for women's participation and leadership. This could involve setting targets for women's participation and monitoring progress towards achieving these targets.

67. To ensure gender mainstreaming and promote gender equality in TVET and job service, four of five project development objective (PDO) level indicators of the Project have incorporated gender-disaggregated data, as follows:

- Percentage of graduates of project-supported training programs in good jobs six months after completion of training, disaggregated by gender and by upcoming and existing workforce;
- Percentage of graduates of project-supported training programs receiving certification, disaggregated by gender and by upcoming and existing workforce;
- Number of individuals completing training, disaggregated by gender and by upcoming and existing workforce; and
- Number of individuals receiving career orientation (online and offline), disaggregated by gender and by types of users (upcoming workforce/students; existing workforce looking to upskill and change occupation; jobseekers).

5.4 **Indigenous People**

68. IP consists of 24 races, representing 1.4% of total population in Cambodia. The majority of IP communities have been reported to live in Rattanakiri, Mondulkiri, Stung Treng and Kratie, which are considered as remote provinces. IP students' access to quality education remains a serious issue. They are likely to drop out of school at grade 6 due to long distance from secondary schools and poverty. Moreover, early age marriage is also considered as another factor that prevents IP students from pursuing secondary education. The lack of proper multilingual education (MLE) for IP students continues preventing students from effectively participating in public schools. See more details in the following tables and figures.

Table 12: Distribution of population by mother tongue and sex, Cambodia, 2019*

Mother Tongue	Population			Percentage		
	Total	Male	Female	Total	Male	Female
(1)	(2)	(3)	(4)	(5)	(6)	(7)

Total	15,552,211	7,571,837	7,980,374	100	100	100
Khmer	14,893,134	7,239,825	7,656,121	95.8	95.6	95.9
Vietnam	78,090	39,657	38,447	0.5	0.5	0.5
Chinese	94,450	54,756	39,712	0.6	0.7	0.5
Lao	13,636	6,940	6,698	0.1	0.1	0.1
Thai	6,650	3,421	3,230	0.0	0.0	0.0
Other	17,969	10,400	7,573	0.1	0.1	0.1
Minority Languages	448,282	218,439	229,928	2.9	2.9	2.9

**Note: These figures exclude migrants working abroad.*

Source: General Population Census of Cambodia of 2019 (GPCC).

Table 13: Indigenous People Identified Language Spoken

Ethnic group	Ratanakiri	Stung Treng	Mondulkiri	Preah Vihear	Kratie	Total
Brao	7,132	207	14	8	0	7,361
Jarai	15,669	16	116	0	0	15,801
Kachac	2,054	2	0	0	0	2,056
Kleung	0	1	0	0	0	1
Kraol	0	0	320	0	2,635	2,955
Kravet	1,726	2,205	0	0	0	3,931
Kreung	14,877	159	5	0	0	15,041
Kuy	0	1	0	4,536	546	5,083
Lun	0	273	0	0	0	273
Mel	0	0	0	0	1,260	1,260
Phnong	367	388	18,036	39	3,166	21,996
Poar	0	0	0	316	0	316
Rhade	0	0	10	0	0	10
Roong	0	0	5	0	0	5
Stieng	0	0	536	1	1,612	2,149
Tampuon	22,128	13	70	0	0	22,211
Thmaun	0	0	95	0	619	714
Others	84	5	22	3	7	121
Total	**64,037**	**3,270**	**19,229**	**4,903**	**9,845**	**101,284**

Source: National Institute of Statistics, National Population Census 1998.

69. According to the National Report on Demographic and Socio-economic Situation of Indigenous Peoples in Cambodia (2021), indigenous peoples in Cambodia have lower primary and secondary school enrolment rates and higher rates of late school enrolment and school dropouts. Approximately about one-third of Indigenous peoples can read and write Khmer, with men generally having a higher literacy rate than women. Nearly 50 percent of Indigenous children have never been enrolled in school and less than 50 percent are currently attending school. Among Indigenous peoples aged 15 and over, 87.1 percent were economically active, largely the same for men and women. However, the majority are working without pay (57.3 percent), in particular women (78.4 percent) who may be doing more domestic and unpaid duties. In terms of the economic sectors, the vast majority of Indigenous peoples aged 15 and over

are employed in agriculture (93.3 percent of the population), followed by the services sector (5.1 percent)[21].

70. **Education.** Indigenous people receive less education than the Cambodian majority due to lower school enrolment rates, late school enrolment, and school dropouts. Only about one-third of indigenous peoples can read and write Khmer (34.3% of the indigenous peoples aged seven years and over and 33.8% of the indigenous peoples aged 15 years and over), and men generally have a higher literacy rate than women. Nearly 50% of indigenous children have never been enrolled in school. Less than 50% are currently attending school (49.03% among the 6-13 age group and 43.56% among the 6-18 age group). Although dropouts are low among boys under the age of 14 and girls under the age of 15, dropouts begin to rise significantly between 14 and 15. Dropouts are the highest in the age group of 16-18. In addition, indigenous peoples are more likely to attend school at grades lower than their school age, which their late enrolment or grade repetition may cause. Among the indigenous population aged 15 and over, almost 66% did not attend a school or complete any educational degrees. In comparison, 24.1% attended only primary school (in total, 90% had little or no education). About 10% have at least completed lower secondary education, of which 4% have joined upper secondary education, and less than 1% have received a high school diploma. However, the data show that younger indigenous peoples have a better education rate than the older indigenous peoples, and men are more educated than women.

71. **Employment and Economic Situation.** Indigenous peoples have higher economically active and employment rates, and there is little difference between men and women. Among indigenous peoples aged 15 and over, 87.1% were economically active (86.6% were employed, and 0.5% were unemployed), and 12.9% were not economically active. The employment rate is 87.7% among men and 85.5% among women. According to different indigenous groups, the larger indigenous groups tend to have higher labor force participation rates, such as Tampuan, Pnong, Kreung, Preu, Kuy, Kraol, and Kavet. However, the majority of indigenous peoples work without pay (57.3%) and are self-employed (38%), with more men being self-employed (58.9%) and the majority of women working without pay (78.4%). In terms of the economic sectors, the vast majority of indigenous peoples aged 15 and over are employed in agriculture (93.3% of the population, 90.6% of men, and 95.9% of women), a few in the industry sector (total 1.6%, men 1.8%, and women 1.4%), and in the services sector (total 5.1%, men 7.6%, and women 2.8%).

72. Table 14 shows that the average headline wage for the majority ethnic group was KR1,146,430 for males and KR966,784 for females in 2019, resulting in a gender wage ratio of 84.33%. On the other hand, the minority ethnic group had a lower average headline wage, with males earning KR1,007,803 and females earning KR784,770, resulting in a lower gender wage ratio of 77.87%. This indicates that there is a notable wage gap between males and females in both ethnic groups, with the minority group experiencing a larger gap. The gender wage ratio for the minority group is notably lower than that of the majority group.

Table 14: Average Headline Wage and Gender Wage Ratio in 2019 (in Riels)

Item		Male	Female	Ratio
Region	**Urban**	1,309,749	1,065,725	81.37%
	Rural	974,759	846,859	86.88%
Ethnicity	**Majority group**	1,146,430	966,784	84.33%
	Minority group	1,007,803	784,770	77.87%
Language Skills	**No**	1,014,916	886,975	87.39%
	Yes	1,761,494	1,366,180	77.56%

[21] *National Report on Demographic and Socio-economic Situation of Indigenous Peoples in Cambodia, 2021.*

Source: Calculation from CSES 2019.

73. While the Project is not expected to negatively impact Indigenous peoples, it is important that these groups have equal access to project opportunities and benefits. If project activities take place in provinces where Indigenous groups live, special efforts should be made to consult with them and ensure that they can benefit from project activities. This could involve working with local indigenous organizations/communities to understand their needs and priorities relating to TVET and employment service, as well as identifying any barriers they may face in accessing TVET, such as linguistic and cultural barriers.

74. To ensure that the project is inclusive and benefits all members of society, the Project should engage with Indigenous organizations and other stakeholders at the national and local levels. This will enable the project to better understand the needs and priorities of Indigenous groups and ensure that project activities are designed and implemented in a way that benefits all members of society, including those from marginalized groups. It is also important to ensure that any benefits resulting from project activities are shared equitably, especially for those who may be marginalized or disadvantaged.

75. In particular, the Project should develop and implement communication and targeted outreach strategy to reach out to Indigenous peoples; and encourage their participation in the training programs and industry partnerships; and conduct training for TVET staff and industry partners on issues related to diversity and inclusion, including cultural sensitivity and social inclusion with Indigenous peoples. The project should also establish monitoring and evaluation mechanisms to track the participation of Indigenous peoples in the training programs and industry partnerships, and to identify and address any barriers or challenges they may face.

76. Overall, the project should pay adequate attention on the inclusion and meaningful participation of Indigenous Peoples in all aspects of the project, recognizing that they may face unique challenges and barriers to accessing training and employment opportunities. By working in partnership with Indigenous communities and organizations, the project can ensure that it is responsive to the needs and aspirations of Indigenous Peoples and supports the development of a more inclusive and sustainable TVET system in Cambodia.

5.5 **Peoples with disabilities**

77. According to the General Population Census of Cambodia of 2019 (GPCC), of the 689,532 individuals with a disability, 74.3 percent had some disabilities; 19.4 percent had moderate disabilities and 6.3 percent had severe disabilities ("cannot do at all")[22]. The disability rate for Cambodia increased as age increased, rising from 1.2 percent for the population aged 5-14 years to 25.6 percent for the population aged 60 years and above. A dramatic increase in the disability rate starts in the 15-34 years age group (1.4 percent), rising to 5.2 percent for the population aged 35-59 years and then increasing substantially (25.6 percent) among the population aged 60 and above. The majority of the population aged 15 years and over with any disability were currently married. This accounted about 68.6 percent, followed by those who were widowed (17.4 percent), divorced (3.9 percent) and separated (0.2 percent). However, there were proportionately more widowed, divorced and separated females than males in both urban and rural areas. See more details in the following tables and figures.

[22] *General Population Census of Cambodia of 2019 (GPCC).*

Table 15: Percentage distribution of population aged 5+ years by disability status, level, sex and area, Cambodia, 2019

Residence and Sex	Population Aged 5 + Years	Total	No Disability	Some Disability	Moderate Disability	Severe Disability
(1)	(2)	(3)	(4)	(5)	(6)	(7)
Total						
Both Sexes	14,102,052	100	95.1	3.7	0.9	0.3
Male	6,825,874	100	95.8	3.2	0.7	0.3
Female	7,276,178	100	94.5	4.2	1.0	0.3
Urban						
Both Sexes	5,622,870	100	95.7	3.2	0.7	0.3
Male	2,729,610	100	96.3	2.8	0.6	0.3
Female	2,893,260	100	95.2	3.6	0.8	0.3
Rural						
Both Sexes	8,479,182	100	94.7	4.0	1.0	0.3
Male	4,096,264	100	95.5	3.5	0.8	0.3
Female	4,382,918	100	94.0	4.6	1.1	0.3

Source: General Population Census of Cambodia of 2019 (GPCC).

Table 16: Percentage distribution of population aged 5+ years with disability by level, sex and area, Cambodia, 2019

Residence and Sex	People with Disability Aged 5 + Years	Total	Some Disability	Moderate Disability	Severe Disability
(1)	(2)	(3)	(4)	(5)	(6)
Total					
Both Sexes	689,532	100	74.3	19.4	6.3
Male	286,659	100	74.6	18.8	6.6
Female	402,873	100	74.2	19.7	6.1
Urban					
Both Sexes	239,135	100	74.3	18.4	7.4
Male	100,498	100	74.4	17.8	7.8
Female	138,637	100	74.2	18.8	7.0
Rural					
Both Sexes	450,397	100	74.3	19.9	5.8
Male	186,161	100	74.6	19.4	5.9
Female	264,236	100	74.1	20.2	5.7

Source: General Population Census of Cambodia of 2019 (GPCC).

Table 17: Distribution of population aged 5+ years with a disability by type and level of disability and area, Cambodia, 2019

Type and Level of Disability and Sex	Percentage		
	Total	Urban	Rural
(1)	(2)	(3)	(4)
Disability in Seeing (even wearing glasses)			
Total	100	100	100
No Disability	96.4	96.9	96.1
Some Disability	2.9	2.5	3.2
Moderate Disability	0.5	0.4	0.6
Severe Disability	0.1	0.1	0.1
Disability in Hearing (even using hearing aid)			
Total	100	100	100
No Disability	97.1	97.6	96.7
Some Disability	2.4	2.1	2.7
Moderate Disability	0.4	0.3	0.5
Severe Disability	0.1	0.1	0.1
Disability in Moving or Climbing the Stairs (walking)			

Total	100	100	100
No Disability	97.2	97.7	96.9
Some Disability	2.2	1.8	2.4
Moderate Disability	0.5	0.4	0.6
Severe Disability	0.1	0.1	0.1
Disability in Remembering or Concentrating			
Total	100	100	100
No Disability	97.2	97.7	96.8
Some Disability	2.2	1.9	2.5
Moderate Disability	0.4	0.3	0.5
Severe Disability	0.1	0.1	0.2
Disability in Self-Care (including washing and dressing)			
Total	100	100	100
No Disability	97.7	98.0	97.4
Some Disability	1.8	1.5	2.0
Moderate Disability	0.4	0.3	0.4
Severe Disability	0.1	0.1	0.1
Disability in Communication (such as understanding each other)			
Total	100	100	100
No Disability	97.7	98.1	97.4
Some Disability	1.8	1.5	2.0
Moderate Disability	0.4	0.3	0.4
Severe Disability	0.1	0.1	0.1

Source: General Population Census of Cambodia of 2019 (GPCC).

78. As in the general population, the Khmer literacy rate for disabled males was higher than disabled women. The rate of educational attainment within the disabled population was low. 55.7 percent of the disabled population reported that they had not completed primary school, whilst a small proportion of the disabled literate population (1.4 percent) had become literate without any formal education.

Table 18: Literacy rates of population aged 7+ years with any disability by level of disability, sex and area, Cambodia, 2019*

Area and Sex	Any Disability	Some Disability	Moderate Disability	Severe Disability
(1)	(2)	(3)	(4)	(5)
Cambodia	70.9	73.3	62.4	67.7
Urban	80.1	81.9	73.1	80.0
Rural	65.9	68.8	57.1	59.3
Male	80.7	83.0	73.9	74.7
Female	63.9	66.5	54.6	62.5

**Note*: *Excluding those for whom marital status was not reported.*

Source: General Population Census of Cambodia of 2019 (GPCC).

Table 19: The percentage of literate population with any disability aged 7+ years who had completed education by educational level, Cambodia 2019*

Residence	Any Disability	Some Disability	Major Disability	Severe Disability
(1)	(2)	(3)	(4)	(5)
Cambodia	100	100	100	100
None	1.4	1.4	1.3	1.9
Primary Not Completed	55.7	54.6	61.2	55.7
Primary	22.9	23.4	19.8	24.2
Lower Secondary	17.3	17.8	15.6	14.4
Secondary/ Diploma	1.4	1.5	1.2	2.1
Beyond Secondary	1.3	1.3	0.9	1.7

**Note*: *Excluding those for whom educational level and other variables were not reported.*

Source: General Population Census of Cambodia of 2019 (GPCC).

79. The percentage of the population with any disability who were employed was 52.9 percent. A higher proportion was reported among males (62.7 percent) than females (45.9 percent). The corresponding percentage of the general population who were employed was 61.2 percent which is higher than the rate for the population with any disability.

Table 20: Percentage distribution of population aged 5+ years with disability by usual activity status, sex and area, Cambodia, 2019

Activity Status, Sex and Area	Any Disability	Some Disability	Moderate Disability	Severe Disability
(1)	(2)	(3)	(4)	(5)
Cambodia				
Total	100	100	100	100
Employed	52.9	59.0	36.6	32.0
Unemployed	3.6	2.5	5.9	8.5
Inactive Population	43.5	38.5	57.5	59.5
Urban				
Total	100	100	100	100
Employed	45.7	50.8	31.5	29.3
Unemployed	4.9	2.6	9.8	16.1
Inactive Population	49.4	46.6	58.7	54.7
Rural				
Total	100	100	100	100
Employed	56.8	63.3	39.1	33.8
Unemployed	2.8	2.5	4.0	3.4
Inactive Population	40.4	34.2	56.9	62.8
Male				
Total	100	100	100	100
Employed	62.7	69.4	45.4	36.8
Unemployed	3.7	2.6	6.3	9.2
Inactive Population	33.5	28.0	48.3	54.0
Female				
Total	100	100	100	100
Employed	45.9	51.5	30.6	28.3
Unemployed	3.5	2.5	5.7	8.0
Inactive Population	50.6	46.0	63.7	63.7

Source: General Population Census of Cambodia of 2019 (GPCC).

80. The low literacy rates and educational attainment levels among the disabled population suggest that there is a need for inclusive education and vocational training programs to ensure that they have equal access to TVET opportunities. The Project could play an important role in promoting inclusive policies and practices in the TVET sector, including targeted outreach and recruitment strategies for people with disabilities, and efforts to eliminate discrimination against them in the workplace.

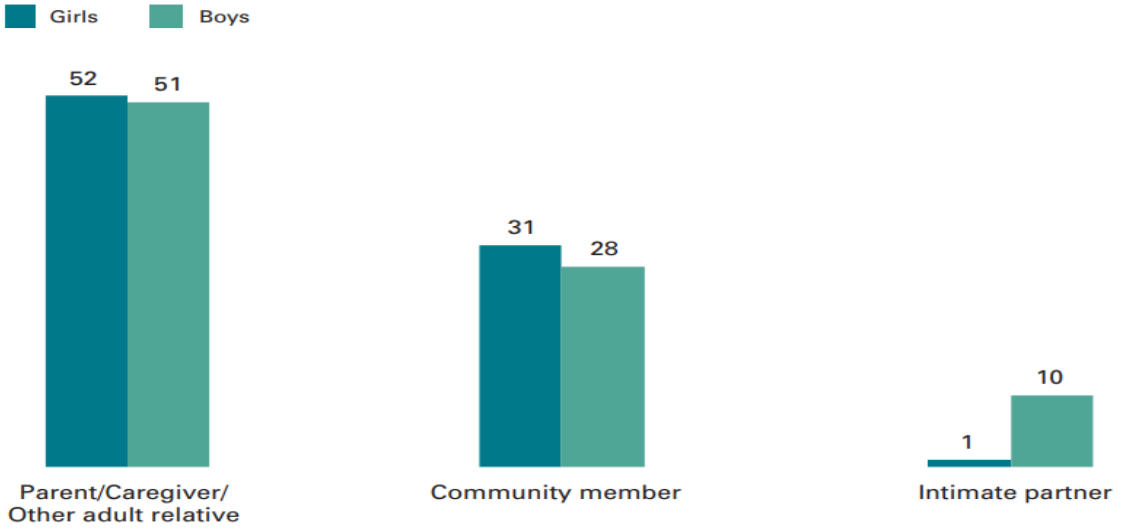
81. The project should develop and implement a communication and outreach strategy that specifically targets people with disabilities, and encourages their participation in the training programs and industry partnerships. This could involve providing special accommodations and support services, such as sign language interpretation, Braille materials, and assistive technology, to ensure that they can fully participate in the program. In addition, the Project should conduct training for TVET staff and industry partners on issues related to diversity and inclusion, including accessibility for people with disabilities. This will help to create a more welcoming and supportive environment for people with disabilities in the TVET system and the workplace. In the process of constructing, rehabilitating or renovating TVET training institutions or JCs, it is essential to ensure compliance with relevant accessibility standards for public buildings. This will help to ensure that these institutions are fully accessible to people with disabilities and that they are not excluded from the benefits of the project due to physical barriers.

82. Moreover, the project should also establish monitoring and evaluation mechanisms to track the participation of people with disabilities in the training programs and industry partnerships, and to identify and address any barriers or challenges they may face. This will enable the project to make necessary adjustments to ensure that people with disabilities are fully included and benefiting from the project.

5.6 **Violence against Children (VAC)**

83. According to the Cambodia Violence Against Children Survey (CVAS, 2013), 53 per cent of females and 54 per cent of males aged 18–24 reported at least one incident of physical violence prior to age 18. A The experience of violence in childhood is commonplace in Cambodia. In 2015, the estimated homicide rate among children aged 0–19 years was 1 per 100,000. Both the Violence Against Children Survey and the Cambodia Demographic and Health Survey (CDHS) suggest that the majority of perpetrators of violence against children are known to victims and come from their own families (parents) or communities (mostly teachers).

Figure 12: Percentage of adolescents aged 13–17 years who experienced any physical violence, by sex and by perpetrators of the first incident of physical violence



Source: CVAS, 2013

84. While the risk of violence against children in the Project is expected to be low, there are still potential risks that need to be addressed, particularly the possibility of perpetrators being family members or community members who have contact with children aged 15-17 participating in TVET programs. While violence in the home is outside the project scope, the Project should develop proper strategies to prevent and respond to violence against children, including providing support and resources for victims, and raising awareness among TVET staff and industry partners.

5.7 **Gender-based violence**

85. For the Project, potential risks of sexual exploitation and abuse (SEA), sexual harassment (SH), and gender-based violence (GBV) should be identified and mitigated during project design and implemented. The presence of outside workers at each subproject runs risks of SEA) and SH both to the local population and to camp followers.

86. Girls were reported to more likely than boys to experience physical, emotional and sexual violence. Compared to boys, girls were found to have more exposure to experienced sexual violence conducted by their friends, neighbours, romantic partners, and strangers. The widespread of gender-

based violence could be attributed to the attitude toward wife-beating. According to the 2014 Cambodia Demographic and Health Survey (CDHS), 50% of women and 27% of men aged 15-49 were reported to have agreement the justification of wife-beating if wives failed to fulfill responsibilities such as neglecting the children, refusing to have sex, and having arguments with their husbands[23]. The role of alcohol in contributing to violence is very strong in both urban and rural settings. It was also reported that that people did not consider power imbalance between men and women as the root course of domestic violence.

87. The small-scale labor influx expected with the new construction activities under the Project may pose GBV risks. However, as small-scale works are likely to be undertaken by local contractors and workers, the project expects the GBV risk to be low. The Project will support the rehabilitation of training facilities and dormitories in selected TIs and JCs. These efforts aim to provide safe and secure accommodation for trainees, especially for those who are vulnerable to exploitation or abuse. Dormitories will be separated by gender, and the project expects the risk of SEA/SH and GBV to remain low based on country experience.

88. The project activities and venues that may generate SEA/SH risks, such as skills training, job counselling services, and employment, will primarily take place in urban areas (the capital city and other urban centers) that are easy to reach and monitor. Moreover, the project areas have an established national referral pathway protocol for gender-based violence (GBV) service provision. Existing mechanisms are in place for trainees, trainers, and workers to report instances of violence that may occur at the TIs and JCs or be caused by someone from outside the training venues. Moreover, measures and instruments, including GBV measures, will be prepared and implemented to mitigate these risks in accordance with relevant ESSs of World Bank. Therefore, at the concept stage, the risk of SEA and SH is assessed as low in Cambodia.

89. Nevertheless, it is still crucial for the Project to adopt a gender-sensitive approach to program design and implementation in order to mitigate these risks. This approach could involve ensuring that all training and employment opportunities are accessible and welcoming to women and girls, as well as implementing measures to prevent and respond to GBV. Additionally, PMU's consultants to be recruited under Component 4 should provide training to program staff and participants on gender equality and women's rights, to help to create a safe and supportive environment for all individuals involved in the project.

90. Moreover, working with local organizations and communities will be vital to raising awareness about GBV and its impact on women and girls, and to promoting gender equality in all aspects of the project. This collaborative effort can involve engaging with community leaders and women's groups to identify and address the specific needs and challenges faced by women and girls in accessing training and employment opportunities. The E&S focal person and consultants of PMU can also work with local organizations to provide counselling and support services to survivors (if any) of GBV and to strengthen referral systems to ensure that survivors receive the care they need.

91. Finally, project level monitoring and evaluation will be conducted to ensuring that measures under Project to prevent and respond to GBV in selected TIs and JCs are effective. The project should establish a monitoring and evaluation framework that includes gender-disaggregated data collection and analysis, regular stakeholder consultations, and feedback mechanisms for program participants. This will enable the project team to identify any emerging risks or challenges, and to make adjustments to program

[23] https://dhsprogram.com/pubs/pdf/fr312/fr312.pdf

design and implementation as necessary to ensure that the project remains gender-sensitive and responsive to the needs of all participants.

5.8 **Training Facilities Construction/Rehabilitation/renovation and civil works-related risks**

92. The project will not involve large-scale civil works outside of compound of existing TIs and JCs. The civil works associated with this project will mainly involve new construction, rehabilitation and renovation of TVET training facilities within existing compounds. Therefore, no involuntary resettlement is necessary, and no land acquisition will occur.

93. ***Small-scale labor influx.*** Project contractors of new constructions and rehabilitation/renovation works in existing compounds of TIs and JCs are likely to bring their own staff, such as project managers, technicians and skilled workers with a small scale, for the civil works. This labor influx might lead to:

- Potential social conflicts with local people due to construction disturbance;
- Increased health risks, including contracting communicable diseases such as COVID-19, and HIV/AIDS and other STDs; and
- Increased risk of traffic accidents, particularly for those living in the vicinity of the civil works and those who travel near the construction areas.

94. ***Child Labor and Forced Labor.***Although the national Labor Law sets the minimum working age at 15 years old, ESS2 stipulates the minimum working age at 18 except under very specific conditions. The minimum age for workers in this project is to be 18. Therefore, there is a risk of contractors engaging children under the age of 18, mostly as unskilled workers.

95. Forced or compulsory labor is forbidden under both national law and ESS2. Hiring people to work off their debts, a practice sometimes found in Cambodia, is considered forced labor, and is forbidden under this project, along with all other forms of forced or compulsory labor.

96. Local people, recruited as unskilled workers by project contractors, may not be offered a written working contract. As a result, there is a possibility that they may be underpaid for the nature, scope, and quantity of work that they undertake.

97. ***Occupational Health and Safety (OHS).*** Another social risk associated with the project is occupational health and safety (OHS) in workplaces and venues where trained job seekers are employed and during training sessions. Relevant measures will be taken to ensure that these workplaces are safe for employees and trainees, and that appropriate OHS measures are in place to prevent accidents and injuries.

98. Workers may also be asked to work under conditions that are hazardous to them, such as working without personal protective equipment as required for such work. Worker camps may not have adequate sanitation, clean water, or other facilities.

5.9 **Grievance redress mechanism (GRM)**

99. All stakeholders should be clearly informed how to file a complaint should they be negatively affected by the project.

100. Effective Grievance Redress Mechanisms (GRMs) are essential for addressing complaints and concerns of project-affected people. In the context of TVET, it is important to establish a GRM that is accessible to all stakeholders, including trainees, trainers, and industry partners. The project should ensure that contact information for the GRM is clearly communicated to all stakeholders, including through TVET training institutions and the project management team. The GRM should include multiple channels for filing complaints, such as a dedicated phone line, email address, and online portal. The

project should also ensure that focal persons are designated to handle complaints related to environmental and social issues, and that they are trained in handling and resolving complaints effectively.

101. Regular monitoring and evaluation of the GRM should be conducted to ensure that it is effective and responsive to the needs of all stakeholders. Any identified gaps or challenges in the GRM should be addressed promptly to ensure that it remains an effective tool for addressing complaints and grievances throughout the project lifecycle.

6. Key mitigation measures and recommendations

102. To address the key social issues in relation to the TVET and job information and orientation service, series of recommendations should be considered as summarized in the table below.

Table 21: Key mitigation measures and recommendations to be incorporated into the ESMF

Impacts/Issues/risks	Recommended Mitigation Measures
Limited opportunities for participation of indigenous peoples	Develop and implement communication and targeted outreach strategy to reach out to indigenous peoples and encourage their participation in the training programs and industry partnerships; Conduct training for TVET staff and industry partners on issues related to diversity and inclusion, including cultural sensitivity of indigenous peoples; Establish monitoring and evaluation mechanisms to track the participation of indigenous peoples in the training programs and industry partnerships, and to identify and address any barriers or challenges they may face.
Limited opportunities for participation of people with disabilities	Develop and implement communication and targeted outreach strategy to reach out to people with disabilities and encourage their participation in the training programs and industry partnerships; Provide special accommodations and/or support services, where appropriate, such as sign language interpretation, Braille materials, and assistive technology, to ensure that people with disabilities can participate in the training programs and industry partnerships; Conduct training for TVET staff and industry partners on issues related to diversity and inclusion, including accessibility for people with disabilities; Ensure compliance with relevant accessibility standards for public buildings in the process of constructing, rehabilitating or renovating TVET training institutions or JCs; Establish monitoring and evaluation mechanisms to track the participation of people with disabilities in the training programs and industry partnerships, and to identify and address any barriers or challenges they may face.
Limited opportunities for women to participate in and benefit from project activities	Gender-responsive program design: Ensure that project activities are designed to be inclusive and responsive to the needs and priorities of women. This could involve targeted outreach and engagement strategies to encourage women's participation in training and industry partnerships; Gender-sensitive training and curriculum development: Ensure that training programs and curricula are gender-sensitive and incorporate topics relevant to women's economic empowerment, such as entrepreneurship, leadership, and financial management; Women's economic empowerment initiatives: Incorporate initiatives to promote women's economic empowerment, such as mentoring and networking programs, access to finance and markets, and support for women-owned businesses; and Gender mainstreaming in industry partnerships: Ensure that industry partnerships are inclusive and equitable, and provide opportunities for women's participation and leadership. This could involve setting targets

	for women's participation and monitoring progress towards achieving these targets.
Gender-based violence (GBV)	Explicitly prohibiting and addressing gender-based violence and discrimination; Providing training and education for staff, employees, and community members on gender-based violence and discrimination; Establishing reporting mechanisms that allow for anonymous and confidential reporting of gender-based violence and discrimination; and Ensuring there is access to support services, such as counselling and legal aid, for survivors of gender-based violence and discrimination.
Occupational health and safety (OHS) risks for workers in the training institutions and industries	Developing and implementing comprehensive OHS policies and procedures for all project activities, including training institutions and industry partnerships; Providing OHS training to all workers, including teachers, trainers, and industry personnel, to ensure that they are aware of the risks and how to minimize them; Conducting regular OHS assessments and inspections to identify hazards and ensure compliance with regulations and best practices. Providing appropriate protective equipment and ensuring that it is used properly in accordance with international best practices, including hard hats, masks, safety glasses, gloves, harnesses, and safety boots as necessary as well as masks and hand sanitizer or soap and water to prevent the spread of COVID-19, in accordance with guidelines from the Ministry of Health and the World Health Organization; Establishing a reporting system for OHS incidents and near misses, and ensuring that they are investigated and addressed promptly; and Encouraging the adoption of safer technologies and processes in the target industries and supporting their transition towards more sustainable and safer practices. Provide adequate worker accommodation with proper sanitation, hygiene, and housekeeping facilities; Clearly post signs at the worksite informing workers of key rules and regulations that must be followed; Educate workers, trainees, and staff at TIs and JCs on the worksite and COVID-19.
Lack of meaningful consultation/citizen engagement	Ensure that project information and documentation are easily accessible and disseminated to all stakeholders in a timely and transparent manner; Conduct regular focus group discussions or public consultation meetings to gather feedback and input from stakeholders on project activities and plans; Ensure the grievance redress mechanism functional to address any concerns or complaints raised by stakeholders; and Provide financial support and technical assistance and capacity building support to the implementing agencies to strengthen their capacity to implement SEP effectively.
Compliance with Environmental and Social mitigation measures	Appointment of environmental and social officers to oversee compliance with the ESMP/ESCoP and facilitate stakeholder engagement;

	Regular monitoring and reporting of environmental and social impacts, as well as the implementation of mitigation measures, to relevant authorities and stakeholders; Implementation of training programs for construction workers on environmental and social issues, and the importance of compliance with mitigation measures; Ensure funds for Environmental and Social mitigation measures are disbursed in a timely and fully manner; Conduct regular audits and assessments to ensure the project's compliance with environmental and social regulations, and take corrective action if necessary; and Establish an effective grievance mechanism to receive, investigate, and resolve complaints related to the project's environmental and social impacts.
Community Health and Safety of neighbouring residents	The local community will be notified of the works through appropriate notification in the media and/or at publicly accessible sites (including the site of the works); All work will be carried out in a safe and disciplined manner designed to minimize impacts on neighboring residents and the environment; Safety signs will be prominently displayed, and active workplaces/construction sites will be fenced off; Children will not be allowed within the construction area of the worker's camp; Explicit signs will be installed to forbid children from playing at the construction sites.
Direct or indirect hazards to public traffic and pedestrians	Implementation of comprehensive traffic management measures, including clear signposting, warning signs, barriers, and traffic diversions, to ensure the site is visible and potential hazards are identified to the public; Provision of safe and convenient passages for pedestrians, including safe crossings where construction traffic interferes, to reduce the risk of accidents; Adjustment of working hours to local traffic patterns, such as avoiding major transport activities during rush hours, to minimize disruption to traffic flow and reduce congestion; Active traffic management by trained and visible staff at the site, if required, to ensure safe and convenient passage for students and the public; Ensuring safe and continuous access to buildings of training institutions, JCs, office facilities, shops, and residences, if they remain open to the public, by implementing appropriate traffic management measures.

APPENDIX 4 – E-Waste Management Plan

1. Background

1. Cambodia Skills for Better Jobs Project funded by World Bank to Ministry of Labor and Vocational Training. The proposed project will focus on delivering quality skills that are in demand by industry to respond to the challenges faced in developing skills among the workforce. The proposed project will comprise four components: (a) skilling-up to respond to industry needs; and (b) information and orientation for better jobs; (c) project managements; and (d) Contingent Emergency Response Component (CERC).

Component 1 – Skilling-Up to Respond to Industry Needs.

2. The objective of this component is to provide incentives and strengthen capacity to expand and improve effective collaboration between training providers and industry. T

3. **Sub-component 1.1 – Sector-wide improvements in industry engagement and quality – in select sectors.** The sub-component will: (a) provide TA to strengthen SSCs in their role as facilitators of effective collaboration between industry and training institutions; (b) conduct information campaigns and build capacity among staff of TVET providers and industry on establishing effective partnerships; and (c) to curriculum development by modernizing and developing curricula and standard training packages for priority occupations in the target sectors as well as for basic 21st century skills.

4. **Sub-component 1.2 – Improvements in industry engagement and quality in select training institutions**. This sub-component will finance: (a) TA to establish ISCs; (b) TA to support the training institution and firms to develop, implement, and monitor ILDPs; (c) Implementation ILDPs – which include: (c1) civil works in some cases, (c2) equipment; (c3) incentives for various forms of industry partnerships, e.g. joint curriculum development, guest lecturers from industry, for teachers to train from industry, and for internships.

Component 2 – Information and Orientation for Better Jobs.

5. **Sub-Component 2.1 – Labor market information system (LMIS). This sub-component will finance:** (a) TA to develop an LMIS roadmap, (b) preparation, implementation, and analysis of labor market surveys; (d) TA to training institutions on the TVET MIS; and (e) IT systems. The latter would be carefully reviewed to minimize duplication and ensure sustainability.

6. **Sub-Component 2.2 – Job search support and career orientation.** This sub-component will finance: (a) TA to revise and strengthen career guidance and job counselling and conduct Training of Trainers (ToT) for Government staff to provide the counselling; and (b) possible rehabilitation of select JCs, including renovations to seven JCs with upgrades to equipment and the purchase of five mobile JCs.

7. **Component 3 - Enhancing industry's capacity for EESD and expanding access to quality and relevant training**. This would support the expansion of demand-driven training and new forms of training. Access to quality and relevant training can be increased by providing financing to a broad range of providers that are able to deliver training that benefits from strong employer engagement. This includes the training institutions, other actors including public and private training providers, as well as employers and employer associations. This component would complement sub-component 1.2 in two ways: (a) Build capacity of industry associations that can play an important role in sector skills councils (SSCs); and (b) allow the expansion of training options, including through private training providers, employers, and industry associations.

8. **Component 4 –Project Management, Monitoring and Evaluation.** This component aims to support project implementation and management, capacity building, monitoring and evaluation, and citizen engagement.

9. **Component 5 – Contingent Emergency Response Component (CERC).** This component is designed to provide swift response in an event of an Eligible Crisis or Emergency[24], by enabling RGC to request the World Bank to re-allocate uncommitted project funds to support emergency response and reconstruction.

10. Through upgrading ICT of some learning facilities, JCs, and LMIS, there are potential risks related to disposal/recycling of package and electronic waste. Therefore, this e-waste management guideline/plan is prepared to manage and minimize the anticipated impact caused by e-wastes.

2. National Policy of Waste Management

Relevant National Policy

11. One of the core areas, however, mentioned in the Policy platform of the Royal Government of Cambodia of the Fifth Legislature of the National Assembly (Sept. 2013) noticeably addresses that "Increasing environmental control and reducing pollution including: the management of solid waste, hazardous substances, air quality monitoring and quality improvement, monitoring and prevention of land and water pollution, including noise and visual pollution". It actually can be interpreted as the policy tool covering Waste Electronic and Electrical Equipment (WEEE), where WEEE is so-called hazardous waste referred to the Sub-decree on Solid Waste Management (1999).

Relevant National Law and Legislations

12. Cambodia has a specific legislation for managing Waste Electronic and Electrical Equipment (WEEE) on 01 February 2016 – that is the "Sub-decree on WEEE Management". The Sub-decree aims to manage WEEE through minimizing and intercepting negative impacts to the environment and human health, as well as to promote local socio-economy. On the other hand, the "Technical Guideline on the Environmental Sound Management of WEEE in Cambodia" is identified the implementing tool to accomplish targets of the stipulations of the Sub-decree based on the environmentally sound management.

13. As observing, before 01 February 2016 while Cambodia did not have the above captioned Sub-decree, there are several relevant legislations may be implemented to managing WEEE including such as: Law on Environmental Protection and Natural Resources Management (1996); Law on Labor (1997); Law on Water Resources Management in the Kingdom of Cambodia (2007); Law on Land Traffic (2007); Law on Cambodia Standard (2007); Sub-decree on Solid Waste Management (1999); Sub-decree on Water Pollution Control (1999); Sub-decree on Environmental Impact Assessment (1999); Sub-decree on Air Pollution and Noise Disturbance, etc. Noticeably, the Sub-decree on Solid Waste Management plays crucial roles implicating the WEEE management.

14. Out of local and global impacts resulted from various types of toxic and hazardous substances/wastes movement and disposal. Cambodia has signed the Convention on March 2, 2001. Refer to some articles of the Basel Convention; it considers managing hazardous wastes in both produced

[24] "Eligible Crisis or Emergency" is defined as "an event that has caused, or is likely to imminently cause, a major adverse economic and/or social impact associated with natural or man-made crises or disasters", Paragraph 12, Bank Policy: Investment Project Financing, Projects in Situations of Urgent Need of Assistance or Capacity Constraints. It may include extreme climate event (e.g. flood), nature disasters (e.g. earthquake), public health emergency (e.g. COVID-19), and any natural disaster or man-made crisis.

countries and received countries for different causes in environmental safety and also during transportation as indicating in article 4, 6, 11, 12, and article 13 of the convention. Many kinds chemical and hazardous wastes are stipulated in Annex-1 of the Basel Convention, these must be strictly monitored and control in storing, managing and disposing illegally.

International Treaty

15. The "Basel Convention on Control of Transboundary Movements of Hazardous Wastes and their Disposal" (1989) seeks to ensure environmentally sound management of hazardous waste and to reduce the release of toxic substances from poorly managed waste disposal. It is the international convention, which aims at reducing and phasing out of local and global impacts resulted from various types of toxic and hazardous substances/wastes movement and disposal. Cambodia has signed the Convention on March 2, 2001. Refer to some articles of the Basel Convention; it considers managing hazardous wastes in both produced countries and received countries for different causes in environmental safety and also during transportation as indicating in article 4, 6, 11, 12, and article 13 of the convention. Many kinds chemical and hazardous wastes are stipulated in Annex-1 of the Basel Convention, these must be strictly monitored and control in storing, managing and disposing illegally.

The World Bank ESF related to e-waste

16. Based on environmental and social screening, seven ESSs are applicable to the Project1, specifically among which:

ESS 1 Assessment and Management of Environmental and Social Risks and Impacts requires the borrower to carry out environmental and social risks and impacts assessment, and develop mitigation measures to avoid, minimize, mitigate or otherwise compensate the anticipated impacts. Following the ESS1 requirement, the potential environmental risks of e-waste generation from office equipment procurement is identified, and the development of an e-waste management plan is committed by PMU in the ESCP;

ESS3 Resource Efficiency and Pollution Prevention and Management requires the borrower to apply technically and financially feasible pollution prevention measures proportionate to the risks and impacts levels associated with Project and consistent with World Bank Group Environment, Health and Safety Guidelines (EHSGs) and Good International Industrial Practice (GIIP). The World Bank Group EHSGs provides guidelines on general solid waste and hazardous waste management measures, as well as health and safety measures related to waste management. This e-waste management plan was disclosed on June 8, 2023 and redisclosed in end June after public consultation on June 23, 2023.

3. Brief history and current e-waste management in Cambodia

17. Many kinds of used products, especially electronic and electric equipment are popularly consumed at all hands in the Kingdom of Cambodia due to affordability of people's consumption. The Government recognizes Cambodians still live below the poverty line – that is necessary to allow such used electronic and electric equipment (UEEE) are imported and sold in Cambodia to meet needs of the poor.

18. Less consideration and un-controlling of using quality of imported UEEE – it is a major concern so far. It means imported used electronic and electric equipment are neither checked nor controlled for consuming quality, and obviously some of them have either lower quality or were become wastes prior to import into Cambodia.

19. Both types of recyclable waste electronic and electric equipment (WEEE) or un-functioning electronic and electric equipment generating by different sources, e.g. households, repairing and

dismantling shops and others, are commonly disposed in dustbins, opened areas and dumpsites afterward together domestic/urban wastes, which cause to impact to the environment and human health, especially occupational health to those are engaged these wastes as e-waste is considered hazardous waste. Serious impacts, on the other hand, may occur at dumpsite areas surrounding when such WEEE and other hazardous wastes were burnt or self-fired via releasing toxic emission into the atmosphere, or leachate containing hazardous substances, which contributes to atmospheric pollution, acid rain, etc.

20. Even though, Cambodia does not have recycling facilities or certificated disposal site for e-wastes; the Ministry of Environment (MoE) is partnering with a private company namely "Ecobatt Energy Cambodia" to organise the safe collection of electrical waste, or e-waste from offices and public and private institutions for export to foreign recycling plants[25].

21. The MoE will issue notification letters to several target institutions in the near future. E-waste will be added to household garbage collection services in the second phase of the trial, recognising that many households generate considerable amounts of e-waste[26].

4. Electronic Waste: Potential Impacts and Proposed Management

22. E-waste poses a significant threat to human health. This may include birth defects, infant mortality, blood diseases, malfunctioning of organs and immune system anomalies (ILO report, 2012). On the other hand, there is evidence that the improper treatment of this waste has a negative impact on the environment and the public health of both the workers exposed and the population living nearby. Different types of e-waste bring different degrees of damage. For example, the treatment of electric cables, that does not have an intrinsic hazardous character (except for cables containing heavy metals), has a primary damage on human health (due to the dioxins released during the uncontrolled combustion of the coating rubber) and a secondary damage on the environment. The Hazardous contents in the electronic equipment include Lead, Brominated Flame Retardants, Chromium, Mercury, Beryllium, Cadmium, Barium, Carbon Black, and Phosphor.

23. Table below shows hazardous elements contained in electrical and electronic equipment.

Table 1: Substances in Waste Electronic and Electrical Equipment

Substance	Occurrence in e-wastes
Halogenated compounds	
PCB (polychlorinatedbiphenyls)	Condensers, Transformers
TBBA (tetrabromo-bisphenol-A) PBB (polybrominated biphenyls) PBDE (polybrominated diphenyl ethers)	Fire retardants for plastics (thermoplastic components, cable insulation) TBBA is presently the most widely used flame retardant in printed wiring boards and casings.
Chlorofluorocarbon (CFC)	Cooling unit, Insulation foam
PVC (polyvinyl chloride)	Cable insulation
Heavy metals and other metals	
Arsenic	Small quantities in the form of gallium arsenide within light emitting diodes
Barium	Getters in CRT
Beryllium	Power supply boxes which contain silicon controlled rectifiers and x-ray lenses
Cadmium	Rechargeable NiCd-batteries, fluorescent layer (CRT screens), printer inks and toners, photocopying-machines (printer drums)
Chromium VI	Data tapes, floppy-disks

[25] https://phnompenhpost.com/national/seven-tonnes-e-waste-prepped-export-foreign-recycling-plants
[26] https://www.phnompenhpost.com/national/environment-ministry-set-trial-e-waste-collection

Lead	CRT screens, batteries, printed
Lithium	Li-batteries
Mercury	Fluorescent lamps that provide backlighting in LCDs, in some alkaline batteries and mercury wetted switches
Rare Earth elements (Yttrium, Europium)	Fluorescent layer (CRT-screen)
Selenium	Older photocopying-machines (photo drums)
Zinc sulphide	Interior of CRT screens, mixed with rare earth metals
Others	
Toner Dust	Toner cartridges for laser printers / copiers
Radio-active substances Americium	Fire detectors, active sensing element in smoke detectors

24. Regarding the impacts on the environment, e-waste treatment produces leachates, particle matters, ashes and effluents that contribute to the loss of agriculture land fertility, the pollution of soils, of surface waters, of the air and, on the long term, of ground waters. Considering that the sector brings a non-negligible financial resource to local residents, there is an urgent need to adopt flexible methods to ensure, as much as possible, the separation between the hazardous and non-hazardous components and to apply modern and safe treatment processes. Another issue is the gap of knowledge about the source, the amount, the processing and end points, which makes the tracking and the quality/ quantity/type monitoring of this type of waste difficult to achieve.

The Negative Effects on Air

25. Air pollution occurs when e-waste is informally disposed by dismantling, burning, shredding or melting the materials, releasing dust particles or toxins, such as dioxins, into the environment that cause air pollution and damage respiratory health. E-waste of little value is often burned, but burning also serves a way to get valuable metal from electronics, like copper. Chronic diseases and cancers are at a higher risk to occur when burning e-waste because it also releases fine particles, which can travel thousands of miles, creating numerous negative health risks to humans and animals. Higher value materials, such as gold and silver, are often removed from highly integrated electronics by using acids, desoldering, and other chemicals, which also release fumes in areas where recycling is not regulated properly. The negative effects on air from informal e-waste recycling are most dangerous for those who handle this waste, but the pollution can extend thousands of miles away from recycling sites.

26. The air pollution caused by e-waste impacts some animal species more than others, which may be endangering these species and the biodiversity of certain regions that are chronically polluted. Over time, air pollution can hurt water quality, soil and plant species, creating irreversible damage in ecosystems. For instance, an informal recycling hub in Guiyu, China that was formed by parties interesting in extracting valuable metals from e-waste, and subsequently has caused the region to have extremely high lead levels in the air, which are inhaled and then ingested when returned to water and soil. This can cause disproportionate neurological damage to larger animals, wildlife and humans in the area.

The Negative Effects on Soil

27. When improper disposal of e-waste in regular landfills or in places where it is dumped illegally, both heavy metals and flame retardants can seep directly from the e-waste into the soil, causing contamination of underlying groundwater or contamination of crops that may be planted nearby or in the area in the future. When the soil is contaminated by heavy metals, the crops become vulnerable to absorbing these toxins, which can cause many illnesses and doesn't allow the farmland to be as productive as possible.

28. When large particles are released from burning, shredding or dismantling e-waste, they quickly re-deposit to the ground and contaminate the soil as well, due to their size and weight. The amount of soil contaminated depends on a range of factors including temperature, soil type, pH levels and soil composition. These pollutants can remain in the soil for a long period of time and can be harmful to microorganisms in the soil and plants. Ultimately, animals and wildlife relying on nature for survival will end up consuming affected plants, causing internal health problems.

The Negative Effects on Water

29. After soil contamination, heavy metals from e-waste, such as mercury, lithium, lead and barium, then leak through the earth even further to reach groundwater. When these heavy metals reach groundwater, they eventually make their way into ponds, streams, rivers and lakes. Through these pathways, acidification and toxification are created in the water, which is unsafe for animals, plants and communities even if they are miles away from a recycling site. Clean drinking water becomes problematic to find. Acidification can kill marine and freshwater organisms, disturb biodiversity and harm ecosystems. If acidification is present in water supplies, it can damage ecosystems to the point where recovery is questionable, if not impossible.

The Negative Effects on Humans

30. As mentioned, electronic waste contains toxic components that are dangerous to human health such as mercury, lead, cadmium, polybrominated flame retardants, barium and lithium. The negative health effects of these toxins on humans include brain, heart, liver, kidney and skeletal system damage. It can also considerably affect the nervous and reproductive systems of the human body, leading to disease and birth defects.

31. E-waste management procedures shall be adopted at all stages of phases and will follow and comply with the ESS 3 of the Environmental and Social Framework of the World Bank, all national regulations, the World Bank EHSGs and relevant GIIP. This will cover electrical and telecommunication waste, that could occur during the upgrade or renewal of computer installations and infrastructure, as well as during operation and replacement of electrical equipment (computers, servers, cables, etc.) and the equipment end of life. This will cover electrical and telecommunication waste, that could occur during the upgrade or renewal of computer installations and infrastructure, as well as during operation and replacement of electrical equipment (computers, servers, cables, etc.) and the equipment end of life. The project will designate a room/area for temporary sorting and storage of e-waste prior to delivery to certified recycling facility or to certified disposal site. These will be followed by regular monitoring and reporting to gather information on the types of waste collected and recycled. There will be training and education programs through workshops, seminars, educational materials, etc. to raise awareness of all stakeholders and staff to ensure that the operation follows applicable regulations and standards. For new ICT equipment supplies, the project will set up an arrangement with the contractors to receive back e-waste for their supplies. For replaced ICT equipment, the project will ensure that they are disposed of through certified recycling facility or to a certified recycler.

E-waste Inventory for the Project

32. The Project and the PMU will purchase some ICT equipment for the LMIS as well as select TIs and JCs. The ICT equipment would include computers, and other facilities, desktop computers, laptops, software to accommodate learning, data projectors, tablets, smart TVs, speakers, scanners, printers, data storage and backup facilities, networking and connecting (LAN/VAN), thumb drives, webcams, headsets to support components of the Project. ICT equipment would become E-waste after the end of their effective lifetime and all this electrical and electronic waste (e-waste) will have to be disposed of for

recycling, reuse or final disposal in an environmentally appropriate manner. Table below provides list of possible ICT equipment to be purchased for the Project.

Procured inventory of ICTs

No	Items	Quantity

5. E-Waste Management Procedures

33. The Project Management Unit (PMU) with the technical support from E&S consultants will be responsible for planning, supervision, training/capacity building, coordination, monitoring and reporting of this E-waste management plan. The E&S focal person, line ministries and statistical centres at the provincial level will be responsible for implementation and regular reporting of this E-waste management plan to PMU. The client with the ICT equipment supplier will establish toxic and hazardous wastes (include e-waste) management procedures include collection of damaged and expired ICT equipment, separation, recycling, storage, transport and dispose of the residual parts at the designated site. Considerations of toxic and hazardous wastes (including e-waste) management procedures will be incorporated in the procurement documents and contract of the ICT equipment suppliers.

Inventory Register of the ICT Equipment

34. Once the ICT equipment is procured, PMU shall establish an electronic equipment inventory, with detailed information of equipment name, model, serial number, assigned user, location of use. This registration shall be co-signed by the PMU inventory staff and the user and be kept as part of the PMU archive.

Tracking Use of ICT Equipment for the project

35. PMU shall keep tracking the use of these equipment on an annually basis to update the current users, locations and any malfunction.

36. E-waste contains many valuable, recoverable materials such as aluminum, copper, gold, silver, plastics, and ferrous metals. In order to conserve natural resources and the energy needed to produce new electronic equipment from virgin resources, electronic equipment can be refurbished, reused, and recycled instead of being landfilled.

37. The Project will apply the waste management hierarchy, where the first priority is to avoid the generation of e-waste (in particular hazardous e-waste), followed by waste minimization, reuse/recycling/recovering; and if the e-waste cannot be reused, recycled or recovered, the e-waste will be disposed of in an environmentally sound and safe manner.

38. The development and implementation of e-waste management will be initiated by the PMU/TVET/MoE in cooperation with one or two TVETs through a pilot project, which will then serve as a learning ground for full-scale implementation.

39. In the development of the e-waste management plan, the Project will take into consideration uncertainties on how well potential e-waste recycling companies manage waste, emissions and health and safety; and the current general lack of environmentally safe disposal sites for hazardous waste.

Avoidance and minimization of e-waste

1. Develop and implement a procurement policy for electrical and electronic equipment that:
    a. requires products to be in compliance with EU Directive 2002/95/EC on the restriction of the use of certain hazardous substances in electrical and electronic equipment. With certain exemptions, this EU directive requires that new electrical and electronic equipment put on the market does not contain lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls (PBB) or polybrominated diphenyl ethers (PBDE).
    b. requires products to be in compliance with EU Directive 2009/125/EC on establishing a framework for setting of eco-design requirements for energy-related products. To be considered, the product should have the CE marking as required by the Directive, whereby the manufacturer or its authorised representative ensures and declares that the product complies with all relevant provisions of the applicable implementing measure of the Directive.
2. Appoint an officer responsible for determining when an electrical or electronic equipment has reached its end-of-life.
3. Develop methods to extend the life of electrical or electronic equipment. This could include handing over to other users. This should include a procedure to check if the equipment could be used in another department, training institute or job centre – or handed over to students for use at their home/accommodation. Electronic equipment that has been handed over should be tacked so that once the end-of-life has been reached, the equipment will be recycled/disposed of appropriately.
4. Purchase printer cartridges from suppliers that will take back the used cartridges for remanufacturing. In this way, the entire shell of the cartridge, which is made of plastic is used again instead of being recycled or disposed of at a landfill.
5. Procure electronic devices from credible manufactures to avoid purchasing second hand, refurbished, or obsolete devices with a short shelf life or already categorized as e-waste.
6. Instituting good housekeeping and operating practices, including inventory control to reduce the amount of e-waste resulting from materials that are out-of-date, off specification, contaminated, damaged, or excess to operational needs; and
7. Minimizing hazardous e-waste generation by implementing stringent waste segregation to prevent the commingling of non-hazardous and hazardous e-waste to be managed.

E-waste Recycle, Reuse and Recovery

40. Operational assessment of end-of-life equipment shall be conducted by running appropriate tests to assess the functionality when replacing or retrofitting project related equipment, these tests shall be run by PMU/TVET. A sample of a functionality test that shall be conducted is adapted from the

International Telecommunication Union (ITU) guideline on the End-of-Life Management of ICT Equipment, available in Annex I.

41. In addition to the implementation of e-waste preventive strategies, the total amount of e-waste may be significantly reduced through reusing utilizable components within the project or by PMU/TVET technical staff, or through outsourcing to certified and licenced firms that shall be contracted to receive project related e-waste.

Temporary Storage of E-waste

1. E-waste should be stored in a well-ventilated room with impervious surface in a dry atmosphere at room temperature, not exposed to sunlight or rainfall. The equipment should be stored on pallets or shelves.
2. Fragile equipment such as computer monitors (Cathode Ray Tube, CRT) and fluorescent lamps should be carefully handled and stored to avoid damages (e.g. put in the original packing).
3. E-waste should not be stored together with other waste types.
4. Batteries should be disconnected from the products.
5. Lithium batteries should be stored in a way that ensures that the battery terminals do not get in contact with any metals or other battery terminals.
6. There should be no dismantling of electronic or electrical products.
7. E-waste should be stored for as short a period as practicable.

E-Waste Recycling and Disposal

1. Identify and categorize the various e-waste types that are likely to be generated under the Project
2. Identify suitable e-waste recycling companies that have the necessary government authorizations to recycle the relevant types of e-waste.
3. Carry out inspections of pre-selected companies to check that the management of the e-waste is environmentally sound, in accordance with health and safety standards and in compliance with relevant requirements. This should include checking:
    a. that data storage equipment is physically destroyed
    b. that e-waste is stored and handled under weatherproof cover
    c. that the operator keeps a record of final disposal of waste from the dismantling and recycling process
    d. that final disposal of waste is only done at sites with the required authorization
    e. that there is appropriate fire prevention and fire-fighting equipment
    f. that any final disposal is consistent with end-of-life handling instructions in the product declaration
    g. compliance with restrictions on export of hazardous waste under the Basel Convention
    h. that emissions and discharges from the operations are monitored for content of hazardous substances and that relevant emission/effluent limit values are complied with
    i. that the work area is clean and free of dust
    j. that there is no burning or heating of e-waste components
    k. that workers are wearing appropriate PPE (protective helmets, protective footwear, protective gloves, eye and face protection, hearing protectors, respirators)
    l. that dust levels are controlled by local exhaust ventilation.

Data security

1. Before being taken out of use or handed over to other users, all data will be permanently erased from hard drives in computers, smartphones, printers, scanners, copiers and any other electronic equipment that may store data.

2. The IT managers of MLVT with technical assistance from the Project will develop the specific procedures for erasing data from electronic equipment.

Awareness Raising

1. Awareness raising on proper management of e-waste should be carried out as part of regular office meetings for personnel and at training sessions for students attending ICT training courses.
2. Key do's and don'ts include:
    a. Do's:
        - Always dispose e-waste in the designated bins or containers marked "E-Waste" and as specified in the e-waste management plan
        - Sent discarded electronic equipment only to authorized collection center so they could be properly recycled or disposed off

    b. Don'ts:
        - Do not give e-waste to informal recyclers or unorganized scrap dealers.
        - Do not dispose e-waste in garbage bins for municipal waste.

Institutional Arrangement and Reporting

42. PMU shall assign a staff member who is responsible for creation and management of the equipment inventory throughout the project implementation. This designated staff will be monitoring and updating the inventory according to the above procedures and prepare relevant reporting for PMU. PMU shall provide the update on the e-waste management situation in the project progress report to the Bank as indicated on the ESCP, throughout the project implementation period. The assigned staff should be appointed prior to appraisal.

Monitoring

43. When significant quantities of hazardous e- wastes are generated and stored on site, monitoring activities shall include:

- Regular visual inspection in every month of all e-waste storage collection and storage areas for evidence of accidental releases and to verify that e-waste is properly labelled and stored.
- Monthly inspection of loss or identification of cracks, corrosion, or damage to protective equipment, or floors.
- Verification of locks, and other safety devices for easy operation (lubricating if required and employing the practice of keeping locks and safety equipment in standby position when the area is not occupied).
- Documenting any changes to the storage facility, and any significant changes in the quantity of materials in storage.
- Tracking of e-waste generation trends by type and amount, preferably by facility departments.

44. Additionally, record keeping of collected e-waste needs to be monitored. E-waste collected, stored, or transported shall include:

- Name and identification number of the material(s) composing the hazardous e-waste or Physical state;
- Quantity (i.e., kilograms, number of containers);
- Content (i.e., devices, screens, servers);
- Schedule (date of collection, date of transportation, etc…);
- Hazardous and pollutant contents (i.e., existence of mercury, lead, PAHs);

- E-waste transport tracking documentation shall include, quantity and type, date dispatched, date transported, and date received, record of the originator, the receiver, and the transporter;
- Method and date of storing, repacking, treating, or disposing at the facility, cross-referenced to specific manifest document (e-waste transfer notes) numbers applicable to the hazardous e-waste, or the Location of each hazardous e-waste within the facility, and the quantity at each location.

E-Waste Management Plan

45. Based on the above guidelines, develop a site-specific E-Waste Management Plan with the following general content:

Table 3: List and Description of E-Waste

E-Waste Description	Potential Hazards	Temporary Storage	Transport	Reuse	Recycling Company	Final Waste Destination
CRT Monitors						
LCD/LED Displays						
Keyboards						
CPUs						
Laptops						
Batteries						
Cell phones						
Printers/scanners						
Printer Cartridges						
Copy Machines						
Lamps containing mercury						
Audio/Video Equipment						
Wiring						

Material Handling Information[27]

Annex 1: Sample Functionality Test for Used Computing Equipment

This sample functionality test has been adapted from ITU end-of-life management for ICT equipment7 and the Basel Convention PACE revised guidelines on environmentally sound material recovery and recycling of end-of-life computing equipment.

Computing equipment	Functionality tests	Test results
Central processing units (CPUs), including desk top PCs, routers, and other equipment	**Power on self-test (POST)** Switching on the computer and successfully completing the boot up process. This will confirm that the principal hardware is working, including power supply and hard drive. • A working monitor will need to be used if none present • Ensure that cooling fans are functioning • Remove dust as much as possible (e.g., delicately using a vacuum cleaner is possible), in order to ensure better cooling and stable operation	**Computer** should boot up successfully **Computer** should respond to keyboard and mouse input. **Cooling fans** should operate normally. No strong mechanical sound denoting end-of life of fans.
Cables and power cords	Assess cable insulation and inspect plugs	Cabling and plugs should be complete and free of damage, e.g., has no cracked insulation. Any detachable cable with damage should be replaced by a new one to

[27] This will be prepared for each waste item.

		avoid electric shocks or premature failures.
Components (removed from equipment) including mother boards, other circuit boards, sound cards, graphics cards, hard drives, power supplies and cords/ cables)	Components should be gently wiped from dust to improve thermal exchange and allow better cooling. Components should be tested for functionality either before removal from the host computer or laptop, or by insertion in a test bench computer using diagnostic software, or a known working device as applicable	Components should be fully functional. Power supplies and cords / cables should be complete and free of damage, e.g., has no cracked insulation. Any detachable cable with damage should be replaced by a new one to avoid electric shocks or premature failures.

APPENDIX 5 – Labor Management Procedures

1. Introduction

1. Labor Management Procedures (LMP) is developed to manage risks and impacts under the Cambodia Skills for Better Jobs Project (the Project) implemented by the Ministry of Labor and Vocational Training (MLVT). The LMP sets out the program's approach to meeting national requirements as well as the objective of the World Bank's Environmental and Social Framework, specific objective of the Environmental and Social Standard 2: Labor and Working Conditions (ESS2) and the Environmental and Social Standard 4: Community Health and Safety (ESS4). The Project will also follow the World Bank's interim note on "COVID-19 Considerations in Construction/Civil Works Projects".

2. The LMP is a living document to be reviewed and updated throughout development and implementation of the project. The LMP applies to manager and all project workers, irrespective of contracts being full-time, part-time, temporary or casual.

3. The LMP is structured into 12 sections:

i) Overview of labor use in the project
ii) Assessment of key potential labor risks
iii) Brief overview of labor legislation: Terms and Condition
iv) Brief overview of labor legislation: Occupational Health and Safety
v) Responsible staff
vi) Policies and procedures
vii) Age of employment
viii)Terms and conditions
ix) Grievance redress mechanism
x) TI and JC management
xi) Community workers
xii) Primary supply workers

2. Overview of labor use in the project

4. The EES 2 categorizes the workers into four categories:

i) **Direct workers** refer to people employed or engaged directly by the Borrower (including the project proponent and the project implementing agencies) to work specially in relation to the project, including Civil Servants

ii) **Contracted workers** refer to people employed or engaged through third parties to perform work related to core functions of the project, regardless of location. These could be either international or national workers.

iii) **Primary supply workers** refer to people employed or engaged by the Borrower's primary suppliers (primary supply workers)

iv) **Community workers** refer to people employed or engaged in providing community labor, generally voluntarily. This category will be not involved in the Project.

5. The civil works under the Project will ensure no workers under the age of 18 years old is employed in any type of workers. The LMP also covers the rights of direct workers for the project, which would include those persons hired directly by the MLVT, for whatever length of time, and for which the project has specific control over the work, working conditions, and treatment of the worker. These would include consultants hired to work for the project, persons engaged to conduct monitoring and evaluations, and persons hired to assist with community engagement, which might be needed for some IP communities (all direct workers). Civil servants working for the project, both full time or part time, are subject to the conditions and terms of their existing arrangements, and thus most provisions of ESS2 do not apply to them. Those provisions that do apply to civil servants working for the project concern protection of the

work force and occupational health and safety. Administrators, teachers, and teacher trainers at the targeted training institutes and JCs are not covered under ESS2, as they are considered project beneficiaries and not as workers.

6. The Project is expected to have the following type of workers (Table 1).

Table 1. Type of workers in the Project

Category of workers based on ESS2	Characteristics of Project Workers	Estimated Number of Project Workers	Timing of Labor Requirements
Direct Workers	E&S consultants Other consultants as needed	2-4	Throughout entire project cycle [2 E&S supervision consultants] and as needed [others]
Contracted Workers	In terms of new constructions and rehabilitation/renovation works in existing compounds of TIs and JCs, project contractors will bring in their own staff, such as project managers, technicians and skilled workers on a small-scale, for the civil works.	5-10 per training institute or job center for renovation and/or rehabilitation 10-30 per training institute or job center for new construction	Construction and operation phase
Supply Workers	Those working in companies/factories supply materials for construction, in particular raw materials (including workers in brick kilns industry)	1-2 per training institute or job center	Construction/purchase of equipment for construction
Civil Servants	PMU of the MLVT.	3-10 total in the PMU	Throughout the whole project cycle

3. Assessment of Key Potential Labor Risks

7. The main labor risks associated with the Project are assessed to be related to use of child labor (both as supply workers and contracted workers), the potentially hazardous work environment especially construction workers, the associated risk of accidents and labor influx and the transmission of COVID-19.

8. **Child and Forced Labor:** The risk of child labor will be mitigated through certification of worker's age. This will be done by using the legally recognized document of the National Identification Card. The prohibition and negative impacts of child and force labor will also be included in the training provided by the E&S officer and consultants to build capacity of the select TIs and JCs. The Construction Department and the PMU will monitor periodically that no such practices are in place. The minimum working age in the project will be 18 years.

9. **Small-scale labor influx:** In terms of new constructions and rehabilitation/renovation works in existing compounds of TIs and JCs, it is likely that project contractors will bring in their own staff, such as project managers, technicians and skilled workers on a small-scale, for the civil works. However, this labor influx may lead to several potential issues, , including social conflicts with local communities, increased health risks such as the spread of communicable diseases like COVID-19, HIV/AIDS, and other STDs, as well as an increased risk of traffic accidents, particularly for those living near the civil works and those traveling near the TVET facility while trucks are driving in and out during the civil works. It is important to identify and mitigate these risks to ensure the safety and well-being of all involved in the project.

10. **Gender-based violence:** Most of the workers within the Project will be predominantly male. While most will be from the within the communities, there may be some who are away from home, separated from their family and acting outside their normal sphere of social control. This can lead to inappropriate and criminal behaviour, such as sexual harassment of women and girls, exploitative sexual relations, and illicit sexual relations with minors from the local community.

11. **Occupational health and safety:** If outside labor is required, there may be need for a construction camp or, if there are only a few outside workers and they will be present for only a brief period, some other housing agreed upon by the community for those workers, such as at the village temple or other community building. Under such circumstances, there may be risk associated with their living conditions, include inadequate provision of water and sanitation. With outsiders staying in the community, there are also risks of transmission of sexually transmitted diseases (STD), exposure of workers to vector-transmitted diseases such as malaria and dengue, snakebites and insect stings, as well as COVID-19 transmission.

12. All workers will be provided with appropriate PPE and will be trained in the required safety procedures and precautions. Appropriate clothing, including hardhats and protective footwear, are required.

13. The Project will ensure the safety of the local communities who are exposed to the project activities and other risks, including STDs, exposure to Covid-19, and other problems that might arise with the influx of any workers during the construction phase.

14. The Project will ensure that the select TIs and JCs follow the World Bank's interim note on "COVID 19 Considerations in Construction/Civil Works Projects" to deal with the pandemic situation.

4. Brief overview of the labor legislation: Terms and Condition

15. Cambodia has national legislation that outlines worker's rights. The Labor Law (1997) remains the key document governing the regulatory framework for labor in Cambodia.

16. The **1997 Labor Law** defines non-discrimination in employment and in wages. It establishes a minimum wage level, which may vary among regions. Working hours are limited to 8 hours per day, 6 days a week. There are strong regulatory provisions against discrimination in the work place, enhancing from a legal point of view fair treatment, non-discrimination and equal opportunity, special protection and assistance to vulnerable workers. A whole chapter in the Law is dedicated to health and safety in the workplace. The Law also covers those who work for subcontractors.

17. Child labor remains a noticeable gap in the legal framework despite many years of participation in related international programs. The Labor Law defines 12 years old as the minimum working age for children, though 12-15 year-olds are meant to only engage in certain light jobs, but this is not always closely monitored. The Prakas on the Prohibition of Hazardous Child Labor (2004) allow hazardous work for well- trained children above 16, provided it is not night work. The ESMF details the relevant legislation and a gap analysis with the World Bank ESF. The project will only allow workers over the age of 18.

5. Overview of the labor legislation: Occupational Health and Safety

18. The Labor Law (1997) includes provisions on Occupational Health and Safety (OHS) mostly consistent with ESS2 and ESS4 of the World Bank's Environmental and Social Framework (ESF).

19. In accordance with the Labor Law, the Ministry of Labor and Vocational Training has issued regulations concerning the OHS as follows:

- Prakas No 052 dated 01 February 2000 concerning the sanitary toilet
- Prakas No 054 dated 01 February 2000 concerning the provision of the safe drink
- Prakas No 124 dated 15 June 2001 concerning the heavy object lifting by hand
- Prakas No 125 dated 15 June 2001 concerning the air ventilation and sanitation
- Prakas No 138 dated 22 April 2003 concerning the Noise at the workplace
- Prakas No 106 dated 28 April 2004 concerning the prohibition of working children from the dangerous work place
- Prakas No 075 dated 30 March 2011 concerning the Sanitation at the Construction Site
- Prakas No 077 dated 30 March 2011 concerning the Information at the Construction Site
- Prakas No 078 dated 30 March 2011 concerning the storage, waste management and cleanliness at the construction site.

6. Responsible staff

20. Engagement and management of direct workers: The MLVT will address all LMP aspects as part of administration, implementation of the project, and consultancy/technical assistance activities for Direct Workers as well as for OHS and protection of workforces of civil servants and the GBV related risks.

21. Engagement and management of contracted workers: The contractors of select TIs and JCs will address all LMP aspects as part of civil works, including compliance of ESF instruments. The contractors for construction/rehabilitation works are responsible for management of contracted workers in accordance with the Labor Management Plans (LMP).

22. Labor and working conditions. Contractors of select TIs and JCs will keep records in accordance with specifications set out in this LMP. PMU set at MLVT may at any time require records to ensure that labor conditions are met. PMU will review records against actuals, as appropriate, and can require immediate remedial actions if warranted. A summary of issues and remedial actions will be included in quarterly reports to the World Bank.

23. Training of Workers. The select TIs and JCs and their contractors will be obligated to make staff and workers available for any mandatory training required by MLVT including training in E&S management and OHS and GBV as well as signing of code of conduct.

24. Addressing Worker Grievances. The contractors of select TIs and JCs will be required to implement a Grievance Redress Mechanism (GRM) for workers which is separate from the project GRM and responds to the minimum requirements in this LMP. The E&S officer of the PMU with a support from E&S consultants of PMU will review records quarterly, keep abreast of GRM complaints and resolutions, and provide information on any complaints and resolutions in quarterly reports to the World Bank.

25. Occupational, Health and Safety. The contractors of select TIs and JCs must designate a safety representative to ensure day-to-day compliance with specified safety measures and to record any incidents. Minor incidents and near misses should be reported to PMU at MLVT on a monthly basis; serious incidents should be reported immediately. Minor incidents should be reflected in the quarterly reports to the World Bank, and major issues should be flagged to the World Bank immediately.

26. MLVT and all workers under the Project will:

- Comply with Cambodia legislation, WB ESS2 and ESS4 requirements and other applicable requirements which relate to OHS hazards;
- Enable active participation in OHS risk elimination through promotion of appropriate skills, knowledge and attitudes towards hazards;
- Continually improve the OHS management system and performance;
- Communicate this policy statement to all persons working on the project with emphasis on individual OHS responsibilities; and
- Make this policy statement available to all interested parties.

27. The contractors of select TIs and JCs will be responsible for:

- Identification of potential hazards to project workers, particularly those that may be life threatening;
- Provision of preventative and protective measures, including modification, substitution, or elimination of hazardous conditions or substances;
- Training of project workers and maintenance of training records;
- Documentation and reporting of incidents;
- Emergency prevention and preparedness and response arrangements to emergency situations; and
- Remedies for adverse impacts such as occupational injuries, deaths, disability and disease.

28. The contractors of select TIs and JCs will be required to:

- Develop and implement procedures to establish and maintain a safe working environment, including that workplaces, machinery, equipment and processes under their control are safe

and without risk to health;

- Actively collaborate and consult with project workers in promoting understanding and methods for implementation of OHS requirements;
- Provide OHS training to all workers involved in works or site supervision;
- Provide laminated signs of relevant safe working procedures in a visible area on work sites, in English, Khmer and the local language (if not Khmer) as required;
- Provide PPE as suitable to the task and hazards of each worker, without cost to the worker;
- Put in place processes for project workers to report work situations that they believe are not safe or healthy and to remove themselves from situations they have reasonable justification to believe are unsafe;
- Confirm appropriate measures are in place for working in communities with known risk of conflict/violence;
- Ensure availability of first aid boxes in all work locations;
- Provide employees with access to toilets (separate for male and female) and potable drinking water;
- Provide proper disposal facilities for sewage; and
- Properly dispose of solid waste at designated permitted disposal/landfill sites.

29. Further to enforcing the compliance of environmental and social management, contractors of select TIs and JCs will be responsible and liable for the safety of site equipment, laborers and daily workers attending to the construction site and safety of citizens for each subproject site, as mandatory measures.

7. Policies and procedures

30. The Construction Department and the PMU will make sure that the contractors of select TIs and JCs are aware of environmental and social management performance requirements that shall be expected from them. The contractors of select TIs and JCs is required to ensure all documentation related to environmental and social management, including the LMP, is available for inspection at any time by the PMU of the MLVT.

31. All workers must be aware and sign the Manager's Code of Conduct (see part A of Appendix 6) and/or the Individual Code of Conduct (see part B of Appendix 6), as applicable.

Occupational Health and Safety (OHS)

32. OHS strategy will include specific measures to ensure the safety of workers travelling to remote sites, including (1) project cars to be driven by professional drivers only; (2) compulsory helmet use for drivers and passengers on project motorcycles at all times, and on private motorcycles when used for project- related tasks; (3) travel by motorcycle for project-related purposes to be in daylight hours only; and (4) measures to monitor, anticipate and avoid potential security risks while travelling, including liaison with local police and authorities and encouraging project workers to share any concerns they may have.

33. Project workers in remote areas will receive health and safety training including prevention of infection through contaminated food and/or water and/or through vector-borne diseases and avoidance of snakebites and insect stings as well as Covid-19. Site-specific risks will be assessed as part of the ESMP which will include plans for emergency evacuation and identification of emergency health facilities. If necessary, stocks of snakebite antivenom may be maintained at project sites, or availability otherwise ensured.

34. The Health and Safety specifications will include the following provisions:

- Ensuring workplace health and safety standards in full compliance with Cambodian law, at a minimum, and including (1) basic safety awareness training to be provided to all persons as a pre- condition for presence at an active construction site; (2) all vehicle drivers to have appropriate licenses, and all construction equipment operators to be trained including in

safety procedures; (3) Safe management of the area around operating equipment; (4) all workers on construction sites to be equipped with hard helmets, safety boots and protective gloves; (5) secure scaffolding and fixed ladders to be provided for work above ground level; (6) First aid equipment and facilities to be provided in accordance with the Labour Law; (8) at least one supervisory staff trained in safety procedures to be present at all times when construction work is in progress; and (9) adequate provision of hygiene facilities, resting areas etc.

- All workplace health and safety incidents to be properly recorded in a register which will be shared with the supervising engineer. The register should include (1) time and place of incident; (2) type of incident; (3) type of injury or other impact occurring, and number of workers affected; and (4) actions taken (first aid, evacuation etc.).
- All workers to be covered by insurance against occupational hazards and COVID-19.at no cost.
- All work sites to have a health and safety plan including identification of potential hazards and actions to be taken in case of emergency, including location of accident and emergency facilities.
- Any on-site accommodation to be safe and hygienic, including provision of an adequate supply of potable water, washing facilities, sanitation, accommodation and cooking facilities. Location and layout of site camps to be agreed with construction supervisors and risk assessment conducted.
- Workers residing at site accommodation to receive training in preventing prevention of infection through contaminated food and / or water and or through vector-borne diseases; and in avoidance of sexually transmitted diseases.
- Fair and non-discriminatory employment practices. Where contractors hire workers from the beneficiary community, disadvantaged and vulnerable community members are to have equal access to opportunities.
- Employment of children under 18 is prohibited.
- Under no circumstances will contractors engage forced labor.
- Due diligence will need to be conducted to ensure construction materials manufactured in Cambodia be procured only from suppliers able to certify that no forced labour (including debt bondage labour) or child labour (except as permitted by the Labour Law).[28]
- All employees to be aware of their rights under the Labour Law, including the right to organize; and
- All employees to be informed of their rights to submit a grievance through the Project Worker Grievance Mechanism.

35. Additional guidelines on OHS can be found in Annex 5.1.

8. Age of Employment

36. No workers under 18 years of age shall be allowed to work in the Project. Workers will be required to provide proof of their identity and age before commencing any works on site.

9. Terms and Conditions and Equal Opportunities

37. All terms and conditions as outlined in the World Bank Environmental and Social Framework (ESF) ESS2, paragraphs 10 to 15 apply to contracted workers. In addition,

- In line with national law, the maximum working hours are limited to 8 hours per day, 6 days a week.
- Employers shall guarantee that the workers shall have at least one resting day per week. The

[28] As forced labor has been associated with the production of bricks in Cambodia, MLVT will need to conduct due diligence on the origin of bricks being purchased for the project.

employers shall also make arrangements for the employees to take vacation according to law during Khmer New Year festival, Pchum Ben Festival and any other holidays prescribed by laws and regulations.

- Employment opportunities will be available to all. This includes equal pay for equal work, regardless whether the person performing the work is male or female.
- The wages paid by the employers to the workers shall not be lower than the local Cambodian minimum wage.
- Provisions of the Labor Law must be followed, including maternity leave for females if applicable.

38. The labor contract shall be provided to workers writing and shall have the following provisions:

a) The term of the labor contract;
b) Work content;
c) Labor protection and working conditions;
d) Remuneration for labor;
e) Labor discipline;
f) Conditions for termination of the labor contract;
g) Responsibility for breach of labor contract;
h) Individual Staff Code of Conduct;
i) Grievance Redress Mechanism.

10. Grievance Redress Mechanism

39. There will be a specific Grievance Redress Mechanism (GRM) for project workers as per the process outlined below. This considers culturally appropriate ways of handling the concerns of direct and contracted workers. Processes for documenting complaints and concerns have been specified, including time commitments to resolve issues.

40. All project workers will be informed of the Grievance Mechanism process for workers:

i) **First stage at Field-Level:** the affected worker will present their complaints and grievances to the Site Engineer. Immediate remedial action is expected. The resolution of the complaint should be done within one week.

ii) **Second stage to the E&S Officer of PMU**: If the worker is not satisfied with the decision, they can appeal directly to the project PMU. Within 30 days, the **E&S Officers** will investigate and, in consultation with the Project Manager and other members of the Project Management Team, recommend a course of action to resolve the dispute. The worker may also decide to lodge their grievance directly with MLVT following local labor laws.

iii) **Final stage at Provincial court level**: If the either party does is not satisfied with the decision by the E&S Officer of PMU, they can bring the case to Provincial or Municipal Court, understanding that all costs at this stage will be borne by the aggrieved party. The project will no longer be involved, unless requested by the court. During the litigation of the case, the RGC will request to the court that the project proceed without disruption while the case is being heard. If any party is still unsatisfied with the ruling of the Provincial Court, he/she can bring the case to a higher-level court. The RGC shall implement the decision of the court.

41. Each grievance record should be allocated a unique number reflecting year and sequence of received complaint (for example 2024-01, 2024-02 etc.). Complaint records (letter, email, record of conversation) should be stored together, electronically or in hard copy. The E&S Officer of PMU will be responsible for undertaking a regular (at least quarterly) review of grievances to analyse and determine if there are any common issues that arise and should be dealt with systematically.

42. Grievances involving gender-based violence, sexual harassment, violence against children, etc., can be submitted directly to the E&S Officer of PMU or to local law enforcement. If the AP prefers to remain anonymous, the grievance can be submitted through a confidential third party.

11. Primary Supply Chain Workers

43. The selected TIs and JCs will be responsible for conducting due diligence on the primary supply workers (those providing key materials for school construction, in particular raw materials), to ensure there is no indentured/forced or child labor (as per the Labor Law).

44. In conducting due diligence, the selected TIs and JCs should:

- Inform the provider, that the TI or JC will not engage a provider who has forced or child laborers;
- When possible, visit the company/factory, and conduct interviews with key personnel about their working conditions, as well as informal random interviews with workers;
- Conduct secondary due diligence, by asking information from others who may be familiar with the provider, to make sure there are no reported instances of forced or child labor;
- If necessary, and when possible, engage the Ministry of Labor to conduct checks on supplier to ensure no child labor or forced labor; and
- Keep records of the information and include in reporting to the Construction Department and the PMU of the MLVT.

12. Capacity Building

45. While the provisions outlined in this LMP are in most respects consistent with the requirements of the Labour Law 1997, with only limited additional provisions (for example, the Worker Grievance Redress Mechanism) to meet the requirements of ESS2 and ESS4, the LMP considerably exceeds actual practice in labor management in Cambodia, particularly in the Cambodian construction industry. Therefore, to ensure that the contractors and suppliers of select TIs and JCs can meet these obligations, the project will develop and deliver trainings and simple awareness raising materials. This will be the responsibility of the E&S officer of the MLVT in supporting from the E&S consultants.

46. Key project personnel who will require training include:

- Human resources staff or administration staff responsible for recruitment of direct project workers in PMU of MLVT;
- Procurement staff in PMU of MLVT;
- E&S officer of the PMU of MLVT;
- TI and JC staff;
- Contractors of TIs and JCs;
- Management Focal Points in each project partner agency; and
- Staff, consultants and consultants' staff acting as supervisors and responsible for monitoring compliance with the policy.

47. The E&S officer and E&S Consultants will develop and deliver a short training course for the select TIs and JCs responsible for engaging the contractors and supervising the day-to-day work of the contractors. This course will explain the obligations and requirements as set out in the Health and Safety specifications. Supervising engineers are also to attend these courses. Courses will be delivered by E&S officer the PMU at MLVT under the supporting from the E&S Consultants.

48. Requirements of the LMP should be included in the ESMPs or ESCoP, including details of the Worker Grievance Redress Mechanism. The GRM should be disseminated to all project direct and contracted workers.

Annex 5.1 – OHS Guidelines

The objective of this guideline is to provide guidance on the:

- Key principles involved in ensuring the health and safety of workers is protected;
- Preparation of Health and Safety plans

The key reference document for this Guideline is the World Bank Group's *Environmental, Health, and Safety (EHS) Guidelines* (April 2007)[29] and the World Bank's ESS 4.

1. Principles

Employers must take all reasonably practicable steps to protect the health and safety of workers and provide and maintain a safe and healthy working environment. The following key principles are relevant to maintaining worker health and safety:

1.1 Identification and assessment of hazards

Each employer must establish and maintain effective methods for:

- Systematically identifying existing and potential hazards to employees;
- Systematically identifying, at the earliest practicable time, new hazards to employees;
- Regularly assessing the extent to which a hazard poses a risk to employees.

1.2 Management of identified hazards

Each employer must apply prevention and control measures to control hazards which are identified and assessed as posing a threat to the safety, health or welfare of employees, and where practicable, the hazard shall he eliminated. The following preventive and protective measures must be implemented order of priority:

- Eliminating the hazard by removing the activity from the work process;
- Controlling the hazard at its source through engineering controls;
- Minimizing the hazard through design of safe work systems;
- Providing appropriate personal protective equipment (PPE).

The application of prevention and control measures to occupational hazards should be based on comprehensive job safety analyses (JSA). The results of these analyses should be prioritized as part of an action plan based on the likelihood and severity of the consequence of exposure to the identified hazards.

1.3 Training and supervision

Each employer must take all reasonably practicable steps to provide to employees (in appropriate languages) the necessary information, instruction, training and supervision to protect each employee's health and to manage emergencies that might reasonably be expected to arise in the course of work. Training and supervision include the correct use of PPE and providing employees with appropriate incentives to use PPE.

1.4 General duty of employees

Each employee shall:

[29] www.ifc.org/ehsguidelines

- Take all reasonable care to protect their own and fellow workers health and safety at the workplace and, as appropriate, other persons in the vicinity of the workplace;
- Use PPE and other safety equipment supplied as required; and
- Not use PPE or other safety equipment for any purpose not directly related to the work for which it is provided.

1.5 Protective clothing and equipment

Each employer shall:

- Provide, maintain and make accessible to employees the PPE necessary to avoid injury and damage to their health;
- Take all reasonably practicable steps to ensure that employees use that PPE in the circumstances for which it is provided; and
- Make provision at the workplace for PPE to be cleaned and securely stored without risk of damage when not required.

2. Design

Effective management of health and safety issues requires the inclusion of health and safety considerations during design processes in an organized, hierarchical manner that includes the following steps:

- Identifying project health and safety hazards and associated risks as early as possible in the project cycle including the incorporation of health and safety considerations into the worksite selection process and construction methodologies;
- Involving health and safety professionals who have the experience, competence, and training necessary to assess and manage health and safety risks;
- Understanding the likelihood and magnitude of health and safety risks, based on:
    - The nature of the project activities, such as whether the project will involve hazardous materials or processes;
    - The potential consequences to workers if hazards are not adequately managed;
- Designing and implementing risk management strategies with the objective of reducing the risk to human health;
- Prioritising strategies that eliminate the cause of the hazard at its source by selecting less hazardous materials or processes that avoid the need for health and safety controls;
- When impact avoidance is not feasible, incorporating engineering and management controls to reduce or minimize the possibility and magnitude of undesired consequences;
- Preparing workers and nearby communities to respond to accidents, including providing technical resources to effectively and safely control such events, in particular relating to traffic;
- Improving health and safety performance through a combination of ongoing monitoring of facility performance and effective accountability.

3. Implementation

3.1 Documentation

A Health and Safety Plan must be prepared and approved prior to any works commencing on site. The H&S Plan must demonstrate the Contractor's understanding of how to manage safety and a commitment

to providing a workplace that enables all work activities to be carried out safely. The H&S Plan must detail reasonably practicable measures to eliminate or minimise risks to the health, safety and welfare of workers, contractors, visitors, and anyone else who may be affected by the operations. The H&S Plan must be prepared in accordance with the World Bank's EH&S Guidelines and the relevant country health and safety legislation.

3.2 Training and Awareness

Provisions should be made to provide health and safety orientation training to all new employees to ensure they are apprised of the basic site rules of work at / on the site and of personal protection and preventing injury to fellow employees. Training should consist of basic hazard awareness, site-specific hazards, safe work practices, and emergency procedures for fire, evacuation, and natural disaster, as appropriate. Training should also include HIV/AIDS awareness training.

Visitors are not permitted to access to areas where hazardous conditions or substances may be present, unless appropriately inducted.

3.3 Personal Protective Equipment (PPE)

Personal Protective Equipment (PPE) provides additional protection to workers exposed to workplace hazards in conjunction with other facility controls and safety systems.
PPE is considered to be a last resort that is above and beyond the other facility controls and provides the worker with an extra level of personal protection. The table below presents general examples of occupational hazards and types of PPE available for different purposes. Recommended measures for use of PPE in the workplace include:

- Active use of PPE if alternative technologies, work plans or procedures cannot eliminate, or sufficiently reduce, a hazard or exposure;
- Identification and provision of appropriate PPE that offers adequate protection to the worker, co-workers, and occasional visitors, without incurring unnecessary inconvenience to the individual;
- Proper maintenance of PPE, including cleaning when dirty and replacement when damaged or worn out. Proper use of PPE should be part of the recurrent training programs for Employees;
- Selection of PPE should be based on the hazard and risk ranking described earlier in this section, and selected according to criteria on performance and testing established.

Objective	Workplace Hazards	Suggested PPE
Eye and face protection	Flying particles, molten metal, liquid chemicals, gases or vapours, light radiation.	Safety Glasses with side-shields, protective shades, etc.
Head protection	Falling objects, inadequate height clearance, and overhead power cords.	Plastic Helmets with top and side impact protection.
Hearing protection	Noise, ultra-sound.	Hearing protectors (ear plugs or earmuffs).
Foot protection	Falling or rolling objects, pointed objects. Corrosive or hot liquids.	Safety shoes and boots for protection against moving & falling objects, liquids and chemicals.
Hand protection	Hazardous materials, cuts or lacerations, vibrations, extreme temperatures.	Gloves made of rubber or synthetic materials (Neoprene), leather, steel, insulating materials, etc.
Respiratory protection	Dust, fogs, fumes, mists, gases, smokes, vapours.	Facemasks with appropriate filters for dust removal and air purification

		(chemicals, mists, vapours and gases). Single or multi-gas personal monitors, if available.
	Oxygen deficiency	Portable or supplied air (fixed lines). On-site rescue equipment.
Body/leg protection	Extreme temperatures, hazardous materials, biological agents, cutting and laceration.	Insulating clothing, body suits aprons etc. of appropriate materials.

4. Monitoring

Occupational health and safety monitoring programs should verify the effectiveness of prevention and control strategies. The selected indicators should be representative of the most significant occupational, health, and safety hazards, and the implementation of prevention and control strategies. The occupational health and safety monitoring program should include:

- **Safety inspection, testing and calibration**: This should include regular inspection and testing of all safety features and hazard control measures focusing on engineering and personal protective features, work procedures, places of work, installations, equipment, and tools used. The inspection should verify that issued PPE continues to provide adequate protection and is being worn as required.
- **Surveillance of the working environment**: Employers should document compliance using an appropriate combination of portable and stationary sampling and monitoring instruments. Monitoring and analyses should be conducted according to internationally recognized methods and standards.
- **Surveillance of workers health**: When extraordinary protective measures are required (for example, against hazardous compounds), workers should be provided appropriate and relevant health surveillance prior to first exposure, and at regular intervals thereafter.
- **Training**: Training activities for employees and visitors should be adequately monitored and documented (curriculum, duration, and participants). Emergency exercises, including fire drills, should be documented adequately.
- **Accidents and Diseases monitoring**. The employer should establish procedures and systems for reporting and recording:
    - Occupational accidents and diseases
    - Dangerous occurrences and incidents

These systems should enable workers to report immediately to their immediate supervisor any situation they believe presents a serious danger to life or health. Each month, the contractor shall supply data on trainings delivered, safety incidents prevented and any accidents to the TI or JC for reporting to the PMU. These data are to also include incidents related to any sub-contractors working directly, or indirectly, for the Contractor.

The PMU shall be notified of any incident in accordance with the standards below:

Incident Severity Class	Incident Classification	Notification timeframe
Class 1	Fatality	Immediately – within 24 hours
	Notifiable Injury, Illness or Incident	Immediately – within 24 hours
Class 2	Lost Time Injury	As soon as practicable but within 48 hours

	Medical Treatment	Within 72 hours

All Class 1 and Class 2 health and safety incidents must be formally investigated and reported to the PMU through an investigation report. This report shall be based on a sufficient level of investigation by the Contractor so that all the essential factors are recorded. Lessons learnt must be identified and communicated promptly. All findings must have substantive documentation. As a minimum the investigation report must include:

- Date and location of incident;
- Summary of events;
- Immediate cause of incident;
- Underlying cause of incident;
- Root cause of incident;
- Immediate action taken;
- Human factors;
- Outcome of incident, e.g. severity of harm caused, injury, damage;
- Corrective actions with clearly defined timelines and people responsible for implementation;
- Recommendations for further improvement.

APPENDIX 6 – Codes of Conduct

Part A. Manager's Code of Conduct

Instructions: This Code of Conduct should be included in bidding documents for the civil works contractor(s) and in their contracts once hired. This Code of Conduct should also be included in bidding documents, and the contracts of consultants. This Code of Conduct is to be signed by the main party (head or manager) in the Contractor.

Manager's Code of Conduct

The contractor is committed to ensuring that the project is implemented in such a way which minimizes any negative impacts on the local environment, communities, and its workers. This will be done by respecting the environmental, social, health and safety (ESHS) standards, and ensuring appropriate occupational health and safety (OHS) standards are met. The contractor is also committed to creating and maintaining an environment where children under the age of 18 will be protected, and where sexual abuse and sexual harassment have no place. Improper actions towards children, Violence Against Children (VAC), sexual abuse/harassment, and/or acts of Gender Based Violence (GBV) will not be tolerated by any employee, sub-contractors, supplier, associate, or representative of the company.

Staff at all levels have a responsibility to uphold the contractor's commitment. Contractors need to support and promote the implementation of the Code of Conduct. To that end, staff must adhere to this Code of Conduct and also to sign the Individual Code of Conduct. This commits them to supporting the implementation of the Contractor's Environmental and Social Management Plan, the OHS Management Plan, and developing systems that facilitate the implementation of the GBV Action Plan.

Staff, in particular Managers, need to maintain a safe workplace, as well as a GBV-free environment at the workplace and in the local community. Their responsibilities to achieve this include but are not limited to:

Implementation

a. To ensure maximum effectiveness of the Code of Conduct:

   (i) Prominently displaying the Code of Conduct in clear view at workers' camps, offices, and in public areas of the workspace. Examples of areas include waiting, rest and lobby areas of sites, canteen areas and health clinics.

   (ii) Ensuring all posted and distributed copies of the Code of Conduct are translated into the appropriate language of use in the work site areas as well as for any international staff in their native language.

b. Verbally and in writing explain the Code of Conduct to all staff, including in an initial training session.

c. Ensure that:

   (i) All staff sign the 'Individual Code of Conduct', including acknowledgment that they have read and agree with the Code of Conduct.

   (ii) Staff lists and signed copies of the Individual Code of Conduct are provided to the OHS Manager.

   (iii) Participate in training and ensure that staff also participate as outlined below.

   (iv) Put in place a mechanism for staff to:
   - report concerns on ESHS or OHS compliance; and

- confidentially report GBV incidents through the Grievance Redress Mechanism (GRM) .

(v) Staff are encouraged to report suspected or actual ESHS, OHS, GBV, VAC issues, emphasizing the staff's responsibility in compliance with applicable laws and to the best of your abilities, prevent perpetrators of sexual exploitation and abuse from being hired, re-hired or deployed. Use background and criminal reference checks for all employees nor ordinarily resident in the country where the works are taking place.

d. Ensure that when engaging in partnership, sub-contractor, supplier or similar agreements, these agreements:

(i) Incorporate the ESHS, OHS, GBV, VAC Codes of Conduct as an attachment.

(ii) Include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers, to comply with the Individual Codes of Conduct.

(iii) Expressly state that the failure of those entities or individuals, as appropriate, to ensure compliance with the ESHS and OHS standards, take preventive measures against GBV and VAC, to investigate allegations thereof, or to take corrective actions when GBV or VAC has occurred, shall not only constitute grounds for sanctions and penalties in accordance with the Individual Codes of Conduct but also termination of agreements to work on or supply the project.

e. Provide support and resources to the E&S team to create and disseminate staff training and awareness-raising strategy on GBV, VAC and other issues highlighted in the ESMP.

f. Ensure that any GBV or VAC complaint warranting Police action is reported to the Police, the client and the World Bank immediately.

g. Report and act in accordance with the agreed response protocol any suspected or actual acts of GBV or VAC.

h. Ensure that any major ESHS or OHS incidents are reported to the client and the supervision engineer immediately, non-major issues in accordance with the agreed reporting protocol.

i. Ensure that children under the age of 18 are not present at the construction site or engaged in any hazardous activities.

Training

j. The managers are responsible to:

(i) Ensure that the OHS Management Plan is implemented, with suitable training required for all staff, including sub-contractors and suppliers; and,

(ii) Ensure that staff have a suitable understanding of the ESMP and are trained as appropriate to implement the Contractor's ESMP requirements.

k. All managers are required to attend an induction manager training course prior to commencing work on site to ensure that they are familiar with their roles and responsibilities in upholding the GBV and VAC elements of these Codes of Conduct. This training will be separate from the induction training course required of all employees and will provide managers with the necessary understanding and technical support needed to begin to develop the GBV Action Plan for addressing GBV issues.

l. Managers are required to attend and assist with the project facilitated monthly training courses for all employees.

m. Ensure that time is provided during work hours and that staff prior to commencing work on site attend the mandatory project facilitated induction training on:

   (i) OHS and ESHS, and,

   (ii) GBV and VAC.

n. During civil works, ensure that staff attend ongoing OHS and ESHS training, as well as the monthly mandatory refresher training course required of all employees on GBV.

Response

o. Managers will be required to take appropriate actions to address any ESHS or OHS incidents.

p. Regarding GBV:

   (i) Maintain the confidentiality of all employees who report or (allegedly) perpetrate incidences of GBV (unless a breach of confidentiality is required to protect persons or property from serious harm or where required by law).

   (ii) If a manager develops concerns or suspicions regarding any form of GBV by one of his/her direct reports, or by an employee working for another contractor on the same work site, s/he is required to report the case using the GRM.

   (iii) Once a sanction has been determined by the GRM, the relevant manager(s) is/are expected to be personally responsible for ensuring that the measure is effectively enforced, within a maximum timeframe of 14 days from the date on which the decision to sanction was made by the GRM.

   (iv) If a Manager has a conflict of interest due to personal or familial relationships with the survivor and/or perpetrator, he/she must notify the Company and the GRM. The Company will be required to appoint another manager without a conflict of interest to respond to complaints.

   (v) Ensure that any GBV issue warranting Police action is reported to the Police, the client and the World Bank immediately.

q. Managers failing address ESHS or OHS incidents or failing to report or comply with the GBV provisions may be subject to disciplinary measures, to be determined and enacted by the Company. Those measures may include:

   (i) Informal warning;

   (ii) Formal warning;

   (iii) Additional Training;

   (iv) Loss of up to one week's salary;

   (v) Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months;

   (vi) Termination of employment.

r. Ultimately, failure to effectively respond to ESHS, OHS, VAC and GBV cases on the work site by the company's managers may provide grounds for legal actions by authorities.

I do hereby acknowledge that I have read the Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS, VAC and GBV requirements. I understand that any action inconsistent with this Code of Conduct or failure to act mandated by this Code of Conduct may result in disciplinary action.

Signature: _____

Printed Name: _____

Title: _____

Date: _____

Part B. Individual Code of Conduct

Instructions: This Code of Conduct should be included in bidding documents for the civil works contractor(s) and in their contracts once hired. This Code of Conduct should also be included in bidding documents, and the contracts of consultants. This Code of Conduct is to be signed by all contractors and consultants including managers, working on the project.

I, _____, acknowledge that adhering to environmental, social, health and safety (ESHS) standards, following the project's occupational health and safety (OHS) requirements, and preventing Violence Against Children (VAC) and Gender Based Violence (GBV) is important.

The Contractor considers that failure to follow ESHS and OHS standards, or to partake in activities constituting VAC or GBV—be it on the work site, the work site surroundings, at workers' camps, or the surrounding communities—constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. Prosecution by the Police of those who commit GBV or VAC may be pursued if appropriate.

I agree that while working on the project I will:

a. Consent to a background check in any place I have worked for more than six months.

b. Attend and actively partake in training courses related to ESHS, OHS, VAC and GBV as requested by my employer.

c. Wear my personal protective equipment (PPE) at all times when at the work site or engaged in project related activities.

d. Take all practical steps to implement the environmental and social management plan (ESMP).

e. Implement the OHS Management Plan.

f. Adhere to a zero-alcohol policy during work activities, and refrain from the use of narcotics or other substances which can impair faculties at all times.

g. Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.

h. Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.

i. Not sexually exploit or abuse project beneficiaries and members of the surrounding communities.

j. Not engage in sexual harassment of work personnel and staff —for instance, making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature is prohibited: i.e. looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; in some instances, giving personal gifts.

k. Not engage in sexual favors —for instance, making promises of favorable treatment (i.e. promotion), threats of unfavorable treatment (i.e. loss of job) or payments in kind or in cash, dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior.

l. Not use prostitution in any form at any time.

m. Not participate in sexual contact or activity with children under the age of 18—including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.

n. Unless there is the full consent[30] by all parties involved, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex (including prostitution). Such sexual activity is considered "non-consensual" within the scope of this Code.

o. Consider reporting through the GRM or to my manager any suspected or actual GBV by a fellow worker, whether employed by my company or not, or any breaches of this Code of Conduct.

With respect to children under the age of 18:

p. Bring to the attention of my manager the presence of any children on the construction site or engaged in hazardous activities.

q. Wherever possible, ensure that another adult is present when working in the proximity of children.

r. Not invite unaccompanied children unrelated to my family into my home, unless they are at immediate risk of injury or in physical danger.

s. Not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography (see also "Use of children's images for work related purposes" below).

t. Refrain from physical punishment or discipline of children.

u. No hiring of children for any project activity (no persons under the age of 18).

v. Comply with all relevant local legislation, including labor laws in relation to child labor and World Bank's safeguard policies on child labor and minimum age.

w. Take appropriate caution when photographing or filming children (see x-bb below). Photos or films of children should generally not be taken in the CRCIP, except in instances showing the benefits or impacts of road works, such as impacts to schools or school safety trainings.

Use of children's images for work related purposes

When photographing or filming a child for work related purposes, I must:

x. Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.

y. Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.

[30] **Consent** is defined as the informed choice underlying an individual's free and voluntary intention, acceptance or agreement to do something. No consent can be found when such acceptance or agreement is obtained using threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even if national legislation of the country into which the Code of Conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defense.

z. 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.

aa. Ensure images are honest representations of the context and the facts.

bb. Ensure file labels do not reveal identifying information about a child when sending images electronically.

Sanctions

I understand that if I breach this Individual Code of Conduct, my employer will take disciplinary action which could include:

cc. Informal warning;

dd. Formal warning;

ee. Additional Training;

ff. Loss of up to one week's salary;

gg. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months;

hh. Termination of employment;

ii. Report to the Police if warranted.

I understand that it is my responsibility to ensure that the environmental, social, health and safety standards are met. That I will adhere to the occupational health and safety management plan. That I will avoid actions or behaviors that could be construed as VAC or GBV. Any such action will be a breach of this Individual Code of Conduct. I do hereby acknowledge that I have read the foregoing Individual Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS, VAC and GBV issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signature: _____

Printed Name: _____

Title: _____

Date: _____

APPENDIX 7 – Environmental and Social Codes of Practice (ESCoP)

Part A: E&S Codes of Practice of Managers

Generic contract clauses are provided to assist with environmental and social management works. These clauses are general and should be modified as needed. These clauses are intended to be included as requirements in the works contract and shall remain in force throughout the contract period.

Responsibilities for ESCoP Implementation

Project Management Unit with support of E&S officer and consultants (hosted at MLVT):

1. Have overall responsibility for ensuring the implementation of the ESCoP.
2. Ensure all environmental and social requirements are included in the bidding documents and contracts of civil works and the installation of digital infrastructures.
3. Ensure allocation of sufficient budget for ESCoP implementation and monitoring.
4. Ensure the design engineers, target TIs and JCs, and the contractors implement the ESCoP properly and in compliance with the requirement.
5. Prepare and submit semi-annual E&S monitoring reports to WB.

Target TIs and JCs and the Contractors:

1. Be responsible for implementing the ESCoP and relevant environmental and social requirements.
2. Report any incidents related to E&S impacts and risks and take appropriate actions.
3. Report regularly to the PMU on the implementation status and performance of ESCoP.

Clause on ESCoP

The Contractor is required to implement this ESCoP. The Contractor is responsible for the implementation of construction and rehabilitation activities for the sites and for implementing the impact mitigation measures in the construction phase. The Contractor's approach shall be detailed in the Contractor's Management Plan.

The Contractor shall include a suitably qualified and experienced Environmental, Occupational Health and Safety Officer (and other staff or consultants as necessary) to be specifically responsible for preparation and regular update and supervision of the ESCoP. The Environmental, Occupational Health and Safety Officer is responsible for the daily supervision and monitoring of the Contractors implementation of the Plan and compliance with the Project ESCoP for the duration of the contract. The Contractor's approach to comply with the ESCoP shall be approved by PMU prior to the Contractor's mobilization to the site.

The Contractor will be required to report on the implementation status of the ESCoP to PMU. The damages due to the violation of the stipulations by the Contractor shall be compensated and/or restored by the Contractor at his or her own expense. Performance will be monitored by PMU and will be enforced by withholding of payments (refer to relevant clause in the bid documents).

Mitigation measures in detailed design and tendering document preparation.

As the Project enters the implementation stage, relevant procurement activities will be implemented according to the Procurement Guidelines of the World Bank. The PMU of MLVT is required to include the mitigation measures proposed in the ESCOP against any potential adverse environmental impacts into the technical specifications of the tendering documents and design drawing and the construction design under the coordination, guidance and supervision of the PMU. The tendering documents need to require

the tenderer to make commitments on the following environment management requirement in the bid document and incorporate such contents into the construction contract of the civil works.

i) The contractor is required to provide one environment engineer on each construction site responsible for implementing the environmental protection measures throughout the construction stage to assure that the construction activities of the contractor and its subcontractors (if any) satisfy the various requirements of this ESCoP and necessary environmental protection measures are taken in the construction process.
ii) In the construction process, the contractor is required to communicate and negotiate with the local people in the project area and set up a bulletin board at the entrance of each construction site to disclose detailed information to the public such as construction works, construction time as well as the contact person and contact information for complaints and advices.
iii) The contractor should actively assist the construction supervision agency commissioned by the owner in carrying out the various environmental supervision tasks in the construction stage.
iv) The contractor must include the "Site Environment Management Plan" in its construction program after the contract is signed and before the commencement of the construction works.
v) The contractor must respect the local construction safety and civilization requirements.
vi) The contractor should take timely remedial measures in case of any serious environmental impacts arising from non-compliance of environmental protection measures proposed in this ESCoP and a report should be delivered within 24 hours to the TI or JC ant the PMU at MLVT. The PMU should supervise and assist the contractor to take such remedial measures. The contractor must keep records of the implementation status of such measures and report to the construction supervision unit and the PMU.

Construction and Installation Activities and Environmental Rules for Contractors.

Any huts, office accommodations, toilets and welfare facilities should be accommodated within the boundaries of the construction sites. The contractor should prepare a layout and obtain PMU/building owner's permission prior commencement of works. The layout plan shall indicate stockpiling of materials and waste containers.

The Contractor should always follow a 'good housekeeping' policy. This should include, but not necessarily be limited to the following:

i) Ensure considerate behavior of the Contractor's staff;
ii) Prohibit open fires;
iii) Ensure that appropriate provisions for dust control and road cleanliness are implemented;
iv) Remove rubbish at frequent intervals, leaving the construction sites clean and tidy;
v) Remove food waste;
vi) Frequently inspect, repair and re-paint as necessary all construction site hoardings;
vii) Remove all flying posts/boards as soon as reasonably practicable and within 24 hours of notice; and
viii) Maintain toilet facilities and other welfare facilities for staff.

Core working hours should be from 08:00 to 18:00 on weekdays and 08:00 to 13:00 on weekends. Noisy operations shall not take place outside these hours without prior approval from the PMU and/or building owners and relevant authorities. Individual construction site requirements which differ from the above should be considered on a site-by-site basis.

On completion of the works the Contractor should clear away and remove all materials and rubbish and temporary works of every kind. Construction sites should be left clean and in a condition to the satisfaction of the PMU or delegated agencies and authorities.

Other Standard Clauses

Permits and Approvals

The contractor shall be responsible for ensuring that he or she has all relevant legal approvals and permits required to commence works.

Public information and site access

Any un-authorized entry to or exit from the construction sites should be restricted as much as possible. Upon request, the Contractor should provide public information on the construction program (start and finish dates), plus a telephone number for public contacts and/or requests.

Prohibitions

The following activities are prohibited on or near the project sites:

i) Cutting of trees for any reason outside the approved construction area;
ii) Hunting, fishing, wildlife capture, or plant collection;
iii) Use of unapproved toxic materials, including lead-based paints, asbestos, etc.;
iv) Disturbance to anything with architectural or historical value;
v) Burning of waste;
vi) Illegal dumping of ICT equipment, material and debris;
vii) Use of firearms (except authorized security guards);
viii) Use of alcohol by workers; and
ix) Illegal sourcing of construction materials such as sand and gravel.

Site Security

The contractor shall be responsible for maintaining security over the construction site including the protection of stored materials and equipment. In the event of severe weather, the contractor shall secure the construction site and associated equipment in such a manner as to protect the site and adjacent areas from consequential damages. This includes the management of onsite, construction materials, construction and sanitary wastes, additional strengthening of erosion control and soil stabilization systems and other conditions resulting from contractor activities which may increase the potential for damages.

Discovery of Antiquities and Cultural Heritage

If, during the execution of the activities contained in this contract, any material is discovered onsite which may be considered of historical or cultural interest, such as evidence of prior settlements, native or historical activities, evidence of any existence on a site which may be of cultural significance, all work shall stop and the supervising contracting officer shall be notified immediately and the Chance Find Procedures followed. The area in which the material was discovered shall be secured, cordoned off, marked, and the evidence preserved for examination by the local archaeological or cultural authority. No item believed to be an artefact must be removed or disturbed by any of the workers. Work may resume, without penalty of prejudice to the contractor upon permission from the contracting officer with any restrictions offered to protect the site.

Worker Occupational Health and Safety

The contractor shall ensure that all workers operate within a safe environment. Sanitation facilities shall be provided for all site workers. All sanitary waste generated as a result of project activities shall be managed in a manner approved by the contracting officer and the local authority responsible for public health. The contractor shall ensure that there are basic medical facilities on site and that there are staff

trained in basic first aid. Workers must be provided with the necessary protective gear as per their specific tasks such as hard hats, overalls, gloves, goggles, boots, etc. The contractor shall provide the contracting officer with an occupational health and safety plan for approval prior to the commencement of site activities.

The contractor must ensure that all workers operate within a safe environment. All relevant Labor and Occupational Health and Safety regulations must be adhered to ensure worker safety. Sanitary facilities must be provided for all workers on site. Appropriate posting of information within the site must be done to inform workers of key rules and regulations to follow.

Emergency Procedures: The Contractor must ensure that emergency procedures are developed to facilitate effective actions in case of medical/fire emergency as well as environmental pollution (major spillage of gasoline, used oil, and/or toxic chemicals, etc.). The emergency procedure must contain emergency phone numbers and the method of notifying the statutory authorities. Contact numbers for the key staff of the contractor must also be included.

Fire Prevention and Control: All construction sites and associated accommodation or welfare facilities must have appropriate plans and management controls to prevent fires in place. The site fire plans must be prepared by the contractors and must have due regard to government regulations. During operation and maintenance of equipment and vehicles, the Contractor must ensure that its workers are well aware of the procedures and have enough knowledge to comply with them. The specification of non-combustible materials, products and packaging should be pursued wherever reasonably practicable. The Contractor must also comply with government requirements as may be appropriate at specific sites.

Operation of equipment: The Contractor must take all reasonable precautions to ensure that equipment is operated in a manner so as not to cause safety risk and/or nuisance to surrounding residents and occupiers. Operations of cranes and other large equipment must be closely supervised. Permission may be required.

Accident prevention. The Contractor's responsibilities include the protection of every person and nearby property from construction accidents. The Contractor shall be responsible for complying with all government safety requirements and any other measures necessary to avoid accidents, including the following:

- Properly install notice signs/board at construction sites
- If trainees are in the vicinity, include traffic safety personnel to direct traffic during training hours;
- Conduct safety training for construction workers prior to beginning work;
- Provide necessary personal protective equipment and clothing (goggles, gloves, respirators, dust masks, hard hats, steel-toed and -shanked boots, etc.,) for construction workers and enforce their use;
- During emergencies of any kind, suspend all work.

Noise Control

The contractor shall control noise emissions generated as a result of contracting activities to the extent possible. In the case of site locations where noise disturbance will be a concern, the contractor shall ensure that the equipment is in good working order with manufacturer supplied noise suppression (mufflers etc.) systems functioning and in good repair.

Where noise management is a concern, the contractor shall make reasonable efforts to schedule activities during normal working hours (between 7 am and 5 pm). Where noise is likely to pose a risk to the surrounding community either by normal works or working outside of normal working hours or on

weekends, the contractor shall inform the contracting officer and shall develop a public notification and noise management plan for approval by the contracting officer. Additionally, contractor shall have lightweight, hand-held, portable monitoring meters for noise measures in place for daily monitoring.

Use and Management of Hazardous Materials, fuels, solvents and petroleum products

The use of any hazardous materials including pesticides, oils, fuels and petroleum products shall conform to the proper use recommendations of the product. Waste hazardous materials and their containers shall be disposed of in a manner approved by the contracting officer in accordance with State and/or national laws and the subproject-specific ESMPs. A site management plan will be developed by the contractor if the operation involves the use of these materials to include estimated quantities to be consumed in the process, storage plans, spill control plans, and waste disposal practices to be followed. Any plans required shall be approved by the contracting officer.

Elements of the hazardous materials management shall include:

- Contractor must provide temporary storage on site of all hazardous or toxic substances in safe containers labeled with details of composition, properties and handling information;
- Hazardous substances shall be placed in a leak-proof container to prevent spillage and leaching; and
- Wastes shall be transported and disposed of in a manner outlined in the ESMP, and cleared by the PMU compliant with national laws and policies and the ESMP.

Use and Management of Pesticides

Any use of pesticides shall be approved by the contracting officer and shall conform to the manufacturers' recommendations for use and application. Any person using pesticides shall demonstrate that they have read and understood these requirements and are capable of complying with the usage recommendations to the satisfaction of the contracting officer. All pesticides to be used shall conform to the list of acceptable pesticides that are not banned by the relevant local authority.
If termite treatment is to be utilized, ensure appropriate chemical management measures are implemented to prevent contamination of surrounding areas, and use only licensed and registered pest control professionals with training and knowledge of proper application methods and techniques.

Use of Explosives

No explosives shall be used under the Project.

Site Stabilization and Erosion Control

The Contractor shall implement measures at the site of operations to manage soil erosion through minimization of excavated area and time of exposure of excavated areas, preservation of existing ground cover to the extent possible, provision of approved ground cover and the use of traps and filtration systems. Where excavations are made, contractor shall implement appropriate stabilizing techniques to prevent cave-in or landslide. Measures shall be approved by the contracting officer.

The contractor must ensure that appropriate erosion control measures such as silt fences are installed. Proper site drainage must be implemented. Any drain clogged by construction material or sediment must be unclogged as soon as possible to prevent overflow and flooding. The use of retaining structures and planting with deep rooted grasses to retain soil during and after works must be considered. The use of bio-engineering methods must be considered as a measure to reduce erosion and land slippage. All slopes and excavated areas must be monitored for movement.

The contractor will establish appropriate erosion and sediment control measures such as hay bales, sedimentation basins, and / or silt fences and traps to prevent sediment from moving off site and causing excessive turbidity in nearby streams, rivers and wetlands. Construction vehicles and machinery will be washed only in designated areas where runoff will not pollute natural surface water bodies.

Air Quality

The Contractor shall comply with the Project ESMF requirements for dust management.

Traffic/Transport Management

In the event that construction activities should result in the disruption of area transportation services, including temporary loss of roadways, blockages due to deliveries and site related activities, the contractor shall provide the contracting officer with a traffic management plan including a description of the anticipated service disruptions, community information plan, and traffic control strategy to be implemented so as to minimize the impact to the surrounding community. This plan shall consider time of day for planned disruptions, and shall include consideration for alternative access routes, access to essential services such as medical, disaster evacuation, and other critical services. The plan shall be approved by the contracting officer.

Elements of the traffic management plan to be developed and implemented by contractor shall include:

- Alternative routes will be identified in the instance of extended road works or road blockages;
- Public notification of all disturbance to their normal routes;
- Signage, barriers and traffic diversions must be clearly visible, and the public warned of all potential hazards;
- Provision for safe passages and crossings for all pedestrians where construction traffic interferes with their normal route;
- Active traffic management by trained and visible staff at the site or along roadways as required to ensure safe and convenient passage for the vehicular and pedestrian public; and
- Adjustment of working hours to local traffic patterns, e.g. avoiding major transport activities during rush hours or times of livestock movement.

Water Quality

The Contractor shall comply with the Project ESMF requirements for water quality. Under no circumstances shall the contractor permit the collection of standing water as a consequence of contractor activities to ensure that it does not create breeding grounds for any pests such as mosquitoes.

Management of Solid Wastes and Construction Debris

The contractor shall provide a solid waste management plan that conforms to the national solid waste management policies and regulations and the Project ESCoP for approval by PMU (see Annex 5). The site waste management plan shall include a description of waste handling procedures including collection, storage and disposal through the national waste management system. There will be no open burning of waste material and the contractor shall endeavor to recycle waste as appropriate. Under no circumstances shall the contractor allow construction wastes to accumulate so as to cause a nuisance or health risk due to the propagation of pests and disease vectors.

Management of Workers/Workforce

The Contractor will prepare a specific Code of Conduct (see Appendix 6) to describe the expected behaviors of their project worker in relation to the local communities and their social sensitivities. This is to avoid creating demand for illegal sex work, avoid Gender-Based Violence and Violence Against Children,

manage alcohol consumption and avoid the use of illegal substances, and abide by cultural and social norms of the host community. The Contractor is to ensure no children (persons under the age of 18) are hired to work in the project.

The Contractor is to ensure that all overseas project staff undergo a training on the Staff Code of Conduct. Gender based violence and HIV/AIDS and communicable disease awareness raising and resources shall also be provided to all workers. PMU of MLVT shall provide to the Contractor a list of approved service providers, which shall include recognized NGOs and others for conducting this training.

The Contractor is to stipulate the conditions under which visitors may attend the workers' accommodation, including curfews. The Contractor shall ensure that basic social/collective rest and recreation spaces and activities within the workers accommodation to help minimize the impact that the workers would have on the leisure and recreational facilities of the nearby communities. The Contractor must comply with the Labor Management Procedures (Appendix 5).

As per guidelines in the ESCoP, the Contractor must ensure that Worker's Camps are located at least 500m from nearby communities and schools (see Part B).

Earthworks, Cut and Fill Slopes

During the upgrading of the benefited digital infrastructures, contractors shall implement following requirements where applicable:

1. Minimize the area of soil clearance.
2. Maintain slope stability at cut faces by implementing erosion control measures.
3. All raw materials shall be sourced from a licensed entity.
4. On site good soil maintenance practices:
    - Minimize the area of soil clearance.
    - Maintain slope stability at cut faces by implementing erosion protection measures.
    - Use temporary berms or other appropriate temporary drainage provisions to prevent stormwater runoff.
    - Dispose of spoil (if any) by a contracted qualified entity

Demolition of Existing Infrastructure

In case the demolition of existing infrastructure, e.g. a power distribution room or a generator base, following requirement shall be adhere to:

Before demolition of the infrastructure, the civil works contractor should develop a demolition program and submit it to the construction supervision agency and digital infrastructure operators for approval. Dust prevention and control measures should be taken during the demolition including removal of cumulated dust, spraying water on the demolished structure and erecting fences. A site for stockpiling of garbage and debris should be designated on the construction site of demolition and the debris and construction waste should be removed out of site in a timely manner and transported along the approved route and within the approved time period to a designated disposal site.

Community Relations

To enhance adequate community relations, the Contractor shall:

i) Inform the local authorities and community about construction and work schedules, interruption of services, traffic detour routes and provisional bus routes, as appropriate; and
ii) Limit No construction activities at night.

Environmental training and education

Training and education on environmental protection should include the following contents:

i) Prior to the commencement of the Project, the PMU should assign an environmental specialist to provide environmental protection training for the contractors and construction supervision agencies of the small civil works;
ii) Prior to the commencement of the construction works, the contractor of the civil works should organize training and examinations for the operators on the construction sites on laws and regulations on environmental protection and health and sanitation;
iii) The contractor of the civil works should organize staff training on the risk emergency response plan as well as emergency response rehearsal.
iv) The contractor of the civil works should organize occupational health training and physical examination on a half-year basis for operators handling toxic and hazardous substances and provide guidance to such operators on correct use of occupational disease prevention devices and personal labor protection devices.
v) The civil works contractor should prepare a training plan to provide appropriate site briefing, dialogue toolkits, safety guidance to all employees and visitors. The training plan should also include details on training time and frequency.
vi) Environmental protection inspection system must be set up on the construction sites and inspection records should be properly maintained by the contractor and the PMU.

Annex 7a. Checklist for Environment Protection Inspection on Construction Sites Instructions:

This table is the checklist for environmental protection inspections in the construction stage of the small civil works and includes the environmental protection measures tailored to the specific subprojects and the local environmental conditions, which may be added or adjusted if necessary.

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Name of subproject: Contract No. and Subproject Location:
Name of construction site:

Current construction stage: inspection items		Inspection result ("√")			Notes / Recommended actions
		Yes	No	N/A	
I. General requirements	1.1 Are effective measures for prevention and control of air, water, noise, solid waste pollution and soil erosion and improvement of environmental sanitation included in the construction organization design of the Project?				
	1.2 Is an Environmental protection and environmental sanitation management and inspection system set up on the construction sites?				
	1.3 Are records kept of inspections of environmental protection and environmental sanitation management on the construction site?				
	1.4 Are necessary protective devices provided to the operators and effective measures taken for prevention and control of occupational diseases?				

	1.5 Are periodical physical examination and training organized for workers engaged in operations involving hazards of occupational diseases?				
	1.6 Does the education and training and assessment for operators on construction sites include contents of laws and regulations related to environmental protection and environmental health?				
	Others (please specify)				
II. Site arrangement and temporary facility construction	2.1 Is the construction area on the construction site clearly separated from the office area?				
	2.2 Is the construction area kept tidy and in good order?				
	2.3 Is the company name or company logo displayed at the entrance and exit of the construction sites? Is a project introduction bulletin board set up at obvious positions at the main entrance and exit?				
	2.4 Is land occupation involved in the newly constructed temporary buildings reasonable? Are the safety and fire protection requirements satisfied?				
	2.5 Is a special storage space provided for oils and chemical solvents stored in the construction sites? Are warning signs erected?				
	2.6 Is the floor in the warehouse of oils and chemical solvents subject to anti-seepage treatment? Are absorbing bags, sand and chips among other emergency response materials prepared in the warehouse?				
	Others (please specify)				
III. Working conditions and environmental safety	3.1 Are the construction sites enclosed with color steel fences at a height of not less than 2.5m and, in sensitive areas, not less than 3m?				
	3.2 Are acceptable bulletin boards erected on the construction sites to disclose information on the rules and regulations on environmental protection and civilized construction?				
	3.3 Does the construction contractor take protective measures to ensure the safety of buildings, structures and underground pipelines adjacent to the construction works?				
	3.4 Is a safety distance set for large and high scaffolds, tower cranes and other large mechanical equipment on the construction sites from overhead power transmission lines?				
	3.5 Are hard safety protection measures taken for sidewalks and vehicle entrances and exits in the vicinity of the construction works? Are lighting and indication devices provided at night?				
	3.6 Are visible safety warning signs complying with the national standard erected at dangerous positions on construction sites?				

	3.7 Are appropriate safety and technical measures taken on construction sites based on seasonal changes achieve the conditions of safe and civilized construction?				
	3.8 Are fire extinguishing devices properly maintained and the escape routes kept free of obstacles?				
	Others (please specify)				
IV. Dust pollution control	4.1 Are the existing or planned roads on and around the construction sites utilized to the best possibility as access roads on site?				
	4.3 Are materials on the construction site stockpiled in a centralized way?				
	4.4 Is the site for material stockpiling selected in a reasonable way?				
	4.5 Are the sites for storage and process of materials and storage of large formworks on the construction sites flat and solid?				
	4.6 Are dust-prone, fine and bulk materials stockpiled on the construction sites stored in an enclosed space and proper covering measures taken in the course of loading and unloading and transportation?				
	4.7 Are measures taken for proper covering, curing or greening for sites for centralized stockpiling of earth materials?				
	4.8 Are the soil spoils utilized in a comprehensive way or transported to designated places for disposal?				
	4.9 Is dust suppression carried out through water spraying on exposed surfaces in the office and living areas on construction sites? Are landscaping and beautification measures taken if needed?				
	4.10 Are earth, debris and construction waste transported using enclosed vehicles?				
	4.11 Are vehicle washing facilities provided at the entrances and exits of the construction sites?				
	4.12 Are pre-mixed concrete and pre-mixed mortar used on construction sites?				
	4.13 Are dust prevention and dust removal measures taken during operation of concrete and mortar mixing?				
	4.14 Are earthwork backfilling and transportation and other dust-prone construction activities prohibited in windy days with a strong wind of or above Grade 4?				
	Others (please specify)				
V. Emission control of hazardous gases	5.1 Is Burning of wastes prohibited on the construction sites?				
	5.2 Are the construction vehicles and plants maintained in excellent condition and tail gas				

	emitted by such vehicles and plants complying with the national emission standards?				
	5.3 Are construction materials tested and accepted by lawful test bodies selected as the decoration materials?				
	5.4 Are bitumen, coal tar and similar anticorrosion and moisture proof treatment agents prohibited for wood panels and other wood materials used in the decoration works?				
	5.5 Are fume treatment facilities installed in kitchens in the living areas on construction sites according to the respective requirements?				
	Others (please specify)				
VI. Water pollution control	6.1 Are sedimentation tanks provided at sites for washing and cleaning of concrete mixers and transportation vehicles on the construction sites?				
	6.2 Is direct discharge of wastewater into the municipal sewage pipelines or rivers prohibited?				
	6.3 Is wastewater recycled or used for dust suppression after secondary sedimentation?				
	6.4 Are the temporary toilets and septic tanks provided on the construction sites subject to antiseepage treatment?				
	6.5 Are drainage gutters provided on the construction sites and the wastewater discharged into the municipal sewage pipeline or natural rivers after properly settled? Are the drainage ditches kept tidy and free of obstacles to assure smooth drainage?				
	Others (please specify				
VII. Noise pollution control	7.1 Are the requirements of construction time strictly followed?				
	7.2 Are low-noise equipment selected and proper maintenance provided for equipment?				
	7.3 Are noise-generating equipment located on the far side from the residents?				
	7.4 Are the construction vehicles subject to measures of speed limit and honking prohibition?				
	7.5 Are noise-generating equipment (air compressors, power generators, etc.) located in an enclosed facility?				
VIII. Waste control	8.1 Are enclosed garbage stations provided on construction sites and construction wastes and domestic wastes stored separately and removed out of site in a timely manner?				
	8.2 Are construction wastes inside buildings removed out of the buildings in containers or via pipelines?				
	8.3 Are wastes generated from the activities of construction, demolition and site clearing separately treated and collected for reuse?				
	8.4 Does the construction waste transportation unit hold a waste digestion qualification certificate and				

	business license granted by the concerned authorities?				
	8.5 Are waste oil and chemical solvents stored at a centralized place and handled by a qualified agency?				
	8.6 Are obvious oil spillage noticed of the construction equipment?				
	8.7 Are enclosed garbage stations provided in the construction camps for timely collection, removal and digestion of domestic solid wastes of staff according to the respective requirements?				
	8.8 Are all the solid wastes generated during construction fully removed after the construction is over?				
	Others (please specify)				
IX. Soil erosion control	9.1 Did the contractor hire a permitted waste handling entity?				
	9.2 Is attention paid to clearing and storage of top soil to make sure it is used for vegetation restoration after the construction works is completed?				
	9.3 Are interception and diversion ditches constructed to divert storm water formed in rain season and avoid runoff scours?				
	Others (please specify)				
X. Safeguarding of cultural properties	10.1 If any cultural relics and historic sites are discovered or suspected in the construction stage, the construction contractor shall immediately suspend the works and protect the site and submit a report to the local cultural relics bureau for further action. The construction works shall not be resumed until an action is taken by the Cultural Relics Bureau.				
	Others (please specify)				
XI. Vegetation protection	11.1 Are there any activities of tree felling outside the construction area?				
	11.2 Is the layout of the construction sites reasonably optimized (judged based on the level of reduction of damages to vegetation from implementation of the construction works)?				
	11.3 Are effective measures taken in a timely manner against vegetation damaged and exposed surface resulting from the construction activities to avoid soil erosion and loss (e.g., covering the exposed surface with sand and gravels or planting fast-growing grass)?				
	11.4 Are the sites where original vegetation is damaged restored or reasonably landscaped upon the completion of the construction works?				
	Others (please specify)				
XII. Risk prevention	12.1 Is an accident prevention plan developed?				
	Others (please specify)				
XIII. Occupational	13.1 Are warning signs or instructions provided at job positions and equipment or sites prone to				

health	occupational diseases and hazards on the construction site?				
	13.2 Do operators should wear earmuffs during high-noise operation to protect hearing?				
	13.3 Do operators working in sites involving toxic and hazardous gases wear gas masks or protective masks?				
	13.4 Do operators in dusty operation sites wear dust masks?				
	13.5 Do operators in welding operations wear protective masks, goggles and gloves and other personal protective equipment?				
	13.6 Are summer cooling supplies provided on construction sites where high-temperature operations are involved and reasonable work and rest timetable developed?				
	Others (please specify)				
XIV. Health and epidemic prevention	14.1 Are the respective health standards satisfied in terms of meals, drinking water, and rest places provided for staff on the construction sites?				
	14.2 Are toilets, sanitary facilities, drainage gutters and dark and humid areas sterilized on a periodical basis?				
	14.3 Are clinics provided on construction sites and equipped with health kits, frequently used drugs and bandages, tourniquets, neck care, stretchers and other first aid devices?				
	14.4 Are incidents of infectious diseases, food poisoning, acute occupational poisoning of the construction workers promptly reported to the local health and epidemic prevention authorities and construction administration authorities so that corresponding actions are taken in accordance with the relevant provisions of the health and epidemic prevention authorities?				
	Others (please specify)				
XV. Traffic safety	15.1 Is safety education and training organized to particularly make the drivers aware of the importance of safe driving?				
	15.2 Are actions taken to limit driving time and make sure drivers drive in turns? Are actions taken to avoid driving on dangerous roads and time periods to minimize traffic accidents?				
	15.3 Are vehicles regularly maintained using manufacturer-approved spare parts, which should be purchased in a timely manner?				
	15.4 Are locally purchased materials used where possible to minimize transportation distance?				
	15.5 Are drivers mandatorily required to be licenses?				
	Others (please specify)				

Stage of inspection:
Date of inspection:
Time of inspection:
Checked by: (signature)
Supervision Engineer: (signature) _____
Notes:
(1) Information to be noted may include remarks on non-conforming situations observed on site, and recommended corrective or preventive actions.
(2) In the event of any unacceptable measures or situations requiring further improvement identified during site inspection, the Supervision Engineer may immediately issue an “Instruction on Environmental Protection Corrections” to the contractor and indicate the serial number of the Instruction herein. Details of corrective actions taken by the contractor need to be recorded separately.
(3) This table is the checklist for environmental protection inspections in the construction stage of the small civil works and is applicable to the specific subprojects and specific environmental problems. This table may be adjusted, and corresponding measures of environmental protection may be taken, where appropriate, based on local environmental conditions and construction components.

Part B: Guidelines for Workers' Camps

If relevant, these guidelines will help the contractor when setting up workers' camps.

GENERAL

The Workers' Camp Management Plan will be compliant with the specific prescriptions of the ESMP.

WORKER RECRUITMENT

The Contractor is required to minimise the number of skilled workers that are recruited from overseas. No unskilled labour will be sourced from overseas. Local communities should be prioritized for unskilled labor. The Contractor will maximise the number of skilled and unskilled workers that are recruited from the communities along the project site.

The Contractor will be required to provide justification for any skilled workers recruited from overseas and explain why this position cannot be filled locally/ in Cambodia.

WORKERS CAMP FACILITIES

All facilities in the Workers' Camp must be complaint with the stipulations of the ESMP. The camp shall be provided with the following minimum facilities:

- Eating space and dormitories as required shall be constructed of suitable materials to provide a safe healthy environment for the workforce and which facilitate regular cleaning and the provision of ventilation and illumination.
- At least one water closet toilet, one urinal and one shower per 10 personnel engaged either permanently or temporarily on the project. Separate toilet and wash facilities shall be provided for male and female employees, including ensuring that toilets are available close to working sites/road sections where women are working.
- A sick bay and first aid station.
- Sewage collection facilities to allow for the treatment of black and grey wastewater discharge from toilets, washrooms, showers, kitchens, laundry and the like. The management of all camp wastewater water shall be as prescribed in the ESMP.
- All camp facilities shall be maintained in a safe clean and or appropriate condition throughout the construction period.
- Throughout the period of the contract the employer, the engineer, or their representatives shall have uninterrupted access to and from the camp for the purpose of carrying out routine inspections of all buildings, facilities or installations of whatever nature to ensure compliance with this specification.

WORKERS' CAMP OPERATIONS

- The Contractor will be required to provide adequate provisions for the workers for the duration of the project so as not to be a burden on the food or water security of the surrounding communities. The Contractor will strive to hire local labor to provide cleaning and food services.
- All wastewater, solid waste, freshwater usage, noise levels, handling and storage of hazardous materials shall be as prescribed in the ESMP.

MANAGEMENT OF OFF DUTY WORKERS

- The Contractor will prepare ensure all staff sign and adhere to the Individual Code of Conduct to describe the expected behaviours of their project worker in relation to the local communities and their social sensitivities.

- The Contractor is to ensure that all overseas project staff, not already living in Cambodia, undergo a cultural familiarisation session as part of their induction training. The purpose of this induction will be to introduce the project staff to the cultural sensitivities of the local communities and the expected behaviours of the staff in their interactions with these communities.
- The Contractor is to stipulate the conditions under which visitors may attend the workers camp. Strict visiting hours should be enforced and all visitors will be required to sign in and out of the workers' camp. No overnight visitors will be allowed.
- The Contractor shall ensure that basic social/collective rest spaces are provided equipped with seating within the Workers Camp to help minimise the impact that the workers would have on the leisure and recreational facilities of the nearby communities. Provisions should also be made to provide the workers with an active recreation space within the camp.

WORKERS' CAMP MANAGEMENT PLAN

A Workers' Camp Management Plan shall be submitted by the Contractor to PMU. The Workers' Camp Management Plan shall describe how this document and the ESMP shall be implemented in the following:

- Recruitment strategy;
- Accommodation;
- Canteen and dining areas;
- Ablutions;
- Water supply;
- Wastewater management system;
- Proposed power supply;
- Code of Conduct for Workers;
- Recreational/leisure facilities for workers;
- Visitors to the Workers' Camp;
- Interactions with the local communities.

Part C: Standard practice to prevent COVID-19 contagion

Given the global issues related to COVID-19 pandemic, all communities who work for project will apply the basic knowledge and procedures to prevent COVID-19. The below provides some specific guidance on Infection Prevention and Control Protocol (IPCP) of the COVID-19 recommended by WHO.

1. Conduct risk assessment to identify low, medium or high exposure risk to COVID-19
2. Prepare an action plan for prevention and mitigation of the spreading of COVID-19.
3. Monitor the implementation of COVID-19 measures and apply.
4. Conduct risk communication, training, and education. Training of teachers, staff and students and any construction workers in infection prevention and control practices.
5. Dissemination about COVID-19 prevention and mitigation measures to teachers, staff and students and any construction workers through orientation or distributing leaflet/poster at information/safety board at each construction and camp site.
6. Daily checking temperature of teachers, staff and students and any construction workers.
7. Teachers, staff and students and any construction workers have to wear a face mask all the times indoor.
8. Avoid common physical greetings, such as handshakes.
9. Maintain a minimum physical distance of one metre from others if possible.
10. Wash hands often with soap and water for at least 20 seconds after using the washroom, before handling food, after blowing nose, coughing, or sneezing, and before smoking. If hands are not visibly soiled, and soap and water are unavailable, alcohol-based hand sanitizer can be used.
11. Coughing or sneezing into a tissue or the bend of your arm, not your hand.

Responds Measures if there is a COVID-19 Case

12. Individuals who have been potentially exposed to the virus, or who are exhibiting flu-like symptoms such as fever, tiredness, coughing, or congestion are instructed to: Not come to work; Contact their supervisor and/or human resources department; Stay at home and self-isolate; and contact local health authorities for further direction.
13. Such individuals are required to follow the directions of the local health authorities and may not return to work until given approval by the proper health authorities.
14. Individual who begins to display flu-like symptoms on site are instructed to avoid touching anything, take extra care to contain coughs and sneezes, and return home immediately to undergo self-isolation as directed by the local health authority.

Part D: Asbestos Management Procedure

Prohibited Use and Activities

No asbestos materials will be used, re-used or brought onto project site. New or second-hand plant, equipment or consumables shall not contain asbestos. The following activities must not occur on existing Asbestos Containing Materials (ACM):

- Using high pressure water spray;
- Using compressed air;
- Using power tools;
- Using brooms (on dust);
- Abrasive hand tools.

Identification of all existing Asbestos Containing Materials (ACM)

If buildings or plants are required to be refurbished or demolished, an additional asbestos identification is required for previously inaccessible areas and is advisable for items previously assumed to contain asbestos.

Risk Control

The primary objective of asbestos risk control is to prevent the inhalation of asbestos fibres. This will be achieved by:

- The removal whenever reasonably practicable of ACM under strictly controlled conditions by trained, competent and licensed personnel.
- Enclosing, containing, sealing or encapsulating asbestos.
- Identifying all known or suspected ACM on the site asbestos register and with labels or signage.
- Avoiding disturbance of low risk ACM with regular review of its condition.
- Providing asbestos awareness training.
- Providing appropriate PPE for work where exposure risk cannot be adequately controlled by the above measures.

Demolition, Removal and Disposal

Removal of ACM must be conducted by a licensed asbestos removalist or authorized firm's staff. The removal of bonded asbestos contamination from soil where there is no friable asbestos and the bonded asbestos content is less than regulatory limits (refer Annex below).

The following requirements must be met for all asbestos removal jobs:

- Removal must comply with local regulatory requirements;
- The removalist must be appropriately licensed for the type of removal;
- The person responsible for managing asbestos removal must have completed asbestos awareness training;
- Barricades and signage must be in place during removal to ensure normal operating personnel may not enter the asbestos removal area until removal is complete;
- Where asbestos is required to be removed from a site, the asbestos must be removed in accordance with local legislated requirements.

Annex: Management of asbestos contaminated soil

Asbestos contamination of soil may occur in a variety of situations including sites that contain or previously contained buildings or structures containing asbestos that have been damaged or improperly demolished.

Example of asbestos contaminated soil

Process to be followed if soil is suspected to contain asbestos

- Immediately suspend any soil disturbance works following discovery of suspected asbestos containing material;
- Either assume the material contains asbestos or arrange for the material to be analyses by accredited laboratory for asbestos;
- If any excavation work or soil disturbance work involving the contaminated soil is required, contact Remediation Management who will organize an assessment of asbestos contamination;
- All visible asbestos in the top 10cm of soil must be removed before commencing excavation or soil disturbance workers. All workers involved in removal must be trained in asbestos awareness;
- If it is not practicable to remove discrete ACM from topsoil, then consideration should be given to topsoil removal at a depth that has no visible contamination or asbestos debris. This need would be determined following further advice from an authorized agency.

Methodology for removing less than 10m^2 bonded asbestos from soil contaminated with bonded asbestos

- Complete a work permit stating the risk controls and requirements needed to complete the task safely. Identify the trained personnel to be involved in the task and their role and responsibilities;
- Clearly identify and demarcate the work area where the asbestos removal work is being performed and prevent access to this area by unauthorized personnel;
- Notify relevant personnel including site managers, supervisors, workers and other personnel, as necessary;
- Follow the recommendations / guidance of the licensed asbestos removalist or licensed firm.

APPENDIX 8 – Outline for ESMP

An ESMP consists of a set of mitigation, monitoring, and institutional measures to be taken during implementation and operation of a project to eliminate adverse environmental and social risks and impacts, offset them, or reduce them to acceptable levels. The ESMP also includes the measures and actions needed to implement these measures.

The ESMP will consist of:

a) Brief Project description;
b) Overview of the Project location, including socioeconomic and environmental baseline information;
c) Legislative Framework (RGC laws and regulations, WB ESF and Gap Analysis);
d) Identifying all anticipated adverse environmental and social impacts, including those involving indigenous people or other vulnerable groups, and any relevant direct, indirect or cumulative impact;
e) Describing in detail each mitigation measure, including the type of impact to which it relates to, including Labor Management Procedures, Occupational Health and Safety Procedures, Community Health and Safety Plan, Child Labor Prevention Plan, Labor Influx Plan, Road Safety Plan, GBV Prevention Plan and other plans that may be necessary, etc.;
f) Monitoring objectives and the type of monitoring, with linkages to the impacts assessed, including a description of monitoring measures, including the parameters to be measured, methods to be used, sampling locations, frequency of measurements and monitoring and reporting procedures;
g) Stakeholder Engagement, aligned with the project's SEP, and summary of consultations conducted on the ESMP;
h) Description of the Grievance Redress Mechanism, including a specific Labor-GRM for workers;
i) Description of institutional arrangements, identifying which party is responsible for carrying out the mitigation and monitoring measures (i.e. for operation, supervision, enforcement, monitoring, staff training, etc.), capacity assessment of the selected TIs and JCs and a training plan for them;
j) Implementation Schedule and Cost Estimates, showing coordination with overall project implementation plans, costs and sources of funds.

Sample Table for ESMP

POTENTIAL NEGATIVE IMPACT	ENVIRONMENTAL AND SOCIAL MITIGATION MEASURES	LOCATION	ESTIMATED MITIGATION COSTS	EXECUTING AGENCY	SUPERVISING / MONITORING AGENCY
DETAILED DESIGN/ PRE-CONSTRUCTION MOBILISATION STAGE					
CONSTRUCTION STAGE					
OPERATION AND MAINTENANCE STAGE					

POTENTIAL NEGATIVE IMPACT	ENVIRONMENTAL AND SOCIAL MITIGATION MEASURES	LOCATION	ESTIMATED MITIGATION COSTS	EXECUTING AGENCY	SUPERVISING / MONITORING AGENCY

Sample Monitoring Checklist

SUBPROJECT:		**LOCATION:**	
DATE:		**CONTRACTOR:**	
PREPARED BY:		**SUPERVISION: CONSULTANT**	

Inspection Participants: (insert names and positions)

ESMP Items	Applies		Compliance	Issues	Status (R)/ (O)	Action Required/Taken	Target/ Actual Date
	Yes	No					
Mitigation & Management Measures: Construction Phase							
Mitigation measure from ESMP							
Mitigation & Management Measures: Operation and Maintenance Phase							

Compliant, Minor Non-Compliance, Significant Non-Compliance
Status: (R) Resolved Issues, (O) Ongoing Issues

APPENDIX 9 – CERC Emergency Response Manual

Executive Summary

1. This document serves as the Emergency Response Manual (ERM) of Cambodia Skills for Better Jobs Project (the Project, P179159), Royal Government of Cambodia (RGC) for Component 4 (Contingent Emergency Response Component or CERC). It provides detailed information on (i) mechanism for activating the CERC; (ii) main instruments under the CERC; (ii) coordination and implementation arrangements; (iii) procurement, financial management and disbursement aspects; (v) compliance with Environmental and Social Framework/ESF; and (vi) monitoring and evaluation.
2. This document is considered an Annex to the Project Operations Manual (POM) of the Project.
3. The specific activities to be financed by the funds reallocated to CERC are event and demand driven. The activities selected should be consistent with CERC's purpose to provide short-term bridge financing exclusively for the immediate recovery needs related to an eligible emergency. The contents of this ERM represent the framework by which CERC will be activated and by which the approved activities will be coordinated and implemented in accordance with World Bank and national policies and procedures as agreed with the World Bank. There is no limit to the number of times the CERC may be activated, but the framework described in this ERM should be followed for each activation.

A - Background

4. The RGC has received financing from the World Bank for the Cambodia Skills for Better Jobs Project (P179159), whose development objective is to improve the quality of and equitable access to general education in target areas and to provide immediate and effective response in case of an eligible crisis or emergency.
5. The Project's total cost is USD40million, financed by WB. The Project has four components, including the CERC (Component 4); and 4 disbursement allocation categories, with a CERC Category with zero allocation.
6. The Ministry of Labor and Vocational Training (MLVT) is the owner for the Project. MLVT will establish the Project Management Unit (PMU) for the project.
7. Consistent with the Project's objectives, the CERC will support the immediate and effective response to an eligible crisis or emergency, as needed. Eligible expenditures may include critical goods, services and works to quickly restore livelihoods and lifeline infrastructure.
8. In an event of eligible crisis or emergency (as per paragraph 9 below), the RGC may submit a request to reallocate uncommitted and undisbursed funds from the Project to the CERC. The use of such resources will be subject to Bank no-objection.

B - Mechanism for Activating CERC

9. The Project's Financing Agreement establishes that four conditions should take place for requesting the CERC activation (equivalent to disbursement conditions for the CERC). These are:
    i. the Recipient has determined that an Eligible Crisis or Emergency has occurred, has furnished to the Association a request to include said activities in the Emergency Response Part in order to respond to said crisis or emergency, and the Association has agreed with such determination, accepted said request and notified the Recipient thereof;
    ii. the Recipient has ensured that all ESS instruments required for said activities have been prepared and disclosed, and the Recipient has ensured that any actions which are required

to be taken under said instruments have been implemented the entities in charge of coordinating and implementing the Emergency Response Part have adequate staff and resources, in accordance with the provisions of Section I.G of this Schedule, for the purposes of said activities; and

iii. the Recipient has adopted the ERM, in form and substance acceptable to the Association, and the provisions of the ERM.

10. An Eligible Crisis or Emergency is defined by the World Bank as an event that has caused or is likely to imminently cause a major adverse economic and/or social impact associated with natural or man-made crises or disasters. This may include: (i) cyclone: (ii) earthquake; (iii) storm; (iv) storm surge and strong waves; (v) tornado; (vi) tsunami; (vii) volcanic eruption; (viii) flood; (ix) landslides; (x) forest fires; (xi) drought; (xii) severe weather; (xiii) extreme temperature; (xiv) high winds; and (xv) any natural disaster.

11. The causal relationship between the eligible emergency and the need to activate the CERC in order to withdraw funds will be established by an official letter stating Emergency Situation by the National Committee for Disaster Management (NCDM) which is chaired by the Prime Minister and is the designated apex coordination entity for Disaster Management in country. This role was confirmed and institutionalised through the 2015 Law on Disaster Management [31] (DM-Law) (Decree No NS/RKM/0715/007, article 21).

12. Alternatively, the causal relationship between the eligible emergency and the need to activate the CERC in order to withdraw funds can be established by a Statement of Facts from a designated authority of the RGC that is also acceptable to the Bank [32] such as Notification of a State of Emergency by Provincial Committees Disaster Management (PCDMs) and District Committees Disaster Management (DCDM) formed since 2002 (Sub-decree No. 30 ANKR.BK); Commune Committees for Disaster Management (CCDM) were formed since 2006 (Sub-decree No. 61 ANKR.BK), or; Village Disaster Management Groups (VDMGs) formed in 2010 (NCDM Directive No. 315). The Statement of Facts can also be a third-party declaration of emergency, such as the United Nations (UN) Flash Appeal.

13. In case of health emergencies, third-party declarations will be considered for activating, such as the World Health Organization (WHO) Risk Assessment[33] level 2 grade and greater as described by the WHO Emergency Response Framework; or an equivalent grading by other international agencies such as World Organization for Animal Health (OIE), United Nations Environment Program (UNEP), or the Food and Agriculture Organization (FAO).

14. Upon the Statement of Facts described above, the RGC will undertake the necessary steps to complete a Rapid Needs Assessment[34] conducted by RGC (NCDM/ MLVT) or a third-party that is acceptable to the Bank, with the objective of identifying a list of potential activities for inclusion in the EAP. Upon compilation of the list of potential activities, RGC will review and select those for financing under the CERC based upon: (i) the eligibility and ESF requirements outlined in the Financing Agreement, and (ii) mandate and scope of work of MLVT as the CERC Implementing Agency.

15. The RGC will seek support from the Bank to select a list of activities for financing under the CERC

[31] http://www.ifrc.org/Global/Publications/IDRL/DM%20acts/Cambodia%20DM%20Law_English.pdf

[32] As agreed during the Bank's mission in June 2023.

[33] As described in WHO Emergency Response Framework (2013) http://www.who.int/hac/about/erf.pdf.

[34] Rapid Needs Assessment Template is in Annex 2 of this manual.

based on (i) the positive list and the negative list presented in paragraph 31 of this manual, and (ii) priorities identified at the Rapid Needs Assessment of the emergency's impact. The RGC may seek advice from the World Bank in the selection of the Project's component from which funds will be reallocated to CERC, if necessary.

16. The RGC will send an official letter from the Ministry of Economy and Finance (MEF) to the World Bank's Cambodia Country Director requesting to activate the CERC along with an activation package that includes the following information:
    a. Nature of emergency, its impacts, and confirmation of causal relationship between the event and the need to access the funding through CERC[35], as supported by the official Statement of Facts (as per paragraphs 10, 11 and 12 above).
    b. Rapid Needs Assessment (as per paragraph 17 below).
    c. Indication of Project's funding to be reallocated to CERC and the distribution of reallocation across components.
    d. An EAP (as per paragraph 18 below)[36104].
    e. Implementation modalities with respect to decentralized activities, if applicable.

17. The RGC may request Bank technical assistance to undertake the activities detailed in paragraph 14 above (e.g., Rapid Needs Assessment and other related preparatory activities to support CERC activation and implementation activities). This request can be made directly to the Country Director in a written form via letter or electronic communication.

C – Key Instruments of CERC

18. As detailed below, the key instruments of CERC are the Rapid Needs Assessment and the Emergency Action Plan (EAP):

    Rapid Needs Assessment. MLVT as the CERC Implementing Agency will conduct or adopt a Rapid Needs Assessment of the impacts and/ or needs due to the emergency as a basis for the EAP. The assessment will focus on immediate needs as a more comprehensive impact and needs assessment may follow if the situation so demands. A template of the Rapid Needs Assessment is in Annex 2 of this manual.

    Emergency Action Plan (EAP). MLVT will prepare an EAP, which is the most critical instrument for Bank support under the CERC. The EAP, as a minimum, will include the following:

    - The list of emergency activities, goods, works, services (based on the positive/negative list included in this manual) to be financed under the CERC, including itemized costs.
    - If civil works are being proposed, the locations, types and number of civil works.
    - It either confirms the CERC's implementation modalities outlined in this manual or proposes changes (which would require Bank's no-objection to the updates in the manual).
    - It should also include a summary of the environmental and social implications (e.g. potential environmental and social impacts) of proposed activities and, if needed, the environmental and social instrument(s) to be prepared in order to comply with the national law and the Bank's ESF. If deferral of ESF completion is agreed upon CERC activation, it should include an action plan for such completion. More information on ESF requirements is in the ESF section of this manual.
    - A (simplified) Procurement Plan as described in the Procurement section of this manual[37].

[35] A draft request letter to activate the CERC is in Annex 1 of this manual.

[36] A template for the EAP is in Annex 3 of this manual.

[37] A template for Procurement Plan is in Annex 3 of this manual.

- It specifies the End of Implementation Date, upon which all items financed under the EAP should have been received or completed.

D - Coordination & Implementation Arrangements

Summary of the National Civil Protection/DRM Coordination System in Cambodia:

19. While responsibility for disaster coordination (at national level) lies with the National Committee for Disaster Management (NCDM), it falls to subnational administrative structures at provincial, district/municipal, commune/sangkat[38] to deliver civil protection related activities at local level. These structures have been progressively adopted through various regulatory instruments including:
    i. Provincial Committees Disaster Management (PCDMs) and District Committees Disaster Management (DCDM) formed since 2002 (Sub-decree No. 30 ANKR.BK);
    ii. Commune Committees for Disaster Management (CCDM) were formed since 2006 (Sub-decree No. 61 ANKR.BK), and
    iii. Village Disaster Management Groups (VDMGs) formed in 2010 (NCDM Directive No. 315).
20. Jointly these established coordinating structures are meant to support and undertake preparedness and response activities in case of disaster events. The PCDMs, DCDMs and CCDMs are tasked[39] to coordinated and deliver necessary services during disaster events and support information gathering at different stages (before, during, and after) a disaster event and forwarded it up the national hierarchy to NCDM for analyse and respond to disaster events in a timely manner.
21. The main roles of the VDMG are to reinforce disaster preparedness mechanisms by sharing disaster information among local people, disseminate warnings of impending threats and assist evacuation of people and livestock in times of emergency, as well as assisting with the distribution of relief items as needed. The CCDM is responsible for commune contingency planning and the VDMG for local disaster risk reduction planning (RGC 2014).
22. The NCDM, which is chaired by the Prime Minister, is the designated apex coordination entity for Disaster Management in country. NCDM is tasked to facilitate the inter-ministerial responses to emergency and disaster events and these role(s) were confirmed and institutionalised through the 2015 Law on Disaster Management [40] (DM-Law), this re-established NCDM roles "to lead, administer and coordinate all disaster management activities".
23. A further Royal Decree elaborates on the organization and the functioning of NCDM[41], it has representatives of (all) government ministries, as well as from the Royal Cambodian Armed Forces (RCAF), Cambodian Red Cross and the Civil Aviation Authority. The decree lists ten tasks and responsibilities for NCDM (article 3), including: issuing, policies, strategic and action plans, programme, projects and guidelines for DM. As well as recommending for government action on disaster events, mainstreaming DRM, climate change, sustainable development, gender, in

[38] Designated Municipalities are districts containing the 24 provincial capitals and two main border crossing district Poipet in the Northwest on the border with Thailand and Bavet in the Southeast on the border with Viet Nam, while the "sangkats" are official communes in urban areas. Additionally, the capital Phnom Penh is a province, with its now 12 districts, officially designated as "Khans".

[39] CoM Notification No. 211 SCNSR dated 24 February 2012 of the Office of the Council of Ministers on the Guidelines on the Assessment and Reporting of Disaster Impacts, Damage and Needs

[40] http://www.ifrc.org/Global/Publications/IDRL/DM%20acts/Cambodia%20DM%20Law_English.pdf

[41] RGC (2015) Royal Decree on The Organization and Functioning of the National Committee For Disaster Management NS/RKT/1215/1141, dated 24/12/2015.

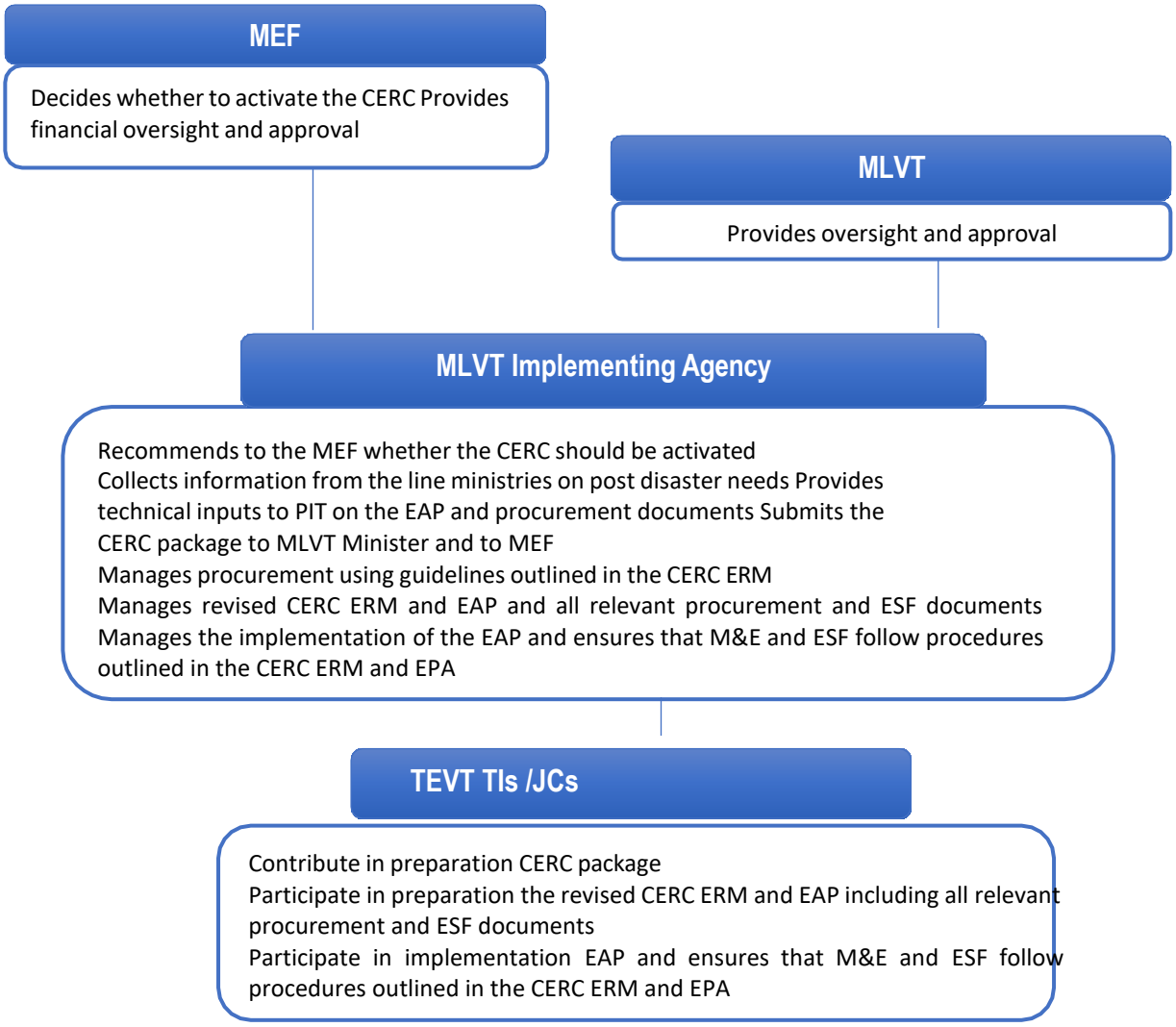
cooperation with other Ministries in developing and strengthening the institutions, mechanisms and disaster management at all levels, in particular, at local community level.

24. If the impacts of a disaster event are beyond local response capacities and abilities, the responsible subnational committees for disaster management shall immediately report to NCDM for assistance or mobilise humanitarian assistance for disaster response-based circumstances. If the scale is significant NCDM will raise proposals and measures in consultations with other parts of the Royal Government for decision making on the declaration of disaster and take actions to deal with the disaster relief and emergency response operations.
25. NCDM hosts the National Emergency Coordination Centre (NECC) which is meant to analyses information and coordinated inputs as required. And each province is reported to have also established coordination centres as needed to better support information gathering and communication.

CERC coordination and implementation arrangements for the Project:

26. In line with the implementation arrangement of Project, MLVT are the lead agencies within the RGC to implement the emergency activities under the CERC, including all aspects related to procurement, financial management, monitoring & evaluation and ESF compliance.
27. MLVT with support of the sectorial ministries will be responsible for:
    i. Ensuring the delivery of the emergency activities outputs and the accomplishments of outcomes by facilitating coordination amongst the governmental agencies and institutions participating in the implementation and by addressing coordination issues as they arise;
    ii. Reviewing progress reports as submitted by the Construction Department and act thereon if needed; and
    iii. Providing guidance as needed.

Figure 1: Implementation Arrangements for CERC



28. Below is a table that summarizes the specific steps associated with the activation, implementation, and closing and evaluation of the CERC, the assigned responsibilities and estimated time:

Table 1: Steps for implementation

Step	Actions	Responsible	Estimated Time
1	***Decision to trigger CERC:*** The RGC may inform the Bank in advance about its interest of activating CERC (and of the need for Bank technical assistance for preparatory activities such as the Rapid Needs Assessment).	MEF	
2	***Preparation of Rapid Needs Assessment****:* MLVT will undertake the necessary steps to complete a Rapid Needs Assessment.	MLVT	1 week
3	***Preparation of Emergency Action Plan (EAP):*** MLVT in coordination with MEF will prepare the EAP (as per paragraph 18 above) including a list of emergency response activities based on the results of the Rapid Needs	WB/ MLVT/ MEF/governmental agencies	2 weeks

	Assessment.		
4	***Request of activation*:** The MEF will send a letter requesting the activation of the CERC to WB. This letter will be part of a package as per paragraph 14 above.	MEF	3 weeks
5	***Bank review and non-objection of CERC Activation:*** The Bank upon positive review of activation request formally grants no-objection, including in the same communication the notification of fulfillment of disbursement conditions.	WB	4 weeks
6	***Advance of Funds to CERC*:** The Bank provides CERC advance(s) upon activation. It will process the reallocation of funds from Project components/disbursement categories to CERC as part of overall Project restructuring within 3 months of CERC activation. CERC disbursements will follow the Disbursement and Financial Information letter's (DFIL) instructions.	WB	5 weeks
7	***Implementation of EAP under CERC:*** MLVT starts the implementation of approved emergency activities agreed upon in the EAP. All Procurement, Financial Management, and Monitoring and Evaluations aspects of EAP will follow the guidance of this manual.	MLVT	18 months (EAP implementation period)
8	***Final reporting***: a final evaluation report will be prepared by MLVT once all emergency activities are finished and submitted to the WB.	MLVT	24 months (6 months from end of EAP implementation date)
9	***Closing of CERC Activation and end of EAP implementation:*** RGC and the Bank will ensure adequate closing within six months of end of EAP implementation date. This will include submission of audit reports and any other agreed technical, fiduciary and E&S implementation reports.	MEF/ MLVT/ WB	24 months (6 months from end of EAP implementation date)

E - Procurement

29. Procurement falls under Paragraph 12 of IPF Policy, Projects in Situations of Urgent Need of Assistance or Capacity Constraint, once the CERC is activated. MLVT are responsible for ensuring that the procurement policies and procedures governing the CERC are fully and successfully applied to the contracting of goods, works, non-consulting services, and consulting services related to the EAP. These policies and procedures, and the standard procurement documents are detailed in the Project. In addition to ensuring that the procurement policies and procedures are applied, MLVT are also responsible for ensuring that all the proposed procurement activities on the EAP are in-line with the ERM positive list of activities.

30. Using the funds allocated to Disbursement Category 2, the EAP will finance the immediate response to an eligible crisis or emergency, as needed. Eligible expenditures may include critical goods, consulting services, non-consulting services and works to quickly restore livelihoods, lifeline infrastructure and services. Per the World Bank's review of procurement methods and prior review thresholds, the following prior review thresholds will govern the procurement activities associated with the EAP. Upon activating the CERC and with a request from the RGC, the potential waiver to the procurement thresholds could be applied for Bank's management approval. Table 3 presents

the thresholds for prior review to be applied to CERC based on the World Bank's emergency procurement procedures.

Table 2: Threshold for procurement of works, goods and services

No.	Procurement Categories	Prior Review Threshold (US$)
1.	Goods and non-consulting services	Each package estimated to cost more than US$2,000,000.
2.	Works	Each package estimated to cost more than US$10,000,000.
3.	Selection of Consulting firms	Each package estimated to cost more than US$1,000,000.
4.	Selection of Individual Consultant	Each package estimated to cost more than US$300,000.

31. Contract below thresholds for prior review will be subject to post review based on a 20% sample.

a. Procurement Plan:

32. A Procurement Plan will be prepared based on the approved EAP as soon as it is feasible to MLVT and will be sent to the Bank through STEP for approval. This plan will also be used for monitoring and reporting purposes.

33. In order to expedite the procurement of critical goods, non-consulting services, consulting services, and civil works contracts for the execution of the EAP, MLVT may pre-qualify suppliers, service providers and contractors for the Critical Goods and Non-Consulting Services, Emergency Works, and Consulting Services which have been identified by MLVT in consultation with MEF and agreed to be financed by CERC in case of emergency (this may include e.g., Survey and Design Consultancies, Contractors for emergency repairs, and Construction materials in case PMU uses force account in emergency situations).

34. Pre-qualification would allow the RGC to check the capability of suppliers or contractors to supply the goods or carry out the works. A simple request for expressions of interest (REOI) and related technical bidding documents would be prepared annually for potential expected activities in order to create the short-list.

b. Procurement Methods and circumstances under EAP:

Consultants

35. *Single-source Selection.* Single-source selection of consulting firms and individuals may be used only if it presents a clear advantage over competition for the required consulting services. Firms and individual consultant that were selected through an applicable procurement method under the procurement guidelines applicable for the project and are already working in the country and that have proven track records in similar assignments may be the most suitable option for the start-up activities. Consultants selected on a single-source basis may be given the right to participate in future assignments under the same project provided that there is no conflict of interest with the tasks performed under the initial contract. However, for future or downstream assignments, any available information must be shared with all participating firms to ensure a level playing field.

36. ***Under the single source selection,*** MLVT is allowed to negotiate the technical aspects (work plan, methodology, approach) and also the financial aspects (unit rates, taxes, etc.) with the consultants.

37. The applicable procurement steps and other applicable methods are elaborated in the procurement manual for externally funded projects/programs in Cambodia, which is refereed in the Project.

38. *Other Streamlined Approaches.* Using a "pool of experts" or a list of "preselected" consulting firms may also be considered as an appropriate method for supporting counterpart agencies at various steps of project execution, including the procurement process and the preparation of ToR, shortlists, RFPs, and bidding documents. Remuneration and fees may be resolved at the time of pre-selection and prescribed in a framework agreement; this is similar in concept to an Indefinite Delivery Contract.

39. The steps to establish the "pool of experts" include:

    1. Draft ToRs (including Cost Estimate) based on historical experience and expected services to be provided;
    2. Draft REOIs following the ToR;
    3. Collect contact details of potential the Consultants to be directly approached by MLVT;
    4. Approach the Consultants by sending the REOI;
    5. Collect the CVs and evaluate the qualifications; and
    6. Evaluate the CVs and establish a list of qualified Consultants.

    Note: The best qualified Consultant will be approached to be provide the services in case of emergency; if the Consultant is not available the next ranked will be approached; if more than one Consultant is required MLVT will approach the Consultants as per their ranking and availability.

Civil Works, non-consulting services, and Goods

40. *Direct Contracting.* Direct contracting for the procurement of civil works, non-consulting services and goods may be used to extend an existing contracts or award new contracts in response to disasters. For such contracting to be justified, the Bank should be satisfied that the price is reasonable and that no advantage could be obtained by further competition. The direct contracting may be from the private sector, UN agencies/programs (for goods), or contractors or NGOs that are already mobilized and working in the country and that have proven track records in similar works and supply of goods; and were selected through an applicable procurement method under the procurement guidelines applicable for the project.

41. ***Under the direct contracting,*** MLVT is allowed to negotiate the technical aspects (work plan, methodology, approach) and also the financial aspects (unit rates, taxes, etc.) with the contractors or suppliers.

42. The applicable procurement steps and other applicable methods are elaborated in the procurement manual for externally funded projects/programs in Cambodia, which is refereed in the Project.

43. *Simplification of Pre- and Post- Qualification criteria.* The pre- and post- qualification criteria requirements of the Bank's Standard Bidding Documents (SBD) for both Large Works and Works can be amended in order to optimize the participation of available local or regional contractors. In particular, adapting the qualification requirements to match the qualifications of available and competent local and regional contractors.

44. *Prequalified Suppliers and Contractors.* Using lists of prequalified suppliers and contractors, to whom periodic invitations are issued, may also help accelerate the procurement process. Such an approach could be used for a large number of similar simple contracts of any size, as well as for procurement of commodities. Prequalification documents may use a simplified format that is acceptable to the Bank.

45. Suppliers and contractors would be asked to provide quotations for simple unit prices, as for commodities. Contracts should be awarded on a competitive basis, and may be for up to two years, with a price escalation clause and the possibility of extension upon mutual agreement between the client and the supplier.

46. The steps for "pre-qualification":

    1. Develop the scope of works or needs of Goods;
    2. Prepare the Technical Specifications and Type of Goods / Works;
    3. Define the Pre-qualification criteria: Technical Capacity: similar contracts, required production capacity; Financial Capacity: Turn over (for the last 3 years).

47. *Waiving Bid and Performance Security Requirements.* For contracts for goods or works, the preparation of bids by small and medium-size suppliers or contractors can be accelerated by taking the option, set out in paragraph 2.14 of the Procurement Guidelines, of not requiring a bid security. Similarly, in the case of contracts for works or supply of goods, the borrower may decide not to require a performance security in accordance with paragraph 2.40 of the Procurement Guidelines. However, in works contracts, retention money may be retained during the liability period; and for goods contracts, manufacture warranties will be requested. A bid and performance securing declaration should be required.

48. *Advance Payment.* Where it is not easy for contractors and suppliers to obtain lines of credit from banks, the Government may consider increasing the amount of advance payment under works and supply contracts to up to 20 percent of the contract value, provided that the contractor/supplier provides a bank guarantee for the same amount.

49. Flexibilities in procedures and contract provisions acceptable to the Bank in emergency situations.

    a. *Accelerated Bid Times.* Under ICB and NCB, accelerated bid times might be envisaged; however, these may vary depending on the event:
        - 21 days for ICB and 14 days for NCB – for complex requirements (construction of bridge, supply of complex items);
        - 14 days for 14 ICB and 7 days for NCB – for less complex requirements (standard Goods and Works); and
        - 3 days for IFQ.

    Note: If no Quote/Bid is received within the time allowed for preparation the deadline will be extended.

c. Special Procurement Arrangements:

Commodities

50. Procurement of commodities, such as grain and fuel, must be in accordance with paragraph 2.68 of the Procurement Guidelines. Priority commodities must be determined in response to the basic needs resulting from the emergency situation, in particular the needs of the poorest people.

Force Account

51. In emergencies, when construction firms are unlikely to bid at reasonable prices because of the location of and risks associated with the project or a certain government agency has a sole right in certain type of work (e.g., railway track work, high tension transmission cables), Force Account for repair/reconstruction using the Government agency's own personnel and equipment or a government- owned construction unit may be the only practical method (see paragraph 3.9 of the Procurement Guidelines).

Use of stand-by arrangements

52. There is no need to wait for an emergency for making arrangements for procurement of emergency works, goods, non-consulting services, and consulting services. The Government may carry out advanced procurement procedures according to those established in this manual and WB Procurement Guidelines under Framework Agreements (FAs). This long-term agreement with suppliers, contractors and providers of non-consulting services sets out terms and conditions under which specific procurements (call-offs) can be made throughout its term. FAs are generally based on prices that are either pre-agreed, or determined at the call-off stage through competition or a process allowing their revision without further competition. Prior arrangements allow the offering and signing of contracts, whose execution is only triggered when a disaster strike.

Use of United Nations Agencies

53. When it is appropriate to place greater reliance on, or to delegate part or whole of project implementation to, UN agencies may be hired on sole-source basis for contracts for which they offer their unique roles and qualifications in responding to the emergency situations. Standard forms of agreement for UN agencies as acceptable to the Bank will be adopted. For those UN agencies, where such forms have not been agreed with the Bank, the Bank's team will provide acceptable sample forms.

54. The UN agencies may participate in activities financed by the World Bank or WB-administered trust funds in one of the following ways:

    a. The UN implements all or part of project activities on behalf of the country;
    b. The UN acts as a supplier of critical goods (e.g., vaccines) under a WB-financed project; and
    c. The UN acts as a provider of technical services under a WB-financed project.

d. Links to Bank Standard Procurement Documents:

https://intranet.worldbank.org/WBSITE/INTRANET/UNITS/INTOPCS/0,,contentMDK:23708834~pagePK:51455324~piPK:3763353~theSitePK:380832,00.html

55. The government standard bidding documents for national competitive procedures can be found in the annex of the procurement manual for externally funded projects/programs referred in the Project.

E – Positive and Negative Lists

56. Table 4 present a positive list that should be used for the procurement or upon Bank's review and agreement reimbursement of already procured goods that might be required for the Government's immediate emergency response, as well as services, and works. The RGC and the World Bank may reach agreement on the conditions for the release of the financial tranches and the required documentation and certifications, such as customs and tax certificates or invoices. The acceptable procedures and addressing any associated risks and mitigation measures should be agreed.

Table 3: Positive list of goods, services, non-consulting services, works, and other eligible expenses

Item
Goods
• Medical equipment and supplies • Non-perishable foods, bottled water and containers • Tents for advanced medical posts, temporary housing, and classroom/daycare substitution • Equipment and supplies for temporary housing/living (gas stoves, utensils, tents, beds, sleeping bags, mattresses, blankets, hammocks, mosquito nets, kit of personal and family hygiene, etc.) and school • Gasoline and diesel (for air, land and sea transport) and engine lubricants • Spare parts, equipment and supplies for engines, transport, construction vehicles • Lease of vehicles (Vans, trucks and SUVs) • Equipment, tools, materials and supplies for search and rescue (including light motor boats and engines for transport and rescue) • Tools and construction supplies (roofing, cement, iron, stone, blocks, etc.) • Equipment and supplies for communications and broadcasting (radios, antennas, batteries) • Water pumps and tanks for water storage • Equipment, materials and supplies for disinfection of drinking water and repair/rehabilitate of black water collection systems • Equipment, tools and supplies for agricultural, forestry, and fisheries • Feed and veterinary inputs (vaccines, vitamin tablets, etc.) • Construction materials, equipment and industrial machinery • Water, air, and land transport equipment, including spare parts • Temporary toilets • Groundwater boreholes, cargos, equipment to allow access to affected site, storage units • Any other item agreed on between the World Bank and the Recipient (as documented in an Aide-Memoire or other appropriate formal Project document)
Services and non-consulting services
• Consulting services related to emergency response including, but not limited to urgent studies and surveys necessary to determine the impact of the disaster and to serve as a baseline for the recovery and reconstruction process, and support to the implementation of emergency response activities • Feasibility study and technical design. • Works supervision • Technical Assistance in developing TORs, preparing Technical Specifications and drafting tendering documents (Bidding Documents, ITQ, RFP). • Non-consultant services including, but not limited to: drilling, aerial photographs, satellite images, maps and other similar operations, information and awareness campaigns Non-consultant services to deliver any of the activities described in the “Goods” section of this table (e.g., debris removal, dump trucks, drones survey)
Works
• Repair of damaged infrastructure including, but not limited to: water supply and sanitation systems, reservoirs, canals, roads, bridges and transportation systems, energy and power supply, telecommunication, and other infrastructure damaged by the event • Re-establish of the urban and rural solid waste system, water supply and sanitation (including urban drainage) • Repair of damaged public buildings, including schools, hospitals and administrative buildings • Repair, restoration, rehabilitation of schools, clinics, hospitals • Removal and disposal of debris associated with any eligible activity.
Training
• Conduct necessary training related to emergency response including, but not limited to the Implementation of EAP • Training on rapid needs assessment and other related assessments
Emergency Operating Costs
• Incremental expenses should be borne by the Government source of funds for a defined period related to early recovery efforts arising as a result of the impact of an eligible emergency.

Note: Direct cost- Any costs/expenditures contribute directly under the CERC activities (goods, works, and services) will be treated as eligible expenditure per the financing agreement. The incremental operating costs should be

borne by the Government Source of Funds. The indirect costs (incremental operating costs) for CERC activities cannot be charged to the project funds.

57. The following uses for goods and equipment financed by the CERC are prohibited, which also applies to use and storage for DRM-related activities including hazard monitoring, disaster preparedness, and future response to natural disasters.

i. Activities that would lead to conversion or degradation of critical forest areas, critical natural habitats, and clearing of forests or forest ecosystems
ii. Activities affecting protected areas (or buffer zones thereof), other than to rehabilitate areas damaged by previous natural disasters.
iii. Land reclamation (i.e., drainage of wetlands or filling of water bodies to create land)
iv. Land clearance and levelling in areas that are not affected by debris resulting from the eligible crisis or emergency
v. River training (i.e., realignment, contraction or deepening of an existing river channel, or excavation of a new river channel)
vi. Activities that will result in the involuntary taking of land, relocation of households, loss of assets or access to assets that leads to loss of income sources or other means of livelihoods, and interference with households' use of land and livelihoods
vii. Construction of new roads, realignment of roads, or expansion of roads, or rehabilitation of roads that are currently located on communal lands but will be registered as government assets after rehabilitation
viii. Use of goods and equipment on lands abandoned due to social tension / conflict, or the ownership of the land is disputed or cannot be ascertained
ix. Use of goods and equipment to demolish or remove assets, unless the ownership of the assets can be ascertained, and the owners are consulted
x. Uses of goods and equipment involving forced labor, child labor, or other harmful or exploitative forms of labor
xi. Uses of goods and equipment for activities that would affect indigenous peoples, unless due consultation and broad support has been documented and confirmed prior to the commencement of the activities
xii. Uses of goods and equipment for military or paramilitary purposes
xiii. Uses of goods and equipment in response to conflict, in any area with active military or armed group operations
xiv. Activities related to returning refugees and internally displaced populations
xv. Activities which, when being carried out, would affect, or involve the use of, water of rivers or of other bodies of water (or their tributaries) which flow through or are bordered by countries other than the Borrower/Recipient, in such a manner as to in any way adversely change the quality or quantity of water flowing to or bordering said countries.

F - Fraud and Corruption

58. All procurement entities as well as bidders and service providers (i.e., suppliers, contractors, and consultants) shall observe the highest standard of ethics during the procurement and execution of contracts financed under the Project in accordance with paragraphs 1.16 and 1.17 (Fraud and Corruption) of the Procurement Guidelines and paragraph 1.23 and 1.24 (Fraud and Corruption) of the Consultants Guidelines, and "Guidelines on Preventing and Combating Fraud and Corruption in Projects Financed by IBRD Loans and IDA Credits and Grants", dated October 15, 2006 and revised in January 2011.

G - Disbursement & Financial Management

59. MLVT and MEF are responsible for ensuring that requirements set out in the Financing Agreement, the additional instructions, disbursement letter for CERC, including the World Bank and RGC financial management and disbursement policies and procedures governing the Project, are fully and successfully applied to the management of the financial resources mobilized through Disbursement Category 2 in support of the approved EAP. These policies and procedures are detailed in the approved Financial Management Manual as well as Chapter 9 – withdrawal of Credit proceeds.

60. Disbursements under Category 2 will be contingent upon the fulfillment of conditions specified in paragraph 8 of this document. Disbursements shall be made based on the approved EAP, and shall be subject to evaluation, examination and approval by the World Bank.

61. Upon issuance of no-objection for CERC activation, PITs will submit the withdrawal application to the WB to advance the resources allocated to Disbursement Category 2 to finance eligible expenditures as they are incurred and for which supporting documents will be provided later.

62. Funds for the CERC will be channelled through the existing designated account denominated in US dollar at the National Bank of Cambodia. Withdrawals from the DA will only be made for expenditures incurred related to emergency activities laid out in the EAP.

63. MLVT shall be responsible for requesting disbursement of funds in accordance with the instructions contained in the additional instructions, disbursement letter and for ensuring that funds are accounted for and their use reported to the Bank on a timely manner.

64. The Disbursement methods will include reimbursement, advance, and direct payment. The ceiling for DA advance shall be variable, based on forecast of emergency expenditures for 2 quarters. Supporting documentation required to be provided with the signed application for withdrawal are as follows:

    - For requests for Reimbursement:
        - Interim Unaudited Financial Report (IFR) in the form as included in the Project Operations Manual);
    - For reporting eligible expenditures paid from the Designated Account:
        - Interim Unaudited Financial Report in the form as included in the Project Operations Manual
    - For requests for Direct Payment:
        - Records evidencing eligible expenditures, e.g., copies of receipts, supplier invoices

65. Expenditure incurred under Category 2 will be reported as part of the project's Interim Unaudited Financial Report (IFR) and submitted to the Bank as per the requirement of the Financing Agreement.

66. Incurred expenditures under Disbursement Category 2 for Emergency Expenditures under CERC will be audited by the external auditor alongside other Project activities. This audit is an integral part of the annual project audit's requirement as outlined in the financing agreement.

67. Per the Project's Financing Agreement, for expenditures under Disbursement Category 3 (i emergency expenditures), to be eligible expenditure for financing under the CERC, expenditures must be included in the approved EAP, meet the fiduciary and ESF requirements and adequately supported with documentation, and meet the requirements that were detailed in Section B, paragraph 8 of this document, must be met.

68. In the case of a contract providing for defect liability with a warranty period beyond the end of the

EAP implementation period, payments under such a contract can be made if: (a) the contract for works has been completed and the works have been provisionally accepted before the EAP implementation period; and the contract provides the option to replace the retention money with an on-demand bank guarantee or other suitable performance security. When conditions for payment are met, the retention money may be released and paid from the DA or submitted to the Bank for payment through Direct Payment mode, within six (6) months after the end of the EAP implementation period. Supporting documentation that includes evidence of provisional acceptance of completed works and a copy of a bank guarantee equivalent to the retention money (same currency and amount) must be submitted to the Bank together with the application. This 6-months "grace period" will be provided so that payments can be completed consistent with the Government's contractual rights and obligations and related expenditure reported to the Bank. Upon completion of the defects liability period, the borrower should certify that the contractor or supplier has corrected all defects about which they were notified. And refund to the Bank any amount withdrawn that exceeds the amount of eligible expenditure (e.g., reductions from payment or retention on account of lower-quality level of outputs). This will affect the completion of the audit and MLVT may be needed to include the CERC audit in two audit cycles of the Project (interim audit).

69. Unutilized advances to the designated account must be refunded to the Bank, within 6 months after completion of EAP. The refund should be made to the Bank not later than the disbursement deadline date of the Project.

70. The World Bank may suspend disbursement or cancel the undisbursed balance of CERC funds, or require refund of disbursed CERC funds, if RGC or any of its agencies and contractors have used such funds in a manner inconsistent with the provisions of this Emergency Response Manual and the Financing Agreement.

71. MLVT shall keep at least 10 years after the completion of EAP all supporting documents evidencing eligibility of expenditures financed with CERC funds. These supporting documents shall be made available for examination by the World Bank or any other RGC authority.

H - Environmental and Social Standard/ESS Compliance

72. All activities financed through the CERC are subject to World Bank Environmental and Social Framework that included and Environmental and Social Standards/ESSs (and related guidelines such as Environmental, Health and Safety (EHS) Guidelines[111]) that are relevant for this project and Environmental and Social (E&S) instruments that were developed and disclosed , keeping in mind that paragraph 12 of the IPF Policy applies once the CERC is triggered. An Environmental and Social Management Framework (ESMF) Addendum will be prepared to supplement the parent project's ESMF. The ESMF Addendum should include information on the CERC, to align with the Emergency Response Manual (ERM), and to supplement the existing Project's Environmental and Social Framework (ESF) and Environmental and Social Standards (ESS) instruments, where needed[112]. When required, the ESMF addendums will include supplement contents to the project's Stakeholder Engagement Plan (SEP). The Addendum will outline a screening process built around the positive (eligible) list for key environmental and social risks and impacts. This will be linked to identifying institutional arrangements for oversight of any required additional E&S due diligence and monitoring (MLVT can use the existing institutional structure that has been established). In addition, the Addendum will include generic emergency civil works "sector" guidance identifying key E&S issues with practical Environmental and Social Management Plan (ESMP) checklists.

73. Content of the ESMF and ESMP Addendums, plus the others ESF instruments as required, will be aligned with the project's documents and Emergency Response Manual (ERM), and include but not

limit to:

i. Description of the potential emergencies and the types of activities likely to be financed;
ii. Potential risks and general mitigation measures associated with the potential activities;
iii. Identification of Vulnerable locations and/or groups;
iv. Environmental and social standards screening and the environmental and social management requirements (studies, plans, etc.) to comply with the Bank's requirements and the national laws and relevant legislation;
v. An ESCOP (Environmental and Social Code of Practice) for the positive list of goods;
vi. Assessment to guide emergency responses (e.g. what additional stakeholder engagement activities may be required underran emergency); and
vii. Institutional arrangements for environmental and social due diligence and monitoring.

74. Activities financed under the CERC will be limited to provision of critical goods and services, as well as rehabilitation and reconstruction of damaged infrastructure outlined in a positive list in this ERM (Table 4). Land acquisition leading to involuntary resettlement and/or restrictions of access to resources and livelihoods is not anticipated. However, this will be screened at the checklists of the ESMPs. It is further not anticipated to support activities which might have adverse impacts on ethnic groups considered indigenous people under the World Bank's ESS7 on Indigenous Peoples Communities. Again, this will be screened with the ESMPs. It is also unlikely that changes to the existing ESSs and ESF instruments of the project will be required. However, if necessary, the instruments (ESMF, SEP, IPPF, and RPF) will be updated if the EAP do not fall within the scope of the existing instruments. It is unlikely that emergency works, new ESSs will be relevant and /or change in E&S risk categorization, however, if required, new instruments will be prepared, consulted upon and disclosed upon clearance by the World Bank; per the requirements of the Bank's Investment Financing Policy, a restructuring would be prepared.

75. MLVT has appointed the Environmental and Social (E&S) officer and will recruit E&S consultants during project implementation stage. The MLVT through the E&S officer and Consultants, will identify based on the activities and works proposed in the EAP, the potential environmental and social negative impacts, and the studies or plans required for the environmental and social management plans. This will be done by completing the Environmental and Social Screening Forms, annexed to the addendum ESMF for each activity.

76. The contractors are required to be informed, sign and comply with the Codes of Conduct (CoC) to prevent and address possible GBV, VAC and human trafficking. The E&S officer of MLVT with support from its E&S consultants will monitor ESH compliance performed by the contractors.

77. Engagement activities and Grievance Redress Mechanism (GRM) required to be established under the project (as part of its Stakeholder Engagement Plan) will also be applied by CERC activities (sub-projects) identified in the EAP. GRM aims to provide and facilitate a time-bound, transparent and accountable mechanism to voice and resolve social and environmental concerns and issues linked to the sub- project(s) that may be raised by the project affected persons (PAPs) or who believe they are affected by the project activities. GRM also serves as a channel for the project to receive and hear feedback and suggestions from PAPs and project beneficiaries to improve sub-project design and implementation.

I - Monitoring & Evaluation

78. CERC will be monitored and evaluated as required by Bank IPF policy, considering especially that it represents a novel approach to disaster recovery financing and will require particularly strong oversight in order to ensure appropriate emergency activity implementation. The oversight and

reporting mechanisms established for the Project will also be applied to the CERC. An annually recruited external financial audit firm will audit the annual financial statements of the whole Project, including those financed through Disbursement Category 2.

79. In case of activation, additional indicators related to CERC will be added to the Project's Result Framework through restructuring. The CERC activities will be part of the regular Project monitoring and will be assessed as part of the final project evaluation.

80. Given the large number of post-disaster activities that may be initiated shortly after the CERC activation – in addition to those already under implementation – MLVT may hire additional technical consultants to support supervision and procedural compliance efforts, particularly as they pertain to fiduciary and ESF requirements.

J – Closing of CERC and EAP Implementation

81. It is noted that a CERC will be activated at any time during project implementation. Considering that the CERC is expected to be implemented in a relatively short time, the Project's implementation will continue after the EAP has being completed. Accordingly, all technical, fiduciary and ESF requirements related to the CERC will be finalized within six months of the end of implementation of the EAP and should not go beyond the disbursement deadline date of the Project. These include:

    - Fiduciary Requirements, such as Audit Report, interim unaudited financial reports, and proper documentation and closing of CERC designated account.
    - M&E Requirements, such as final evaluation report of CERC, and any other technical and social and environmental reports agreed upon CERC activation.

82. In case of a surplus of goods, these goods may be used by the Government, following the negative lists provided in the ERM. The management of vehicles, motorcycles, boats and other equipment should follow the standard administrative and inventory procedures applicable to other project assets managed by MLVT. MLVT will be required to report annually on the usage and location of the equipment, purchased under the CERC until the Project closes. This will be reviewed and audited by the external auditor alongside other Project activities as indicated in the external audit TOR after the EAP implementation period. The reports must document that goods are used as outlined in the ERM and that the negative list of uses is complied with.

83. Within four months after end of implementation of the EAP, MLVT will document expenditures, verify inventories, and finalize payments. On receipt of the final progress and financial reports on the activities undertaken under the agreed EAP, the Bank (through the Country Director) will notify the RGC that the CERC for the specific eligible expenditure is closed, and that no further withdrawals will be permitted for purposes of the specific emergency.

APPENDIX 10 – Chance Find Procedures for Physical Cultural Resources (PCR)

The Cambodia Skills for Better Jobs Project (the Project) will support building the skills of the upcoming and existing workforce in response to industry needs and to provide labor management information (LMI) and career orientation for better jobs. The proposed project will focus on delivering quality skills that are in demand by industry to respond to the challenges faced in developing skills among the workforce.

Even the proposed project is not expected to yield archaeological, paleontological or cultural findings of any significance because of construction works will occur in the existing compounds of target TIs and JCs, there remains a possibility for (as yet undiscovered) sites of local cultural significance (i.e. sacred sites, cemeteries) and archaeological sites to exist within selected TIs and JCs.

MLVT and selected TIs and JCs will ensure that the bidding and contract documentation for civil works contractors will include a clause on chance find procedures and includes the following measures:

i. Stop construction activities in the area of the chance find;
ii. Delineate the discovered site or area;
iii. Secure the site to prevent any damage or loss of removable objects;
iv. Notify the supervisory Engineer who, in turn, will notify the responsible local authorities;
v. Responsible local authorities would conduct a preliminary evaluation of the findings to be performed by archaeologists who will assess the significance and importance of the findings according to various criteria, including aesthetic, historic, scientific or research, social and economic values;
vi. Decisions on how to handle the finding shall be taken by the responsible authorities which could result in changes in layout, conservation, preservation, restoration and salvage;
vii. Implementation for the management of the finding communicated in writing; and
viii. Construction work could resume only after permission is given from the responsible local authority concerning safeguard of the heritage.

During the project supervision, the site engineer will monitor the above procedures related to the treatment of any chance find encountered.