Ministry of Innovation and Technology

Ethiopia Digital Foundation Project

Environmental and Social Management Framework (ESMF)

REVISED REPORT

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ACRONYMS

ARAP	Abbreviated Resettlement Action Plan
BoE	Bureau of Education
BoH	Bureau of Health
CHMP	Cultural Heritage Management Plan
CERC	Contingent Emergency Response Component
COPCD	Channel One Programs Coordinating Directorate
CRGE	Climate Resilient Green Economy
CSA	Central Statistics Agency
DMP	Digital Malawi Project
ECA	Ethiopian Communication Authority
EDFP	Ethiopia Digital Foundation Project
EDHS	Ethiopian Demographic and Household Survey
EEPCo	Ethiopian Electric Power Corporation
ESF	Environmental and Social Framework
ESMF	Environmental and Social Framwork
ESIA	Environmental and Social Impact Assessment
ESS	Environmental and Social Standards
EthERNet	Ethiopian Research and Education Network
GDP	Gross Domestic Product
GNI	Gross National Income
GRM	Greivance Redress Mechanism
HDI	Human Development Index
IDA	International Development Association
ICS	Interconnected Power System
ICT	Information Communication Technology
ID	Digital Identification
IMR	Infant Mortality Rate
IPF	Investment Project Financing
IRU	Indefeasible Right of Use
MDA	Ministries, Departments and Agencies
MDG	Millenium Development Goals
MoF	Ministry of Finance
MoEFCC	Ministry of Environment, Forest and Climate Change
MInT	Ministry of Innovation and Technology
MoSHE	Ministry of Science and Higher Education
MSME	Medium, Small. and Micro Enterprises
NGO	Non-Government Organization
PEHAA	Public Enterprise Holdings and Administration Agency
PIU	Project Implementing Unit
RAP	Resettlement Action Plan
SIM	Subscriber Identification Module
TA	Technical Assistance
TVET	Technical, Vocational Education and Training
UEAP	Universal Electricity Access Program
USD	United States Dollar
USF	Universal Service Fund

EXECUTIVE SUMMARY

I. Introduction and Background

Ethiopia is located in the Horn of Africa and is a land-locked country with an area of 1.1 million km^2. Ethiopia lags in key digital indicators compared to its peers. In a country of more than 100 million people where 40 percent are aged under 15, internet use/access was a meager 18.6 percent at the end of 2017. Mobile phone use and ownership in Ethiopia (SIM cards per 100 inhabitants) stands at around 44 percent in mid 2020. The Ethiopia Digital Foundations Project (EDFP) is intended to develop Ethiopia's digital economy. It will support the necessary steps to introduce market competition, private sector participation, foreign investment and independent sector regulation. The EDFP is a five years project (2021 to 2026) financed by the World Bank Group with a total amount of 200 million USD (IDA Credit). This ESMF is prepared to provide an environmental and social management process and to serve as a risk management instrument to ensure that the environmental and social impacts of the EDFP are properly considered during project design and implementation.

II. Methodology

The methodology adopted for preparing the ESMF includes conventional methods which includes review of relevant legislations, policies and related documents, qualitative and quantitative data collection and analysis, conducting consultations with project implementers and stakeholders. Two sessions of COVID-19 appropriate virtual consultative meetings were held with representatives of the lead project implementing and partner instituions such as MInT, ECA, MoSHE, and other World Bank project development team members and task team leaders via Webex. Issues discussed in the initial meeting covered identification of the main stakeholders at all levels and their involvement modalities in the project, as well as EDFP sub-componets and the potential for environmental and social risks to arise from physical construction activities, and the nature of the potential environmental and social risks were discussed. The second virtual consultation meeting was also held with all the lead, partner and beneficiary institutions to assess the existing instituional capacities for environmental managemnt and to explore the gaps in capacity. During the consultation meeting, discussions were also held on devising feasible institutional arrangements necessary for implementation of the present ESMF and on recommendations necessary to close the capacity gap.

III. Description of the Project

The EDFP is intended to lay the building blocks to develop Ethiopia's digital economy through support to the policy and regulatory environment, improving infrastructure and quality of broadband connectivity and support the digitalization of services, and promote digital entrepreneurship. The project development objective is " to improve Ethiopia's competitiveness in the digital age through increased inclusiveness and affordability of digital services and through digital job creation". The project will be implemented in all regions of the country including the Federal, regional and woreda levels. The project benefits the public by creating new opportunities for digital transformation in Government and education and new opportunities for innovation and entrepreneurship.

The EDFP project has five main components and eight subcomponents which are briefly described as follows.
Component 1: ***Digital Economy, enabling legal and regulatory environment.*** It consists of the following three subcomponents
Sub-component 1.1: Partial privatization of Ethio-Telecom
Sub-component 1.2:Strengthening independent ICT sector regulation

Sub-component 1.3: Supporting the development of the Digital Economy

Component 2: Digital Government and Connectivity: The objective of this component is to develop the capacity of GoE to deliver digital services, and to crowd-in private sector investments to improve regional and domestic connectivity infrastructure, to connect public institutions and educational institutions to broadband internet. Component 2 have the following three sub-components which are among the important once interms of environmental and social risk management.

Sub-component 2.1: Digital Government and COVID-19 response. Capacity building activities include (i) developing a Government e-Portal accessible by citizens and firms, (ii) improving Government facilities for remote working, and (iii) building the digital skills of Government officials. In response to the COVID-19 the project will address Government requirements for improved facilities for remote working, and the installation of up to 50 Communications Rooms with internet connection.

Sub-component 2.2: Connecting targeted public institutions to broadband across the Country. The locations of targeted public institutions to be served would include Ministries, Departments and Agencies (MDAs), youth community associations across the Country and especially in the first phase selected hospitals and health centers, as part of the COVID-19 response. The proposed mechanism to do this would entail an upfront commitment for the pre-purchase of internet bandwidth from private sector operators under Indefeasible Right of Use (IRU) contracts, over a period of 5-10 years.

Sub-component 2.3: Connecting selected educational institutions to broadband
This sub-component will connect selected educational institutions to high-speed internet services. This will include universities, colleges of teacher's education, research institutions and Technical and Vocational Educational Trainings (TVETs), with the aim of nationwide coverage in the first phase and some 200 selected secondary schools in the second phase and eventually all secondary schools in the country.

Component 3 – Digital Business and Entrepreneurship: This component has the following two subcomponents.

Subcomponent 3.1 Grants to digital start-ups and digital businesses- The subcomponent introduces two financing windows for digital start-ups and digital businesses. *Window 1* is a co-investment grant aimed at helping digital start-ups gain access to risk capital, knowledge and networks to start operating as a viable business. *Window 2* is aimed at incentivizing more established digital businesses to provide training, digital devices and other support to Ethiopians to participate in the digital economy by becoming suppliers of goods/services for productive purposes (e.g. enabling offline farmers to sell products via ecommerce and earn higher income).

Subcomponent 3.2: Technical Assistance to the Ministry of Innovation and Technology. This subcomponent will also provide capacity building to MInT for harmonizing Ethiopia with the regional digital single market initiative proposed under the Horn of Africa Digital Foundations Initiative.

Component 4: Project Management: This component will support the project implementation unit to be initially set up in MInT.
Component 5: Contingent Emergency Response Component: This will have an initial zero value but may be financed during the course of the project to allow for an agile response to an eligible crisis or emergency.

The project implementation arrangement has two phases- preparation phase and implementation phase. The MoF is responsible for the preparation stage of the project and implementation of activities under component 1. Once the project becomes effective, MInT will assume overall implementation leadership during implementation phase, and will host the PIU for the remaining of the project life. MInT will coordinate the work of the other implementing partners.

IV. Environmental and Social Baseline

Overview of biophysical baseline: Ethiopia, found in east Africa, is a large land-locked country occupying an area of over 1.1 million km². Ethiopia has a tropical climate that is strongly a function of altitude. The country is constituted of ten regional states and two city administrations. The physiographic diversity of the country is impressive. It consists of rugged mountains, flat-topped plateaus, deep gorges and river valleys and vast lowland areas. About 45% of the country is highland with an altitude of 1500 m or above, and 55 % is lowlands with an altitude of less than 1500 m. As a result of the contrasting physiographic and climatic features of the country, Ethiopia has diverse ecosystems. There are 10 major ecosystems, and 18 major and 49 minor agro-ecological zones, which are inhabited by a great diversity of animal, plant and microbial genetic resources (FDRE, 2015, in EFCCC, 2019). Across all these different ecosystem types, there are 52 conservation areas with official protection status. These include 20 National parks, 3 wildlife sanctuaries, 2 wildlife reserves, 17 controlled hunting areas, 7 open hunting areas and 3 community conservation areas (EWCA, 2012).

The country possesses twelve major river basins, which form four major drainage systems, i.e. the Nile basin, Rift Valley basin, Shebelle-Juba basin and the North-East Coast. These four major drainage systems drain the entire rural and urban parts of the Country through its primary, secondary and tertiary level tributaries.

Overview of Social baseline: Ethiopia is the second most populous country in Sub Saharan Africa with a population of 110 million; based on projections of the census conducted in 2007. It has high percentage of young population with 46% of the population being under 15 years of age. The gender disaggregation is 50% with slightly higher women (51%) in urban areas. The average household size in Ethiopia is 4.6 persons. It is a diverse and multi-cultural nation and a home for over 90 ethnic groups.

Telecommunication and Internet: Ethiopia remains one of the least connected countries in the world. The level of internet and mobile phone penetration remain low in Ethiopia. Recent figures show that about 20.6% or 23.96 million people have internet connections while 38.5 percent of population or 44.86 million mobile services. The number of internet users in Ethiopia increased by 2.8 million (13%) between 2020 and 2021 (DATAPORTAL 2021). The telecom infrastructure is largely absent in rural areas and there is generally low access and irregular supply of power to rural areas where the majority of the population resides.

V. Relevant Policy, Legal and Institutional Framework of Environmental and Social Management

The Government of Ethiopia (GoE) has enacted the necessary legal frameworks for environmental and social management and institutions to support its implementation and enforcement. The primary legislations that support environmental and social management in Ethiopia are the FDRE Constitution, Environmental Policy of Ethiopia, Environmental Impact Assessment Proclamation No.

299/2002, Solid Waste Management Proclamation No. 513/2007; Research and Conservation of Cultural Heritage Proclamation No. 209/2000; the Labor Proclamation No. 1156/2019, Proclamation no.1161/2019 on Expropriation of Land for Public Purposes, Environmental Impact Assessment Procedural Guideline (2003); Environmental and Social Management Plan Preparation Guideline (2004); National Social Protection Policy; National Policy on Ethiopian Women; and other Laws, Strategies, and Guidelines Enforcing Special Support for Developing Regions and Vulnerable Groups.

Review of the World Bank ESF and relevant Environmental and Social Standards (ESSs), as well as the EHS guidelines was also carried. Accordingly, it was noted that ESS 1, 2, 3, 4, 8 and 10 were potentially applicable to the EDFP subprojects. In addition, the following EHS guideline appeared to be most relevant to the EDFP subprojects.

- EHS Guideline for Telecommunications
- EHS General Guideline Section 1 to 4
- EHS Guideline for Waste Management Facilities

VI. ESMF Process and Implementation

Responsibilities for ESMF Implementation: The lead responsibility for the overall coordination and implementation of the EDFP lies on the Ministry of Innovation and Technology (MInT) under which a Project Implementation Unit (PIU) will be established. The PIU and its E & S risk management staff will be in charge of implementing the ESMF in all applicable EDFP financed subprojects. It is also important that EDFP partner and beneficiary Government institutions and the telecom operators who will be awarded with indefeasible right of use (IRU) contracts should assign focal persons for E & S risk management. The PIU E & S risk management specialists will coordinate with the assigned focal persons and will be responsible for the implementation of subproject activities in compliance with the requirements of the ESMF.

Subproject categorization and the ESS requirements: The EDFP is generally categorized as "Moderate Risk" project and hence MInT will be required to undertake the appropriate E & S assessment of subprojects in accordance with the national law and any requirements of the ESSs that deemed relevant to the sub-projects. The national guideline categorizes subprojects into schedules I, II or III. It is anticipated that the majority of EDFP Component II & III subproject activities will fall into Schedule II subprojects and may require Preliminary ESIAs. However, it is also possible that certain subprojects crossing through environmentally sensitive areas and ecosystems may fall under Schedule I. Under such circumstances, re-sitting, redesigning or rerouting of subproject sites should be made to avoid impacts on the sensitive areas and ecosystems. If the risk rating of a subproject is classified as substantial or higher risk, as per the World Bank ESF classification the MiNT will notify the World Bank to update both the ESCP and ESMF as appropriate and apply the relevant requirements of the ESSs. The ESCP will be updated so that it could have a clear requirement/ provision on updating of this ESMF if the risk rating of any of subprojects is rated as substantial or high.

PROCEDURES OF THE ESMF:

Step-1: Sub project identification:

Sub project refers to the set of activities derived from the EDFP Component and sub-component activities including technical assistance studies and consultancies for which support through

investment project financing is sought by MInT. One procurement contract be a subproject, or can multiple subprojects be part of one contract. Identification of subprojects is carried through consultative process by the lead implementing agency (MInT), the partner institutions such as MoSHE and ECA, regional states (e.g: Health and Education sector offices), and in collaboration with other beneficiary MDA offices. The identified subprojects will be reviewed and compiled into an annual action plan by the technical committee and will be forwarded to the project steering committee for endorsement and approval. Subprojects included in the approved annual action plan of the EDFP will be eligible for E & S screening.

Step-2: Screening/scoping: The PIU E & S staff in collaboration with the E & S focal persons of partner and beneficiary institutions will initiate the scoping/ screening process by completing the form in Annex A. The ESMF requires that all relevant EDFP subprojects identified and endorsed during planning phase and having specified site location as well as relevant technical assistance subprojects be scoped/screened for E & S risks. The E & S scoping/screening will follow two stages. Initially, a scoping/screening of subprojects will be carried to categorize it into one of high, substantial, moderate or low risk using the scoping/screening form. Once the subprojects are scoped/screened and confirmed to fall on or below moderate risk category, then further categorization will be carried by applying the national screening system to identify the schedule of activities into which the subproject will fall (Schedule I, II &III). The outcome of environmental scoping/screening will be classifying the proposed EDFP subproject into one of Substantial, Moderate, or low Categories and Schedule I, II or III activities. In the event that a sub-project screening/scoping results in "High risk" rating it will be necessary to exercise re-sitting, redesigning or rerouting of the subproject sites to avoid the adverse impacts and lower the risk rating to moderate risk. If this is not possible, the MiNT will notify the World Bank to update both the ESCP and ESMF as appropriate and apply the relevant requirements of the ESSs.The completed scoping/screening report will be submitted first to the PIU coordinator for internal checking and approval. It will then be submitted to the relevant Regional or Zonal EPFCCA with an official application letter for review and approval.

Step 3: Schedule II Subprojects: If the outcome of the E & S screening/scoping finally results in categorizing the subproject as schedule-II activities, it is required to prepare Preliminary ESIA that should be carried out with the help of registered and licensed E & S consultants. The Preliminary ESIA will be submitted by the PIU and/or E & S focal persons in partner/beneficiary institutions to the relevant Regional or Zonal level EPFCC office with an official application for review and approval. If, on the other hand, the outcome of the E & S screening/scoping finally results in categorizing the subproject as schedule-III activities, no further actions to carry Environmental Assessment will be needed. Based on the nature of the schedule-III subproject, if it deemed necessary, a distinct ESMP will be prepared to address and mitigate the expectedly few and minor environmental and social impacts of the subproject and attach it with the E&S screening report for further implementation.

Step 4: Review and Decision: The relevant Regional or Zonal EPFCC will review the Preliminary ESIAs submitted to it by the PIU and/or environment focal persons in partner/beneficiary institutions. While in the review and approval process the documents must be disclosed for public review at a place accessible to local people. The outcome of the review of the Preliminary ESIA by the Regional or Zonal level EPFCC will result in either accept the document with conditions relating to implementation; accept the documents with required and/or recommended amendments; or reject the document with comments as to what is required to submit an acceptable preliminary ESIA and ESMP.

Step 5: Implementation and Supervision: The PIU will be required to enforce implementation of proposed mitigation measures as proposed in the ESMP (which will be part of a Preliminary ESIA for schedule II subprojects) by all responsible institutions and stakeholders. Moreover, in order to enforce the implementation of recommended mitigation measures, there is also a need to include an environmental clause in the bids and contract agreements to be signed with the construction contractors and telecom operators. Periodic reports of internal monitoring should be prepared quarterly by the E & S risk management staff and submitted to the PIU and then to the PSC as part of the regular EDFP M&E process. The contractors will be required to submit routine ES performance reports so that the ES staff have data/information in addition to their supervision activities. The implementation of the recommended mitigating measures will also be externally monitored by the Regional, or Zonal level EPFCC offices.

Step 6: E & S Risk Management Monitoring Reports: Quarterly, biannual, and annual E & S risk management monitoring reports must be prepared by the PIU in collaboration with the environment focal persons in partner/beneficiary institutions. The E & S risk management monitoring reports should be submitted to the project steering committee, to the Regional EPFCCA and the World Bank for review.

Step 7: Annual Reviews: ESMF implementation will also be supported by conducting annual E & S performance audit that will be carried out by a third party (i.e. Registered and licensed independent consultant firm). The third-party annual E & S performance audits will be conducted on the EDFP subproject activities to evaluate the overall implementation of the ESMF.

The EDFP subproject activities should consider avoiding impacts on cultural heritage. Based on the nature (i.e. whether affecting National or World heritage sites) and scale of impacts on cultural heritage, where appropriate, it will also develop a Cultural Heritage Management Plan (CHMP) if there are significant impacts on cultural heritage. In case of chance find of heritage encountered during subproject implementation activities, a chance find procedure is presented in Annex C.

VII. Potential environmental and social risks and benefits

Overall, the subproject activities involved with EDFP will be site specific and generating impacts that are of moderate significance which can be mitigated. The E & S risk assessment carried as part of the present EDFP ESMF has also confirmed that the risk rating is "*Moderate*" for both E & S risks with the overall risk rating being the same "*Moderate*".

Beneficial Environmental and Social Impacts: The EDFP will have an overall significant positive social impacts on the country's population, as it is expected to (i) reduce costs and enhance reliability of digital access; (ii) increase efficiency of public service delivery through support of digitalization of public services; (iii) allow digitalization of higher education and thus raising graduate's preparedness for the digital world; (iv) promote affordable internet coverage in rural areas with low access to communications infrastructure and services; and (v) support an enhanced digital business environment potentially leading to more well-paid jobs in the sector. National and Regional State Governments will also benefit through lower cost, higher quality access to the internet within public institutions, and ability to launch new digital services.

Environmental risks of Subproject activities financed by the EDFP-The Digital Government and Connectivity Component (Component 2) of the Project involves subproject activities that will develop

ePortals and data centers for government MDAs, digitalization of MDAs selected services, and the installation of about 50 communication rooms, as well as connecting selected educational institutions to high speed broadband internet service. The potential environmental risks likely to occur from such directly financed subprojects will involve noise and dust releases during building modifications, excavation of trenches and installation of the new electronic facilities as well as equipment. The generation and disposal of demolition wastes during building modifications, as well as release of packaging wastes during equipment installation will cause potential risk to the environment. Operationalizing the Government MDA ePortals and digital services as well as the Communication rooms will entail expanded use of servers, computers, printers, large screens, speakers, microphones, WiFi Routers, and associated furniture, which at the end of its lifetime will join the e-waste stream. Occupational health and safety, as well as Community health and safety risks are also likely to occur by the subproject activities during construction and operation phases.

Technical assistance subproject risks: The EDFP will provide technical assistance support to the sector for general capacity building and regulatory strengthening, capacity building of senior Government officials, notably in MInT and ECA to design, implement and evaluate policies and regulations for the development of the digital economy as well as in developing standards and procedures regarding potential risks on siting, design, construction and operations of digital infrastructure, including need for small-scale land acquisition and community health and safety. The technical assistance to be provided by EDFP should consider EHS risks, the development of appropriate standards and guidelines for the proper management of e-waste generation and disposal which will pose potential public health risks, as well as development of adequate e-waste service providers. During development of these standards considerations of relevant national environmental and social legislations as well as requirements should be made and would need to be thoroughly consulted to ensure that the standards provides for adequate protection of sensitive habitats and heritages such as National Parks, Sanctuaries, Wetlands, as well as archeological, cultural and historical heritage sites found all across the Country.

The recruitment of Transaction Advisor to be paid by the Project should comply with the requirements of ESS2 and EHS aspects should be included in the terms of reference and should also be properly monitored. The telecommunication reform should include consideration of how it should be done to properly address potential ES impacts and risks. Thus, the TA work and related should include ES considerations. Potential Examples could be development of proper ES regulations, standards and guidelines, such as e-waste management, tower siting, etc. forms to enhance the development of adequate e-waste service providers in the country, and inclusion of ES aspects in bids and contracts. Technical assistance activities will be undertaken following the requirements of OESRC's Advisory Note Technical Assistance and the Environmental and Social Framework (2019).

Indirect Environmental risks of activities financed by the EDFP: The tendering and procurement of digital connectivity and pre-purchase of internet bandwidth from the private sector operators through direct financing of the EDFP is likely to have no potential environmental and social risks. However, reform of the telecommunications sector and the opening of the market to new operators could lead to infrastructure development for expansion of services (such as construction of data centers and cell towers). The implementation of activities such as the roll-out of fiber-optic networks and 4G/5G mobile networks to enhance and provide mobile and internet connectivity across the Country is likely to necessitate the undertaking of construction activities that are usually carried in the telecommunication sector. If at any point this assessment would be revised based on adaptation of the project design, instruments would be developed for these facilities under this project and the ESCP

revised accordingly to ensure that these works would be subject to compliance with relevant WBG Environment, Health and Safety Guidelines and ESF Standards. Respective due diligence will be conducted regular during the Bank's Implementation Support Missions or ad hoc based on request by MInT. The potential EHS risks associated with TA activities shall be managed in compliance with the applicable World Bank standards and EHS incidents, if any, will be recorded, reported, responded and followed up following the requirements of the Bank's Environment and Social Incident Response Toolkit.

The environmental and social risks likely to arise from the telecom sector construction activities include terrestrial and aquatic habitat alteration, use of hazardous materials, generation of construction wastes and limited hazardous material wastes, noise and air emissions, visual impacts, electric and magnetic fields, occupational health and safety aspects including electric safety, fiber optics safety, elevated and overhead work, fall protection, confined space entry and motor vehicle risks as well as community health and safety aspects with a focus on structural safety issues. There are also potential environmental risks associated with towers, access roads and right-of-way maintenance (e.g. vegetation control). The details of these risks, its significance and recommended mitigation measures are presented in table 8, the Environmental and Social Management Plan (ESMP) of the main report.

Environmental Risks of Grants to digital start-ups and digital business: As the size of the maximum matching investment finance allowed by the grant windows appears to constitute medium or larger size business enterprises (US$ 100,000) there will occur environmental risk concerns in relation to waste generation from its activities. The type of waste to be generated during operation phases of these enterprises will mainly constitute packaging wastes and e-wastes from the new digital entrepreneurs supported through grant window-1 and from the dissemination of digital devices by the digital businesses acting as suppliers of goods/services to be supported by grant window 2, and construction related wastes from any start up and expansion works.. Recommended management strategies to address the waste management risks including the e-waste stream include the inclusion of requirements for submission of "waste management plan" as one of the criteria for evaluation and selection of eligible digital entrepreneur start up matching fund beneficiaries and private investors. This has been reflected in Section 6.2.2.8 of the ESMF. The inclusion of these criteria into the evaluation and selection process can be done by inserting the criteria in the Project Implementation Manual (PIM).

Adverse Social Impacts: The project social risks include the exclusion of underserved communities and vulnerable groups due to lack of infrastructure, weak institutional capacity and other barriers and risk of exclusion of women and girls from project benefits.

Lack of Infrastructure and Weak Government Capacity: Public institutions in emerging regions have poor infrastructure (such as unreliable power/electricity, poor roads), government offices lack decent office structures/buildings and basic ICT facilities and equipment. They lack sufficient budget to run day to day business. Local government offices suffer from poor leadership commitment, low motivation, low salary and lack of low capacity to plan and execute.

Barriers to Benefits: Underserved communities and vulnerable groups face many barriers that hinder their access to project benefits. These barriers include digital illiteracy; unavailability of power; lack of ICT infrastructure; unaffordability of ICT technologies and services; unavailability of user-friendly devices for people with disability; lack of awareness of the digital businesses; lack of initial capital to start digital businesses; physical access problem for people with disabilities; and lack of awareness and readiness for the use of technology among the elderly**.**

Exclusion of Women: Women and girls can be excluded from the project benefits due to embedded gender inequality, i.e., socio-economic and cultural marginalization of women and girls. Women's time poverty means they find it difficult to balance their triple roles competing for their equal attention. Female household heads may face the risk of not benefiting from the project in equal measure with male counterparts because of not being able to balance their domestic responsibilities with their other roles. The low level of literacy and education attainment by women put further barriers to access project benefits.

Digital identification system: Digital identification system is an important aspect of the digital foundation project. It is also a risk factor for privacy and unintended profiling for individuals who need to trust the system to collect and store personal information. The project will support (with additional financing in 2023) on-going effort to develop a national identification system including the introduction of a general data protection law and establishment of independent data protection commission that could potentially mitigate these risks.

Risk of Loss of Land and other assets: Due to the nature of the sub-projects directly financed by the EDFP, most of the construction and refurbishment activities do not require permanent loss of assets or properties. All physical investments directly financed by the EDFP are expected to be carried on government owned/used land or property in existing education, health and government office facilities and sites. The EDFP is also going to provide technical assistance for ECA to adopt regulatory standards on sitting, design, construction and operation of telecommunication infrastructure which will be imposed on private sector operators. The technical assistance to the ECA will also involve the preparation of RFP.

Exclusion of Underserved Communities: The project will be implemented in many parts of the country that encompasses emerging regions where underserved and vulnerable communities reside. There will be potential risk of social exclusion and inequitable distribution of project benefits to underserved and vulnerable.

Vulnerable and Disadvantaged Groups: Women and female headed households have less time available for participation in project consultations and information sessions and can be missed during targeting for project benefits such as training and access to digital devices. Persons with disability have much lower access to ICT, accessible devices (for visual, hearing and speech impairment) and women with disability are even less opportunity in this respect. Poverty and illiteracy and lack of basic digital skills all are hinderances to benefiting from the project.

Gender Based Violence (GBV): The project services such as improved internet access, Wi-Fi and broadband services can be misused and facilitate acts that may cause GBV/SEA through stalking, bullying, sexual harassment, defamation, hate speech and exploitation. In rural areas, there is a potential for increased misuse of digital technology for recruiting young boys, girls and children for human trafficking. The GBV/SEA risk within the project scope is considered moderate. To mitigate these moderate risks, the project should ensure close monitoring of GBV/SEA in project implementation. It should develop a clear code of conduct and ensure that its staff and contracted workers sign to it.

Other community health and safety risks. Since it appears that the project involves provision of service to communities, ESS4 states that the Borrower will establish and implement appropriate quality management systems to anticipate and minimize risks and impacts that such services may have on community health and safety. In such circumstances, the Borrower will also apply the concept of universal access, where technically and financially feasible.

VIII.   Grievance Redress Mechanism (GRM)

The main objective of a Grievance Redress Mechanism (GRM) is to assist to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved. Grievance mechanism for the project should be adapted to the specific contexts of project implementation. The project implementation takes place at Federal level, in selected public institutions, at Woreda level with woreda offices as well as community youth associations. The GRM needs to be integrated with the existing grievance mechanisms in kebeles, Woreda, MDAs, Universities and TVETs. Similarly, grievance mechanism in the context of underserved communities requires an approach that considers the existing community institutions and local mechanisms. The GRM should be close to the potentially affected communities. The project will have three pathways for grievance redress.

Pathway 1- is for grievances related to expansion of services to underserved communities and rural areas. Grievances related to component 3.1 by individual farmers and MSMEs. The first point of complaint under pathway 1 should be received by the existing GRMs in the kebele where the complainant resides.

Pathway 2- grievances related to government offices and institutions targeted by the project at any level. The first point of grievance under pathway 2 is the GRM of the targeted MDA, public institution, city administration or Woreda office.

The GRM should be designed to include grievances related to more sensitive types of grievances such as Gender Based Violence and Sexual Exploitation and Abuse. The project needs to identify GBV service providers to effectively respond in case of incidents of SEA/SH and build this into the existing GRM. All prevention and responses action will need to balance the respect for due process with the requirements of a survivor-centered approach in which the survivor's choices, needs, safety, and wellbeing remain at the centre in all matters and procedures.

The Labor Management Procedure (LMP); Social Asseessment Report and Gender Based Violence Risk Assessment and Action Plan which will be used as a basis of some the project risks have been annexed to the ESMF for further reference.

IX. Training and Capacity Building

Effective implementation of ESMF will require technical capacity within the PIU, partner and beneficiary institutions as well as other institutions responsible for monitoring EDFP activities including line ministries and departments (MDAs). The existing capacities and practical experiences of the main EDFP implementing and partner institutions in the area of environmental management is found to be generally weak. During the consultations carried with the main implementing agency (MInT), it was learned that its existing organizational structure does not constitute an environmental unit and have no E & S staff deployed. In summary, the consultation discussions and assessments held with the various institutions have shown that there are huge capacity gaps in environmental and social management which needs to be filled through deploying adequate human resource and training. As a

result, it is recommended that the capacity gap in environmental and social risk management should be filled in as follows.

- Deploy two full time professional Environment and Social risk management specialists in the PIU at the earliest possible. These specialists should be deployed and prior to the start of project implementation.
- Assign qualified Environment and Social Focal Persons at the main Partner Institutions; MoSHE and ECA
- Assign qualified Environment and Social Focal Persons at the main beneficiary sector institutions at regional level expected to implement multiple subprojects (e.g.: Health and Education).
- Assign qualified Environment and Social Focal Persons at the Private Sector Operators (i.e. Telecom operators) that will enter into Contractual Agreement with EDFP for Pre-purchase of internet connectivity under Indefeasible Right of Use. This requirement together with the need to comply with the ESMF procedures during subproject implementation should be included in the "environmental clauses" of the main Contractual Agreement.

One of the capacity building areas sought for by the Lead implementing institution (MInT) and the Partner Institutions (ECA, MoSHE) involved in the implementation of the EDFP subprojects is the provision of training. The training to be offered will also need to address target groups from different beneficiary (e.g: focal persons from regional education and health sectors & MDAs,) and stakeholder institutions (e.g: private sector operators/contractors) which will have a role in implementing the ESMF at various levels. The training is also necessary for high level project coordination and management groups, (such as members of project steering committee and technical committee) as well as to relevant members of the broader beneficiary community to create awareness on environment management aspects of the EDFP.

The total estimated costs for mainstreaming environment into the EDFP subcomponent are USD 1,275,000. The budget is not only for training but for overall ESMF implementation over the project period of five years. These includes cost for implementation of GBV action plan. The above cost will be funded from EDFP project. The EDFP PIU Environmental and Social Specialists will report on EDFP ESMF expenditure. Costs related to the required mitigation measures for EDFP subprojects are not set out in the budgets presented here. These will be assessed and internalized by beneficiary institutions as part of the overall EDFP subproject cost.

1. **INTRODUCTION**

Ethiopia is located in the Horn of Africa and is a land-locked country with an area of 1.1 million km^2. Ethiopian population is estimated to be over 100 million, with annual population growth rate of 2.5 percent. Ethiopia is experiencing profound political and economic change. The country has been experiencing rapid and stable economic growth over the past decade. GDP grew at an annual rate of 10% between 2007 and 2017, leading to a 61 percent increase in per capita GDP. The Homegrown Economic Reform Agenda, launched in September 2019, outlines macroeconomic, structural and sectoral reforms for job creation, poverty reduction, and inclusive growth. While the GoE sets its vision to transform Ethiopia from a largely agrarian low-income country to an industrialized lower-middle-income country by 2030, the initiative gives special emphasis to sectors such as agriculture, manufacturing, mining, tourism, and information and communication technology (ICT).

Ethiopia lags in key digital indicators compared to its peers. In a country of more than 100 million people where 40 percent are aged under 15, internet use/access was a meager 18.6 percent at the end of 2017. Mobile phone use and ownership in Ethiopia (SIM cards per 100 inhabitants) stands at around 44 percent in mid 2020. The digital divide within Ethiopia is equally apparent as the disparities with its neighbors. Lack of availability, affordability, and low quality of broadband connectivity is particularly significant among socially vulnerable populations, including children and elderly, women, disabled, low-income, and rural populations. The Ethiopia Digital Foundations Project (EDFP) is intended to develop Ethiopia's digital economy. It will enable its citizens, businesses and government to reap digital dividends in the form of faster growth, lower transaction costs, more jobs and greater efficiency. It will support the necessary steps to introduce market competition, private sector participation, foreign investment and independent sector regulation. The country must also expand and strengthen its basic digital infrastructure, especially the fiber network and mobile broadband, towards achieving the African Union goal of universal affordable and quality broadband access by 2030. The Ethiopia Digital Foundation Project is a five years project (2021 to 2026) financed by the World Bank Group with a total amount of 200 million USD (IDA Credit) .

This document provides an Environmental and Social Management Framework (ESMF) for the Ethiopia Digital Foundation Project (EDFP). The main objective of the ESMF is to establish an environmental and social management process that meets the National Environmental requirements and World Bank ESF principles applicable for addressing environmental and social risks of EDFP subprojects. The ESMF sets out the principles, rules, guidelines and procedures to assess the environmental and social risks and impacts of the EDFP. Its purpose is to provide general guidance to program implementers found in the participating institutions on the implementation of environmental and social standard requirements and associated procedures that should be accomplished prior to the

commencement of the EDFP sub-projects on the ground. The ESMF contains proposed mitigation measures to reduce, mitigate and/or offset adverse risks and impacts and information on the institutions responsible for addressing project risks and impacts. The ESMF also consists of the country's policy, legal and institutional framework including its national, regional, and sectoral implementing institutions and associated implementation capacity relevant to the environmental and social risks and impacts of the project. The ESMF is complimented by the Social Assessment (SA) and Labor Management Procedure (LMP) and Action Plan for Gender Based Violence (GBV), both annexed as part of the ESMF.

Chapter one outlines of the purpose, objectives and methodologies of the EDFP ESMF. Description of the EDFP and its components are outlined in Chapter two. The next chapter (Chapter.3) broadly sets the environmental and social baseline description which is followed by review of applicable policies, legislations and World Bank ESS in chapter four. Whereas the essential procedures and process of the ESMF implementation are presented in chapter five, the environmental and social benefits and adverse risks of the EDFP subproject are presented in chapter six. The subsequent chapters also outline the Environmental and Social Management Plan on chapter 7, capacity building and training including budget for ESMF implementation on chapter 8, as well as Monitoring of ESMF implementation on chapter 9.

1.1 Purpose and objectives of the ESMF

The objective of the Environmental and Social Management Framework (ESMF) is, among others, to provide an environmental and social management process for Ethiopia Digital Foundation Project (EDFP). The ESMF is prepared to serve as instrument for risk management to ensure that the environmental and social impacts of the EDFP are properly considered during project design and implementation. The ESMF provides guidance for designing of appropriate measures and plans to reduce, mitigate and/or offset adverse impacts and enhance positive outcomes including benefits for project beneficiaries and the environment. It also provides guidance to implementing agency, partner and beneficary institutions, key stakeholders, and communities to ensure project activities are implemented in an environmental friendly and sustainable manner as required by the World Bank Environmental and Social Standards (ESSs) and the National Environmental Policies and relevant legislations pertaining to sustainable environmental and social management of sub project activities.

The objectives of the ESMF are to:
- Establish clear procedures and methodologies for integrating environmental and social issues in planning, review, approval and implementation of subprojects to be financed under the EDFP.

- Specify appropriate roles and responsibilities, and outline the necessary reporting procedures, for managing and monitoring environmental and social concerns related to the EDFP.

- Determine the training, capacity building and technical assistance needed to successfully implement the provisions of the ESMF.

- Provide practical resources for implementing the ESMF.

- Provide generic Environmental and Social Management Plan (ESMP) and report forms under the projects t---o ensure that environmental and social issues will be managed effectively.

- Specify appropriate roles and responsibilities of lead agencies and government regulatory departments, and outline the necessary reporting procedures, for managing and monitoring environmental and social concerns related to the project subcomponents.

1.2 Justification for the ESMF

The Environmental and Social Management Framework is being prepared to ensure that investments under the proposed EDFP are implemented in accordance with World Bank's Environmental and Social Standards and GoE's National Environmental legislations which require that investments should be implemented in an environmentally and socially sustainable manner. The National EIA proclamation no. 299/2002 under its Article 3.1 states that a project that requires environmental impact assessment shall not commence implementation without authorization from the competent Federal or Regional authorities. According to the World Bank Environmental and Social Policy for Investment Project Financing (IPF), Projects supported by the Bank through IPF are required to meet the ten Environmental and Social Standards outlined in the new ESF. The Bank also supports the use of the Borrower's (in this case MoFED and MInT) ES Framework in the assessment, development and implementation of projects supported through IPF.

Environmental and social management framework (ESMF) is an instrument that examines the risks and impacts when a project consists of a program and/or series of subprojects, and the risks and impacts cannot be determined until the program or subproject details have been identified. The EDFP will be implemented throughout Ethiopia including in rural and urban centers. However, the specific locations where the project activities will be implemented have not been yet identified. The project activities will be implemented under different environmental conditions. As part of the project preparation, MInThas prepared this Environmental and Social Management Framework (ESMF) which will serve as a basis for management of any potential environmental and social risks originating from the project.

The EDFP could stimulate public sector investment in new infrastructure, notably laying of optical fibers and cell towers. Terrestrial and aquatic habitats may be altered during the construction of such communications infrastructure depending on the proposed locations. Potential impacts to habitat may

be more significant during construction and installation of linear infrastructure, such as long-distance optical fiber cables, as well as access roads to other types of infrastructure along previously undeveloped land. In general, activities involving construction of communications network infrastructure and related equipment and installation of ancillary telecommunication infrastructures are likely to generate adverse environmental and social impacts.

Any infrastructure subproject consisting of physical works could trigger one or more of the ESSs in line with World Bank ESF. On the other side, it is predicted that most infrastructure related investment subproject of EDFP would be undertaken by other project stakeholders who are not directly financed for the infrastructure works, but they will carry it to meet its service obligations under contract agreements. At this point these indirect consequences and/or downstream activities are not considered Associated Facilities, assessing the criteria outlined in the ESF Policy, Para 11. The importance of this ESMF, therefore, emanates from the need to fulfill both the World Bank ESSs and National environmental requirements throughout the process of EDFP design and implementation.

1.3 Potential Users of the ESMF

This ESMF has been prepared for use by the lead project implemnting agency, partner and beneficiary institutions, as well as key stakeholders to be involved in the planning, implementation and management of the proposed EDFP. As such, the ESMF would be useful to the following stakeholders:

- Project financier.
- MInT and Project Implementation Unit (PIU).
- Ethiopian Communication Authority.
- Ministry of Science and Higher Education
- Federal and Regional Environment, Forest and Climate Change Commissions and offices
- Service providers, Contractors and Consultants to be engaged under EDFP

1.4 Methodology

The methodology adopted for preparing the ESMF includes conventional methods which are briefly discussed below.

a. *Review of relevant legislations, policies and other documents*

Relevant literatures that consists of the following were reviewed for the ESMF preparation:

- Review of the existing national and regional policies and legal documents, regulations and guidelines on environmental management.

- Existing ESMFs for similar World Bank projects such as the DMP ESMF.

- Project Appraisal Document (PAD),

- Environmental and Social Review Summary report (ESRS) as well as Environmental and Social Commitment Plan (ESCP), and

- WB EHS guidance materials

- WB environmental and social policies for IPF projects as outlined in the Environmental and Social Framework. The new ESF of the World Bank (2017) was reviewed and applied for preparation of the current ESMF.

b. Data Collection and Analysis

Both qualitative and quantitative approaches were used to collect valid and reliable data from different government offices and beneficiaries of the project. Secondary data were collected, analysed and applied to compile the environmental and social baseline of the ESMF.

c. Consultation with project implementers and stakeholders

As part of the ESMF preparation process consultations with stakeholders involved in project implementation and regulatory functions as well as project beneficiaries were conducted. Two sessions of COVID-19 appropriate virtual consultative meetings were held with representatives of the lead project implementing and partner instituions such as MInT, ECA, MoSHE, and other World Bank project development team members and task team leaders via Webex. The consultations were focused on providing information and receiving the concerns and opinions of the participants regarding the overall EDFP objectives, its main components for which the ESMF was prepared. The consultations were also carried out to obtain their input in the identification of environmental and social impacts of the EDFP and design of mitigation measures.

The first consultative meeting was held on December 14/2020 to initiate discussions on the preparation of the ESMF. Issues discussed in the initial meeting covered identification of the main stakeholders at all levels and their involvement modalities in the project, as well as EDFP sub-componets and the potential for environmental and social risks to arise from physical construction activities, and the nature of the potential environmental and social risks were discussed. During the intial consultation virtual meeting, discussions on gathering of information with regard to consultations carried so far during project development as well as gathering of organizational policies, legislations, guidelines including existing GRM systems were also made.

The second virtual consultation meeting was also held on 20 January 2021 with all the lead, partner and beneficiary institutions to assess the existing instituional capacities for environmental managemnt and to explore the gaps in capacity. During the consultation meeting, discussions were also held on

devising feasible institutional arrangements necessary for implementation of the present ESMF and on recommendations necessary to close the capacity gap.

A visit to MInT (the lead implementing agency) head office was also made on 18 January 2021 to carry indepth assessment and discussion with regards to its existing institutional capacities, practices and experiences in the area of environmental management in general and ESMF procedures inparticular. The Environmental Impacts Assessment Directorate of the Federal Environment Forest and Climate Change Commission was also consulted on the same day by holding discussions regarding the EIA procedural guidelines. The consulations conducted as part of the preparation of SA has confirmed strong support for the project across all spectrum of potential beneficiaries especially the vulnerable population groups among the underserved communities in the emerging regions.

Community consulation with underserved communties and vulenarble gorups has not been possible during the prepartion of this ESMF due to Covid 19 related challenges and the difficulty of communication to conduct consultations remotely. The ESMF has mde use of existing primary and secondary data collected through extensive desk review of documents on World Bank finance projects in underserved regions as well interviews and guided questionnairs adminstered remotely with experts and NGOs working direclty with underserved pastoral communities. The project will ensure continuous community engagement and conducting localized mini-surveys to assess the scale of some of the potentential challenges these groups may face. The Social Mangement Plan has identified measures to address some of the challenges during project implementation. The project Stakeholder Egnagement Plan also outlines a process for regular consulation with vulnerable groups and underserved communities during implementation. The SEP includes Six monthly consulation meetings and annual survey to receive feedback on project implemtation and quality of services from communties.

 Key stakeholders consulted   include impleenting agency and implementing partner insitutions, Universities in three underserved regional states, umbrella associations for disability as well as experts and INGOs operating in underserved commnties.

- Ministry of Innovation and Technology
- Ethiopian Communication Authority
- Ministry of Science and Higher Education
- Federal Environment Forest and Climate Change Commission
- Women Children and Youth Directorate Director, MInT
- Federation of National Association of Persons with Physical Disability
- Universities of Gmabella, Jinka , Mizan Tepi and Assosa
- INGOs operating in underserved regions

2. DESCRIPTION OF THE PROJECT

Overview of project: The Ethiopia Digital Foundations Project is intended to lay the building blocks to develop Ethiopia's digital economy through support to the policy and regulatory environment, improving infrastructure and quality of broadband connectivity and support the digitalization of services, and promote digital entrepreneurship. The project results will measure the level of cost reduction and affordability of services, the increase in use of internet services by women and men and the contribution to job creation and level of market competition. The project is implemented in all regions of the country. The project adapts a programmatic approach with subsequent phases for financing of some of the project subcomponents and a phased approach to rolling out the different components.

Project development Objective: The Digital Foundation project development objective is to improve Ethiopia's competitiveness in the digital age through increased inclusiveness and affordability of digital services and through digital job creation.

2.1 Project Target Beneficiaries

All regions of the country will benefit from the project implementation. The project will be implemented in all regions of the country including the Federal, regional and woreda levels. The project benefits the public by creating new opportunities for digital transformation in Government and education and new opportunities for innovation and entrepreneurship. Ultimately, the project enables citizens, businesses and Government to reap digital dividends in the form of faster growth, lower transaction costs, more jobs and greater efficiency.

MDAs, Government officials and staff: The technical assistance benefits government ministries (MInT and ECA) in their role as policy and regulatory bodies. Government officials and staff at federal, regional and woreda levels will be targeted for digital skills training for effective use and operation of digital services, for coordination and service delivery. Training will aim for equal participation of female employees and government officials.

Government Ministries, Departments and Agencies (MDAs) at federal, regional and woreda levels will benefit from capacity building activities for digital government (e.g. consolidated portal and e-services) enable remote working and facilitation of communication through installation of communication rooms in 50 selected health institutions.

Health and educational Institutions: Hospitals, health centers, education and research institutions will benefit from high speed internet and broadband services. Higher Educational institutions

(Universities and TVETs, Colleges) will be targeted for high speed internet broad band and wi-fi to be able to access educational resources and open learning platforms and library resources. Education institutions benefit from improving online and face to face tuitions necessitated by the closure of schools as result of the COVID-19 pandemic. Improving connectivity for educational institutions is critical to empowering the next generation of digital leaders for the private sector and Government. The project also targets youth community associations and secondary cities for improved digital connectivity. These institutions will eventually serve as an anchor tenant for wider geographical service provision.

Students, academia and researcher: the project targets 30 universities and 40 TVETs from all regions of the country with the aim of nationwide coverage including 200 schools. The specific institutions are to be selected by regional authorities. The students and academia will benefit from access to library and learning platforms and open sources. The universities will also facilitate access to affordable digital devices smart phones and laptops to access internet services. Girls are targeted to benefit equitably from the skills training and access to digital services by educational institutions.

Start-ups and digital Businesses: Start ups are targeted to benefit from project co-investment grants, training and coaching activities. Established digital businesses will receive grants to provide training, digital device and outreach activities to suppliers, MSMEs and contractors. Grantees are incentivized to extend inclusive services and reach women and rural farmers.

Service users: The project targets general public (such as farmers, rural residents, underserved communities, businesses, women) is expected to benefit from wide range of activities that ultimately improved digital infrastructure, improved connectivity and increased affordability of services and digital devices and from improvement in government e-service.

2.2 EDFP Project Components

The project has the following five main components.

Component 1: Digital Economy, enabling legal and regulatory environment

The aim of this technical assistance (TA) is to strengthen the analog foundations of the digital economy, policy-making, and effective regulation for the telecommunications sector and for the development of digital entrepreneurship. Component -1 have the following three sub-components.

Sub-component 1.1: Partial privatization of Ethio-Telecom: This subcomponent will support the partial privatization of Ethio-Telecom, through the recruitment of a transaction advisor. The project activity for this sub-component is limited to the hiring of a Transaction Advisor to manage the process. No further support is included for Ethio-Telecom's restructuring process, nor any technical assistance on any organizational or staffing development. The recruitment and deployment of

Transaction Advisor to be paid by the Project should comply with the requirements ESS2 and EHS aspects should be included in the terms of reference and should also be properly monitored. Technical assistance activities will be undertaken following the requirements of OESRC's Advisory Note Technical Assistance and the Environmental and Social Framework (2019).

The potential EHS risks associated with TA activities should be managed in compliance with the applicable World Bank standards and EHS incidents, if any, should be recorded, reported, responded and followed up following the requirements of the Bank's Environment and Social Incident Response Toolkit.

Sub-component 1.2: Strengthening independent ICT sector regulation. This sub-component will provide TA to support the establishment of ECA as independent, transparent and efficient and accountable regulatory body. Activities include: (1)Assisting the physical, institutional and professional establishment of ECA, (2) Drafting procedures to create a competitive market environment, (3) TA for ECA in its role of managing spectrum, including acquiring relevant equipment for spectrum monitoring, (4) Assisting ECA in developing a Universal Service Fund (USF) and the capacity building to run it (5) Transferring responsibility for the .et domain name management, (6) General capacity building and regulatory strengthening, (7) adopt regulatory standards on siting, design, construction and operation of telecommunications infrastructure in response to climate risks.

Sub-component 1.3: Supporting the development of the Digital Economy: The project will provide legal and regulatory support for the implementation of the Digital Transformation Strategy 2025. The technical assistance would lay the basis for possible future activities supported under the program. These include:

a) Supporting capacity building of senior Government officials, notably in MInT and ECA to design, implement and evaluate policies and regulations for the development of the digital economy.

b) Systematic study of existing legislation that might be hindering digital job creation and identify the policy and regulatory actions

c) Digital Identification (ID) provide support for development of the enabling environment for a national digital ID program

Component 2: Digital Government and Connectivity: The objective of this component is to develop the capacity of GoE to deliver digital services, and to crowd-in private sector investments to improve regional and domestic connectivity infrastructure, to connect public institutions and educational institutions to broadband internet. Component 2 have the following three sub-components which are among the important once interms of environmental and social risk management during implementation of the EDFP.

Sub-component 2.1: Digital Government and COVID-19 response. Capacity building activities include (i) developing a Government e-Portal accessible by citizens and firms, (ii) improving Government facilities for remote working, and (iii) building the digital skills of Government officials. In response to the COVID 19 the project will address Government requirements for improved facilities for remote working, and the installation of up to 50 Communications Rooms with internet connection.

Sub-component 2.2: Connecting targeted public institutions to broadband across the Country. The locations of targeted public institutions to be served would include Ministries, Departments and Agencies (MDAs), youth community associations across the Country and especially in the first phase selected hospitals and health centers, as part of the COVID-19 response. The proposed mechanism to do this would entail an upfront commitment for the pre-purchase of internet bandwidth from private sector operators under Indefeasible Right of Use (IRU) contracts, through a competitive bidding process, over a period of 5-10 years, applying principles of geographically averaged pricing. Private sector investors/operators/ in internet connectivity will be incentivized using provisions of services to public institutions as anchor tenant for wider geographical service provision.

Sub-component 2.3: Connecting selected educational institutions to broadband

This sub-component will connect selected educational institutions to high-speed internet services. This will include universities, colleges of teacher's education, research institutions and TVETs, with the aim of nationwide coverage in the first phase and some 200 selected secondary schools in the second phase and eventually all secondary schools in the country.

Component 3 – Digital Business and Entrepreneurship

This component aims to nurture digital entrepreneurship and incentivize digital businesses to train, provide digital devices, and employ Ethiopians to participate in the digital economy. This component has the following two subcomponents.

Subcomponent 3.1 Grants to digital start-ups and digital businesses- The subcomponent introduces two financing windows for digital start-ups and digital businesses.

Window 1 is a co-investment grant aimed at helping digital start-ups gain access to risk capital, knowledge and networks to start operating as a viable business.

Window 2 is aimed at incentivizing more established digital businesses to provide training, digital devices and other support to Ethiopians to participate in the digital economy by becoming suppliers of goods/services for productive purposes (e.g. enabling offline farmers to sell products via eCommerce and earn higher income).

Subcomponent 3.2: Technical Assistance to the Ministry of Innovation and Technology. This subcomponent will also provide capacity building to MInT for harmonizing Ethiopia with the regional digital single market initiative proposed under the Horn of Africa Digital Foundations Initiative.

Component 4: Project Management

This component will support the project implementation unit to be initially set up in MInT. The PIU and MInT taking the lead will be responsible for implementation with partnering agencies and beneficiaries, but also including MoF, ECA and EthERNet. The MoF is currently responsible for the project preparation and activities relating to component 1.

Component 5: Contingent Emergency Response Component

A Contingent Emergency Response Component (CERC) is added to the project structure. This will have an initial zero value but may be financed during the course of the project to allow for an agile response to an eligible crisis or emergency. These could include, for instance, humanitarian crises which require the provision of emergency communications services to replace facilities that have been damaged, or to facilitate emergency humanitarian payments using mobile money.

2.3 Implementation arrangements

The project targets federal, regional and local (Woreda and city) level institutions for implementation. The project activities would be implemented directly by federal level agencies in cooperation with regional counterparts and local institutions. The large portions of project activities are expected to be implemented at federal level due to the focus of the activities on Technical Assistance for as policy and regulatory tasks and capacity building of federal institutions. project activities at regional agencies, public institutions and Woreda offices will also be implemented through private sector operators contracted by federal level implementing agency and partners. Regional level agencies are also important stakeholders in targeting of institutions for project support (components 2.2 and 2.3), facilitation and monitoring support to project activities.

The project implementation arrangement has two phases- preparation phase and implementation phase.

Preparation stage: The MoF is responsible for the preparation stage of the project and implementation of activities under Component 1. The Channel One Programs Coordinating Directorate (COPCD)of the Ministry of Finance (MoF) will serve as a Project Implementation Unit (PIU) for the preparation phase of the project. The activities at this stage include recruitment of project staff for the future PIU, experts to support ECA, as well as the transaction advisor under component 1.1.

Implementation phase: Once the project becomes effective, MInT will assume overall implementation leadership, and will host the PIU for the remaining of the project life. MoF and Public Enterprises Holdings and Administration Agency (PEHAA) will partner with MInT as implementing agency for subcomponent 1.1 and Ethiopian Communication Agency (ECA) for subcomponent 1.2 respectively, while MInT will deliver most of the activities under subcomponents 1.3, 2.1 and component 3. Ethiopian Research and Education Network (EthERNet) will partner for activities under subcomponent 2.3. For Digital ID (under sub-component 1.3), MInT will also liaise with the Ministry of Peace (MOP) on the aspects relevant to Digital ID.

Project Steering Committee (PSC) will provide overall guidance to the PIU. The PSC will be chaired by a State Minister of MInT and comprising representatives from the MoF, the ECA, EthERNet (representing MoHSHE), MOP, the Job Creation Commission (JCC) and the Ministry of Trade and Industry (MoTI). Technical Committees (TCs) will be formed for each of the Component. The committees will be appointed by the PCS and chaired by MInT. The TCs will be conduct specific tasks such as managing the grants and Monitoring and Evaluation (M&E) reporting process for component 3. The TCs will extend their consultations to the private sector, including the new market entrants.

The Project Steering Committee
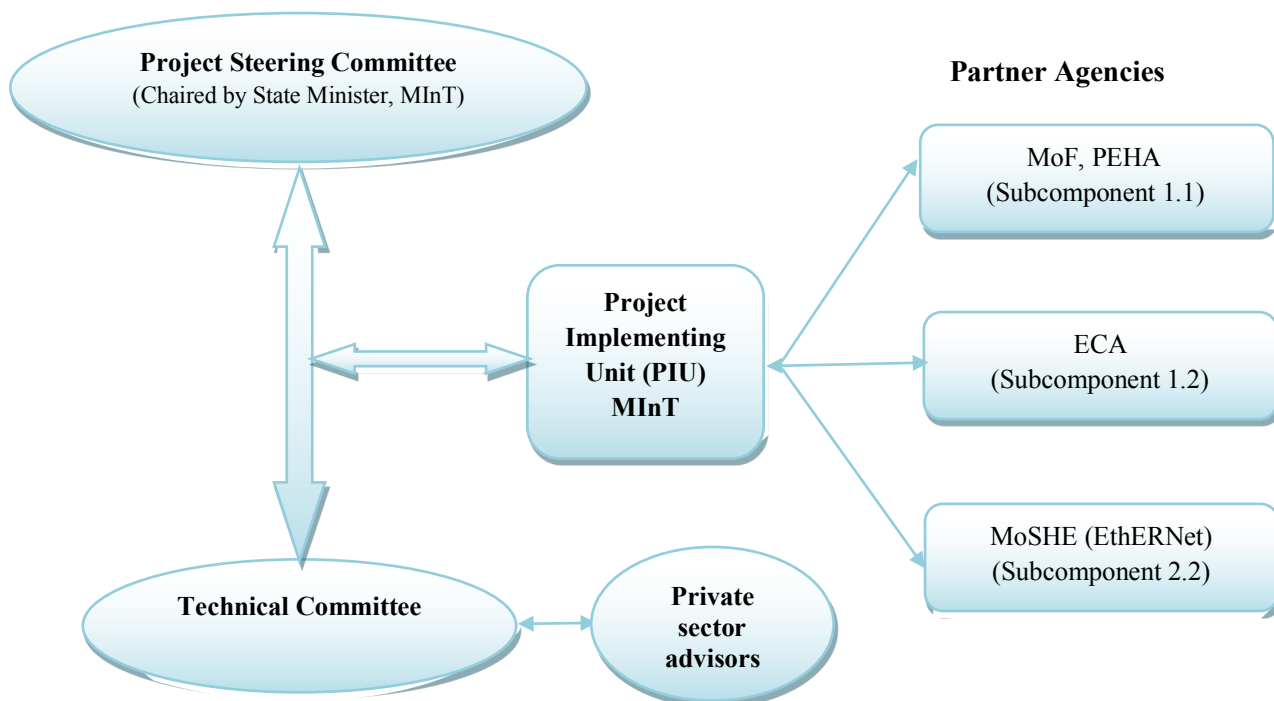
Figure 1: Illustration of proposed project implementation arrangements

3. ENVIRONMENTAL AND SOCIAL CONTEXT AND BASELINE CONDITIONS
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3.1 Overview of biophysical baseline

Ethiopia is a large land-locked country occupying an area of over 1.1 million square km². It is located between 3º and 15ºN latitude and 33º and 48 º E longitudes. Ethiopia is bounded by Sudan on the west, Eritrea and Djibouti on the northeast, Somalia on the east and southeast, and Kenya on the south. The country is constituted of ten regional states and two city administrations. It is a country of great geographical and climatic diversity, which has given rise to many and varied ecological systems.
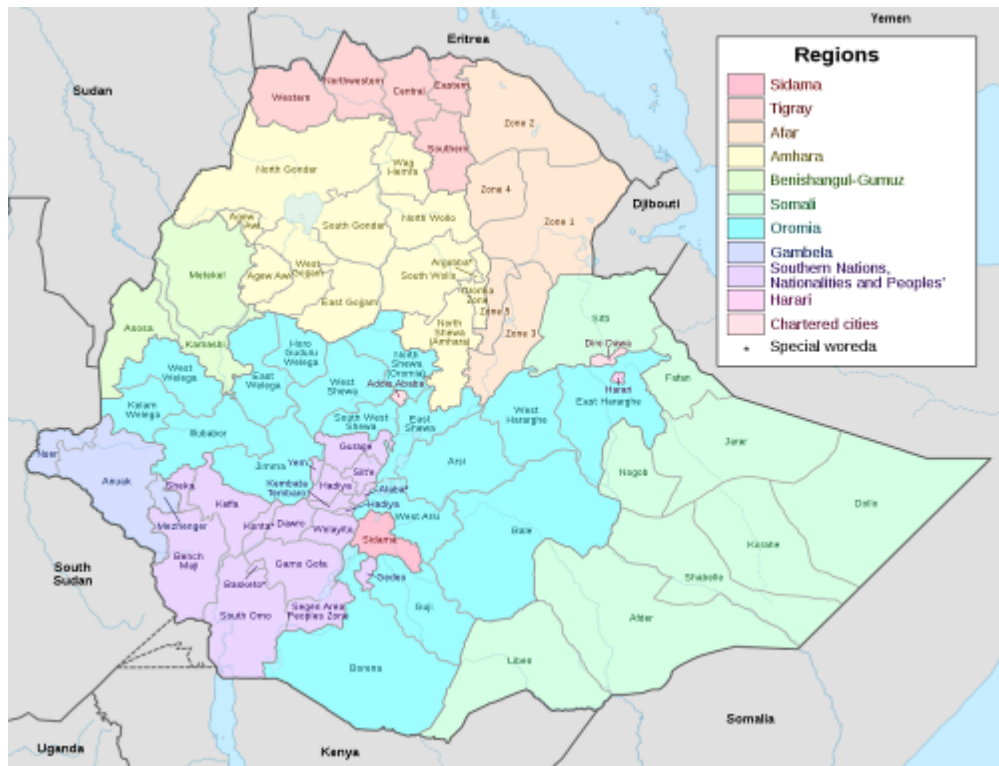
Figure 2: Map of Ethiopia (Source: Wikipedia, List of Zones of Ethiopia, December, 2020)

3.1.1 Climate

Ethiopia has a tropical climate that is strongly a function of altitude. The mean annual temperature varies from more than 30^0C in the lowlands to less than 10^0C in the highlands. The annual rainfall is over 2,700 mm in the southwestern highlands; and less than 200 mm towards the north; less than 100 mm in the northeast; and less than 200 mm in the southeast. Based on rainfall distribution, Ethiopia has three major seasons: 'Kiremt' (June – September, the main rainy season for most parts); 'Bega' (October – February, the dry season for most parts); and 'Belg' (March – May, the short rainy season for some parts). While this is the broad climatic pattern, large spatial and temporal variability are the salient features of Ethiopia's climate.

3.1.2 Morphology, Relief and Ecology

The physiographic diversity of the country is impressive. It consists of rugged mountains, flat-topped plateaus, deep gorges and river valleys and vast lowland areas. About 45% of the country is highland with an altitude of 1500 m or above, and 55 % is lowlands with an altitude of less than 1500 m. The highest peak is at Ras Dashen (4,620 m) and the lowest altitude is in the Danakil depression (120 m below sea level). The Great Rift Valley cuts across the country in a northeast-southwest direction and divides the highlands and plateaus and associated river drainage systems into western and eastern parts. The diversity of the terrain is fundamental to regional variations in climate, natural vegetation, soil composition, and settlement patterns. Much of the Ethiopia's landmass is part of the East African Rift Plateau.

As a result of the contrasting physiographic and climatic features of the country, Ethiopia has diverse ecosystems. There are 10 major ecosystems, and 18 major and 49 minor agro-ecological zones, which are inhabited by a great diversity of animal, plant and microbial genetic resources (FDRE, 2015, in EFCCC, 2019). Evidence suggests that there are 1,408 known species of fauna and 6,603 species of flora, of which 15.1 percent are considered endemic (FDRE, 2015. in EFCCC, 2019). This makes Ethiopia to be one of the biodiversity hotspots of the world.

Table 1: Summary of the Eco-climatic zones and associated environmental sensitivities

No.	Eco-Climatic Zone	Environmental sensitivity
1	**High Dega Wurch** Very high elevation areas (>3200 m) principally in Wollo, Gonder and Gojam in Amhara; dominated by grassland landscapes; rainfall is 1000-1600 mm.	Potential for rapid rainfall runoff and the vulnerability to overgrazing and other human uses.
2	**Dega** High elevation areas (2000-3200 m) such as in Tigray, Wollo, Gonder and Gojam in Amhara, and Harrerege, Arsi and Bale in Oromiya; typically mixed coniferous shrubs and trees; rainfall is 1000-2000 mm.	Relatively high rainfall and potential high soil erosion rates.
3	**Kolla** Low elevation semi-arid areas (500-1500m) of western Tigray, southern Oromiya and northern Somali; dry savanna landscapes; rainfall is in the range of 200-800 mm.	The semi-arid, dry savanna Kolla landscapes are vulnerable to deforestation and overgrazing, variable rainfall, and wildfire potential; soils are generally nutrient poor and moderate-high erodability.
4	**Bereha** Low elevation arid areas in Afar, Somali, Benshangul, Gumuz and Gambella and the western parts of Tigray and eastern Oromiya (Harrerege and Bale); arid and dry savanna landscapes; rainfall is generally less than 200 mm.	Generally have low soil quality, high erosion potential and vulnerability to pastoral livelihoods.

3.2 Natural Resources

3.2.1 Water resources and drainage

Ethiopia is endowed with a substantial amount of water resources. The surface water resource potential is impressive. The country possesses twelve major river basins, which form four major drainage systems:

➢ The Nile basin (including Abbay or Blue Nile, Baro-Akobo, Setit-Tekeze/Atbara and Mereb river basins) covers 33 percent of the country and drains the northern and central parts westwards;

➢ The Rift Valley basin (including Awash, Denakil, Omo-Gibe river basins and Central Lakes) covers 28 percent of the country;

➢ The Shebelle-Juba basin (including Wabi-Shebelle and Genale-Dawa river basins) covers 33 percent of the country and drains the southeastern mountains towards Somalia and the Indian Ocean;

➢ The North-East Coast (including the Ogaden and Gulf of Aden basins) covers 6 percent of the country.

These four major drainage systems drain the entire rural and urban parts of the Country through its primary, secondary and tertiary level tributaries. Cities like Addis Ababa, Adama, Bishoftu and Mekelle are found far upstream of the Awash and Tekeze River basins respectively and are drained by small tributaries such as the Akaki Rivers in the case of Addis Ababa. Other cities such as Dessie, Kombolcha and Woldiya are also situated upstream of the Awash basin and are drained by its major tributary rivers (i.e. Borkena and Mile Rivers). On the other hand, whereas cities like Bahirdar, Gondar, Assosa and Gambella are found within the Blue Nile and Baro Akobo River Basins not far from its main tributaries, other cities/towns like Batu (Zeway), Awassa and Arbaminch are situated within the Rift valley lakes basins close to the lakes respectively. Bahirdar City is situated adjacent to Lake Tana and it is crossed by the river mouth of the main Blue Nile River which starts from Lake Tana itself. Similarly, Gambella city is crossed by Baro River which is one of the main rivers of the Baro-Akobo basin. The Bishoftu, Hawassa, Ziway and Abaya lakes, which are among the important lakes in the rift valley basin, are situated adjacent to Bishoftu, Hawassa, Batu and Arbaminch city/town respectively.
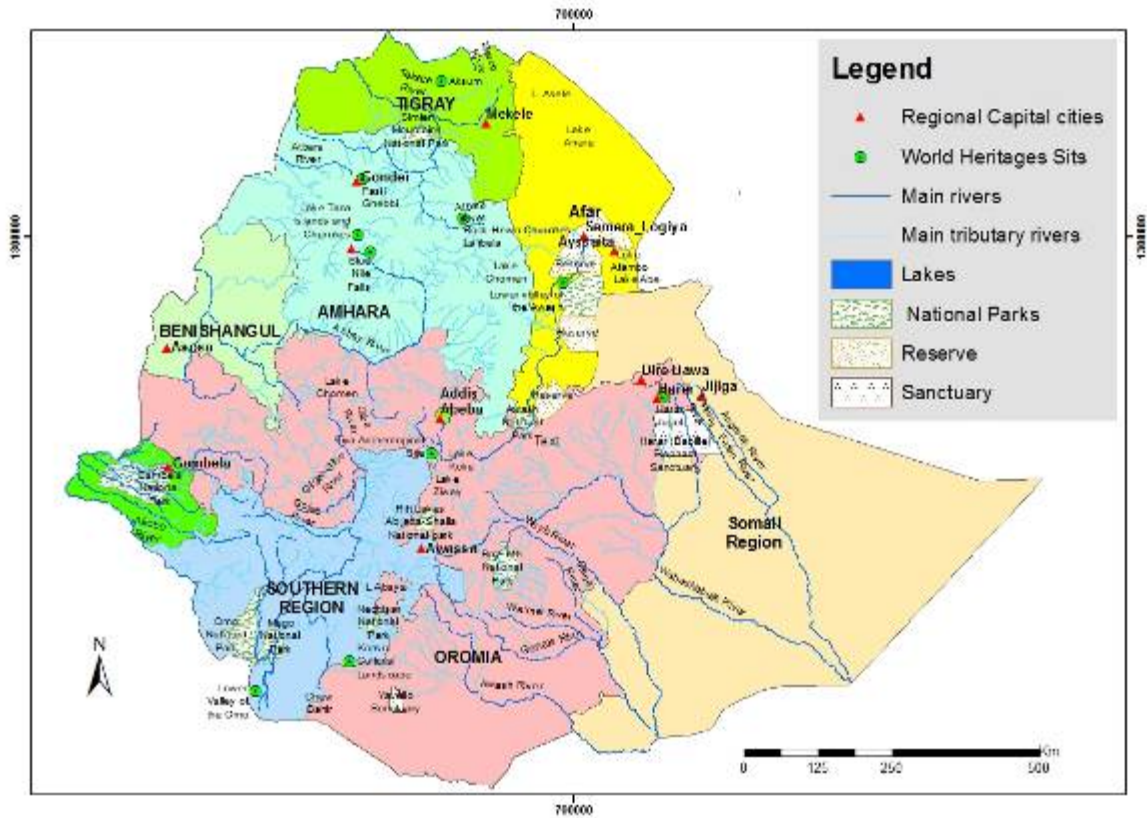
Figure 3: Map showing major water bodies, National parks &World Heritage sites of Ethiopia

3.2.2. National Parks and Wildlife Sanctuaries

Ethiopia harbors six of the world's major terrestrial biomes (alpine, coniferous forests, deciduous forest, tropical rain forest, savanna, and desert) and nine distinct ecosystem types (BIDNTF, 2010). Across all these nine different ecosystem types, there are 52 conservation areas with official protection status. These include 20 National parks, 3 wildlife sanctuaries, 2 wildlife reserves, 17 controlled hunting areas, 7 open hunting areas and 3 community conservation areas (EWCA, 2012). The difference between the different conservation statuses includes a wildlife sanctuary does not allow people to live inside it but a wildlife reserve allows people to live together and conserve wildlife (Vreugdenhil et al., 2012). National parks are areas of land protected to conserve native plants and animals and their habitats, places of natural attractiveness, historic heritage and indigenous cultures (NSW, 2015). The list of National parks administered by the Federal and respective regional governments is shown in table 2 below.

Table 2: List of National Parks in Ethiopia

No.	National Park	Region	Established	Area	Administered by
1	Awash National Park	Oromia, Afar	1958	756 square kilometers (292 sq mi)	Federal Government
2	Omo National Park	SNNPR	1980	4068 square Kilometers (1571 sq.mi)	Federal Government
3	Simien Mountains National Park	Amhara	1959	412 square kilometres (159 sq mi)	Federal Government
4	Alatish National Park	Amhara	2006	2,666 square kilometres (1,029 sq mi)	Federal Government
5	Bahir Dar Blue Nile River Millennium Park	Amhara	2008	4,728 square kilometres (1,825 sq mi)	Regional Government
6	Borena Saynt National Park	Amhara	2001	4,325 square kilometres (1,670 sq mi)	Regional Government
7	Bale Mountains National Park	Oromia	1962	2,200 square kilometres (850 sq mi)	Federal Government
8	Abijata Lakes National Park	Oromia	1963	887 square kilometres (342 sq mi)	Federal Government
9	Nech Sar National Park	SNNPR	1966	514 square kilometres (198 sq mi)	Federal Government
10	Mago National Park	SNNPR	1974	1,942 square kilometres (750 sq mi)	Regional Government
11	Chebera Churchura National Park	SNNPR	1997	1,190 square kilometres (460 sq mi)	Regional Government
12	Maze National Park	SNNPR	1997	202 square kilometres (78 sq mi)	Regional Government
13	Yangudi-Rassa National Park	Afar	1969	4,731 square kilometres (1,827 sq mi)	Federal Government
14	Gambela National Park	Gambela	1966	5,061 square kilometres (1,954 sq mi)	Federal Government
15	Geraille National Park	Somali	1998	3,558 square kilometres (1,374 sq mi)	Regional Government
16	Dati Wolel National Park	Oromia	1998	431 square kilometres (166 sq mi)	Regional Government
17	Yabello National Park	Oromia	1978	2,500 square kilometres (970 sq mi)	Regional Government
18	Gibe Sheleko National Park	SNNPR	2001	248 square kilometres (96 sq mi)	Regional Government
19	Loka Abaya National Park	SNNPR	2001	500 square kilometres (190 sq mi)	Regional Government
20	Kafeto Shiraro National Park	Tigray	1999	5,000 square kilometres (1,900 sq mi)	Federal Government

3.3 Energy

Having access to modern energy sources is essential for economic development and livelihood improvement. Access to modern energy supports both income generation activities and the national development agenda through improving education, reducing indoor air pollution, and ensuring

environment sustainability. The primary source of energy in Ethiopia is biomass, which accounts for 91% of energy consumed. Petroleum supplies about 7% of total primary energy and electricity accounts for only 2% of total energy use. Biomass consumption accounts for over 98% of total supply in the residential sector.

Power generation for the electric grid in Ethiopia currently depends almost entirely on hydropower. Ethiopia is having large Interconnected Power System (ICS). This ICS consist of 13 hydro, 6 diesel standby, 1 geothermal and 3 wind farms. Presently, Ethiopia has a total installed power generation capacity of around 4244 MW. About 90% (3814 MW) is generated by hydroelectric power plants. Additionally, 324 MW (7.65%), 7.3 MW (0.17%) and 99.17 MW (2.34%) are produced by the wind, geothermal and diesel power plants, respectively. The government is developing large-scale hydroelectric projects with the aim of increasing the supply of renewable energy sources from the present generation capacity of 4244MW to 10,000MW by the end of 2014 &15. The Grand Ethiopian Renaissance Dam (GERD) is under construction and expected to be completed soon. The GERD hydropower plant would add 6000MW to meet the government targets of over 10,000MW capacity.

The per capita electricity consumption was 23 kWh in 2000 and increased to about 41 kWh by 2008 and 70 kWh by 2014. There are stark differences in the rate of electricity access in urban and rural areas. Urban populations have major access to electricity; while the large populations residing in rural areas have less access to electricity. In urban areas 87% of the population has access to electricity, while in rural areas electricity access remains extremely low at about 5%. Eighty-three percent of the population resides in rural areas, largely relying on traditional biomass energy sources for cooking and heating.

The Universal Electricity Access Program (UEAP) has been developed to provide electricity access for most of the rural areas. An integrated plan has been developed by the Ethiopian electric power corporation (EEPCo) for achieving these goals. The government of Ethiopia is targeting to increase the electricity access from 26% (2014) to 60% by 2040.

3.4 Climate change

Ethiopia is vulnerable to climate variability and global climate change. Climate change has occurred across much of Ethiopia, particularly since the 1970s, at a rate that is variable but broadly consistent with wider African and global trends. Mean annual temperature has increased by 1.3°C between 1960 and 2006, an average rate of 0.28°C per decade. Climate models suggest that Ethiopia will see further warming in all seasons of between 0.7°C and 2.3°C by the 2020s and of between 1.4°C and 2.9°C by the 2050s and that the timing, intensity, and volume of rainfall will change over much of the country. The frequency and intensity of droughts has increased in recent years, severely affecting the

livelihoods of millions of people. At the same time, increases in floods have placed additional stress on social institutions and intensified the vulnerability of households. Climate related shocks affect productivity, together with high levels of poverty and low levels of technology, leave people with limited choices or resources to adapt. These changes also hamper economic progress and exacerbate existing social and economic problems. The Ethiopian government is committed to building a Climate Resilient Green Economy (CRGE) that aims to ensure economic development whilst pursuing a low emissions pathway and building resilience to climate change.

3.5 Overview of Social baseline

3.5.1. People and population dynamics

Ethiopia is a large country covering a geographic area of more than 1 million km^2. It is a diverse and multi-cultural nation and a home for over 90 ethnic groups and 10 regional states. An estimated 80% of Ethiopians live in rural areas and 20% live in cities. Rain fed agriculture is the main source of livelihood. Agro-pastoral and mobile pastoral livelihood is practiced in East and Southern part of the country. Urban livelihood is dominated by informal employment and self-sustaining activities.

Ethiopia is the second most populous country in Sub Saharan Africa and the 12th most populated country in the world[1]. The population of Ethiopia is 110 million based on projections of the last population census conducted in 2007. Growing at a rate of 2.5%, Ethiopia's population is projected to reach 150 million by 2035. The population density (2018) is 109.2 persons per 1000square kms with significant variations between the more densely populated north and central highlands and the sparsely populated lowlands in Eastern part of the country.

3.5.2 Demography

Ethiopia have high percentage of young population. The DHS survey (2016) shows that 46% of the population is under 15 years of age and 51% of the population is between 15-64 years old. The population under 30 years of age account for 73%. The gender disaggregation is 50% with slightly higher women (51%) in urban areas. The average household size in Ethiopia is 4.6 persons. Urban households are slightly smaller than rural households (3.5 persons versus 4.9 persons). Women are heads of households for 1 in 4 households.

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[1] Worldometer: https://www.worldometers.info/demographics/ethiopia-demographics/#pop viewed on December 5, 2020.

3.5.3 Social-Economic Environments

3.5.3.1 Urbanization

Ethiopia is among countries with the lowest level of urbanization and rapidly urbanizing countries in the world. Share of urban population is slightly higher than 20% well below the Sub-Saharan Africa average of 37 percent. Ethiopia is rapidly urbanizing, and the rate of urbanization is 5.4% a year (World Bank 2015)[2]. According to official figures from the Ethiopian Central Statistics Agency (2016), the urban population is projected to nearly triple from 15.2 million in 2012 to 42.3 million in 2037, growing at 3.8 percent a year. Studies show that 30 percent of the country's population will reside in urban areas by 2028.

The capital, Addis Ababa has, according to CSA 2012 population projection, a total population of 3,384,569, representing over 30 % of the urban population in Ethiopia. Based on projected growth of urban population, the current population of Addis Ababa is close to 4 million. All other major cities have a population of less than one million. Ethiopian cities employ 15 percent of the labor force and contribute 38 percent to gross domestic product (GDP).

3.5.3.2 Employment

There is high level of unemployment in Ethiopia. A quarter of urban working age population is unemployed, and 2million people join the work force annually. Agriculture is the main source of employment for 70% of working population in Ethiopia. Women experience high rates of unemployment than men. The overall labor participation of women is 45% in the year 2015-2016 compared to 55% for men. Women's participation is the lowest (37%) in the same year compared with men (63%). (EDHS 2016)

In 2016, employment among women age 15-49 increased from 29% in 2005 to 38% in 2011 but decreased to 33% in 2016. The percentage of men who are currently employed has shown a slight increase since 2005, from 85% to 88%. In rural areas, 55% of employed women and 83% of employed men are engaged in agricultural work while urban women are most likely to be employed in sales and services (56%) and in the professional/technical/managerial sector (13%). In contrast, urban men are most likely to be employed in skilled manual labour (25%) and sales and services (22%). (World Bank Gender Diagnostic Report Ethiopia 2019).

3.5.3.3 Economic Situation

Ethiopia is a land locked country with second largest population in Sub-Saharan Africa. The country ranks 147th in UNDP Human Development Index (HDI) of 0.047 in 2019. The per capita GNI is estimated at USD 850 for the same year. The country's GDP is USD 96 Billion in 2019.

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[2] World Bank and Cities Alliance (2015): Ethiopia Urbanization Review: Urban Institutions for Middle Income Countries

Ethiopia's average annual growth rate of slightly over 10 percent in the past decade has far exceeded the regional average of 5 percent. Services grew at 12 percent, industry at 21 percent, and agriculture at 7 percent. The recent rapid economic growth disproportionately favoring services and industry than agriculture signals the advent of a demographic transition. The main driver of growth has been public investment particularly in power production, roads, railways, and industrial parks to education, health, and water provision (World Bank).

Economic growth over the past decades has resulted in significant reduction of poverty. Between 2011-2016 the national poverty rate (1.9 USD/day) dropped from 30% to 24%. The reduction was higher for urban residents than rural residents and resulted in slight increase of inequality (0.33). In urban areas poverty decreased from 26 percent in 2011 to 15 percent in 2016. In rural areas poverty decreased in 4 percentage points, from 30% to 26% in the same period (World Bank).

3.5.3.4 Education

Education is instrumental to attaining development goals through application of science, technology and innovations. The latter are major instruments to bring about transformation such as increasing the productive capacity and efficiency of the economy by rapidly improving quality, productivity, and competitiveness of agriculture and manufacturing industries.

There is low level of literacy in Ethiopia. Half of women (48%) and 28% of men age 15-49 in Ethiopia have not gone through any formal education (EDHS2016). Three percent of women and 5% of men have completed primary school, while 1% of women and men have a secondary education. Six percent of women and 9% of men have more than a secondary education. Education in urban areas is better than in rural areas; 57% of rural women have no formal education, as compared with 16% of urban women.

The gender gaps in education have been narrowed significantly due to improvement in the education sector. Between 2000-2016 the share of women who had never attended school dropped from 77 percent to 49 percent. Similarly, the gender parity index, or the ratio of female to male primary school attendance, increased from 73 percent to 99 percent. The effects of increased attendance on literacy are beginning to show for younger cohorts, with the current gender literacy gap for individuals ages 15–24 standing at only 3 percent (EDHS 2016).

Access to education has increased over the last decades. Between 2011 and 2015, primary enrollment increased by 2.5 million students, to nearly 19 million students by 2016, yet net rates of primary attendance (65 percent) and completion (below 50 percent) are low.

Regional variations on school enrollment are significant. School enrolment national average (2016) for ages 7-18 is 59%. The highest percentage of school attendance is in Addis Ababa while the lowest

is in Afar region (54%). Girls school attendance in the same age group is 86% in Addis Ababa and 51% in Afar and Somali regions.

 Access to quality education and equity are particularly severe in several emerging regions, home to Ethiopia's pastoralist communities. While 80 percent of enrolled students in Addis Ababa survive to Grade 5, the proportion in Gambella and Afar regions, for example, were 49 percent and 29 percent respectively, as of 2016/17.

There is a rapid expansion in the development of the higher education infrastructure (institutions and facilities), qualified human resource, the enrolment rate and the graduation rate in the higher education of the country for the last 15 years. 200 plus universities, colleges of teachers' education (CTE) and research institutions, and roughly 1,500 Technical and Vocational Education and Training institutions (TVETs).

3.5.3.5 Health

Health service provision in Ethiopia includes a wide range of providers in both the public and private sectors, such as public facilities managed by federal, regional state, zonal and woreda administration and private for-profit providers, NGOs, community-based and faith-based organizations and traditional care givers (WHO 2002). Currently there are 290 hospitals, 3962 health centers, and 16547 health posts under the regional and federal government which provides health care services. Ethiopian health care delivery system has three-tier, to deliver essential health services and ensure referral linkages. The first tier is primary health care unit in woreda health system which comprises health posts, health centres and primary hospital. Secondary health service includes general hospitals. Tertiary facilities form the highest level of healthcare in the country and include Specialist Hospitals, Teaching Hospitals and Federal Referral Hospitals.

Government investment in basic health services has brought results in declining mortality and increasing life expectancy. Over the last two decades, under five mortality rate declined from 166 deaths per 1000 live births in 2000 to 67 in 2016 and infant mortality rate (IMR) declined from 97 deaths per 1000 live births in 2000 to 48 deaths per 1000 live births in 2016.

Infant mortality also declined from 97 deaths per 1,000 live births in 2000 to 48 deaths per 1,000 live births in 2016, which is about a 50% reduction in the last 16 years. Neonatal mortality declined from 49 deaths per 1,000 live births in 2000 to 29 deaths per 1,000 births in 2016, a reduction of 41% over the past 16 years (EDHS 2016).

Between 2000 and 2016, Contraceptive Prevalence Rate increased from 8 percent to 36 percent; Total Fertility Rate declined from 5.5 to 4.6 children per woman; and births attended by skilled attendants increased from 6 percent to 28 percent. However, Ethiopia remains one of the poorest countries in the

world with lagging indicators in maternal and child health, especially neonatal mortality(EDHS 2016).

Similarly, despite progress toward the MDG on undernourishment (stunting rates fell from 58 percent to 38 percent between 2000 and 2016), the prevalence of stunting remains alarmingly high. Stunting (2017) affects 36.8% of children under 5 years of age which is higher than the average for the Africa region (29.1%) and wasting affects 7.2% of children under 5 years of age are still affected, which is higher than the average for the Africa region (6.4%). There are significant spatial disparities within and between regions as well as between rural and urban areas (EDHS 2016).

Ethiopia has 123,145 confirmed cases of COVID 19 and 1912 confirmed deaths (December 30, 2020). COVID has wide ranging consequences in all sectors of the economy. The country's economic growth has slowed down, exports and investments have dropped and earnings from Tourism industry have dropped. Unemployment and loss of income particularly in urban areas has increased the number of people in the safety net programs. Covid-19 has reversed gains in education and health and other sectors too.

3.5.3.6 Telecommunication, Internet and Technology

Ethiopia remains one of the least connected countries in the world. The level of internet and mobile phone penetration remain low in Ethiopia. Recent figures show that about 20.6% or 23.96 million people have internet connections while 38.5 percent of population or 44.86 million mobile services. The number of internet users in Ethiopia increased by 2.8 million (13%) between 2020 and 2021. (DATAPORTAL 2021). Measures to lower costs, promote use of mobile phone through credit sales and upgrading the telecom services have contributed to the expansion.

The telecom infrastructure is largely absent in rural areas and there is generally low access and irregular supply of power to rural areas where most of the population resides. Women have limited access to mobile phone and use it differently than men due to limited resources and social norms. A study by World Bank found out that while 46 percent of male-owned businesses used mobile phones for business purposes, only 3 percent of female owned businesses did (World Bank Gender Diagnostic Study 2019). Ethiopia is currently undertaking several reforms to improve the ICT sector including the partial privatization and deregulation of the sector.

4. RELEVANT POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK OF ENVIRONMENTAL AND SOCIAL MANAGEMENT

4.1 APPLICABLE POLICIES AND STRATEGIES FORMING THE NATIONAL ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM

4.1.1 The Constitution

The constitution of the Federal Democratic Republic of Ethiopia had been issued in August 1995 with several provisions, which provides basic and comprehensive principles and guidelines for environmental protection and management in the country. The concept of sustainable development and environmental rights are presented in Articles 43, 44 and 92 of the Constitution.

Article 43- The Right to Development

- The Peoples of Ethiopia as a whole, and each Nation, Nationality and People in Ethiopia in particular have the right to improved living standards and to sustainable development.
- Nationals have the right to participate in national development and, in particular, to be consulted with respect to policies and projects affecting their community.

Article 44- Environmental Rights

- All persons have the right to a clean and healthy environment.
- All persons who have been displaced or whose livelihoods have been adversely affected as a result of State programs have the right to commensurate monetary or alternative means of compensation, including relocation with adequate State assistance.

Article 92- Environmental Objectives

- Government shall endeavour to ensure that all Ethiopians live in a clean and healthy environment.
- The design and implementation of programs and projects of development shall not damage or destroy the environment.
- People have the right to full consultation and to the expression of views in the planning and implementations of environmental policies and projects that affect them directly.
- Government and citizens shall have the duty to protect the environment.

Article 40: Land and Natural Resource

In relation to land and natural resources, the Constitution under Article 40 proclaims that land and natural resources are commonly owned by the people of Ethiopia and shall not be subject to sale or other means of exchange. It stipulates the rights of Ethiopian farmers and pastoralists to obtain land for cultivation and for free grazing without payment and the protection against eviction from their possession.

Article 42: Rights of Labor

Article 42(2) stipulates that 'workers have the right to a healthy and safe work environment', obliging an employer (be it government or private) to take all necessary measures to ensure that workplace is safe, healthy and free of any danger to the wellbeing of workers.

Article 41: Economic, Social and Cultural Rights

Article 41 of the Constitution states that every Ethiopian has the right to access publicly funded social services. Sub Article 5 of the same article stipulates, the state, within available means, should allocate resource to provide rehabilitation and assistance to physically and mentally disabled, the aged and to children who are left without parents or guardians.

Regional states constitution: Regional states have their own constitution upholding the federal constitution in its entirety and constituting their regional particulars. All the regional state constitutions have addressed land and natural resources management and environmental protection. The regional states constitutions state that:

- The regional governments are entrusted to administer land and natural resources in the name of the people and deploy for the common benefit of the same;
- The regional governments and all citizens of the regions are responsible for the conservation of natural resources and the environment;
- Concerned communities shall be given opportunity to express their opinions in the formulation and implementation of policies in relation to the environment.

4.1.2 Environment Policy of Ethiopia

The first comprehensive statement of Environmental Policy of Ethiopia was approved by the Council of Ministers in April 1997 that was based on the policy and strategic findings and recommendations of the Conservation Strategy of Ethiopia. The policy is aimed at guiding sustainable social and economic development of the country through the conservation and sustainable utilization of the natural, man-made and cultural resources and the environment at large. The overall policy goal is to improve and enhance the health and quality of life of all Ethiopians and to promote sustainable social and economic development through the sound management and use of natural, human-made and cultural resources and the environment as a whole so as to meet the needs of the present generation without compromising the ability of future generations to meet their own needs. The Environmental Policy provides a number of guiding principles that require adherence to the general principles of sustainable development. In particular, the need to ensure that Environmental Impact Assessment:

- Considers impacts on human and natural environments
- Provides for early consideration of environmental impacts in project and program design

- Recognizes public consultation processes as essential to effective management
- Includes mitigation and contingency plans
- Provides for auditing and monitoring
- Is a legally binding requirement

The Government of Ethiopia has recently initiated to update the Environmental policy of Ethiopia. The technical committee under the Ministry of Environment, Forest and Climate Change was formalized to be in charge of updating the National environmental policy to fulfil the gaps identified in addressing climate change and other environmental issues.

4.1.3 Climate Resilient Green Economy

The Climate Resilient Green Economy (CRGE, 2011) is Ethiopia's overarching framework and a national strategy towards a green economy. The Green Economy Strategy is believed to provide an opportunity to promote sustainable development in Ethiopia. Currently, it builds on an investment plan of over 60 initiatives that are, or can be, turned into financed projects. For this to happen, there is a strong need to reform the economy. The CRGE is envisioned to be the main driver for this transformation. The CRGE has three complementary objectives: i) fostering economic development and growth, ii) ensuring abatement and avoidance of future GHG emissions; and iii) improving resilience to climate change. To achieve these objectives, CRGE sets out to tap into international climate finance, seize opportunities for innovation and new technologies, and create competitive advantages via sustainable resource use and improving productivity.

4.1.4 Digital Transformation Strategy

Technological change has been the primary driver of social development, productivity improvements and inclusive growth. Ethiopia's digital economy is at an early stage of development with few private sector players offering digital services and some government driven digitalization initiatives. While these initiative and services help solve important challenges, they cut across multiple stakeholders and require a coordinated effort to maximize their impact. The digital transformation strategy was developed to provide a collective vision and, specifically to meet the following key objectives:

- To propose an inclusive digital economy approach that will catalyse the realisation of Ethiopia's broader development vision.
- To emphasize the need for a sense of urgency and mobilize critical stakeholders to address the imperatives to enable an inclusive digital economy.
- To coordinate and strengthen current initiatives underway so the most pragmatic and strategic pathways are explored to unlock growth and maximize impact.
- To ensure an inherently international approach that will enhance Ethiopia's place in regional and global value chains while benefitting from best practice and interoperable systems.

The strategy took into consideration the current economic drivers (Agriculture, Manufacturing and Services), the priority sectors, and the national objectives of jobs creation, forex earnings and inclusive prosperity as a means of identifying the most relevant digital enabled pathways for Ethiopia. These are:

- Pathway 1: Unleashing value from agriculture,
- Pathway 2: The next version of global value chains in manufacturing
- Pathway 3: Building the IT enabled services, and
- Pathway 4: Digital as the driver of tourism competitiveness.

4.1.5 FDRE National Occupational Safety and Health Policy and Strategy

The National Policy and strategy on Occupational Safety and Health (OSH) was endorsed by the FDRE Council of Ministers in July 2014. The OSH policy and strategy was prepared to implement the rights of Labour as stipulated in article 42(2) of the Constitution and also implement the requirements of International Conventions on Occupational Health and Safety (No.155) to which Ethiopia is a signatory. The overall objective of the national OSH Policy and strategy is to avoid, prevent or minimize occupational and health hazards by providing effective OSH services in all working places and thereby contribute to the socioeconomic development of the Country.

The guiding principles of the National OSH policy and strategy are stated as the following:

a. Occupational Safety and Health Services are basic rights of workers
b. Occupational Safety and Health Services are necessary in all working places
c. Occupational accidents and health hazards can be prevented
d. Tripartite and bipartite cooperation and coordination are key instruments for the national OSH policy and strategy implementation.

The Specific objectives of the National OSH policy and strategy include:

e. To ensure availability and accessibility of OSH services in all economic activities including in the informal work sectors
f. To prevent occupational safety and health hazards by establishing a tripartite and bipartite consultation and coordination mechanisms
g. To establish OSH systems that pays attention to those workers who seek special assistance (e.g: Women, youth, persons with disabilities, HIV patients, etc.).
h. To prevent the environment, public and workers health by preventing the release of pollutants from the work places.

The strategy of the national OSH policy includes;

a. Establishment of an effective and accessible work conditions inspection mechanism that is focused on prevention.

b. Formulating and implementing national regulations and standards on OSH and updating and improving it periodically.

c. Integrating and implementing OSH protection principles in all national development plans

d. Establishing control and inspection mechanism that ensure prevention of occupational and health hazards to workers and impacts on the environment from occurring due to import. Use or disposal of machineries, raw materials or chemicals in work places.

e. Establishing a mechanism to ensure OSH services are provided in the private sector

f. Establishing a mechanism to ensure provision of advices and technical support on OSH are provided by Organizations.

The national OSH policy and strategy is applicable to all types of work places and economic activities in Ethiopia.

4.1.6 The National Policy on Ethiopian Women (1993)

It underlines the need to establish equitable and gender sensitive public policies that empower woman, especially in education and property rights, and engaging them in decision making. Improving healthy working conditions, ensuring access to basic services, protecting woman from harmful traditional practices are among the emphasized key issues.

4.1.7 Gender mainstreaming strategy and guideline (2010)

This strategy was adopted at policy, program and project level by government and development parteners to ensure the out comes of development to be shared equally between men and women; both men and women enjoy equal opportunities, status and recognition.

The ratification of the Family Law and amendements made to the criminal code significantly support to fight abuses committted against woman and children. Proclamation No, 377/2003 gives special attention to woman and young workers. The proclamation provides protection for woman in general and pregenant woman in particular from hard work and long hours. The law clearly states that women should not be discriminated against as regards to employment and payment on bases of her sex. Gender norms in Ethiopia vary widely depending on geographic location, ethnicity, and religion, especially related to property ownership, inheritance, and the division of assets after divorce. However, the new Family Code has changed all that. Passed in 2000, it gives equal rights to women in marriage and it requires all assets be divided equally among both partners in the case of a divorce. By now, all the states in Ethiopia have approved this new Code. Ethiopia is one of many developing

countries implementing gender policy reforms, especially regarding women's equal access to assets and resources.

4.1.8 The Development and Change Package (2007)

It envisions to build democratic society where women are equal participants and beneficiaries of economic, social and political life of the country. Widespread awareness creation of women to actively participate in the development process; organizing and associate women to address challenges they face; capacitate women to solve problems and fight demeaning perceptions & fight for their rights; facilitate linkages and support among created associations and organization; and enable women to benefit economically and socially.

4.2 APPLICABLE PROCLAMATIONS, REGULATIONS AND PROCEDURAL GUIDELINES FORMING THE NATIONAL ENVIRONMENTAL MANAGEMENT SYSTEM

4.2.1 Environnemental Impact Assessment Proclamation (Proclamation No. 299/2002)

The ESIA Proclamation is used to predict and manage the environmental effects of a proposed development activity as a result of its design, sitting, construction, operation, or an ongoing one as a result of its modification or termination, entails and thus helps to bring about intended development.

The proclamation is an effective means of harmonizing and integrating environmental, economic, cultural and social considerations into the planning and decision-making processes thereby promoting sustainable development. Moreover, it serves as a basic instrument in bringing about administrative transparency and accountability, to involve the public and the communities in particular, in the planning and execution of development programs that may affect them and their environment. The objective of undertaking the assessment study is to ensure the impacts of a development project and the incorporation of mitigating measures for the adverse significant impacts. The ESIA law and associated guidelines clearly defines:

- Why there is a need to prepare ESIAs
- What procedure is to be followed in order to implement ESIA
- The depth of environmental impact studies
- Which projects require full ESIA studies
- Which projects need partial or no ESIA studies
- To whom the report must be submitted

There are ongoing efforts carried by the former MoEFCC (now Environment, Forest, and Climate Change Commission/EFCCC/) to review the ESIA Proclamation in order to update and improve it.

a. *Environmental Impact Assessment Procedural Guidelines Series (Series 1 and 2)*

In order to facilitate the implementation of Environmental Impact Assessment Proclamation (Proclamation 299/2002), the then MoEFCC (now EFCCC) had formulated four procedural guidelines, namely, Review Guideline Series 1: Guidelines for Review Approach; Review Guideline Series 2- Guidelines for Contents and Scopes of Report; Review Guideline Series 3- Checklist of Environmental Characteristics and Review Guideline Series 4- Review Criteria. These widely applied draft environmental impact assessment guidelines were under review to enhance the documents in light of the experiences gained so far and to publish it for official use after endorsement by the Ministry. The review process is still ongoing and yet to be completed during the current 2018/2019 fiscal year. Review Guideline Series 1 and 2 will be elaborated to a certain extent here and any further updates made to the documents will apply after official publication of the reviewed guidelines.

b. *Procedural Guideline Series 1 -Guidelines for Review Approach*

This guideline pointed out roles and responsibilities of the former MoEFCC (now called EFCCC) and Regional Environmental Agencies, the proponent, consulting firm, interested and affected parties, and the licensing agency. In the guideline, the ESIA processes and requirements, and comprehensive description of the EA process has been stated. It also outlined projects which may have adverse and significant environmental impacts, and may, therefore, require full ESIA (Schedule 1), projects whose type, scale or other relevant characteristics have the potential to cause some significant environmental impacts but not likely to warrant an environmental impact study (Schedule 2) and projects which would have no impact and does not require environmental impact assessment (Schedule 3).

c. *Procedural Guideline Series 2 - Guidelines for Contents and Scopes of Report*

This guideline among others indicates structure and content of the Environmental Impact Study Report and describes the contents including the administrative, legal and policy requirements, assessment and mitigation measures. The guideline indicates the following main types of mitigating measures, which need due considerations:

- Preventing, reducing or minimizing impacts before they occur;
- Eliminating an actual impact over time by incorporating appropriate maintenance measures during the life of the project;
- Rectifying an impact by repairing, rehabilitating or restoring the affected environment;
- Compensating for an impact by replacing or providing substitute resources or environments as well as contingency plans in case of emergencies;
- Maximizing beneficial impacts through specific additional actions

d. *Directive No.2/2014 (2006 EC)*

Directive on issuing "professional competence certificate to consultants and firms providing service in Environmental Impact Assessment, Environmental Audit and Climate Change fields"

The Directive has been issued by the MoEFCC (now called EFCCC) and has been in force for the last four years. It has become an important milestone in the development of the ESIA system in Ethiopia. The directive stipulates that ESIA and Environment Audits should be conducted by professional consultants and firms that are registered and certified for their competence by the Federal Environment, Forest, and Climate Change Commission. ESIAs and Environment Audits prepared by unregistered and certified firms will not be eligible for review and approval. The Regional EPFCCs have also started applying the stated directive of MoEFCC. Directive no.2/2014 is also among the guidelines put under review by the MOEFCC and is being updated.

e. *Environmental guideline and management plan*

- Guideline for Environmental Management Plan (draft), May 2004 outlines measures for preparation of an Environmental Management Plans (ESMP) for proposed developments in Ethiopia and institutional arrangements for implementation of ESMPs.

- ESIA Procedural Guideline (draft), November 2003: This guideline outlines the screening, review and approval process for development projects in Ethiopia and defines the criteria for undertaking an ESIA.

- ESIA Guideline, July 2000: The ESIA Guideline Document provides essential information covering the following elements:

- Environmental Assessment and Management in Ethiopia
- Environmental Impact Assessment Process
- Standards and Guidelines
- Issues for sector environmental impact assessment in Ethiopia covering agriculture, industry, transport, mining, dams and reservoirs, tanneries, textiles, hydropower generation, irrigation projects and resettlement
- The guideline contains annexes that:
  - Identify activities requiring a full ESIA, partial measure or no action
  - Contain sample forms for application
  - Provide standards and guidelines for water and air

Table 3: Relevant EFCCC (MoEFCC) and other guidelines and standards

GUIDELINE/ STANDARD	DESCRIPTION
ESIA Procedural Guideline, November 2003	The ESIA guideline of 2000 mentioned above was revised in 2003 and issued as draft ESIA procedural guideline. The later outlines the screening; review and approval process for development projects in Ethiopia and defines the criteria for undertaking an ESIA. Annex-III identifies the schedule of activities for which a full ESIA, Preliminary ESIA or no action is required. The schedule of activities listed in Annex-III is widely applied by the Federal and Regional competent authorities to classify sub-projects into one of the three Categories.
Directive No.2/2014 (2006 EC): Directive on issuing "professional competence certificate to consultants and firms providing service in Environmental Impact Assessment, Environmental Audit and Climate Change fields"	The Directive has been issued by the EFCCC and brought into force in the last four years. It has become an important milestone in the development of the ESIA system in Ethiopia. The directive stipulates that ESIA and Environment Audits should be conducted by professional consultants and firms that are registered and certified for their competence by the Ministry of Environment. ESIAs and Environment Audits prepared by unregistered and certified firms will not be eligible for review and approval. The Regional EPFCCs have also started applying the stated directive of EFCCC and others preparing their own version of the Directive (e.g. Amhara region)
Draft Guideline for Environmental Management Plan (draft), May 2004	The guideline provides guidance on the necessary elements for preparation of an Environmental Management Plan (ESMP) for proposed development projects in Ethiopia and the institutional arrangements for implementation of ESMPs.
The Labor Proclamation 377/2005	The Labor proclamation requires an employer to take the necessary measures to adequately safeguard the health and safety of the workers. It also consists of provisions that address working conditions of women and young workers (14-18 years age). The Federal Labor law is the basic legislation directly applied by all the regional states without further making regional version of it.
Directive No.01/2010 Regional ESIA guideline of Amhara Region Environment, Forest, Wildlife Protection and Development Authority (EFWPDA).	The ESIA guideline provides details for acceptable ESIA content, the review and approval process involved, the certification process of ESIA practitioners/consultants/ in the region, and ESMP formats which need to be applied during ESIA preparation. The Amhara region EFWPDA is testing the preparation and submission of ESIA reports in the local Amharic language and is starting to collect service charges for reviewing and clearing ESIA documents.

4.2.2 Environnemental Pollution Control Proclamation (Proclamation No. 300/2002)

This proclamation is aimed at eliminating or, when not possible, to mitigate pollution as an undesirable consequence of social and economic development activities. It has also an objective of protecting the environment and safeguarding of human health, as well as maintaining of the biota and the aesthetic value of the environment. The Proclamation, among others has considered control of pollution; management of hazardous waste, chemical and radioactive substances; management of municipal wastes; the importance and need to respect environmental standards; and punitive and incentive measures.

4.2.3 Solid Waste Proclamation (Proclamation 513/2007)

Solid Waste Management proclamation aims to promote community participation to prevent adverse impacts and enhance benefits resulting from solid waste management. It provides for preparation of solid waste management action plans by urban local governments.

Ethiopia lacks (i) appropriate legal framework for e-waste management, (ii) absence of e-waste recycling and refurbishing centers, and (iii) lack of regulatory framework including standards and certifications addressing environmental impacts from optical fibers and related telecommunications equipment and materials.

4.2.4 Hazardous waste management and disposal control (Proclamation no.1090/2018)

This is one of the recently introduced environmental legislations that specifically deal with hazardous wastes, the proclamation in its preamble elucidated hazardous waste as one of the most crucial environmental problems in Ethiopia. It stated the importance of prevention and control of these type wastes and emphasized the need for creation of a system to control the generation, storage treatment, recycling and reuse as well as transportation and disposal of hazardous wastes to prevent harm to human and animal health as well as the environmental.

The proclamation defined "hazard" as the inherent characteristics of a substance, agent, or situation having the potential to cause adverse effects or damage to human or animal health, the environment, biodiversity and property and has determined the categories and characteristics of hazardous waste in annex I and annex II respectively. The objectives of this proclamation are stated as;

- Create a system for the environmentally sound management and disposal of hazardous Waste
- Prevent the damage to the human or animal health, the environment, biodiversity and property due to the mismanagement of hazardous waste.

Further its scope of application is also stated as:
- Waste that belong to any category contained in Annex One of this Proclamation, and waste possesses any of the characteristic contained in Annex Two; as well as on those wastes that might be categorized as hazardous waste by the directive to be issued by the Ministry;
- Person who generates, reuses, recycles, stores, transports, or disposes hazardous waste at large in nation.

The proclamation within its 24 articles has dealt with all character and management of hazardous wastes.

4.2.5. Water Resources Management Proclamation (197/2000)

The purpose of the Proclamation is to ensure that the water resources of the country are protected and utilized for the highest social and economic benefits of the people of Ethiopia, to follow up and supervise that they are duly conserved, ensure that harmful effects of water are prevented, and that the management of water resources is carried out properly.

4.2.6. Expropriation of landholding for Public Purposes, Payment of compensation and Resettlement of Displaced People (Proclamation No 1161/2019):

The previous proclamation no. 455/2005 has been repealed and replaced by a new Proclamation no. 1161/2019. The new proclamation has introduced extensive improvements to the principles and provisions governing the process of expropriation of landholdings for public purposes and payment of compensation. The new legislation bases itself on the following four principles:

Principle 1: Expropriation of land for public purposes shall be made only on the basis of approved land use plan, urban structural plan; or development master plan.

Principle 2: Compensation and Resettlement Assistance Compensation for the expropriated land shall sustainably restore and improve the livelihood of displaced people.

Principle 3: The amount of compensation to be paid at Federal, or Regional or Addis Ababa or DireDawa level for simillar properties and economic losses in the same areas shall be simillar.

Principle 4: Where land is expropriated for public purpose, the procedure shall be transparent, participatory, fair and accountable.

The new proclamation has made improvemnts to the amount and kind of compensation entitlements to displaced people. Landholders whose land is expropriated for public purposes are entitled for property compensation, displacement compensation, displacement assistance, economic loss compensation and social ties discontinuance and moral damage compensations as deemed appropriate. The determination of the amount of property compensation for the property on the land is improved from "replacement cost" to "replacing the property anew". Simillarly the determination of compensation for permanent improvement to land is clarified to be based on "current value of capital and labor expended on the land". Determination of displacement compensation for expropriated Land holding where equivalnet substitute land is not available is improved from the previous "ten times" to "fifteen times" the highest annual income generated during the last three years preceding the expropriation of land.

The new legislation has also introduced new provisions on resettlement (i.e. livelihood restoration) and compensation for economic loss aspects. Article 16(1) of the proclamation states that "Regional states…..shall establish fund for compensation payment and rehabilitation" Moreover the the next

subarticle 16(2) puts a responsibility to regional states to develop a resettlment packages that enable displaced people to sustainably resettle. Subarttle 16(3) places the duty to resettle the people displaced on Urban or Woreda administrations based on the resettlement package and allocated budget.

4.2.7. Council of Minister Regulation No 135/2007:

The regulation is titled "payment of compensation for property situated on land holdings expropriated for public purposes". It is issued by the council of Ministers for the purpose of not only paying compensation but also to assist displaced persons to restore their livelihood. The regulation provides the procedures for application of proclamation No 455/2005, for compensation payment for property situated on expropriated land for public benefit.

The regulation identified the type of properties eligible for payments of compensation which includes buildings, fences, crops, perennial crops, trees, protected grass, improvement made on rural land; relocated property, mining license and burial grounds.

4.2.8. Communication Services Proclamation No. 1148/2019

The Communication services proclamation have been promulgated to establish the Ethiopian Communications Authority, which is an independent, transparent and accountable regulatory Authority, to achieve the Government's policy of restructuring the telecommunications market and introducing competition. The main objectives of the Authority includes to promote the development of high quality, efficient, reliable and affordable communications service; and to promote a competitive service and market for the achievement of these goals throughout the nation.

The communication services proclamation, under Article 32, stipulates the rights of telecommunications operator to use land and buildings by paying usage fee. Article 32 sub article (1) states that: Any telecommunications operator before ten days of entering to any land or building, upon giving written notice to the lesee or possessor of the land or owner of the building may conduct the following activities;

- Pass telecommunications lines in or upon land or over, the building and establish same
- Put up any pole, which may be required for support of a telecommunications line,
- Fasten or attach to anything growing on that land a bracket or other support for a telecommunication line
- Cut down any tree or branches that is likely to injure, impede or interfere with any telecommunications line

The proclamation also states that: a telecommunications operator shall ensure that as little damage as possible is caused to the land or building and to the environment and shall pay fair and adequate

compensation to the lessee or possessor of the land or owner of the building for any damage or loss sustained by reason thereof.

4.2.9 Proclamations 1156/2019 - The Labour Law

The Proclamation repealed and substituted the former Labor Proclamation No.377/2003. But much of the provisions of the previous labor law were retained with some improvements and additions. . One of the important improvements made is on protecting child labor by increasing the minimum age for young workers to be 15 years old (versus the previous 14 years) and have introduced a new sub-article (14h) prohibiting Sexual Harassment or Sexual Assault at workplace to prevent GBV.

Proclamation 1156/2019 covers health and safety at work, harmonious industrial relation and minimum workplace standard and addresses workplace vulnerability. Article 92-93 of the proclamation defines obligation of employers and employees in work-place including assignment of safety officers and committee. The Labor Proclamation mandates employers to protect occupational safety, health and create better working environment for their workers. Article 92 states that "An employer shall take the necessary measure to safeguard adequately the health and safety of the workers…" The law requires employers to i) take appropriate steps to ensure that workers are properly instructed and notified concerning the hazards of their respective occupations and the precautions necessary to avoid accident and injury to health; ii) ensure that directives are given and also assign safety officer; establish an occupational, safety and health committee of which the committee's establishment, shall be determined by a directive issued by the Minister; iii) provide workers with protective equipment, clothing and other materials and instruct them of its use; etc.

In addition to enacting its labor codes, Ethiopia is also a signatory to the international UN conventions and has ratified the major international human rights instruments. Ethiopia has also ratified the following ILO conventions:

- Forced Labor Convention No.29 /1930;
- Freedom of Association and Protection of the Right to Organize Convention, No.87/1948;
- employment Service Convention, No.88/1948;
- Right to Organize and Collective Bargaining Convention, No.98/1949;
- Abolition of Forced Labour Convention, No.105/1957;
- Minimum Age Convention No. 138 /1973;
- Occupational Safety and Health Convention, No.156/1981;
- Termination of employment Convention, No.158/1982;
- The Rights of the Child Convention (1989); and
- The Worst Forms of Child Labor Convention No.182/1999.

The 2005 Occupational Health and Safety Directive: developed as a follow-up to the labor Proclamation provides guidance on the establishment of occupational health and safety committees in public and private organizations.

4.2.10 Federal Civil Servants Proclamation No. 1064/2017

This law was replaced by the Federal Civil Servants Proclamation No.515/2007. The new proclamation changes the system of recruitment and selection of civil servants and introduce a national system for the certification of professional and occupational competence. Disability and Inclusion aspects: The proclamation prohibits discrimination on grounds of ethnic origin, sex, religion, political outlook, disability, HIV/AIDS or any other ground and entitles persons with disability for affirmative action in recruitment, promotion, education and training. The public employer is also required to create a conducive environment and provide necessary tools and materials. Placement of civil servants in government institutions should be in fair representation of nations, nationalities and peoples. Minority groups of the country will enjoy affirmative action during recruitment, promotion, transfer, redeployment education and training.

Gender equity:The law grants equal pay for equal work, affirmative actions to recruit, promote and train female workers. It also subjects sexual harassment or abuse at the workplace as offense that is subject to disciplinary action. The proclamation requires that government institutions establish a nursery where female civil servants could breastfeed and take care of their babies,

4.2.11 Proclamations on Persons with Disability and Vulnerable groups

Proclamation No. 568/2008 Rights to employment for Persons with Disabilities: makes null and void any law, practice, custom, attitude and other discriminatory situations that limit equal opportunities for persons with disabilities. It also requires employers to provide appropriate environment for work, training and take affirmative measures particularly when employing women with disabilities.

4.2.12 Building Proclamation No. 624/2009 and Regulation No. 243/2011:

These legislations put as requirement accessibility for the elderly and physically impaired persons in the design and construction of public building. Various policies and plan of action have been formulated to protect people with disability and the elderly. The most relevant are mentioned below;

- National Plan of Action of Persons with Disabilities (2012-2021) addresses the needs of persons with disabilities for comprehensive rehabilitation services, equal opportunities for education, skills training and work, as well as full participation in the life of their families, communities and the nation.

4.3 APPLICABLE INTERNATIONAL CONVENTIONS ENDORSED BY ETHIOPIA

Ethiopia has ratified several international/multilateral environmental conventions and many of the principles and provisions in those conventions have been well addressed in the national environmental policies and regulations. Accordingly, Article 9(4) of the constitution of the Federal Democratic Republic of Ethiopia provides that once an international agreement is ratified through the accepted or established procedure, it automatically becomes an integral part of the law of the land. Therefore, the following international conventions and protocols are relevant to the proposed EDFP operation;

UN Framework Convention on Climate Change: It provides a framework for international cooperation to combat climate change by limiting average global temperature increases and the resulting climate change and coping with its impacts. The objective of this convention is to stabilize greenhouse gas concentrations in the atmosphere at a level that will prevent dangerous interference with the climate system. Ethiopia ratified this convention through proclamation No. 97/1994 on May 2/1994. This convention considers the fact that climate change has trans-boundary impacts.

The United Nations Conventions to Combat Desertification: The objective of the convention is to combat desertification and mitigate the effects of droughts in countries experiencing serious drought and desertification, particularly in Africa. Ethiopia has ratified the convention through its proclamation No. 80/1997.

Convention on Biological Diversity: The convention on biological diversity has three goals. These are:

- Conservation of biodiversity;
- Sustainable use of the components of biodiversity; and
- Fair and equitable sharing of the benefits arising from the use of genetic resources.

Cartagena Protocol on Bio-Safety to the Convention on Biological Diversity: It aims to ensure the safe handling; transport and use of living modified organisms (LMOs) are resulting from modern biotechnology that may have adverse effects on biological diversity, taking also into account risks to human health.

Convention for the Protection of the World Cultural and Natural Heritage Paris, 23 November 1972

Kyoto Protocol to the United Nations Framework Convention on Climate Change: Legally binds developed country Parties to emission reduction targets.

4.4 INSTITUTIONAL ROLES AND RESPONSIBILITIES FOR ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT AND MANAGEMENT

The discussions hereunder summarize the roles and responsibilities of institutions involved in environment and social management in Ethiopia. Identification of institutional roles and responsibilities takes into account potential environmental and social implications of supported activities of the EDFP.

4.4.1. Proclamation to Provide for the Establishment of Environmental Protection Organs (Proclamation No. 295/2002)

The first objective of this proclamation is to assign responsibilities to separate organizations for environmental development and management activities on the one hand, and environmental protection, regulations and monitoring on the other, which is instrumental for the sustainable use of environmental resources. The second objective is to establish a system that fosters coordinated but differentiated responsibilities among environmental protection agencies at federal and regional levels.

4.4.2. The Environment, Forest and Climate Change Commission (EFCCC)

As per proclamation 916/2015, the former Ministry of Environment, Forest and Climate Change (MoEFCC) is bestowed among others with the powers and duties listed below. Despite its devolvement from the level of Ministry headed by a Minister to a Commission headed by a Commissioner during the recent restructuring of the GoE introduced by the incumbent Prime Minister in 2018, the powers and duties of the former MoEFCC remains the same and it is made to be directly accountable to the Prime Minister. The powers and duties include:

- Coordinate activities to ensure that the environmental objectives provided under the Constitution and the basic principles set out in the Environmental Policy of the Country are realized;
- Establish a system for evaluating and decision making, in accordance with the Environmental Impact Assessment Proclamation, the impacts of implementation of investment programs and projects on environment prior to approvals of their implementation by the concerned sectoral licensing organ or the concerned regional organ;
- Coordinate actions on soliciting the resources required for building a climate resilient green economy in all sectors and at all Regional levels; as well as provide capacity building support and advisory services;
- Establish an environmental information system that promotes efficiency in environmental data collection, management and use;
- Enforcing and ensuring compliance to the ESIA proclamation which currently is being implemented through delegated authority provided to sector ministries;

- Reviewing ESIAs and monitoring the implementation of ESIA recommendations which is also in part being implemented through delegated authority provided to sector ministries;

- Regulating environmental compliance and developing legal instruments that ensure the protection of the environment;

- Ensuring that environmental concerns are mainstreamed into sector activities; and

- Coordinating, advising, assessing, monitoring and reporting on environment-related aspects and activities

Sector environment units: The other environmental organs stipulated in the Environmental Protection Organs Establishment Proclamation (295/2002) are 'Sector Environmental Units' which have been established in some of the line Ministries. These Sector Environment Units have the responsibility of coordinating and implementing activities in line with environmental protection laws and requirements (Article 14, Proclamation 295/2002). Article 13 of the ESIA Proclamation 299/2002 requires that public instruments undertake ESIA. To this end, Sector Environmental Units play an important role in ensuring that ESIA is carried out on projects initiated by their respective sector institution. However, capacity of these units is limited.

Delegated authority: The EFCCC has delegated its authority to sector institutions to ensure implementation of ESIA laws and requirements in their sector and to undertake ESIA reviews. For instance, the Federal Ministry of Agriculture, Industry, Mining as well as Water, Energy and Irrigation are responsible for ensuring that an ESIA is undertaken on their sectoral projects and to review the ESIA. This delegation has been communicated to the sector ministries through an official letter sent by the former MoEFCC (i.e. EFCCC).

4.4.3. Regional Environment Protection Forest and Climate Change Authority (REPFCCA)

At regional level, there are environmental bureaus to implement environment management systems within their respective jurisdictions. Proclamation 295/2002 requires regional states to establish or designate their own regional environmental agencies. The regional environmental agencies are responsible for coordination, formulation, implementation, review and revision of regional conservation strategies as well as environmental protection, regulation and monitoring. Relating to ESIA specifically, Proclamation 299/2002 gives regional environmental agencies the responsibility to evaluate ESIA reports of projects that are licensed, executed or supervised by regional states and that are not likely to generate inter-regional impacts. Regional environmental agencies are also responsible for monitoring, auditing and regulating implementation of such projects. The institutional standing of regional environmental agencies varies among regions. In many of the regions, they are established as separate institutions in the form of Environment, Forest and Climate Change Authorities (e.g., SNNPR, Oromia, Amhara, and Gambella regions) while in others they are joined with Land use administration and utilization agencies as EPLAUA (e.g. Tigray and Benshangul).

Table 4: Summary of Existing Institutions and Critical Legislations for Environmental and Social Management at Regional Level. (Source: Zereu G., Compiled from field assessment data and consultations, updated for EDFP ESMF, 2020).

Region	Responsible Regional Environment Bureau/Agency	ESIA Regulations enacted at regional level	Other Environmental Key Management Legislations/guidelines			Remarks
			Pollution Control	Solid Waste Management	Regional guideline for ESIA	
Oromia	Oromia EFCCA	Yes	Yes	No	No	-It has zonal and woreda level Environment Offices
Tigray	Tigray EPLAUA	Yes	Yes	Yes	Draft	-Apply Federal ESIA procedural guideline - Has woreda level Environment Offices
Amhara	Amhara EFWPPDA	Yes	Yes	No	Yes	-ESIA guideline Directive 01/2010 - It has zonal and woreda level Environment Offices
SNNPR	SNNPR EFCCA	No (Draft level)	No (Draft level)	No	No	-Apply Federal ESIA law & guideline. - It has zonal and woreda level Environment Offices
Benishan gul Gumuz	Benshangul Gumuz EPLAIB	No (Draft level)	No	No	No	-Apply Federal ESIA law & guideline -It has zonal and woreda level Environment Offices
Gambella	Gambella EPFCC	No (Draft level)	No	No	No	-Apply Federal ESIA law & guideline. -It has no zonal and woreda level Environment Offices
Afar	Afar EPRLUA	Yes	Yes	No	No	Apply Federal ESIA procedural guideline
Somali	Somali EFCCB	Yes	Yes	Yes	Yes	

4.4.4. Zonal and Woreda level Environment, Forest, Land Utilization, and Climate Change Offices

The ESMF team identified that institutional structures for environmental management in the regions at zonal, woreda and city level are varied from region to region. Whereas the Environment Authorities of SNNPR, Oromia, Amhara, Tigray, Afar and Benshangul Regions have parallel offices at woreda level, the Gambella Region lacks parallel offices at the same level. However, the Gambella regional environment bureau has delegated the Natural Resource Conservation section in the woreda office of Agriculture to carry environmental management related activities on its behalf. Many of the regional environment authorities have zonal environment offices except for Tigray Gambella and Afar regions.

Tigray region has deployed two of its staff in its southern and north western zone administrations to serve as zonal environment focal persons.

It should be noted that all the regional, zonal and woreda level environment offices are located in the capital cities of the respective zone and woreda cities/towns. However, there are some cities and towns which have their own city level environmental protection offices. For example, in Amhara Region, EFWPDA has branch offices in three major cities of the region (i.e. Bahirdar, Gondar, and Dessie) which are categorized as metropolitan cities by the region's bureau for industry and urban development. Moreover, in Oromia regional state, eighteen selected Cities with potential growing economic activities are made to have their own Environment Protection Forest and Climate Change (EPFCC) Offices with a Zonal office status. In SNNPR, the capital city Hawassa has its own environment protection office.

Except in Amhara region, the roles and responsibilities of the woreda level environmental organs are almost identical. Their main areas of responsibility fall in carrying environmental performance monitoring and follow up of development projects for which ESMPs and screening reports are approved and the review and approval of Schedule III (category C) environmental and social screening reports. In Amhara region, the Authority has prepared and transmitted a list of the type of projects that can be reviewed and approved at woreda and zone levels. The SNNPR environment authority has generally given the mandate to review and approve all types of projects (Schedule I to III) at its zonal level offices, but it allows them to seek assistance of the regional head office when faced with challenging ESIA reviews.

4.4.5. Ministry of Labour and Social Affairs/Regional Labor and Social Affairs Bureaus

The Ministry of Labor and Social Affairs (MoLSA) is responsible to ensure industrial peace, maintain employee's health and safety at workplace, improve working condition and environment, promote efficient and equitable eemployment services; and maintain developmental social welfare of citizens. Implementing Occupational Safety & Health, Public Safety and Social welfare protection activities, prevention of child labor are also among the mandates, roles and responsibilities of their Ministry. Overall the ministry shall have the following powers and duties to:

- With a view to ensuring the maintenance of industrial peace(a) Encourage and support workers and employers to exercise their rights to organize and collective bargaining;(b)Encourage the practice of participating in bilateral forums between workers and employers and tri-partite forums including the government; and (c) Establish efficient labor dispute settlement mechanisms;
- Issue and follow up the implementation of occupational health and safety standards
- Create conducive conditions for the provision of efficient and equitable eemployment services; determine conditions for the issuance of work permit to foreigners, issue such permits and

incorporation with the relevance bodies, supervise compliance there with; regulate the provision of foreigners eemployment service to Ethiopians;

- Undertake studies on manpower employed in the formal and informal sectors, unemployed manpower and occupational classifications in the country collect, compile and employers' unions established at national level;

- Register workers' and employers' unions established at national level;

- Register workers' unions and collective agreement relating to federal public enterprise situated in cities accountable to the federal government, and carry out labor inspection services in such enterprise; provide conciliation services to amicably settle labor disputes arising between employers and employees;

- In corporation with the concerned stakeholders, undertake and facilitate the implementation of studies on ensuring and improving social well-being of citizens in particular on; (a)The creation of enabling condition for persons with disabilities to benefit from equal opportunities and full participation; (b)The provision of care to the elderly and the encouragement of their participation and (c)The prevention of social problems and provision of rehabilitation services to the affected.

Regional governments have established bureau/agency responsible to implement the national vision and set mission of the Ministry. Woreda and town administrations have offices whose responsibility is investigation and supervision of establishment (manufacturing plants) to ensure that all stakeholders are adhering to Proclamation 377/2003. Ensuring rights and interest of persons with disabilities and the elderly is included in policies and laws of federal and regional governments and are mainly the duty of the Ministry. By the same token even though the implementation of the National Social Protection strategy is a consorted effort of all government organs, the responsibility mainly falls on the Ministry.

In addition to Ministry of Labour and Social Affairs, the Ministry of Construction is responsible to ensure public and workers safety at construction sites. Regional governments have adopted different approach to establish a body responsible for the construction sector, as a department within the bureau of urban development, housing and construction (Amhara region) or an independent bureau of construction (Oromia region).

4.4.6. Ministry of Women, Children and Youth Affairs (MoWCYA) /Regional Women, Children and Youth Bureaus

MoWCYA has the responsibility to ensure that women and children are benefiting from development activities and are protected from harm. Its main area of responsibilities focus on awareness creation and compilation and dissemination of data and information on woman and children; ensuring opportunities are created for woman to participate in political, economic and social affairs; ensure

woman and children are not discriminated against and devise strategies for the proper application of affirmative actions; encourage and support women to organize and ensure their agenda (including children) are mainstreamed in to national and regional policies, legislations and programs.

Regional governments have also established Woman, Children and Youth Affairs Bureau responsible to implement national visions and objectives at region level. All urban administrations have offices responsible to promote women, children and youth agenda.

Woman, child and youth affair offices also provide legal support to children and women victim of physical and sexual abuse by offering free legal counsel. The offices work in close collaboration with Labor and Social Affairs, Justice Department, the Police and the court to ensure perpetrators get appropriate punishment. Efforts to rehabilitation victims are however hindered due to capacity limitations.

4.5 WORLD BANK ENVIRONMENTAL AND SOCIAL STANDARDS

According to the World Bank Environmental and Social standards, projects supported by the Bank through Investment Project Financing are required to meet the Environmental and Social Standards (ESS). The ESS is designed to help the implementing agency and implementing partners (i.e. MInT, ECA and Partners) to manage the risks and impacts of a project, and improve their environmental and social performance, through a risk and outcomes-based approach. The implanting agency and partners (i.e. MInT, ECA and Partners) are required to manage environmental and social risks and impacts of the project throughout the project life cycle in a systematic manner, ***proportionate to the nature and scale of the project*** and ***the potential risks and impacts***.

MInT and MoF have prepared an Environmental and Social Commitment Plan (ESCP) outlining detailed commitments to support compliance with the ESS of the Environmental and Social Framework (ESF) of the Bank. The ESCP described the different management tools that MiNT will use to develop and implement the agreed measures and actions. These management tools include environmental and social management framework (ESMF), Social Assessment (SA), Stakeholders Engagement Plan (SEP),   Labour Management Plan (LMP) and GBV Action Plan. In the context of the present EDFP project, ESMF has been proposed as a management tool for the project as the specific sites for the implementation of the subproject activities has not been identified at this stage. However, during implementation stage, the site specific risk management instruments (ESMP, ESIA) will be prepared to mitigate risks associated with the sub project activities.

This EDFP ESMF will serve as an instrument to satisfy the Bank's ESS1 on Assessment and Management of Environmental and Social Risks and Impacts. In the present context of the EDFP, the

Environmental Assessment takes into account the natural environment (air, water, and land); human health and safety; as well as social aspects (involuntary resettlement and physical cultural resources) in an integrated way.

Table 5: World Bank – Applicable Environmental and Social Standards

World Bank Environmental and Social Standards (ESS)	Applicable	Explanation (Optional)
ESS1: Assessment and Management of Environmental and Social Risks and Impacts	Yes	The EDFP will finance a variety of subprojects including development of e-portals for government MDAs, installation of 50 communication rooms to facilitate remote working, pre-purchase of internet bandwidth to enhance connectivity of Government MDAs; hospitals; health centers and youth associations; connecting higher education institutions to high speed broadband internet (Universities, TVETs, Teachers Educational Colleges-TECs) through the EthERNet, incentivizing private sector investment through tendering contracts which will be used as investment guarantees for rolling out fiber-optic networks and 4G/5G mobile networks, provision of digital start-up grants, and grants for digital businesses to provide training and digital devices. Part of these subproject activities are planned to be carried by outsourcing to contractors and others by incentivizing private sector operators. Many of these subprojects can pose potential environmental and social risks during implementation and triggers ESS 1. Part of these subprojects such as rolling out of fiber-optic and 4G/5G networks are not directly financed by the EDFP. ESS1 is therefore relevant for activities under EDFP. The ESMF ESMP is designed to identify these potential impacts and direct the PIU team to practical ways of avoiding or mitigating them. **Note**: For projects involving multiple small subprojects, that are identified, prepared and implemented during the course of the project, the MiNT will carry out appropriate environmental and social assessment of subprojects, and prepare and implement such subprojects, as follows: (a) High Risk subprojects, in accordance with the ESSs; (b) Substantial Risk, Moderate Risk and Low Risk subprojects, in accordance with national law and any requirements of the ESSs that the Bank deems relevant to such subprojects. Note also that the overall Environmental and social risk rating of the EDFP is "Moderate". The environmental risk rating is also "Moderate". Annex-III of the Federal EFCCC ESIA Procedural Guideline, (November 2003) has outlined the schedule of activities (subprojects) for which a full ESIA, Preliminary ESIA or no action is required. The schedule of activities listed in Annex-III of the guideline is widely applied by the Federal and Regional competent authorities to classify sub-projects into one of the three Categories. In Amhara Regional State, EFWPDA has issued the list of subprojects that are reviewed and approved at Regional, Zonal and Woreda level environment offices.

ESS2: Labor and Working Conditions	Yes	The EDFP will engage public workers, workers hired by the project (direct workers such as consultants, technical experts and other workers), and workers hired by contractors under the project. These involve MInT and PIU staff engaged in project implementation, as well as staff working in outsourced subproject directly procured by EDFP. The sub-component on digital start up and digital business grant provision is also anticipated to create jobs and employment for many. The project has developed LMP to mitigate risks. The potential risks identified include occupational health and safety (OHS) risks specifically to hazards from exposure to e-waste as well as workplace accidents/injuries, lack of use of personal protective equipment (PPE), and dust; community health and safety issues (e.g., exposure to e-waste & other hazardous materials); communicable disease (e.g., COVID-19) which may arise from the interaction of project workers with local communities, between project workers; GBV in relation to contacts between project workers, and members of the project affected local communities and members of local communities. Although there might be a risk of discrimination, i.e., a potential inappropriate treatment or harassment of project workers; potential exclusion/preferences with respect to recruitment, training and development, termination of employment, and working conditions, discrimination is unacceptable as per the Ethiopian Labour Law and WB's ESS2.While most of the workers involved are public workers governed by the government civil service regulation, other workers hired by the project (PIUs, consultants, etc) and project contractor need to be contracted in line with the requirements of ESS2 in relation to labor and working conditions, non-discrimination and equal opportunities and occupational health and safety and workers grievance redress mechanisms. Thus, ESS2 remains relevant and is triggered by the EDFP project
ESS3: Resource Efficiency and Pollution Prevention and Management	Yes	The EDFP has sub component activities that result in the installation of digital communication infrastructures and wide dissemination of digital devices, grants that encourage wider digital entrepreneurship start ups, as well as provision of high speed internet connectivity to health and educational establishments which result in expanded use of digital devices. These and similar other activities of the project will result in the generation of an electronic waste stream that will have a potential to cause environmental and social impacts. On the other hand schemes for recovery, reuse and recycling of the e-waste stream can create jobs and minimize impacts on environment. Moreover the construction activities to be carried to install equipments in the communication rooms, to expand and install facilities such as fiber optics, and trench excavation to provide broad band connectivity to MDAs will likely generate pollutants that will be released to air, water and soil. The energy use and efficiency aspects of the digital devices to be procured and disseminated by the various sub-components of the project are also a major concern that seek due attention during project implementation to ensure efficiency in resource use. As a result ESS 3 will be triggered by the subproject activities and remains relevant to EDFP.
ESS4 Community Health and Safety	Yes	Project may involve small scale civil works and installation of hardware may result in the presence of workers with the potential to impact community health. Construction activities such as expanding the

		geographical coverage of broadband fiber-optics and installation of 4G/5G cell towers will result in excavations consisting of trenches. Open trenches can cause risks to community safety especially inside towns and campuses. Increased traffic movements due to subproject construction and digital equipment installation activities may also cause community safety hazards. Improperly managed electronic waste stream generated by subproject supported activities may also pose public health risks in the long term. Thus, ESS4 is relevant and is triggered by the EDFP. ESS4 is also relevant with regard to provisions for GBV
ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	No	The project design will not involve any loss of assets and properties and excludes any respective investments. Physical investments will only be implemented on land currently used/owned by government (e.g. university campus, health and education facilities, government offices, etc.). The ESMF includes a respective screening out requirements. Current assessment points at no association in line with ESF Policy Para 11 to any potential infrastructure

As the Project will finance also the design of procedures for future digital infrastructure investments, which may lead to land acquisition downstream, such TA will include the development of an RPF in line with the development of the related documents during project implementation. The RPF also provides guidance on the process of public consultations, establishment of a functional grievance handlingmechanism, and disclosure requirements. To reiterate from above, this project will not finance any land acquisition

As the Project will also assist the development of regulatory standards on siting, design, construction and operation of telecommunications infrastructure for future digital infrastructure investments, which may lead to land acquisition downstream, such TA to ECA will include the development of an RPF in line with the development of the related documents during project implementation. Thus ESS 5 will be not be relevant to the EDFP. |
| ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources | Yes | The EDFP is planned to be implemented throughout Ethiopia. Some sensitive terrestrial habitats including national parks are found close to urban and rural centres in Ethiopia. Some cities/towns such as Bahirdar, Batu (Zeway) and Arbaminch are situated adjacent to lakes and National Parks respectively (e.g: Nechsar and Bahirdar Blue Nile River Millennium National Park). Though the scale could be small, construction of digital facilities/infrastructure by the private or public sector could affect sustainable use of natural resource. Potential impacts to habitat could be more significant during construction and installation of linear infrastructure, such as long-distance fiber-optic cables, cell towers as well as access roads to infrastructure along previously undeveloped land. Hence, ESS6 is relevant for this project. |
| ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities | Yes | The Project will be implemented country-wide, including in emerging regions and in areas where large part of the population follows pastoralist livelihood systems. The project has conducted Social Assessment as part of the ESMF. The SA has identified key impacts and planning measures to ensure equitable benefit sharing, accessibility of services to remote communities, culturally appropriate communication including the use of local languages in project web site. The full report of the SA is annexed and is part of the ESMF. Hence, ESS7 is relevant for this project. |

ESS8 Cultural Heritage	Yes	Ethiopia is an extremely rich and diverse country culturally and is home to ancient civilizations. The Country has 7 sites that are classified as UNESCO World Cultural Heritage sites. Some of the Ethiopian cities and rural areas has historical, religious, and cultural properties that are of significance at National and/or International levels in them (e.g: Harar, Addis Ababa, Bahirdar, Gondar, and Mekelle). There are also additional heritages sites such as buildings and religious sites registered at national, regional or Woreda level throughout the Country. Although large scale infrastructure development is not anticipated, the small scale infrastructure development activities such as data centers, communication rooms, and right of way may have impact on cultural heritage. If there is a possibility that EDFP subprojects may result in damage to cultural property, the ESMF specifies procedures for avoiding such damage. Chance find procedures will be incorporated into civil works supervision plan, and buffer zones will be created to avoid damage to cultural resources. Thus ESS 8 remains relevant for the EDFP.
ESS9 Financial Intermediaries	No	Financial Intermediaries (FIs) are not involved in this project.
ESS10 Stakeholder Engagement and Information Disclosure	Yes	The project will require inputs from different stakeholder groups, including those who will be directly affected as well as those who have other interests in the project interventions. The project should ensure that the voices of vulnerable people (female-headed households, elderly, youth, people with disabilities) and underserved communities are heard through inclusive consultation and participation to ensure that they can equally participate and benefit from the project. The project will require inputs from different stakeholder groups, including those who will be directly affected as well as those who have other interests in the project interventions. Stakeholder engagement will be facilitated through appropriate means such as virtual arrangements and phone calls among others taking proper measures as precaution to COVID 19. In consultation with the Bank team, a Stakeholder Engagement Plan (SEP) is developed (before appraisal) with specific provisions for the different project components. The SEP outlines the characteristics and interests of the relevant stakeholder groups and timing and methods of engagement throughout the life of the project. The project will ensure that the needs and voices of vulnerable people (female-headed households, elderly, youth, people with disabilities) and underserved communities are heard through inclusive consultation and participation to ensure that they can equally participate and benefit from the project. The project will also ensure that respective provisions on gender equality and the mitigation of gender-based violence in digital businesses to avoid potential adverse impacts but also to ensure strong participation of women in the development of the country's digital sector. The establishment of project level Grievance Redress (GR) will be undertaken no later than 60 days after the project Effectiveness date , targeting integration with existing GR structures in the respective communities and MiNT, and maintained and strengthened throughout the project lifecycle. Application of the standard will be closely monitored and reported on through the project life-cycle.Thus ESS 10 remains relevant for the EDFP. ...

4.6 RELEVANT EHS GUIDELINES (WORLD BANK GROUP) FOR EDFP SUBPROJECTS

The Environment Health and Safety general and industry sector guidelines provide information on a variety of issues which need to be adopted to mitigate adverse environmental and safety issues that may likely arise during the implementation of EDFP subprojects. The most relevant of these guidelines to the EDFP subprojects include the following:

- EHS Guideline for Telecommunications
- EHS General Guideline Section 1 to 4
- EHS Guideline for Waste Management Facilities

4.6.1. EHS GUIDELINES FOR TELECOMMUNICATIONS

The EHS guideline exhaustively covers the major EHS risks associated with the construction activities of the Telecommunications sector. As the EDFP is going to finance (directly or indirectly) subproject activities that would provide high speed broad band connectivity to various institutions and roll out of 4G/5G networks across the country, the EHS guideline becomes directly relevant to address the EHS risks that may arise during subproject implementation. Again, the scope and coverage of these EHS guidelines are very broad and addresses environmental and safety issues commonly encountered in the telecommunications sector construction activities and is heavily consulted while developing the present ESMF.

4.6.2. EHS GENERAL GUIDELINE

The EHS general guideline section 1 to 4 provides guidance on prevention and control of environmental, occupational health and safety, community health and safety, as well as on construction and decommissioning impacts that may occur during new project development, at the end of the project life-cycle, or due to expansion or modification of existing project facilities. As some of the EDFP subprojects consist of building rooms modification and telecommunication sector related construction activities which will involve manual labor work activities, section 2.0 and 4.0 of the EHS general guidance provides some appropriate strategies and recommendations useful to minimize occupational health and safety hazards and demolition waste management. It describes the sources of hazards and recommended strategies for the prevention of risks associated with over-exertion, slips and falls, work in heights, struck by objects, and working in confined spaces and excavations in construction and decommissioning sites. These recommendations of the EHS guidance are highly applicable for the EDFP subprojects and would need to be considered during course of subproject implementation.

4.6.3. EHS GUIDELINE FOR WASTE MANAGEMENT FACILITIES

The EHS Guidelines for Waste Management cover facilities or projects dedicated to the management of municipal solid waste and industrial waste, including waste collection and transport; waste receipt, unloading, processing, and storage; landfill disposal, e.t.c. Though this guideline is broad in context and in its coverage of the environmental and safety issues addressed, there are some environmental and safety risk aspects which are relevant and applicable to the primary solid waste collection and transfer activities. These are mainly reflected under "Waste Collection and Transport" as well as under the "Occupational Health and Safety" topics of the guideline.

Table 6: Comparison of World Bank ESF (ESS 1-10) with Ethiopian Legal and Policy Frameworks

ESF Environmental and Social Standards (ESS)	Status of application to the project	Available national policy and legislation to fulfill the performance standard	Gaps	Measures to bridge the gap
ESS-1: Assessment and Management of Environmental and Social Risks and Impacts	ESS-1 is applicable to the EDFP.	The Federal EIA Proclamation No. 299/2002 and related regional EIA regulations mandatorily requires a project proponent to undertake EIA. The Federal EIA procedural guideline (2003) classifies projects into Schedule I, II and III to facilitate the undertaking of EIA proportionate to the risks and impacts of each project. The EIA proclamation and regulations seek all direct, indirect and cumulative impacts likely to occur during project life cycle are considered in the assessment. The stated legislation and regulation also require stakeholder and community consultations to be carried as part of the EIA process. The preparation of ESMP based on mitigation hierarchy and monitoring plan is also required by the EIA proclamation and associated guidelines.	-Requirement of the EIA proclamation and regional regulations do not cover "associated facilities" as defined by the ESF. -Requirements of the EIA proclamation and regional regulations do not explicitly seek for consideration of risks and impacts associated with primary suppliers as defined by the ESF during EA. -Apart from the presence of effluent standards for specified industrial sectors, the EIA proclamation is not complemented by a guideline similar to EHS and do not require its use	- EA requirements for "primary suppliers" shall be addressed as part of the present ESMF process when and if it occurs -The application and use of EHS guidelines as appropriate to subproject EA is required by the present ESMF.
ESS-2: Labour and Working Conditions	ESS-2 is applicable to the EDFP.	The former Labor Proclamation No.377/2003 is repealed and substituted by the new Proclamation 1156/2019. The new	All the rules of the labor law are applicable to employment relations based on a contract of employment	- The ESMF should adopt the provisions of both the labor law and ESS 2 for undertaking

| | | legislation remains to be the labor legislation applied invariably all over the Country without customization to regional contexts. The labor law is applied to govern all aspects of employment relations based on a contract of employment that exists between a worker and an employer. The legislation covers formation of contract of employment defining the rules and conditions of employment, nondiscrimination, equal opportunity for women workers, the right to form trade unions (workers organizations), working conditions of young labor setting the minimum age for child labour to be 15 and working conditions, and arbitration/conciliation mechanism to handle grievances and disputes of workers in relation to employment. The labour law also covers occupational safety, health and work environment aspects. The labor law largely fulfills the requirements of ESS 2.

Proclamation No. 568/2008 Rights to employment for Persons with Disabilities makes null and void any law, practice, custom, attitude and other discriminatory situations that limit equal opportunities for persons with disabilities. | that exists between a worker and an employer. The labor law is not applicable to community workers as it is not based on employment relations between worker and employer. As most workers of EDFP subprojects are likely to be contracted through formal employment process, there are major gaps between ESS 2 and the labor law. | complete Labor Management Practices. |
|---|---|---|---|---|
| ESS-3 Resource Efficiency and Pollution Prevention | ESS-3 is applicable to the EDFP. | The requirements of ESS-3 are largely fulfilled by the following national legislations and International Conventions which Ethiopia is a Party, which are widely referred during EIA studies. These include: | Detailed guidelines to support the avoidance, minimization or reduction of environmental and health impacts of pesticides during application are not | The application of relevant sections of the General EHS and sector specific EHS guideline is advisable when appropriate. |

		-The Pollution Control Proclamation no. 300/2002 which set the binding provisions for prevention and control of pollution addresses management of hazardous waste; chemicals and radioactive materials, management of non-hazardous municipal waste, and set the provisions for issuing environmental standards including for air, water and various effluents. The proclamation is complemented by effluent standards for certain industrial sectors. - Ethiopia has ratified and is party to the following three International Conventions that help in managing/avoiding the use of restricted and banned pesticides, chemicals trade and transboundary movement of Hazardous wastes. These are: -The Stockholm Convention on POPs - The Rotterdam Convention on PIC procedures -The Basel Convention on transboundary movement of Hazardous Wastes. Besides the Proclamation for the Registration and Control of Pesticides (Proclamation No. 674/2010) provides for the procedures of approval and registration of pesticides to be imported or manufactured in Ethiopia.	sufficiently available.	
ESS-4: Community Health, Safety and Security	ESS-4 is applicable to the EDFP.	Building Proclamation No. 624/2009 and Public Health Proclamation No.200/2000 contain certain provisions that partly address the issues of community safety in the areas of building designs and community exposure to health risks. Other regulations such as prevention of industrial pollution require industrial	There are gaps in fully addressing the community Health, Safety and Security aspects as defined in the ESF.	The application of relevant sections of the General EHS and sector specific EHS guideline is advisable when appropriate.

		facilities to prepare emergency response systems. In general some aspects of the ESS 4 are either fully or partially addressed across the existing sector legislations and regulations.		
ESS-5: Land acquisition and Involuntary Resettlement	ESS-5 is not applicable to the EDFP.	The new Proclamation no 1161/2019 for expropriation of land for public purposes has provisions that address resettlement and compensation of involuntary resettlements caused by land acquisition for public purposes. The new proclamation provides for various types of compensation for resetllers such as property, displacement and economic loss compensations. Resettlers are also entitled for replacement land substitution and compensation for disruption of social ties. Entitlement for compensation is based on legal land holding. Valuation of compensation will be based on current costs and values to replace the properties anew. The proclamation also consists of a provision for establishing resettlement fund, resettlement package to restore livelihood of resettlers and complaint hearing and appeal provision to address complaints in relation to resettlement and compensation. - The communication services proclamation provide the rights of telecommunications operator to use land and buildings by paying usage fee. It also require the telecommunications operator to pay fair and adequate compensation to the lessee or possessor of the land or owner of the building for any damage or loss sustained by reason thereof.	The entitlements for compensation of resettlers is based on legal land holding and do not include informal settlers without any legal landholding. -The determination of "user fee" and "compensation" in the communications service proclamation is not elaborated and remains open for subjective interpretation.	The application of ESS 5 to bridge the gap and cover the informal resettlers during resettlement is recommended. -reliance on the more elaborate provisions of proclamation 1161/2019 and regulation 135/2007 is advisable to bridge the gap of non-clarity.
ESS-6: Biodiversity Conservation and	ESS-6 is applicable to the	The Federal EIA Proclamation no.299/2002 has defined the terms "Environment" and "Impact" broadly to include all forms of habitats,	None.	None

Sustainable Management of Living Natural resources.	EDFP.	biodiversity, heritage and ecosystems. "Environment" means the totality of all materials whether in their natural state or modified or changed by human; their external spaces and the interactions which affect their quality or quantity and the welfare of human or other living beings, including but not restricted to, land atmosphere, whether and climate, water, living things, sound, odor, taste, social factors and aesthetics. "Impact" means any change to the environment or to its component that may affect human health or safety, flora, fauna, soil, air, water, climate, natural or cultural heritage, other physical structure, or in general, subsequently alter environmental, social, economic or cultural conditions. The impact of a project shall be assessed on the basis of the size, location, nature, cumulative effect with other concurrent impacts or phenomena, trans regional effect, duration, reversibility or irreversibility or other related effects of the project. The EIA report is required to contain information on the characteristics and duration of all the estimated direct or indirect, positive or negative impacts, as well as measures proposed to eliminate, minimize, or mitigate negative impacts. Thus, the requirements of ESS 6 are broadly addressed through the EIA process. There are also more specific sectoral laws and regulations which complement the EIA proclamation in conserving habitats and biodiversity such as: -Forest Development, Conservation and Utilization Proclamation No.542/2007 -Development Conservation and Utilization of Wildlife Proclamation No. 541/2007		

		-Wildlife Development, Conservation & Utilization Council of Ministers Regulations No.163/2008. -National Biodiversity Strategy and Action Plan (NBSAP).		
ESS-7: Indigenous People	ESS-7 is applicable to the EDFP.	The Constitution of FDRE recognizes all the Nations, Nationalities and Peoples of Ethiopia and provides for equal rights to them through its various articles. The frequently applied name for the Indigenous people as defined in ESS 7 in Ethiopia are "Nationalities". Thus all nationalities are equally treated in accordance with the main stream laws in project EIA studies which involve carrying a series of consultations with community and stakeholders to include their opinions and views during project design and implementation. Thus, though Ethiopia consists of more than 80 different Nations and Nationalities, Indigenous people as defined by ESS 7 do not exist and hence main stream relevant laws are applied without exerting any differentiated impacts on any group of people.	None.	None.
ESS-8: Cultural Heritage	ESS-8 is applicable to the EDFP.	As described above in ESS 6 the term "Impact" is defined broadly by the EIA proclamation. The definition reflects the kind of adverse impacts a project proponent is required to assess which includes any change to the environment or to its component that may affect flora, fauna, **natural or cultural heritage**, or in general, subsequently alter environmental, social, economic or **cultural conditions**. Thus, the Federal proclamation on EIA has provisions by which it considers the issues of cultural resources. Article 41 of Proclamation No. 209/2000 on research and conservation of cultural heritage also contains the	Though natural and cultural heritages are required to be included during EIA process, the preparation of a Cultural Heritage Management Plan (CHMP) as indicated in the ESF is not required by the national EIA law.	The application of ESS 8 requirement for CHMP is advisable when appropriate.

		measures that should be taken during chance finding of heritages.		
ESS 10: Stakeholder Engagement and Information Disclosure	ESS-8 is applicable to the EDFP.	Article 15 of the EIA Proclamation requires public participation/consultation during EIA study process and public disclosure of EIA reports. Current practice also shows public consultations are carried during EIA studies and minutes of consultation produced. Incorporation of the views and concerns of stakeholders into the EIA report usually carried.	The stakeholder and public consultations requirement is focused on initial EIA study phase and do not continue through the project lifecycle as required by ESS-10. Thus, preparation of Stakeholder Engagement Plan not required by the EIA proclamation. Establishing GRM to address public concerns is also not required by the EIA proclamation.	The application of ESS 10 requirement for SEP is advisable to continue engagement of stakeholders during project implementation and beyond when appropriate.

5 ESMF PROCESSES AND IMPLEMENTATION

5.1 RESPONSIBILITIES IN THE ESMF IMPLEMENTATION PROCESS

The lead responsibility for the overall coordination and implementation of the EDFP lies on the Ministry of Innovation and Technology (MInT) under which a Project Implementation Unit (PIU) will be established. It is necessary that the PIU is staffed adequately with environmental and social risk management specialists who will be spearheading the implementation of the ESMF process throughout the project life. The PIU and its environment and social risk management staff will be in charge of implementing the ESMF process in all applicable EDFP financed subprojects.

The PIU environmental and social risk management specialists will also be responsible to oversee the environmental and social risk management issues in relation to all EDFP financed sub projects. The PIU will need to work in close collaboration with the procurement department of the EDFP, the technical committee and other partner as well as beneficiary institutions.

As the EDFP is going to be implemented throughout Ethiopia resulting in potential large number of subproject activities spread all over the country, it will be important that EDFP implementing partners and beneficiary Government institutions (such as MoSHE, ECA, regional BoH and BoE), and the private sector telecom operators, who will be awarded with indefeasible right of use (IRU) contracts, should assign focal persons for environment and social risk management. For purposes of practical application of the later, it is important to include an environmental clause that demands the deployment of an environmental and social risk management focal person. Such a person will be in charge of fulfilling the ESMF requirements in coordination with PIU staff for EDFP financed subproject activities done by them. The PIU environment and social risk management specialists will coordinate with the focal persons to be deployed by the partner and beneficiary institutions and private sector telecom operators. The PIU specialists will be responsible for the implementation of subproject activities in compliance with the requirements of the ESMF. (See Fig 4)

5.1 OVERVIEW OF SUBPROJECT CATEGORIZATION AND THE ESS REQUIREMENTS

The ESMF is designed to support the application of World Bank Environmental and Social Standards in combination with the Ethiopian legislation on environmental impact assessment to EDFP. ESS1 on Assessment and Management of Environmental and Social Risks and Impacts is among the standards triggered by the EDFP and thus the relevant principles in relation to subproject categorization are briefly outlined as follows.

The EDFP being a project which consists of a series of sub-project activities to be identified and implemented in several places across the country, the risks and impacts cannot be determined until the subproject location and design details have been identified. For such projects as EDFP involving

multiple small subprojects, that are identified, prepared and implemented during the course of the project, MiNT will carry out appropriate environmental and social assessment of the subprojects, and prepare and implement such subprojects, as follows:

(a) High Risk subprojects, in accordance with the ESSs;

(b) Substantial Risk, Moderate Risk and Low Risk subprojects, in accordance with National law and any requirements of the ESSs that the Bank deems relevant to such subprojects as determined during its review of the sub-project for "no objection" clearance. Where subprojects are likely to have minimal or no adverse environmental or social risks and impacts (i.e. low risk), such subprojects do not require further environmental and social assessment following the initial scoping.

Figure 4: Proposed institutional arrangement for ESMF implementation
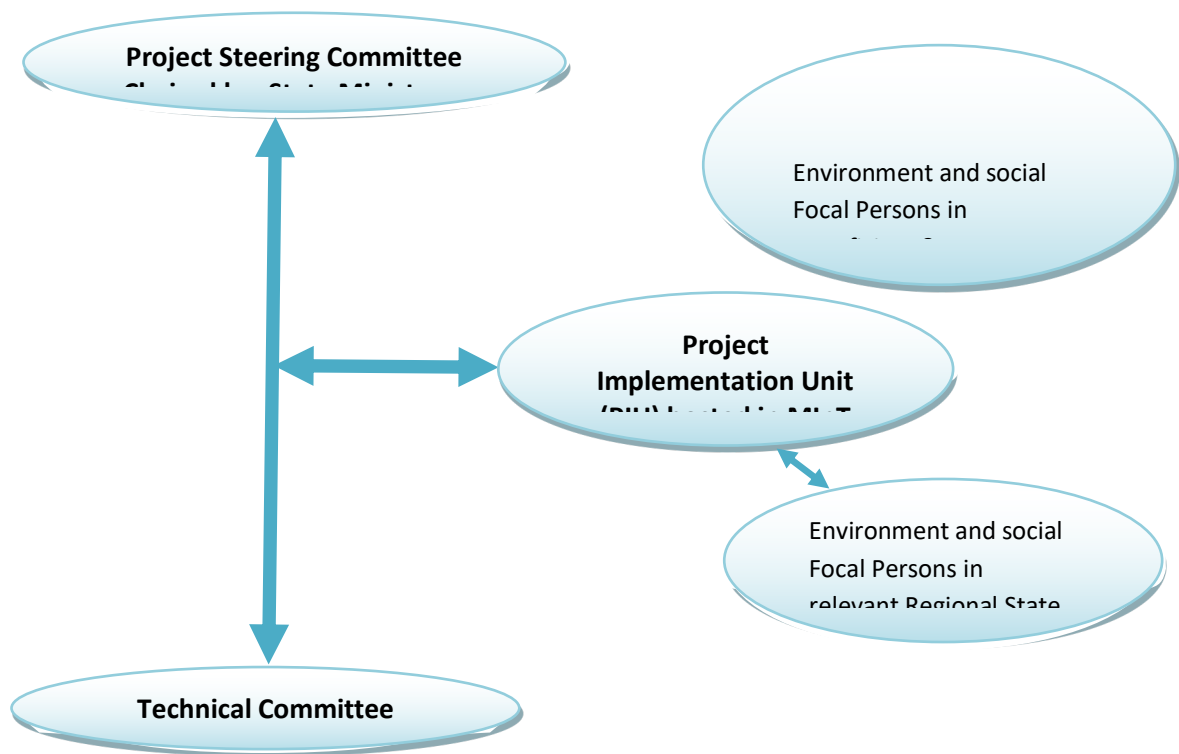
The EDFP is generally categorized as "Moderate Risk" project and hence MiNT will be required to undertake the appropriate environmental and social assessment of subprojects in accordance with the *national law and any requirements of the ESSs* that deemed relevant to the sub-projects. Accordingly, the most important National guideline that defines the categorization of subprojects into various schedules is the EIA Procedural Guideline issued by the Federal Environment, Forest, and Climate Change Commission in November 2003. The ESIA Procedural Guideline Categorises all development projects into three Schedules of activities or projects. The full list of Schedule I, II and III subprojects of the EIA procedural guideline (2003) is provided in Annex- F. It should also be

noted that the relevant ESSs that are likely to be triggered by the EDFP are broadly assessed and outlined in Table 5 of this ESMF and will need to be customized and applied for each sub-project.

Under the EDFP, it is anticipated that the majority of Component II & III subproject activities will fall into Schedule II subprojects and may require Preliminary ESIAs. However, it is also possible that certain subprojects crossing through environmentally sensitive areas and ecosystems such as National Parks, areas with rare/endangered plants and animals, wetlands, and National Heritage sites may fall under Schedule I(i.e. High risk). Under such circumstances, re-sitting, redesigning or rerouting of subproject sites should be made to avoid impacts on the sensitive areas and ecosystems. If the risk rating of a subproject is classified as substantial or higher risk as per the World Bank ESF classification MInT will notify the World Bank to update both the ESCP and ESMF as appropriate and apply the relevant requirements of the ESSs.

5.2 PROCESS AND PROCEDURES OF THE ESMF

Step-1: Sub project identification

Sub project refers to the set of activities derived from the EDFP Component and sub-component activities including technical assistance studies and consultancies for which support through investment project financing is sought by MInT. One procurement contract be a subproject, or can multiple subprojects be part of one contract. Identification of subprojects is carried through consultative process by the lead implementing agency (MInT), the partner institutions such as MoSHE and ECA, regional states (e.g: Health and Education sector offices), and in collaboration with other beneficiary MDA offices. The identified subprojects will be reviewed and compiled into an annual action plan by the technical committee and will be forwarded to the project steering committee for endorsement and approval. Subprojects included in the approved annual action plan of the EDFP will be eligible for E & S screening.

Step 2: Scoping/Screening

Screening is a key environmental and social management process aiming at determining appropriate studies and follow up that might be required for sub-project activities. The screening aims at categorizing the sub-projects into one of the environmental and social categories consistent with National EIA Guidelines and the ESS of the WB. Screening will be carried out on specific project activities once they have been identified during planning phase of the EDFP.

This ESMF requires that all relevant EDFP subprojects having specified site location as well as relevant technical assistance subprojects be scoped/screened for social and environmental impacts. Scoping/screening will be required where investments will be made on refurbishment of existing

infrastructure, or on development of new infrastructure subprojects included in the endorsed action plan of EDFP.

In order to fulfill the requirements of ESS-1 and National EIA guidelines, the environmental and social scoping/screening will follow two stages. Initially, a scoping/screening of subprojects will be carried to categorize it into one of high, substantial, moderate or low risk. During this first stage, the subproject will be scoped/screened using the scoping/screening form attached in Annex-A. Under the EDFP sub-components, it is anticipated that the majority of subproject activities will fall under moderate or low risk (in line with the overall categorization of the EDFP as "Moderate" risk rating) and no "High Risk" sub-projects are expected. In the event that a sub-project screening/scoping results in "High risk" rating it will be necessary to exercise re-sitting, redesigning or rerouting of the subproject sites to avoid the adverse impacts and lower the risk rating to moderate risk. If this is not possible, MiNT will notify the World Bank to update both the ESCP and ESMF as appropriate and apply the relevant requirements of the ESSs. As a general guidance, if the risk rating of a subproject increases to a higher risk rating, MiNT will notify the World Bank to update the ESCP as appropriate and apply the relevant requirements of the ESSs.Once the subprojects are scoped/screened and confirmed to fall on or below substantial risk category, then further categorization will be carried by applying the national screening system to identify the schedule of activities into which the subproject will fall (Schedule I, II &III). Based on the nature and scale of EDFP subprojects it is expected that most will fall under schedule II or III which may require Preliminary ESIA or no ESIAs.

The PIU environment and social staff in collaboration with the environment and social focal persons of partner and beneficiary institutions will initiate the scoping/ screening process by completing the form contained in Error! Reference source not found.. The aim of the scoping/screening form is to assist in identifying potential environmental and social impacts based on field investigations in the area of the subproject site. The form helps to determine the characteristics of the prevailing local bio-physical and social environment with the aim of assessing the potential impacts of the construction and rehabilitation activities on the environment by the sub-project. The scoping/screening exercise should also involve the cultural heritages and resettlement aspects of the subproject. While completing the screening/scoping form the assessor should undertake the assignment after:

- ✓ Gaining adequate knowledge of baseline information of the area.
- ✓ Gaining knowledge of proposed project activities for the area.
- ✓ Having been briefed / trained in environmental and social screening.

Based on the nature and size of the subproject, the PIU environment and social risk management staffs can seek assistance from other members of the technical committees while carrying the environmental and social screening.

The outcome of environmental scoping/screening will be classifying the proposed EDFP subproject into one of Substantial, Moderate, or low Categories and Schedule I, II or III activities. The Scoping/Screening report to be produced will describe,

a)   The proposed subproject and its potential impacts,

b)   Characteristics of the location (sensitivity of the area),

c)   Size (small, medium and large scale),

d)   Degree of public interest,

e)   Main environmental impacts and mitigation considerations,

f)   Categorization of the subproject (Substantial, Moderate, Low risk and schedule II or III)

The completed scoping/screening report will be submitted first to the PIU coordinator for internal checking and approval. It will then be submitted to the relevant Regional, or Zonal EPFCCA with an official application letter for review and approval (**Note**: for reasons explained under section 4.4.4, it is important for EDFP subproject E&S screening reports to be submitted to environment protection offices at federal, regional or zonal level as appropriate for review and approval procedures. For subprojects implemented in Addis Ababa and Diredawa City Administrations, the E&S screening reports will be submitted to the respective City level environment protection offices). The Regional or Zonal EPFCCC offices will review the Scoping/Screening Report and will:

(a)   Accept the document - with conditions relating to implementation;

(b)   Accept the documents with required and/or recommended amendments; or

(c)   Reject the document with comments as to what is required to submit an acceptable Screening Report.

Following the approval of the subproject environmental screening report by REPA, the subproject will be fed into one of the following processes based on its approved Categorization.

i.   Schedule II subprojects will require a partial or preliminary ESIA and will necessitate the inclusion of environmental and social mitigation and enhancement measures in the design and implementation of subprojects.

ii.   Schedule III projects are not subject to environmental assessment as no potential impacts are anticipated. Thus, no further action is required. However, the environmental guideline for construction contractors will be applicable.

The next step in the ESMF process is to proceed to the next actions to fulfill the requirements based on the screening categorization, which is outlined in step 2 below.

Step 3: Schedule II Subprojects (Preliminary ESIA preparation)

If the outcome of the E & S screening/scoping finally results in categorizing the subproject as schedule-II activities, the following actions need to be pursued. Schedule II projects will be subject to a limited Environmental and Social Impact Assessment that could be carried out with the help of registered and licensed environment and social consultants. Schedule II subprojects are required to prepare "Preliminary" or also otherwise called "Partial" ESIAs in which the depth of its information requirement can be defined in consultation with the relevant Regional or Zonal level EPFCCA. Generally, the scope of ESIA for schedule II project may vary, but it is narrower than that of Schedule-I ESIA. Like Schedule I ESIA, it examines the project's potential negative and positive environmental impacts and recommends any measures needed to prevent, minimize, mitigate, or compensate for adverse impacts and improve environmental performance which will be summarized in the ESMP. Undertaking the preparation of the Preliminary ESIA involves:

- A field assessment of the subproject area to identify likely environmental and social impacts;
- Consultation with beneficiaries and affected communities;
- Preparation of an ESMP

During the study of the Partial Environmental and Social Impact Assessment the PIU and partner/beneficiary institution environment and social risk management staff/focal person will have to ensure the quality of the assessment by conducting interim review of draft Preliminary ESIA report submissions. The partial Environmental and Social Impact Assessment will then be presented by the PIU to the PSC for further executive review and approval. Following that, the Preliminary ESIA will be send to the World Bank Country office for review and clearance /no-objection. Finally the Preliminary ESIA will be submitted by the PIU and/or environment focal persons in partner/beneficiary institutions to the relevant Regional or Zonal level EPFCC office with an official application for review and approval. The national EIA system does not have a fixed table of content for preliminary EIA but is usually determined through discussion during the early scoping phase with the EPFCC officers.

Note: If, on the other hand, the outcome of the E & S screening/scoping finally results in categorizing the subproject as schedule-III activities, no further actions to carry Environmental Assessment will be needed. Based on the nature of the schedule-III subproject, if it deemed necessary, a distinct ESMP will be prepared to address and mitigate the expectedly few and minor environmental and social impacts of the subproject and attach it with the E&S screening report for further implementation.

Step 4A: Review and Decision

The relevant Regional or Zonal EPFCC will review the Preliminary ESIAs submitted to it by the PIU and/or environment focal persons in partner/beneficiary institutions. The purpose of review is to

examine and determine whether the Preliminary ESIA is an adequate assessment of the environmental effects of the EDFP subproject under consideration and of sufficient relevance and quality for decision-making. Reviewing by the competent Regional or Zonal level EPFCC may include considerations of the adequacy of:

- The examination of alternatives, assessment of impacts, appropriateness of mitigation measures and monitoring schemes as well as implementation arrangements;

- The extent of public involvement and reflection of Community/stakeholder concerns; and

- The presence of adequate information required in the report.

The outcome of the review of the Preliminary ESIA by the Regional or Zonal level EPFCC will result in either one of the following:

(a)   Accept the document - with conditions relating to implementation;

(b)   Accept the documents with required and/or recommended amendments; or

(c)   Reject the document with comments as to what is required to submit an acceptable ESIA and ESMP.

Step 4B: Disclosure

While in the review and approval process, as required by the World Bank guidelines and the National ESIA proclamation, the Preliminary ESIA documents must be disclosed for public review at a place accessible to local people (e.g. at a local government office i.e. kebele council, City/town and regional bureaus, at the Regional/Federal EPFCCA, MInT website, e.t.c), and made available in a form, manner, and language they can understand. Disclosure of the Preliminary ESIA in the World Bank's info shop is also a requirement for the EDFP. The approved Preliminary ESIA will be send finally to the World Bank Country office for further disclosures in the info shop. The ESMPs will be disclosed following the requirements of the Bank.

Step 5: Implementation & Supervision

When approval has been given to the Preliminary ESIA, implementation of mitigation measures and systemic follow-up is needed for the sub-project. In order to enforce the implementation of recommended mitigation measures, there is a need to include an environmental clause in the contract agreements to be signed with the construction contractors and telecom operators. The environmental clause should demand the construction contractor and telecom operator to implement and monitor all proposed mitigation measures in the ESMP that are applicable during the construction phase and beyond. The PIU will also be required to enforce implementation of proposed mitigation measures as proposed in the ESMP by all responsible institutions and stakeholders.

Internal monitoring to ensure the compliance of EDFP subproject implementation activities against the mitigation measures set out in its ESMP, will be carried out by the environment and social risk management staff of the PIU, focal person of the partner/beneficiary institutions who are responsible for environmental and social management as well as the supervisory engineer at the construction site. The PIU environment and social risk management staff in collaboration with the partner/beneficiary institution risk management focal persons will have the primary responsibility for carrying out this monitoring by regularly visiting the subprojects, and pursuing the corrective measures as required. Periodic reports of internal monitoring should be prepared quarterly by the environment and social risk management staff and submitted to the PIU and then to the PSC as part of the regular EDFP M&E process.

The implementation of the recommended mitigating measures will also be monitored by the Regional, or Zonal level EPFCC offices. The PIU risk management staff and/or focal persons in the partner institutions will have to collaborate in the planning for external compliance monitoring and inspections that will be conducted by the relevant Regional and Zonal EPFCC offices. The planning for external compliance monitoring/inspection could be initiated by the regional and zonal EPFCC itself or (if that is not coming forward from EPFCCC side) by the PIU and partner/beneficiary institution environment focal persons in line with the M&E system.

Compliance monitoring comprises on site-inspection of construction activities to verify that measures identified in the ESMP and those included as environmental clauses in the contractual agreements for contractors are being implemented. Compliance monitoring and supervision of the ESMP covers:

- determining whether the project is being carried out in conformity with environmental risk management instruments and legal agreements;

- ensuring that the anticipated impacts are maintained within the levels predicted,

- identifying problems as they arise during implementation and recommend means to resolve them;

- seeing that the un-anticipated impacts are managed and or mitigated before they become problems,

- recommending changes in project concept/design, as appropriate, as the project evolves or circumstances change; and

- realizing and optimizing the benefits expected, and

- Providing information for a periodic review and alteration of the environmental management plan and enhance environmental protection through good practice at all stages of the project.

It is therefore necessary that Environmental and Social Management Plan, full or Abbreviated Resettlement Action Plan, including Cultural Resources Management Plan (if applicable and prepared) is supervised, monitored and reported on together with other progresses of the subprojects.

Step 6: Environmental and Social Risk Management Monitoring Reports

Quarterly, biannual and annual environmental and social risk management monitoring reports must be prepared by the PIU in collaboration with the environment focal persons in partner/beneficiary institutions. The environmental and social risk management monitoring reports should be submitted to the project steering committee, to the Regional EPFCCA and the World Bank for review.

The purpose of these reports is to provide:

- A record of EDFP subproject activities, experience and issues running from year-to-year throughout the EDFP that can be used for identifying difficulties and improving performance; and

- Practical information for undertaking an annual review.

Step 7: Annual Reviews

ESMF implementation will also be supported by conducting annual environmental and social performance audit (including audit of implementation of Preliminary ESIA/ESMPs, and CHMPs as appropriate) that will be carried out by a third party. The third-party annual environmental and social performance audits will be conducted on the EDFP subproject activities to evaluate the overall implementation of the ESMF. The annual environmental and social performance audits will be considered to be the principal source of information to Project management for improving environmental and social performance. It is expected that these annual performance audits will be carried out by registered and licensed independent consultant firm that is not otherwise involved in the Project. The purpose of the annual performance audit includes:

- to assess compliance with ESMF procedures, learn lessons, and improve future ESMF performance; and

- to assess the occurrence of, and potential for, cumulative impacts due to Project-funded and other development activities.

Figure 5: Diagram showing the ESMF process flow

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┌─────────────────────────────────┐
│ Step 1: Subproject Identification│
│      and Eligibility Checking    │
└─────────────────────────────────┘
                │
                ▼
┌─────────────────────────────────┐
│ Step 2: Sub-project screening/   │
│ scoping using Annex A: Screening │◄──────────────┐
│ checklist by PIU E&S staff and   │               │
│ focal Persons of partner/        │               │
│ beneficiary institutions         │               │
└─────────────────────────────────┘               │
                │ YES                               │
                ▼                                    │
┌─────────────────────────────┐  NO  ┌─────────────────────────┐
│ Step 3: Review and approval │─────►│ Re-sitting, re-design or │
│ of screening/scoping Report │      │ re-route the sub-project │
│ by PIU and by relevant      │      │ or reject for financing  │
│ EPFCC office                │ Amendment└─────────────────────┘
└─────────────────────────────┘                   ▲ PIU
                │                                   │
                ▼                                   │
┌─────────────────────────────┐                    │
│ Step 4: Preliminary ESIA     │◄───────────────────┘
│ Preparation by registered/   │  NO
│ licensed consultant          │
└─────────────────────────────┘
                │ YES
                ▼
┌─────────────────────────────┐      ┌─────────────────────────┐
│ Step 5: Review and approval  │─────►│ Amendment and            │
│ of ESIA, ARAP/RAP Report by  │      │ rectification of the     │
│ relevant EPFCC office        │      │ ESIA, ARAP/RAP reports   │
└─────────────────────────────┘      │ as per comment           │
                │                     └─────────────────────────┘
                ▼
┌─────────────────────────────────┐
│ Step 6: Environmental and Social │
│ Monitoring and Compliance        │
│ Inspection by PIU E&S staff,     │
│ Focal Persons and subproject     │
│ contractor/supervisors           │
└─────────────────────────────────┘
                │
                ▼
┌─────────────────────────────────┐
│ Step 6: Environmental and Social │
│ Monitoring and Compliance        │
│ Reporting to PSC/MInT/ (Quarterly,│
│ biannual and annual) by PIU E&S  │
│ staff                            │
└─────────────────────────────────┘
                │
                ▼
┌─────────────────────────────────┐
│ Step 7: Annual Review of         │
│ Environmental and Social         │
│ Performance by Registered and    │
│ Licensed External E&S            │
│ consultant/firm                  │
└─────────────────────────────────┘
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Table 7: Outline of Roles and Responsibilities for the ESMF

Activity	Lead Role for preparation and/or implementation	Lead role for review, approval &monitoring
Completion of ES screening using the form in Annex A: Screening Form.	E&S staff of the PIU in collaboration with focal persons to be deployed by each Partner/beneficiary institutions.	Regional, Zonal or City level EPFCCCs and the World Bank, for review and clearance of Preliminary ESIA documents
Preparation of Preliminary ESIA, CHMP Environmental and Social Audit and.	Preliminary ESIA, and E&S Audit preparation by registered/licensed consultant/firm, ESMP (for schedule III), CHMP preparation by environmental and social focal persons to be deployed by each partner/beneficiary institutions.	
Implementation monitoring of Preliminary ESIA, ESMP, CHMP	PIU Environmental and Social risk management Specialists in collaboration with Environmental and social focal persons to be deployed by each partner/beneficiary institutions, contractors/supervisors	
Annual Environmental and Social Audit (by independent consultant)	External registered/licensed environment and social consultancy in collaboration with PIU	

5.3 SUB-PROJECTS REQUIRING A SPECIAL PROCEDURE AND GUIDELINES

a) Projects Involving Cultural Heritage Management

As the EDFP subcomponent activities are likely to involve subproject activities with linear infrastructure development, acquiring small plot of land and/or usage of properties, and activities to re-designing or refurbishing of existing buildings it is likely that it can pose an impact on historical buildings and cultural heritage sites. Therefore, it is important that the environmental and social assessment consider direct, indirect and cumulative sub project-specific risks and impacts on cultural heritage. Through the environmental and social assessment, the potential risks and impacts of the proposed activities of the project on cultural heritage will be determined.

The EDFP subproject activities should consider avoiding impacts on cultural heritage. When avoidance of impacts is not possible, it should identify and implement measures to address impacts on cultural heritage in accordance with the mitigation hierarchy. The mitigation measures will need to be integrated into the ESMP to avoid damage to cultural properties. Based on the nature (i.e. whether affecting National or World heritage sites) and scale of impacts, where appropriate, it will also develop a Cultural Heritage Management Plan (CHMP).

The mitigation plan in the ESMP should be consistent with Proclamation No 209/2000 on Research and Conservation of Cultural Heritage, the World Bank ESS8 for Cultural Heritage, and should take into account institutional capabilities relating to the management and preservation of physical cultural resources. Mitigation measures include, for example,

- Consultations with the appropriate authorities and local inhabitants to identify known or possible sites during subproject planning;

- relocating of subprojects to avoid identified sites;

- relocating or modifying the physical footprint of the project;

- conservation and rehabilitation in situ;

- relocation of cultural heritage;

- establishment of a monitoring system to track the progress and efficacy of these activities;

- Establishment of an implementation schedule and required budget for the identified mitigation measures; and cataloguing of finds.

In case of chance find of heritage encountered during subproject implementation activities, the procedures that should be followed are stipulated under article (41) "Fortuitous Discovery of Cultural Heritage" of the Proclamation No 209/2000 which includes:

  i. Any person who discovers any Cultural Heritage in the course of an excavation connected to mining explorations, building works, road construction or other similar activities or in the course of any other fortuitous event, shall forthwith report same to the Authority, and shall protect and keep same intact, until the Authority takes delivery thereof.

 ii. 'The Authority' shall, upon receipt of a report submitted pursuant to Sub-Article (I) hereof, take all appropriate measures to examine, take delivery of, and register the Cultural Heritage so discovered.

iii. Where the Authority fails to take appropriate measures within six month in accordance with Sub- Article (2) of this Article, the 'person who has discovered the Cultural Heritage may be released from his responsibility by submitting, a written ,notification with a full description of the situation to the Regional government official. .

 iv. The Authority, shall ensure that the appropriate reward is granted to the person who has handed over a Cultural Heritage discovered fortuitously in accordance with sub-Articles (I) and (2) of this Article. And such person shall be entitled to reimbursement of expenses, if any, incurred in the course of discharging his duties under this Article.

A complete chance find procedure incorporating the above procedure of the proclamation enriched with other necessary good practice procedures is presented in Annex C.

ES risk assessment procedures and standards for tower siting, access roads, land acquisition, e.t.c are going to be prepared by ECA supported by TA of EDFP subcomponent 1.1. Thus, it is expected that the standards will reflect the special procedures required there. Similarly, the e-waste management guideline recommended in the ESMP will outline the special procedures required.

6   POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS AND BENEFITS

This chapter describes the potential environmental and social benefits and risks/impacts of the EDFP subproject activities. The environmental and social risks likely to arise from the subproject activities of the EDFP can be grouped into two as: (a) those which will arise as a result of subproject activities directly financed by the EDFP and (b) those occurring as a result of subproject activities indirectly financed by the EDFP.

Overall the subproject activities involved with EDFP will be site specific and generating impacts that are of moderate significance which can be mitigated. The environmental and social risk assessment carried as part of the present EDFP ESMF has also confirmed that the risk rating is "*Moderate*" for both Environmental and social risks with the overall risk rating being the same "*Moderate*". The beneficial and adverse environmental and social risks associated with the EDFP subcomponent activities are described as follows.

6.1 PROJECT BENEFICIAL ENVIRONMENTAL AND SOCIAL IMPACTS

The EDFP will have an overall significant positive social impacts on the country's population, as it is expected to (i) reduce costs and enhance reliability of digital access; (ii) increase efficiency of public service delivery through support of digitalization of public services; (iii) allow digitalization of higher education and thus raising graduate's preparedness for the digital world; (iv) promote affordable internet coverage in rural areas with low access to communications infrastructure and services; and (v) support an enhanced digital business environment potentially leading to more well-paid jobs in the sector. These positive social impacts of the EDFP are elaborated further as follows.

Increased affordability and reliability of digital access: One of the important and wide- reaching beneficial impacts of the EDFP is anticipated to be realized through the opportunity it will provide for the wider Ethiopian public to improved access to broadband internet and digital services. The implementation of the project components will enable citizens to access a lower cost, higher quality broadband internet services and access to expanded digital services. This in turn is expected to have multiple beneficial impacts to various sections of the Ethiopian public through increased productivity, job creation, and through the creation of digital solutions and their adoption by economic sectors.

The project through increased participation of service providers and the market competition is expected to lead to reduction of cost of operation and therefore affordability of services in general. Improvements in infrastructure will increase reliability and quality of services.

Increase access to affordable services to rural and underserved areas: The project, through participation of new service providers in the market and incentivizing service providers will enable the expansion of infrastructure and broad band services to remote rural areas and the pastoral and agro pastoral communities living in the lowlands of underserved regions namely Gambella, Benishangul, Somali, Afar, parts of Oromia and Southern Region. The incentive mechanisms and the competition between different providers is expected to lower costs and provide affordable services for poor communities.

Increased access to digital services and devices for female students- The EDFP will also have beneficial social impacts on the Country's Education system and learning processes through provision of connectivity and bandwidth enhancement that will be provided to Universities, Colleges, TVETs and possibly (at later stages and if funds made available) to high schools found throughout the Country. Universities and TVET colleges are expected to enjoy connectivity to more reliable bandwidth at much lower cost which would enable them to provide their staff and students with access to electronic resources and databases, including, but not limited to library and computing resources that will be made available through the network. Access to broad band services for education institutions and affordable digital devices (smart phones and laptops) and basic training is expected to benefit 22 million students and improve their access to education material, and improve quality of education by facilitating the on-line and off- line tuition. The project targets female students to ensure equitable benefits.

Increases access of digital device and digital skills for vulnerable groups: The EDFP is also anticipated to have a positive social impact on the Ethiopian public by contributing towards the narrowing of the existing "digital divide" among different sectors of the society. The EDFP consist of subcomponents that intend to empowering youth, women and girls, the elderly and disabled persons, who are currently digitally-excluded. The EDFP also intends to emphasize on provision of connectivity and skills development for girls, encourage digital entrepreneurship activities and partnerships targeting women and youth aiming to create jobs and nurture tomorrow's digital leaders.

The project activities provide incentives for digital companies to reaching out to farmers, women and persons with disabilities in accessing digital training and digital devices to promote their businesses. The digital devices also facilitate communication and access to information for wide range of services such as financial services, employment and business opportunities.

Promote digital entrepreneurship and job creation: the overall gain in improved services will spur the expansion of digital businesses, platforms and startups that expand employment opportunities particularly for the young population. Moreover, members of the Ethiopian public can also benefit through participating in a platform-based digital business in which suppliers and contractors are expected to generate additional income and jobs. Consumers using digital means to purchase goods and services are also expected to experience welfare gains in the form of lower costs, more convenience and a greater diversity of products and services, as they would now have an expanded access to products and services from both online and offline means.

Improved government services, lower cost of accessing services– The digitization of government services (e-services) will especially benefit remotely located users of services (eg. small businesses, taxpayers and rural people and women) by reducing the travel time and money required to get the services and in cutting the bureaucratic hurdles.

National and Regional State Governments will also benefit through lower cost, higher quality access to the internet within public institutions, improved ability to store and manage data, ability to launch new digital services much more quickly and securely in a cost-effective manner than is possible today, and by taking advantage of data analytics to improve policy and decision-making.

6.2 PROJECT ADVERSE ENVIRONMENTAL RISKS

The environmental impacts/risks of the subcomponent activities under the EDFP are anticipated to have moderate and localized adverse impacts. The following are the anticipated direct and indirect potential adverse environmental impacts/risks that are envisaged to arise during EDFP subproject implementation activities.

6.2.1   Environmental risks of Subproject activities directly financed by the EDFP

The Digital Government and Connectivity Component (Component 2) of the Project involves subproject activities that will develop ePortals and data centers for government MDAs, digitalization of MDA selected services, and the installation of about 50 communication rooms including provision for internet connectivity (i.e. Sub-component 2.1). Moreover, Component 2 of the EDFP also involves subproject activities that will connect selected educational institutions to high speed broadband internet service. The first phase of this subproject will include universities, colleges of teacher's education, research institutions and TVETs, with the aim of nationwide coverage in partnership with the EthERNet (Sub-component 2.3). The implementation of these subproject activities are planned to be among those that will be directly financed by the EDFP.

The implementation of the above described subprojects are anticipated to entail potential environment risks due to the fact that it will necessitate the modification of existing buildings/rooms to suit to the designed functions of the government ePortals and communication rooms, extending fiber optic cables (where it fall short or is not available) to provide high speed internet connection to the educational institutions, and due to increased generation of e-wastes resulting from expanded use of electronic equipments during operation phases. The potential environmental risks likely to occur from the subprojects will involve noise and dust releases during building modifications, excavation of trenches and installation of the new electronic facilities as well as equipments. The generation and disposal of demolition wastes during building modifications, as well as release of packaging wastes during equipment installation will cause potential risk to the environment. Operationalizing the Government MDA ePortals and digital services as well as the Communication rooms will entail expanded use of servers, computers, printers, large screens, speakers, microphones, WiFi Routers, and associated furniture, which at the end of its lifetime will join the e-waste stream. The subproject activities will then cause potential risk to the environment due to increased release of e-waste in the long term.

Technical assistance subproject risks: The EDFP will provide technical assistance support for general capacity building and regulatory strengthening, capacity building of senior Government officials, notably in MInT and ECA to design, implement and evaluate policies and regulations for the development of the digital economy as well as in developing standards and procedures regarding potential risks on siting, design, construction and operations of digital infrastructure, including need for small-scale land acquisition and community health and safety. These technical assistance subprojects involves assisting ECA to strengthening independent ICT sector regulation (Sub component 1.2) and supporting the development of the Digital Economy (Sub component 1.3) which will enable to adopt regulatory standards on construction and operation of telecommunications infrastructure in response to overall social and environmental risks including climate risks. The technical assistance to be provided by EDFP should consider EHS risks, the development of appropriate standards and guidelines for the proper management of e-waste generation and disposal which will pose potential public health risks, as well as development of adequate e-waste service providers. During development of these standards considerations of relevant national environmental and social legislations as well as requirements should be made and would need to be thoroughly consulted to ensure that the standards provides for adequate protection of sensitive habitats and heritages such as National Parks, Sanctuaries, Wetlands, as well as archeological, cultural and historical heritage sites found all across the Country.

The recruitment of Transaction Advisor to be paid by the Project should comply with the requirements ESS2 and EHS aspects should be included in the terms of reference and should also be properly monitored. The telecommunication reform should include consideration of how it should be

done to properly address potential ES impacts and risks. Thus, the TA work and related should include ES considerations. Potential Examples could be development of proper ES regulations, standards and guidelines, such as e-waste management, tower siting, etc. forms to enhance the development of adequate e-waste service providers in the country, and inclusion of ES aspects in bids and contracts. Technical assistance activities will be undertaken following the requirements of OESRC's Advisory Note Technical Assistance and the Environmental and Social Framework (2019).

6.2.2 Environmental risks of subproject activities indirectly financed by the EDFP

Subcomponent 2.2 of the Digital Government and Connectivity Component of the EDFP involves subproject activities that will stimulate private sector investment for internet connectivity through roll-out of fiber-optic networks and 4G/5G mobile networks, using provision of services to public institutions as an anchor tenant for wider geographical service provision. It is expected that this subproject activities will be implemented by telecom operators, fiber wholesalers, internet service providers (ISPs) and other licensed operators that would be able to bid to offer this capacity, *using the tendered contracts as an investment guarantee for a wider network roll-out*. Moreover, subcomponent 2.2 also involves subproject activities to enhance the level of digital connectivity to Government offices and public institutions across the country. The proposed mechanism to do this would involve an upfront commitment for *the pre-purchase of internet bandwidth from private sector operators under indefeasible right of use (IRU) contracts* over a period of 5-10 years. The locations of targeted public institutions to be served would include MDAs, youth community associations across the country and selected hospitals and health centers as part of the COVID-19 response.

As such the tendering and procurement of digital connectivity and pre-purchase of internet bandwidth from the private sector operators through direct financing of the EDFP is likely to have no potential environmental and social risks. However, reform of the telecommunications sector and the opening of the market to new operators could lead to infrastructure development for expansion of services (such as construction of data centers and cell towers). At this point these indirect consequences and/or downstream activities are not considered Associated Facilities, assessing the criteria outlined in the ESF Policy, Para 11. If at any point this assessment would be revised based on adaptation of the project design, instruments would be developed for these facilities under this project and the ESCP revised accordingly to ensure that these works would be subject to compliance with relevant WBG Environment, Health and Safety Guidelines and ESF Standards. Respective due diligence will be conducted regular during the Bank's Implementation Support Missions or ad hoc

6.2.3 Detailed Environmental and Social risks of EDFP Subprojects

In addition to the ES risks briefly stated in the preceding sections, the environmental and social risks likely to arise from EDFP subprojects are further outlined and elaborated below. The ES risks are similar to the ES risks arising from the telecom sector construction activities. These include;

- ✓ Terrestrial and aquatic habitat alteration
- ✓ Use of hazardous materials and waste
- ✓ Construction and demolition waste
- ✓ Emissions to air
- ✓ Noise
- ✓ Visual impacts,
- ✓ Occupational health and safety
- ✓ Electric and magnetic fields
- ✓ Electric safety
- ✓ Fall protection,
- ✓ Confined space entry
- ✓ Motor vehicle risks
- ✓ Community health and safety

6.2.3.1 Terrestrial and aquatic habitat alteration

Terrestrial and aquatic habitats may be altered primarily during the construction of communications infrastructure depending on the type of infrastructure component and proposed location. Potential impacts to habitat may be more significant during construction and installation of linear infrastructure, such as long-distance fiber optic cables, as well as access roads to other types of infrastructure along previously undeveloped land. Owing to the nature of the construction activities which is mainly anticipated to involve land clearing for installation of facilities such as cell towers, the terrestrial habitat alteration is predicted to be small scale. As the EDFP is going to be implemented throughout the Country, sensitive habitats like National Parks, sanctuaries, protected areas as well as wetland areas could be slightly affected during the construction activities. Moreover historical and cultural heritage sites could also be affected. Recommended measures to prevent and control impacts to terrestrial habitats during construction of the right-of-way include:

- ➢ Site fixed line infrastructure (e.g. fiber optic cable) and other types of linear infrastructure rights-of-way, access roads, lines, and towers to avoid sensitive habitats and heritage sites through use of existing utility and transport corridors, whenever possible;

➢ Avoidance of construction activities during the breeding season and other sensitive seasons or times of day;

➢ Revegetation of disturbed areas with native plant species;

6.2.3.2 Hazardous materials and waste

Telecommunications processes /infrastructures for broadband connectivity/ do not normally require the use of significant amounts of hazardous materials. However, the operation of certain types of switching and transmitting equipment may require the use of solar power and backup power systems consisting of a combination of batteries (typically lead-acid batteries) and diesel-fueled backup generators for electricity. Operations and maintenance activities may also result in the generation of electronic waste (e.g. nickel-cadmium batteries and printed circuit boards from computer and other electronic equipment as well as backup power batteries). The operation of backup generators and service vehicles may also result in the generation of used tires, and waste oils and used filters. Transformer equipment may potentially contain Polychlorinated Biphenyls (PCBs) while cooling equipment may contain refrigerants (potential Ozone Depleting Substances [ODSs]).

E-waste handling and disposal also exposes people to non-dioxin-like polychlorinated biphenyls (PCB), polycyclic aromatic hydrocarbons (PAH), polychlorinated dibenzo-p-dioxins (PCDD), polychlorinated dibenzofurans (PCDF) and dioxin-like polychlorinated biphenyls (DL-PCB). Most of these compounds are endocrine disrupters, and most are neuro-and immune-toxic as well. E-waste-related toxic elements can enter living organisms through air (e.g. open burning), soil (e.g. disposal), water via ingestion (e.g. food chains contamination due to disposal and primitive recycling processes), inhalation, and dermal absorption (e.g. dust and direct exposure of workers who labor in primitive recycling areas and their families). E-waste is resistant to biodegradation with strong tendency to bio-accumulate in agricultural lands and be available for uptake by grazing livestock. Elevated levels of e-waste pollutants in water, air, soil, dust and human matrices (blood, urine, breast milk) indicate that not only are e-waste workers at risk from exposure to e-waste, but the general population and future generations as well.

Recommended hazardous materials management actions include:

➢ Implementing fuel delivery procedures and spill prevention and control plans applicable to the delivery and storage of fuel for backup electric power systems, preferably providing secondary containment and overfill prevention for fuel storage tanks;

➢ Implementing procedures for the management of lead acid batteries, including temporary storage, transport and final recycling by a licensed facility;

➢ Ensuring that new support equipment does not contain PCBs or ODSs. PCBs from old equipment should be managed as a hazardous waste;

> ➤ Purchasing electronic equipment that meets international phase out requirements for hazardous materials contents

6.2.3.3 Construction and demolition wastes

Modification of existing buildings/rooms to suit to the designed functions of the government ePortals and communication rooms will initiate demolition of parts of buildings and related infrastructure that will result in generation of demolition waste. Although demolition waste is generally considered as less harmful to the environment since it is composed of inert materials, there is growing evidence that large quantities of such waste may lead to release of certain chemicals into the environment.

Extending fiber optic cables (where it fall short or is not available) to provide high speed internet connection may require the undertaking of trench excavation, which is anticipated to generate waste soil. During such activities, it is advisable to excavate and keep the top soil part separately from the waste soil and stockpile it at soil material management area within the site for recovery and reuse on the site. The soil waste is in general an innocent/inert waste that will not have any adverse effect to the environment when properly disposed. The impact of this soil waste on the environment and community usually arises when it is improperly disposal at unauthorized places blocking drainage channels and pass ways, destroying community open green spaces etc., affecting the movement and wellbeing of communities.

Recommended mitigation measures to avoid or reduce adverse construction and demolition wastes impacts include;

> ➤ Preventing the washing away of construction materials, soil, silt or debris into any drainage system.
> ➤ properly segregate and dispose wastes to encourage reuse and recycling of some useful demolition waste materials
> ➤ Construction and demolition wastes should be recycled or reused as much as possible to ensure that materials that would otherwise be disposed of as waste are diverted for productive uses.
> ➤ The contractor and EDFP subproject beneficiary management must work together to facilitate proper waste handling and disposal from the site. All construction wastes must be taken to approved disposal site.

6.2.3.4 Emissions to air

Emissions from communications subprojects /infrastructures for broadband connectivity/ may be primarily associated with the operation of vehicle fleets, the use of backup power generators, and the use of cooling and fire suppression systems. Cooling equipment may contain refrigerants (potential Ozone Depleting Substances).

Recommended management actions to minimize emissions include:

> ➤ Implementation of vehicle fleet and power generator emissions management strategies

➢ Avoiding the use of backup power generators as a permanent power source, if feasible;

➢ Substitution in use of chlorofluorocarbons (CFCs) in cooling and fire-suppression systems, using contractors who are properly trained or certified in the management of CFCs.

6.2.3.5 Noise

The principal source of noise in telecommunications/infrastructures for high speed internet connectivity/ construction and operation activities is associated with the operation of backup power generators. Recommended noise management action includes the use of noise suppression shields and mufflers, as well as the location of noise generating sources away from residential or other noise-sensitive receptors to meet the noise emission.

6.2.3.6 Visual Impacts

The visual impacts from tower and antennae equipment may depend on the perception of the local community as well as the aesthetic value assigned to the scenery (e.g. scenic and tourism areas). Recommendations to prevent, minimize and control the visual impacts include:

➢ Minimizing construction of additional towers through collocation of proposed antennae in existing towers or existing structures such as buildings or power transmission towers;

➢ Use of tower and antennae camouflaging or disguising alternatives (e.g. masts or towers designed to look as trees);

➢ Taking into account public perception about aesthetic issues by consulting with the local community during the siting process of antenna towers

6.2.3.7 Occupational Health and Safety

Occupational health and safety issues in telecommunications /infrastructures for broadband connectivity/ related construction projects primarily includes electrical safety, electromagnetic fields (occupational), optical fiber safety, elevated and overhead work, e.t.c.. These are elaborated as follows:

a. Electric and Magnetic Fields

Electric and magnetic fields (EMF) are invisible lines of force emitted by and surrounding any electrical device, such as power lines and electrical equipment. Magnetic fields result from the flow of electric current and increase in strength as the current increases. Radio waves and microwaves emitted by transmitting antennas are one form of electromagnetic energy. Radio wave strength is generally much greater from radio and television broadcast stations than from cellular phone communication base transceiver stations. Microwave and satellite system antennas transmit and receive highly concentrated directional beams at even higher power levels. Although there is public and scientific concern over the potential health effects associated with exposure to EMF, there is no empirical data demonstrating adverse health effects from exposure to typical EMF levels from power transmissions

lines and equipment. Telecom workers typically have a higher exposure to EMF than the general public due to working in proximity to transmitting antennas emitting radio waves and microwaves. Microwave and satellite system antennas transmit and receive highly concentrated directional beams at even higher power levels. Occupational EMF exposure should be prevented or minimized through the preparation and implementation of an EMF safety program including the following components:

➢ Identification of potential exposure levels in the workplace, including surveys of exposure levels in new projects and the use of personal monitors during working activities;

➢ Training of workers in the identification of occupational EMF levels and hazards;

➢ Establishment and identification of safety zones to differentiate between work areas with expected elevated EMF levels compared to those acceptable for public exposure, limiting access to properly trained workers;

➢ Implementation of action plans to address potential or confirmed exposure levels that exceed reference occupational exposure levels developed by international organizations such as the International Commission on Non-Ionizing Radiation Protection (ICNIRP), and the Institute of Electrical and Electronics Engineers (IEEE). Action plans to address occupational exposure may include deactivation of transmission equipment during maintenance activities, limiting exposure time through work rotation, increasing the distance between the source and the worker, when feasible, use of shielding materials; or installation of ladders or other climbing devices inside the mast or towers, and behind the transmission beams.

➢ Limiting public access to antennae tower locations

b. Optical Fiber Safety

Workers involved in fiber optic cable installation or repair may be at risk of permanent eye damage due to exposure to laser light during cable connection and inspection activities. Workers may also be exposed to minute or microscopic glass fiber shards that can penetrate human tissue through skin or eyes, or by ingestion or inhalation. Optical fiber installation activities may also pose a risk of fire due to the presence of flammable materials in high-powered laser installation areas. Recommendations to prevent minimize, and control injuries related to fiber optic cables installation and maintenance include:

➢ Worker training on specific hazards associated with laser lights, including the various classes of low and high power laser lights, and fiber management;

➢ Preparation and implementation of laser light safety and fiber management procedures which include:

- Switching off laser lights prior to work initiation, when feasible
- Use of laser safety glasses during live optical fiber systems installation

- Prohibition of intentionally looking into the laser of fiber end or pointing it at another person

➢ Restricting access to the work area, placing warning signs and labeling of areas with potential for exposure to laser radiation, and providing adequate background lighting to account for loss of visibility with the use of protective eyewear

➢ Inspecting the work area for the presence of flammable materials prior to the installation of high powered laser lights

➢ Implementation of a medical surveillance program with initial and periodic eye examinations;

➢ Avoiding exposure to fibers through use of protective clothing and separation of work and eating areas.

c. **Electric safety**

Telecom workers may be exposed to occupational hazards from contact with live power lines during construction, maintenance, and operation activities. Prevention and control measures associated with live power lines include:

➢ Only allowing trained and certified workers to install, maintain, or repair electrical equipment;

➢ Deactivating and properly grounding live power distribution lines before work is performed on, or in close proximity to, the lines;

➢ Ensuring that live-wire work is conducted by trained workers with strict adherence to specific safety and insulation standards.

➢ Qualified or trained employees working on transmission or distribution systems should be able to achieve the following:

➢ Workers should not approach an exposed, energized or conductive part even if properly trained unless:

➢ Where maintenance and operation is required within minimum setback distances, specific training, safety measures, personal safety devices, and other precautions should be defined in a health and safety plan.

➢ Strict procedures for de-energizing and checking of electrical equipment should be in place before any maintenance work is conducted. If de-energizing is not possible, electrical installations should be moved or insulated to minimize the hazardous effects;

➢ Prior to excavation works, all existing underground cable installations should be identified and marked. Drawings and plans should indicate such installations;

➢ All electrical installations or steel structures, such as masts or towers, should be grounded to provide safety as the electrical current chooses the grounded path for electrical discharge. In cases where maintenance work has to be performed on energized equipment, a strict safety procedure should be in place and work should be performed under constant supervision;

d. Elevated and Overhead Work

The assembly of towers and installation of antennae can pose a physical hazard to workers using lifts and elevated platforms and those located below due to the potential for falling objects. Recommended management strategies include:

➢ The area around which elevated work is taking place should be barricaded to prevent unauthorized access. Working under other personnel should be avoided;

➢ Hoisting and lifting equipment should be rated and maintained and operators trained in their use. Elevating platforms should be maintained and operated according to established safety procedures that include such aspects as equipment and use of fall protection measures (e.g. railings), movement of location only when the lift is in a retracted position, repair by qualified individuals, and the use of effective locks to avoid unauthorized use by untrained individuals;

➢ Ladders should be used according to pre-established safety procedures including proper placement, climbing, standing, and the use of extensions.

e. Fall Protection

Workers may be exposed to occupational hazards when working at elevation during construction, maintenance, and operation activities. Prevention and control measures for working at height include:

➢ Implementation of a fall protection program that includes training in climbing techniques and use of fall protection measures; inspection, maintenance, and replacement of fall protection equipment; and rescue of fall-arrested workers, among others;

➢ Establishment of criteria for use of 100 percent fall protection (typically when working over 2 meters (m) above the working surface, but sometimes extended to 7m, depending on the activity). The fall protection system should be appropriate for the tower structure and necessary movements, including ascent, descent, and moving from point to point;

➢ Installation of fixtures on tower components to facilitate the use of fall protection systems;

➢ Provision of an adequate work-positioning device system for workers. Connectors on positioning systems should be compatible with the tower components to which they are attached;

➢ Safety belts should be of not less than 16 millimeters (mm) (5/8 inch) two-in-one nylon or material of equivalent strength. Rope safety belts should be replaced before signs of aging or fraying of fibers become evident;

➢ When operating power tools at height, workers should use a second (backup) safety strap.

The other occupational health and safety hazards that may also arise during construction are common to other types of construction sites.

f. Confined space entry

The type of confined spaces encountered in telecom projects varies, but may include underground fixed line infrastructure co-located with other underground infrastructure in urban areas. Telecommunications facility operators should develop and implement confined space entry procedures. The occupational hazards associated with confined spaces should be prevented according to the following recommendations:

- Providing safe means of access and egress from excavations, such as graded slopes, graded access route, or stairs and ladders
- Avoiding the operation of combustion equipment for prolonged periods inside excavations areas where other workers are required to enter unless the area is actively ventilated
- Controlling site-specific factors which may contribute to excavation slope instability including, for example, the use of excavation dewatering, side-walls support, and slope gradient adjustments that eliminate or minimize the risk of collapse, entrapment, or drowning

g. Motor Vehicle risks

The geographically dispersed nature of the infrastructure of some telecom operators may require the frequent use of ground transportation for maintenance activities. Under these circumstances, operators should prepare and implement motor vehicle safety programs to protect the safety of its workers and the communities in which they operate. Road safety initiatives proportional to the scope and nature of project activities should include:

- ➢ Adoption of best transport safety practices across all aspects of project operations with the goal of preventing traffic accidents and minimizing injuries suffered by project personnel and the public. Measures should include:
  - o Emphasizing safety aspects among drivers
  - o Improving driving skills and requiring licensing of drivers
  - o Adopting limits for trip duration and arranging driver rosters to avoid overtiredness
  - o Avoiding dangerous routes and times of day to reduce the risk of accidents
  - o Use of speed control devices (governors) on trucks, and remote monitoring of driver actions
- ➢ Regular maintenance of vehicles and use of manufacturer approved parts to minimize potentially serious accidents caused by equipment malfunction or premature failure.

h. Community Health and Safety

Examples of community health and safety issues identified during the construction phase include exposure to construction vehicles and transports, and exposure to dust, noise and vibrations caused by construction works. These hazards are common to most typical construction sites. Communities may

also be exposed to structural safety issues in the event of structural failure of masts or towers during operation phase. These same sites may also attract unauthorized persons interested in climbing these structures, also representing a risk to their safety. Recommendations to manage site/structural safety issues include:

➤ Design and installation of tower structures and components according to good international industry practice, taking into account the potential frequency and magnitude of natural hazards;

➤ Erection of fences in combination with other institutional controls and management approaches, such as the posting of signs forbidding entry and placement of guards to protect the premises surrounding the site;

➤ Equipping masts or towers with anti-climbing devices to preclude unauthorized climbing.

Risk of exposure to e waste- related toxicants through air (e.g. open burning of e-waste) soil (e.g. random disposal of e-waste), water via ingestion (e.g. food chains contamination due to disposal and primitive recycling processes), inhalation, and dermal absorption (e.g. dust and direct exposure of workers who labor in primitive recycling areas and their families). E-waste is not biodegradable with strong tendency to bioaccumulation in agricultural lands posing a community health concern.

Other impacts/risks could be linked to data security/personal security of data (e.g., health), data sanitization, and theft when digital equipment is used (cells, computers, scan, etc.).

Human exposure to use of digital technology (cell phones, towers) has been perceived to affect negatively the health and safety to communities and especially children in long term.

The small infrastructural activities may require workers to be deployed in project sites. The social interaction of workers with local communities especially in underserved communities may expose the latter to health risks such as HIV/AIDS. Specific provisions for workers, including in the digital industry, will be included in the LMP.

6.2.2.8 Environmental Risks of Grants to digital start-ups and digital business

Subcomponent 3.1 of the EDFP will introduce two financing windows that will undertake subproject activities to nurture digital entrepreneurship and incentivize digital businesses to train, provide digital devices, and employ Ethiopians to participate in the digital economy, thereby to generate income and jobs. The grant windows of subcomponent 3.1 of the EDFP would finance a 1:1 co-investment matching grant up to a maximum of US$100,000 for each of the selected firms. As the size of the maximum matching investment finance allowed by the grant windows appears to constitute medium or larger size business enterprises (US$ 100,000) there will occur environmental risk concerns in relation to waste generation from its activities. The type of waste to be generated will mainly

constitute packaging wastes and e-wastes from the new digital entrepreneurs supported through grant window-1 and from the dissemination of digital devices by the digital businesses acting as suppliers of goods/services to be supported by grant window 2 and construction related wastes from any start up and expansion works . As the subproject activities of the grant windows financing expand and gains momentum, the packaging waste stream to be generated at the start of the new digital entrepreneur's works and the e-waste stream that will emerge during operation phases of these enterprises is likely going to incrementally increase the quantity of e-waste joining the waste stream and hence would need to be considered for proper handling and disposal to avoid/minimize potential environmental and social risks.

Recommended management strategies to address the waste management risks including the e-waste stream to be generated from the new starting up digital entrepreneurs and digital businesses include the inclusion of requirements for submission of "waste management plan" as one of the criteria for evaluation and selection of eligible digital entrepreneur start up matching fund beneficiaries and private investors. The inclusion of these criteria into the evaluation and selection process can be done by inserting the criteria in the Project Implementation Manual (PIM). To be eligible for this project grant, digital entrepreneurs and digital businesses should prepare and submit an e-waste management plan outlining how they will be managing the e-wastes.

6.3 ADVERSE SOCIAL IMPACTS

The project will be implemented in all parts of the country including in 'emerging regions' where underserved and vulnerable communities reside. The underserved communities live in low lands of Afar, Somali, Beneshangul, Gambella, Southern Nations and parts of Oromia. Vulnerable groups include women, elderly, female heads of households, unemployed youth, persons with disability. These groups in the population that are likely to be impacted adversely or benefit least from project activities. In the context of Ethiopia, certain communities from specific geographic areas and minority ethno-linguistic groups or specific livelihood are recognized as communities deserving special attention for equitable share of benefits from socio economic development of the country. These communities are constrained by limited availability of infrastructure and services and the livelihood strategy based on mobility (pastoral and agropastoral communities) often results in exclusion and inequitable benefits from socio economic improvements. The EDFP has the potential to transform the lives of communities living in these regions. There are also risks that may prevent the project from attaining this objective. The social assessment conducted by the project has identified the main risks and planning measures. The following summarizes the key findings from the Social Assessment

Lack of Infrastructure and Weak Government Capacity: Public institutions in emerging regions have poor infrastructure (such as unreliable power/electricity, poor roads). Government offices lack

decent office structures/buildings and basic ICT facilities and equipment and don't have sufficient budget to run day to day business. Local government offices suffer from poor leadership commitment, low motivation, low salary and lack of low capacity to plan and execute. It is unlikely that project benefits to underserved communities will be realized unless concrete action is taken to improve these bottlenecks. Proposed actions include:

➢ Allocate budget to improve the physical infrastructure and the digital infrastructure and ICT facilities

➢ Build digital infrastructure, i.e., broad band internet access, office machines, solar and hydropower plants, internet rooms, and WIFI access in underserved areas.

➢ Conduct capacity building program focusing on digital literacy for government offices, institutions and beneficiary communities should be provided

➢ Provide local language supporting services.

Barriers to Benefits: Underserved communities include those living in the lowlands of underserved regions (i.e. Gambella, Benishangul, Somali, Afar, parts of Oromia and Southern Region) and vulnerable groups (including women, girls, non-literate people, people with disabilities, elderly, low income youth and rural population). There are many barriers that hinder access to project benefits by underserved communities and vulnerable people such as digital illiteracy; unavailability of power; lack of ICT infrastructure; unaffordability of ICT technologies and services; unavailability of user-friendly devices for people with disability; lack of awareness of the digital businesses; lack of initial capital to start digital businesses; physical access problem for people with disabilities; and lack of awareness and readiness for the use of technology among the elderly. The following actions need to be taken:

➢ Provide the vulnerable people Free/Low priced ICT devices and services, education/training, and localizing the technologies.

➢ Subsidize digital apparatuses and internet services to the vulnerable groups, including women, elderly, persons with disabilities, low-income households, etc.

➢ Improve ICT knowledge by providing short courses/trainings on digital skills and entrepreneurship in both urban and rural areas.

➢ Improve ICT knowledge by providing short courses/trainings on digital skills and entrepreneurship in both urban and rural areas.

➢ Create economic opportunities through digital entrepreneurship

> ICT equipment and services developers should ensure that people with disabilities gain the same benefits as the wider population. Depending on the nature of their impairment, provide additional technological and application/software features.

Exclusion of Women: Women and girls can be excluded from the project benefits due to embedded gender inequality, i.e., socio-economic and cultural marginalization of women and girls. Women's time poverty means they find it difficult to balance their triple roles competing for their equal attention. Female household heads may face the risk of not benefiting from the project in equal measure with male counterparts because of not being able to balance their domestic responsibilities with their other roles. The low level of literacy and education attainment by women could exclude them from realizing project benefits.

> Enhance the status of women by increasing their access to digital technologies and information through affordable and accessible devices and services,

> Providing basic digital literacy etc, that would alleviate their burden, hence allows them to engage in a wide range of activities with reduced hardship and pressure. Beneficiary targeting might involve corruption, nepotism, and elite capture risks

> ICT and digital technology sector is dominated by men and the number of female graduates from ICT, Science and Technology fields is disproportionately low and the Science and Technology is often viewed as a 'male profession'. To meet the project target of reaching 60% female access to digital services would require to take affirmative action to recruit, train and access services especially in underserved regions.

Inequity of benefits and impact on existing power structure: It was observed the project might have potential differential impacts on beneficiaries: (i) the educated and urbanites are more likely to benefit from the project because of access and capacity to pay both for the digital technologies and the services; and (ii) the economically better-off, whether they live in rural or urban areas, might benefit more than others. The educated and urban residents are more likely to benefit from any project due to access and affordability advantage they have over others. There is a risk of creating more access to educated people, so that widening existing socio-economic gaps.

> Have a monitoring and evaluation system in place-Programs such as 'Digital Ethiopia', which are implemented not only in diverse agro-ecological settings, but also in areas where government structures are the strongest makes it very important to put in place effective and efficient M & E system.

Lack of Transparency, Corruption, Nepotism, and Elite Capture: Lack of transparency and corrupt practices are challenges for proper targeting of beneficiaries for project activities (eg. training,

start-up and incentives for ICT businesses) and take project benefits away from the intended target groups. Lack of transparency is especially problematic for vulnerable women as it exposes them to risks of GBV/SEAH.

➢ Develop and implement clear and transparent guidelines to mitigate the risk of corruption

Unintended long-term impact of access to affordable internet - young children and adolescents might fall prey to human traffickers; be addicted to unnecessary contents (gender-based violence (GBV) and sexual exploitation).

➢ Provide proper content management education and training for parents and communities to mitigate the risk of online sexual abuse and exploitation of young children and adolescents.

➢ The ECA also has to issue a regulation that helps mitigate this risk.   .

Land and other assets: Due to the nature of the sub-projects directly financed by the EDFP, most of the construction and refurbishment activities do not require permanent loss of assets or properties. All physical investments directly financed by the EDFP are expected to be carried on government owned/used land or property in existing education, health and government office facilities and sites. The EDFP is also going to provide technical assistance for ECA to adopt regulatory standards on sitting, design, construction and operation of telecommunication infrastructure which will be imposed on private sector operators. The technical assistance to ECA will   include the preparation of RFP that will be consistent with requirements of the ESS 5.

Digital Identification System: Digital identification system is an important aspect of the digital foundation project. The project will support on-going effort to develop a national identification system including the introduction of a general data protection law and establishment of independent data protection commission that could potentially mitigate these risks. The digital system could be a risk factor for privacy theft and unintended profiling for individuals who need to trust the system to collect and store personal information. Consumer data and confidentiality could be a risk if strict code of conduct and measures to protect confidentiality are not practiced by telecom operators.

6.3.1   Gender Based Violence (GBV)

Gender Based Violence (GBV), Sexual Exploitation, Abuse and Sexual Harassment (GBV/SEA/SH): The project will involve limited construction activities for infrastructure development within the premises of existing public facilities. The GBV/SEA/SH as risk within the project scope is considered moderate. The project has conducted an assessment and identified main GBV/SEAH risks and action plans (annex GBV Assessment report). Below is a summary of key findings.

SEA/SH risk training activities and workplace: There is high prevalence of SEAHs in work places of public institutions, universities and offices where services are accessed in return for sexual favors. Although there are national civil servant laws and regulations that prohibit such acts the problems remain widespread. In the project context there are a)GBV/SH between project workers; b) GBV/SEA/SH, perpetrated by project workers toward members of local communities and c) GBV/SEA/SH risks in selection process/targeting of the women and girls for d training d) SH risks in activities supporting startups and ICT businesses.

Sexual violence in higher education: There is high prevalence of sexual violence in higher education institutions in Ethiopia although reporting is very low due to cultural norms. Existing grievance mechanism (often handled by gender officers) within higher institutions are weak and insufficiently resourced to be able to provide the needed services such as counseling and referral for services. The expansion and improvement of digital services in higher institutions such as broadband and Wi-Fi services in libraries and dormitories are likely to aggravate these GBV risks.

Digital Technology Enabled GBV/SEA/SH: Digital technology facilitated GBV (including stalking, bullying, sexual harassment, defamation, hate speech and exploitation) is a global challenge that has serious psychological and social impacts for the victims. Technology-facilitated GBV/SEAH is action by one or more people that harms others based on their sexual or gender identity or by enforcing harmful gender norms. This action is carried out using the internet and/or mobile technology. The impacts of online GBV takes a monumental toll on mental health, including depression, anxiety and fear that follows women offline at home, school, work and other social spaces. Most of these crimes are not reported due to low level of awareness among the public and law enforcement agencies. The project activities to enhance the capacity of higher institutions, MDAs and regional and Woreda offices could potentially increase such digitally facilitated GBV/SEAs.

Labor related GBV/SEA/SH Risk: GBV in relation to contacts between project workers, such as the engineers working on broad band installation, ICT experts, the consultants and others, and members of the project affected local communities and members of local communities (component 2 &; 3). Although there might be a risk of discrimination, i.e., a potential inappropriate treatment or harassment of project workers (e.g., based on gender, age, disability, ethnicity, or religion); potential exclusion/preferences with respect to recruitment, training and development, termination of employment, and working conditions, discrimination is unacceptable as per the Ethiopian Labour Law and WB's ESS2. The project has developed labor management procedures to address these and other risks (Annex G)

Key Recommendations to address GBV/SEAH risks:

➢ Awareness creation on digitally enabled GBV/SEAs in all beneficiary institutions including ICT heads, library and information center managers and educate users on personal data protection, safe use of internet and reporting abuse

➢ Project should put in place open and transparent criteria and procedures for project accessing project services and communicate properly to potential participants

➢ Ensuring that service points for internet (libraries, WiFi spots, internet cafes) are safe environment for service users and can be monitored

➢ Develop codes of conduct on the use of ICT services in public spaces (libraries, information centers, etc) and display in public spaces.

➢ Advice and create awareness on content filters especially education institutions and public offices

➢ Hire part time GBV specialist for effective management GBV/SEAH risks

➢ A robust GBV Action Plan is needed for preventing and mitigating possible related risks.

➢ Develop code of conduct (CoC) to be signed by all and commits all persons engaged by the contractor, including sub-contractors and suppliers, to acceptable standards of behavior.

Other community health and safety risks. Since it appears that the project involves provision of service to communities, ESS4 states that the Borrower will establish and implement appropriate quality management systems to anticipate and minimize risks and impacts that such services may have on community health and safety. In such circumstances, the Borrower will also apply the concept of universal access, where technically and financially feasible.

6.3.2   Labor management

To deliver the '*Digital Ethiopia*' project, the use of government and private human resources (HR) is anticipated at all levels from Federal to *Woreda/Kebele*. The GoE recognizes that comprehensive management of the HRs is important in augmenting the positive outcomes of the project. As a result, the Labour Management Procedures (LMP) has been developed (See Annex G).

Different *categories of workers* are expected to be employed to work on the project and with the exception of a few technical experts; the project will only involve Ethiopian workers, the majority of which are expected to be existing government civil servants, who will remain subject to the terms and conditions of their existing sector employment. Additional staff who may be directly engaged to support the project will need to be contracted in line with the requirements of ESS2 in relation to Labour and working conditions, non-discrimination and equal opportunities and occupational health and safety.

The *potential labour risks* of the project include: occupational health and safety (*OHS*) risks, specifically to hazards from exposure to e-waste[3] (component 2), as well as workplace accidents/injuries, lack of use of personal protective equipment (PPE), and dust; community health and safety issues (e.g., exposure to e-waste & other hazardous materials); communicable disease (e.g., *COVID-19*) which may arise from the interaction of project workers with local communities, between project workers (component 2 & 3); *GBV* in relation to contacts between project workers, such as the engineers working on broad band installation, ICT experts, the consultants and others, and members of the project affected local communities and members of local communities (component 2 & 3). Although there might be a risk of discrimination, i.e., a potential inappropriate treatment or harassment of project workers (e.g., based on gender, age, disability, ethnicity, or religion); potential exclusion/preferences with respect to recruitment, training and development, termination of employment, and working conditions, *discrimination is unacceptable as per the Ethiopian Labour Law and WB's ESS2*.

Labour influx is unlikely to occur on this project since majority of workers are expected to be existing civil servants. If it occurs, it will be limited in scope, due to limited contracted services and short windows of work. Yet, the project needs specific requirements to manage risks associated with Labour influx (i.e., related to interaction between project workers and local communities) such as GBV Action Plan, code of conduct and training, which will be guided by the *ESS2 and Ethiopia Labour Law*.

The risk of child labour use is very low because, as mentioned above, majority of the workers will be existing government civil servants. Moreover, in accordance with ESS2 and the provisions of the Ethiopian Labour Proclamation 1156/2019 (Art.89(3)), young workers should not be involved in any work that endangers their lives or health. Art.89(4) outlines the barred areas for young workers and Art. 90 further states that, young workers should not be assigned to night and overtime work.

Moreover, contractors will maintain labour relations with local communities through a code of conduct (CoC), which commits all persons engaged by the contractor, including sub-contractors and suppliers, to acceptable standards of behaviour. The CoC shall include sanctions (e.g., termination) for noncompliance, including non-compliance with specific policies related to *GBV*, SE and SH. The CoC shall be written in a language a worker better understands (for the expatriate worker, it will be usually in English) in a reader-friendly style and signed by each worker.

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[3] "Electronic wastes (e.g., nickel cadmium batteries and printed circuit boards from computer and other electronic equipment as well as backup power batteries)" (PAD, parag.75).

The project will take necessary measures to address issues related with *COVID-19* by using a systematic approach that emphasizes on the joint collaboration of labourers and the management through active engagement. The World Bank's interim note on "*COVID-19 Considerations in Construction/Civil Works Projects*" will have to be followed to ensure occupational health and safety of the workers.

In short, the '*Digital Ethiopia*' project will be governed by the national labour requirements and the WB's safeguards standards and the ***PIU*** has the overall responsibility to oversee all aspects of the implementation of the LMP, *in particular to ensure contractors' compliance*.

7. GRIEVANCE REDRESS MECHANISM

7.1 WORLD BANK GRIEVANCE REDRESS SERVICES

Communities and individuals who believe that they are adversely affected by the World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non - compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to World Bank's corporate Grievance Redress Service (GRS), please visit http://www.worldbank.org/GRS. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

7.2 PROJECT GRIEVANCE REDRESS MECHANISM

The Ethiopian Digital Foundations project is primarily a technical assistance project focusing on creating enabling environment for market competition, improved policy and regulatory environment for digital economy, capacity building of institutions and the development of infrastructure to expand the geographic coverage and affordability of improved telecom and broad band services.

While considerable efforts have been made to include the Environmental and Social Standards in the design and implementation of the project in order to minimize and prevent potential impacts, there is always a possibility that interests of some individuals, groups and institutions may still be negatively affected by the activities of the project.

Typical grievances that are anticipated from the implementation of EDFP activities may relate to the following:

- Discriminatory practices including gender and disability in selection of beneficiaries (government officials, civil servants, grantees, etc).

- Complaints on targeting, selection criteria

- Poor quality of services, delays or inadequate support compared to needs or promises

- Poor accessibility of services for persons with disability

- Poor relations with contractor workers during implementation

- Corrupt practices and lack of transparency in selection of beneficiaries -trainees, grantees, etc

- Sexual exploitation, abuse gender-based violence

- Poor consultation and lack of information

7.3 INSTITUTIONAL SETUP OF THE GRM

Grievance Redress Mechanisms (GRMs) can be an effective tool for early identification, assessment, and resolution of complaints on projects. Grievance Redress Mechanisms (GRMs) are institutions, instruments, methods, and processes by which a resolution to a grievance is sought and provided. It is a way to receive, assess or review and resolve complaints that may arise from the EDFP supported activities. Understanding when and how a GRM may improve project outcomes can help both project teams and beneficiary institutions improve results. The goals of GRM are (i) open channels for effective communication (ii) mitigate or prevent adverse impacts on individuals and communities caused by caused by projects activities, (iv) improve trust and respect, and promote productive relationships.

The main objective of a Grievance Redress Mechanism (GRM) is to assist to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GRM:

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the implementation of projects;

- Allow anonymous grievances to be raised and addressed; compliant boxes and others that allows anonymity of the complainant will be available

- Ensures that culturally appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and

- Avoids the need to resort to judicial proceedings.

Grievance mechanism for the project should be adapted to the specific contexts of project implementation. The grievance mechanism should be accessible and needs to be integrated with the

existing grievance mechanisms in Woreda, MDAs, universities, TVETs focal regional bureaus and implementing agency and partner ministries. Similarly, grievance mechanism in the context of underserved communities requires an approach that considers the existing community institutions and local mechanisms. The GRM should be close to the potentially affected communities.

Project Grievance Committee: The project will set up a project level grievance mechanism consisting of representatives from the members of the PSCs. It will the final level of the GRM within the project.

Implementing Agency/Partner GRC- Each federal level implementing agency and partners (MiNT, ECA, MoSHE/Ethernet) will within the existing grievance mechanism assign a focal person for handling of project related grievances. The GRCs will address project related grievances submitted directly or through the regional bureaus of health, education.

Beneficiary institution GRC: Beneficiary institutions and offices such as universities and TVETs will use existing GRCs to receive and address grievances where feasible and forward to the respective federal level implementing agency.

Woreda GRC- The woreda level GRCs will also assign a focal person for project related grievances, address grievances and report to the respective regional bureaus.

The grievance handling arrangements do not replace the formal system of justice however; complainants who feel their grievance has not been fairly handled may seek justice in the court of law. The PIU is the responsible body for ensuring that all beneficiary institutions have functioning GRCs in place and GRM procedures are followed, documentation and reporting of grievances. The PIU should provide regular training to improve the capacity of GRMS at various levels. handling of GRMs

7.4 GRIEVANCE PROCEDURES

The GRM process for EDFP will consist of the following steps:

1) Complaint uptake

2) Complaint assessment and analysis

3) Resolution and closure

4) Grievance Registry

5) GRM Monitoring and Evaluation.

1) Complaints Uptake: The project will have three different pathways for submission of grievances

Pathways:

- Pathway 1- is for grievances related to expansion of services to underserved communities and rural areas. The first point of complaint under pathway 1 will be existing GRMs in the kebeles/Woredas where the complainant resides.

- Pathway 2- is for grievances related to beneficiary government offices and institutions targeted by the project. The first point of grievance under pathway 2 is the GRM of the targeted beneficiary institution (public institution, city administration or Woreda office, university, TVET, etc).

- Pathway 3: is for grievances related to component 3.1 by aggrieved persons, farmers or MSMEs that could be submitted directly to the project level GRM.

Submission:

Face to face: This may be verbal or written submissions done at any time through face to face interactions with members of committees, program officials, local administration structures. The name and contact details of the focal person for the GRC at project site shall be disclosed in a clear and observable location such as notice board located at project activity sites or service points.

Complaint Box: Grievance boxes placed in strategic places of project implementation sites or communities where project affected parties would drop in their grievances at any time. These will located at visible sites where project activities take place and at service points (eg. libraries, internet cafes or offices). The boxes will be marked and secured.

Phone Call or SMS: This will be at project affected party's own discretion and capability. Where possible, details of relevant immediate contact persons in the project area shall be made available.

2) Case Assessment and Analysis

When a complaint is received, a maximum of Ten Days (10) 0days will be provided for the GRC to access, analyze and respond to the affected person. This is so to make sure that grievances/complaints are resolved as early as possible.

Once complaints received, the GRM committees shall assesses:

- weather the complaint is related to the project or not, whether the case can be ably handled at their level or another,

- whether the case can effectively be handled through the project GRM or alternative mechanisms (formal court), Where possible, provision of instant feedback will be made depending on the nature of the cases.

3)Handling of complaints- this includes hearing and investigation

4) Case Resolution and Closure

➢ Where a resolution has been arrived at and the affected party accepts the resolution, this will be recorded and case will be closed.

5) GRM Registry and Reporting

➢ All grievances received will recorded on a GRM registry that shall be maintained at all the GRM committee levels following the guidelines to be provided by PIU.

7.5 GBV RELATED GRIEVANCE REDRESS MECHANISM

The project has conducted GBV risk assessment which identified GBV related risks and , mitigation measures. The project should as part of the Environmental and Social screening process assess the GBV risks within the project sites and map existing prevention and handling mechanisms as well as the service providers in specific the project sites. This will be conducted by a GBV specialist.

Once the GBV assessment are finalized, procedure for management of GBV related complaints will be developed. The specific procedures for GBV will ensure confidential reporting with safe and ethical documenting of GBV cases.

The Gender Action Plan recommends that the project engage a GBV specialist on a part time basis to support the screening, mapping of institutions, develop GBV pathways, conduct awareness raising and training on GBV complaints handling mechanism. Project workers, project provided service point supervisors (eg. library supervisors, internet service supervisors), gender officers, local community members and other relevant bodies such as local GBV service providers will undergo training on GBV/SEA and SH. Well-functioning GRMs include multiple channels for voicing feedback or grievances, are widely accessible for different stakeholders, culturally appropriate, and entail strong complaint resolution and feedback functions. When GBV related complaint is received at any point of complaint pathway should observe confidentiality. The GRC will designate a member for GBV complaints handling. Once complaint is reported to the relevant committee, and immediate actions should be taken that is consistent with the wishes and choices, rights and dignity of the complainant. The complainant should be given information in simple and clear terms on the steps for filing complaints and the possible outcomes, the timelines and the types of supports available to be able to make informed decision.

For GBV cases, it is important to ensure that access to the complaints processes is as easy and as safe as possible for the complainant survivor. The recording of incidence should be limited to the nature of complaint put exactly in the words of the complainant, the age of the survivor and if to the best of their knowledge, the perpetrator was associated with the project. The complainant should decide on whether they would like to be referred to the grievance committee and the complainant should give consent to share basic monitoring data.

Safety & Well-Being: The safety of the survivor shall be ensured at all times including during reporting, investigation, and the provision of victim assistance. Those involved in the management of complaints will need to consider potential dangers and risks to all parties (including the survivor, the complainant if different, the subject of the complaint, and the organizations involved), and streamline ways to prevent additional harm in all the complaint handling process.

The survivor is never to blame for reporting an act of GBV and should never be made feel investigated. On the contrary, it is important that she/he feels that her story is heard, believed and valued. The actions and responses of the complaint mechanism will be guided by respect for the choices, needs, rights, and the dignity of the survivor.

Confidentiality: The confidentiality of complainants, survivors, and other relevant parties must be respected at all times. All GBV-related information must be kept confidential, identities must be protected, and the personal information on survivors should be collected and shared only with the informed consent of the person concerned and on a strict need-to-know basis.

Survivor-Centered Approach: All prevention and responses action will need to balance the respect for due process with the requirements of a survivor-centered approach in which the survivor's choices, needs, safety, and wellbeing remain at the centre in all matters and procedures. As such, all actions taken should be guided by respect for choices, needs, rights and dignity of the survivor, whose agency and resilience must be fostered through the complaint process.

Accessibility and non-discrimination: The mechanism must be accessible to all potential complainants and sufficient information must be given on how to access it, making the complaints process accessible to the largest possible number of people. This includes identifying and instituting various entry points that are both gender and context sensitive. To facilitate incidents reporting and avoid stigmatization, reports from third parties (witnesses, people suspicious or aware of an incident, etc.) must also follow accountability protocols.

Labor Related Grievances:

The grievance redress mechanism (GRM) for addressing and managing workplace and employment related conflicts or complaints as well as GBV is crucial for the project. A project worker who has a complaint or grievance has the right to present it and obtain proper redress through the Worker Grievance Mechanism (WGM) established by the project for this purpose. In this project, a grievance mechanism will be provided for all workers (direct and contracted), who will be informed of the GRM at the time of recruitment and the measures put in place to protect them against reprisal for its use. Measures will be put in place to make the GRM is easily accessible to all project workers. A worker's

grievance mechanism will be set up for workers on site such as daily laborers hired from local community in project sites.

7.6 CAPACITY BUILDING OF GRIEVANCE REDRESS MECHANISM

The PIU ESS will initially brief all staff of the project office, the Project Steering Committee (PSC), consultants and contractors on the Grievance Redress Mechanism and GBV complaints mechanism of the Project and explain to them the procedures and formats to be used including the reporting procedures.

The project Social Specialist will brief all project stakeholders on the Grievance Redress Mechanism of the Project and explain the procedures and formats to be used including the reporting procedures. Awareness campaigns would be conducted targeting project stakeholders to inform them of the availability of the mechanism; various mediums will be used- as detailed in previous sections of the SEP. The GRM will also be published on the MInT website and those of the implementing partners and the project website or Facebook page if there is one. A project site board will be erected on the sites of sub-projects indicating the existence of the mechanism and a phone number, email and address for further information. The GRM will be translated into local languages if needed. Workers in project sites will be informed of the Workers Grievance Mechanism that will be established by the project. Training and capacity building activities should be conducted regularly as well as monitoring the effectiveness of the grievance.

8. ENVIRONMENTAL AND SOCIAL MANAGEMENT PLANS

Table 8: Environment and Social Management Plan

No.	Potential Environmental & Social Impacts	Recommended Enhancement /Mitigation Measures	Responsible Institution for implementing the measures	Responsible for monitoring the implementation of mitigation measures	Implementation Period	Budget Estimate
Positive Social and Environmental Impacts						
1	Employment through construction jobs during installation of ICT facilities such as installation of audiovisuals, laying of cables, planting of towers and masts.	Prioritize and promote recruitment of local labor where technically and commercially feasible	Contractors/ private sector operators	PIU E&S staff, Beneficiary Institution E&S focal persons, Construction Supervisor	During Construction phase	Part of construction budget
2	Increased business opportunities for construction materials. Local material suppliers and traders within the project areas will benefit from construction works.	The contractors should purchase as many local materials as possible from local markets	Contractors/ private sector operators	Construction Supervisor	During Construction phase	Part of construction budget
3	Improved connectivity and reliability of internet services as the geographical coverage of high speed internet will be expanded	Connect as many institutions as possible to increase uptake of the internet services.	MInT and EDFP Partner Institutions	Project Steering Committee and PIU	During Construction phase	Part of construction budget
4	Booming of small and medium digital start-up entrepreneurs.	-Ensure the connectivity is reliable to minimize connectivity disruptions -Provide as much support as possible to digital start-up entrepreneurs	Digital start-up and business grant fund administration body, and selected digital businesses	PSC and PIU	During project Operation	Pert of EDFP grant window budget

No.	Potential Environmental & Social Impacts	Recommended Enhancement /Mitigation Measures	Responsible Institution for implementing the measures	Responsible for monitoring the implementation of mitigation measures	Implementation Period	Budget Estimate
Positive Social and Environmental Impacts						
5	Increased agricultural markets as use of ICT in rural areas will connect agricultural producers to markets and sell the produce prevailing prices.	Provide connectivity to farmers associations, agricultural development Companies, agriculture product consumer associations	MInT and Partner Institutions, selected digital businesses	Project Steering Committee, PIU	During EDFP implementation period	Part of EDFP grant windows budget
6	Improved education system and learning process where students can access teaching and learning materials worldwide through improved high speed connectivity.	-Connect as many educational institutions as possible to increase uptake of the internet services - Provide ICT equipment to the education institutions	MInT and Partner Institutions (MoSHE),	Project Steering Committee, PIU	During EDFP implementation period	Part of EDFP budget
7	Improved delivery of public services through development of eportals digitization of selected public services in MDAs.	Maintain and upgrade installed eportal systems and digitized services in good operating order	MInT and Beneficiary Institutions,	Project Steering Committee, PIU	During operation phase	Part of beneficiary institution recurrent operational budget
8	Improved Information management such as dissemination and storage. ICT services will improve information sharing, flow and faster delivery of Services.	Connect as many educational, Health and MDA institutions as possible to increase uptake of the internet services.	MInT and Partner Institutions	Project Steering Committee, PIU	During EDFP implementation period	Part of EDFP budget

No.	Potential Environmental & Social Impacts	Recommended Enhancement /Mitigation Measures	Responsible Institution for implementing the measures	Responsible for monitoring the implementation of mitigation measures	Implementation Period	Budget Estimate
Positive Social and Environmental Impacts						
9	Increased in ICT innovation as affordable and fast internet would allow higher education institutions to develop, test and launch applications at a low cost.	-Connect as many educational institutions as possible to increase uptake of the internet services - Provide ICT equipment to educational institutions	MInT and Partner Institutions (MoSHE),	Project Steering Committee, PIU	During EDFP implementation period	Part of EDFP budget
10	Improved inter/intra-government electronic transactions through establishment of shared platform that could connect various government systems.	Provide ICT training to public institutions to ensure workforce appreciates efficiency brought by ICT services.	MInT and Partner/Beneficiary Institutions	Project Steering Committee, PIU	During EDFP implementation period	Part of EDFP budget
11	Creation of jobs as proposed project will spur booming of Internet Service Providers. Reduced connectivity costs will attract more ISPs to enter into internet business	Maintain connectivity to minimize connectivity disruptions.	MInT and Partner Institutions, selected digital businesses, and digital start ups.	Project Steering Committee, PIU	During EDFP implementation period	Part of EDFP grant windows budget

No.	Potential Environmental & Social Impacts	Recommended Enhancement /Mitigation Measures	Responsible Institution for implementing the measures	Responsible for monitoring the implementation of mitigation measures	Implementation Period	Budget Estimate
Negative Environmental and Social Impacts						
1	Loss of vegetation such as exotic, indigenous and fruit trees due to land clearing to install ICT infrastructure under the project.	-Restrict construction activities to areas earmarked for construction activities -Re-vegetate disturbed areas with native plant species;	Construction contractors/Private sector operators	-Construction supervisor -Private sector operators E&S Focal Persons, -PIU E&S staff,	During Construction phase	-to be determined at specific subproject level.
2	Disturbance and loss of habitat from construction of ICT infrastructure depending on the type of infrastructure component and proposed location	- avoid critical habitat through use of existing utility and transport corridors whenever possible; -Avoid construction activities during the breeding season; -Prohibit illegal harvesting of forest products by construction workers	Construction contractors/Private sector operators	-Construction supervisor - Private sector operators E&S Focal Persons, -PIU E&S staff,	During Construction phase	-to be determined at specific subproject level.
3	Soil disturbance in areas earmarked for construction works. Excavation and soil stripping could lead to soil disturbance sources in the area.	-Avoid installing infrastructure in areas such as hilltops, steep slopes where soils could easily be disturbed; -If siting within the hilltops, steep slopes area is required, comply with the design and construction requirements	Construction contractors/Private sector operators	-Construction supervisor - Private sector operators E&S Focal Persons, -PIU E&S staff,	During Construction phase	-to be determined at specific subproject level
4	Increase in surface runoff and soil erosion from clearance of vegetation which could expose soils to erosion	-Restrict vegetation clearing and stripping to subproject areas to minimize project footprint and soil erosion -Avoid stripping in steep slopes and to minimize soil erosion and landslides	Construction contractors/Private sector operators	-Construction supervisor - Private sector operators E&S Focal Persons, -PIU E&S staff,	During Construction phase	-to be determined at specific subproject level

No.	Potential Environmental & Social Impacts	Recommended Enhancement /Mitigation Measures	Responsible Institution for implementing the measures	Responsible for monitoring the implementation of mitigation measures	Implementation Period	Budget Estimate
Negative Environmental and Social Impacts						
5	Pollution of land by solid wastes from domestic and construction wastes	-Restrict discharge of wastes into drains or onto ground sites -Properly segregate and dispose wastes to encourage reuse and recycling of some useful demolition waste materials. - Construction and demolition wastes should be recycled or reused as much as possible to ensure that materials that would otherwise be disposed of as waste are diverted for productive uses. - All construction wastes must be taken to approved disposal site. -Provide mobile sanitary facilities to construction workers avoid open defecation in nearby bushes.	Construction contractors/Private sector operators	-Construction supervisor - Private sector operators E&S Focal Persons, -PIU E&S staff,	During Construction phase	-to be determined at specific subproject level
6	Pollution from spillage of oils and fuel products construction machinery and operation of generators powering towers	-Secure properly fuel storage facilities to contain any spillage onto soils and water resources. -Provide containment dip trays to contain any leakage from machinery	Construction contractors/Private sector operators	-Construction supervisor - Private sector operators E&S Focal Persons, -PIU E&S staff,	During Construction and operation phases	-to be determined at specific subproject level
7	Noise and vibrations from construction machinery and operation of generators in areas close to communities could be nuisance.	-Use vehicles and machineries that are in good use and are well maintained -Switch off engines of trucks and machines when not in use from injuries.	Construction contractors/Private sector operators	-Construction supervisor - Private sector operators E&S Focal Persons, -PIU E&S staff,	During Construction and operation phases	-to be determined at specific subproject level
8	Air emissions from vehicular traffic will result in discharge of greenhouse gases such as sulphur, nitrogen, carbon dioxide	-Use vehicles and machineries that are in good use and are well maintained -Switch off engines of trucks and machines when not in use	Construction contractors/Private sector operators	-Construction supervisor - Private sector operators E&S Focal	During Construction and operation phases	-to be determined at specific subproject level

No.	Potential Environmental & Social Impacts	Recommended Enhancement /Mitigation Measures	Responsible Institution for implementing the measures	Responsible for monitoring the implementation of mitigation measures	Implementation Period	Budget Estimate
	and monoxide			Persons, -PIU E&S staff,		
9	Generation of e-wastes such as used gadgets which require proper disposal	- Develop guideline and standard for e-waste management consisting of recovery, re-use, recycling as well as its collection and disposal mechanisms to be used by all project beneficiaries. - Publish the e-waste management guideline and disseminate to project beneficiaries - Provide training and awareness on use of the e-waste management guideline to project beneficiaries - encourage development of adequate e-waste service providers	MInT, PSC, and PIU	-Federal and Regional EPFCCCs	During early stages of EDFP implementation period.	60,000 USD
10	Visual impacts	-Minimizing construction of additional towers through collocation of proposed antennae in existing towers or existing structures such as buildings or power transmission towers; -Use of tower and antennae camouflaging or disguising alternatives -Taking into account public perception about aesthetic issues by consulting with the local community during the siting process of antenna towers	Construction contractors/Private sector operators	-Construction supervisor - Private sector operators E&S Focal Persons, -PIU E&S staff,	During Construction phase	-to be determined at specific subproject level
No.	Potential Environmental & Social Impacts	Recommended Enhancement /Mitigation Measures	Responsible Institution for implementing the measures	Responsible for monitoring the implementation of mitigation measures	Implementation Period	Budget Estimate
Negative Environmental and Social Impacts						
11	Disruption of traffic flow during construction works as most of the works could be implemented along road reserves	-Provide temporary road signs and employ flag persons to warn road users on dangerous conditions and works ahead	Construction contractors/Private sector operators	-Construction supervisor - Private sector operators E&S Focal	During Construction	-to be determined at specific subproject level

No.	Potential Environmental & Social Impacts	Recommended Enhancement /Mitigation Measures	Responsible Institution for implementing the measures	Responsible for monitoring the implementation of mitigation measures	Implementation Period	Budget Estimate
		-Provide diversions and alternatives where road use is disrupted by civil works -Restrict trucks and project vehicle movement to off peak hours especially in urban areas to avoid traffic jams		Persons, -PIU E&S staff,		
12	Loss or damage of physical cultural resources from trenching activities	-Avoid implementing civil works in areas known cultural and archaeological sites -Follow and adhere to chance find procedures to rescue any relics	Construction contractors/Private sector operators	-Construction supervisor - Private sector operators E&S Focal Persons, -PIU E&S staff,	During Construction phase	-to be determined at specific subproject level
13	Risks of introduction and spread of communicable diseases and sexually transmitted diseases including HIV/AIDs, and COVID 19.	- Conduct awareness raising and sensitization activities among workers, on transmission prevention of HIV/AIDS and COVID-19. -Distribution of face masks, sanitizers, condoms and IEC materials and hand washes, for free of workers and local people around.	Construction contractors/Private sector operators	-Construction supervisor - Private sector operators E&S Focal Persons, -PIU E&S staff,	During Construction phase	-to be determined at specific subproject level
14	Influx of migrant workers leading to competition of job opportunities for installation of ICT infrastructure.	- Prioritize sourcing of unskilled and skilled labour from local areas.	Construction contractors/Private sector operators	-Construction supervisor - Private sector operators E&S Focal Persons, -PIU E&S staff,	During Construction phase	N/A
No.	Potential Environmental & Social Impacts	Recommended Enhancement /Mitigation Measures	Responsible Institution for implementing the measures	Responsible for monitoring the implementation of mitigation measures	Implementation Period	Budget Estimate
Negative Environmental and Social Impacts						
15	Conflicts between migrant workers and local people due to competition of jobs requiring unskilled labour such as bush clearing, trenching and	- Prioritize recruitment of local people where commercially and technically feasible -Sensitization of migrant workers to respect local cultures and live with	Construction contractors/Private sector operators	-Construction supervisor - Private sector operators E&S Focal Persons.	During Construction phase	N/A

No.	Potential Environmental & Social Impacts	Recommended Enhancement /Mitigation Measures	Responsible Institution for implementing the measures	Responsible for monitoring the implementation of mitigation measures	Implementation Period	Budget Estimate
	excavations	local people in harmony				
16	Risks of child labour to undertake some project activities	-The contract agreement to be signed with contractors must clearly stipulate that it is against the law to employ under age children. -Ensure that no children are employed on site in accordance with national labour laws; and -If the contractor is found employing children below the legally required age, he/she should be penalized and compensate the child.	MInT, Construction contractors/Private sector operators	-Construction supervisor - Private sector operators E&S Focal Persons.	During Construction phase	- Part of main contract budget
17	Loss of temporary and/or permanent access to property, physical or economic displacement as parcels of land could be used and/or acquired for project activities or assets damaged to create route for the cabling.	-Provide fair compensation to affected project persons in line with Resettlement Policy Framework prepared for this project. -Women, youth, people with disabilities and other vulnerable groups affected by project persons should be provided with additional assistance	MInT and Partner/Beneficiary Institutions	- Private sector operators E&S Focal Persons, -Construction supervisor -PIU E&S staff	During Construction phase	-to be determined at specific subproject level
Occupational Health and Safety Impacts						
18	Physical injuries from accidents– fall during construction of towers, optical fiber cable installation and servicing of ICT infrastructure	-Provide training to workers in respect to working at heights. -Provide protective equipment to workers and enforce wearing of PPEs -Backfill all open trenches excavated soon after completing construction works. -Fit firmly all network cables -Restrict access to open trenches and excavated areas to children	Construction contractors/Private sector operators	Construction supervisor - Private sector operators E&S Focal Persons, -PIU E&S staff	During Construction phase	-to be determined at specific subproject level
No.	**Potential Environmental & Social Impacts**	**Recommended Enhancement /Mitigation Measures**	**Responsible Institution for implementing the measures**	**Responsible for monitoring the implementation of mitigation measures**	**Implementation Period**	**Budget Estimate**
Negative Environmental and Social Impacts						

19	Occupation health and safety risks for workers maintaining the equipment.	-Provide appropriate training on occupational health and safety -Enforce use of personal protective wear	Construction contractors/Private sector operators	Construction supervisor - Private sector operators E&S Focal Persons, -PIU E&S staff	During Construction phase	-to be determined at specific subproject level
20	Minute or microscopic glass fiber shards can penetrate human tissue through skin or eyes, or by ingestion or inhalation and affect can workers	- train workers on specific hazards associated with laser lights and fiber management; -restrict access to the work area, placing warning signs and labeling of areas with potential for exposure to laser radiation, and provide protective eyewear -avoid exposure to fibers through use of protective clothing and separation of work and eating areas.	Construction contractors/Private sector operators	Construction supervisor - Private sector operators E&S Focal Persons, -PIU E&S staff	During Construction phase	-to be determined at specific subproject level
21	OHS Impacts from electric and magnetic fields	- Identification of potential exposure levels in the workplace and the use of personal monitors during working activities; - Training of workers in the identification of occupational EMF levels and hazards; - Establishment and identification of safety zones to differentiate between work areas with expected elevated EMF levels compared to those acceptable for public exposure, limiting access to properly trained workers; - Implementation of action plans to address potential or confirmed exposure levels that exceed reference occupational exposure levels	Construction contractors/Private sector operators	Construction supervisor - Private sector operators E&S Focal Persons, -PIU E&S staff	During Construction & operation phase	-to be determined at specific subproject level
22	OHS impacts from elevated and overhead work	- Ladders should be used according to pre-established safety procedures including proper placement, climbing, standing, and the use of extensions. - The area around which elevated work is taking place should be barricaded to prevent unauthorized access. Working under other personnel should be avoided; - Hoisting and lifting equipment should be rated and maintained and operators trained in	Construction contractors/Private sector operators	Construction supervisor - Private sector operators E&S Focal Persons, -PIU E&S staff	During Construction & operation phase	-to be determined at specific subproject level

		their use.				
23	OHS impacts from fall	- Implementation of a fall protection program that includes training in climbing techniques and use of fall protection measures; inspection, maintenance, and replacement of fall protection equipment; and rescue of fall-arrested workers. -Installation of fixtures on tower components to facilitate the use of fall protection systems	Construction contractors/Private sector operators	Construction supervisor - Private sector operators E&S Focal Persons, -PIU E&S staff	During Construction & operation phase	-to be determined at specific subproject level
24	OHS impacts from confined space entry	- Providing safe means of access and egress from excavations, such as graded slopes, graded access route, or stairs and ladders - Avoiding the operation of combustion equipment for prolonged periods inside excavations areas where other workers are required to enter unless the area is actively ventilated - Controlling site-specific factors which may contribute to excavation slope instability including, for example, the use of excavation dewatering, side-walls support, and slope gradient adjustments that eliminate or minimize the risk of collapse, entrapment, or drowning	Construction contractors/Private sector operators	Construction supervisor - Private sector operators E&S Focal Persons, -PIU E&S staff	During Construction & operation phase	-to be determined at specific subproject level
25	OHS impacts from motor vehicle risks	- Adoption of best transport safety practices across all aspects of project operations with the goal of preventing traffic accidents and minimizing injuries suffered by project personnel and the public. Measures should include: ✓ Emphasizing safety aspects among drivers ✓ Improving driving skills and requiring	Construction contractors/Private sector operators	Construction supervisor - Private sector operators E&S Focal Persons, -PIU E&S staff	During Construction & operation phase	-to be determined at specific subproject level

		licensing of drivers ✓ Adopting limits for trip duration and arranging driver rosters to avoid overtiredness ✓ Avoiding dangerous routes and times of day to reduce the risk of accidents ✓ Use of speed control devices (governors) on trucks, and remote monitoring of driver actions - Regular maintenance of vehicles and use of manufacturer approved parts to minimize potentially serious accidents caused by equipment malfunction or premature failure.				
26	Exposure to construction vehicles and transports, structural safety issues in the event of structural failure of masts or towers during operation phase will affect community health and safety.	-Design and installation of tower structures taking into account the frequency and magnitude of natural hazards; -Erection of fences in combination with management approaches, such as the posting of signs forbidding entry and placement of guards; -Adopt best transport safety practices with the goal of preventing traffic accidents and minimizing injuries suffered by project personnel and the public.	Construction contractors/Private sector operators	Construction supervisor - Private sector operators E&S Focal Persons, -PIU E&S staff	During Construction & operation phase	-to be determined at specific subproject level

9. TRAINING AND CAPACITY BUILDING

9.1 INSTITUTIONAL CAPACITY ASSESSMENT

Effective implementation of ESMF and RPF will require technical capacity within the PIU, partner and beneficiary institutions as well as other institutions responsible for monitoring EDFP activities including line ministries and departments (MDAs). There will be need for in depth understanding of the operationalization mechanism for ESMF to be provided to various the lead, partner and beneficiary institutions and key stakeholders involved in the implementation of EDFP activities. Capacity building will be integral to support the teams in appreciating their roles in providing supervision, monitoring, evaluation and environmental reporting on the project activities. Therefore, a special initiative is needed to develop the capacity of the project implementing unit, staff from partner and beneficiary institutions to support implementation of the EDFP with regard to social and environmental aspects. The following sections outline the capacity building needs of the implementing agencies, partner and beneficiary institutions.

9.1.1 Assessment of capacities and practical experiences of implementing Agencies on Environmental and social management.

The main implementing agency of the EDFP is the Ministry of Innovation and Technology (MInT). Partner Institutions involved in spearheading the implementation of various sub-components of the EDFP includes Ministry of Science and Higher Education (MoSHE) and the recently established Ethiopian Communications Authority (ECA). Beneficiary institutions of the EDFP consists of a broad array of Government institutions in the health and education sectors found both at Federal and regional states, various line ministries; departments and agencies (MDAs) as well as youth centers. The EDFP will also invite the participation of private sector operators (i.e. telecom operators) and private digital businesses in the course of implementation of its sub-components.

The existing capacities and practical experiences of the main EDFP implementing and partner institutions in the area of environmental management is found to be generally weak. During the consultations carried with the main implementing agency (MInT), it was learned that its existing organizational structure does not constitute an environmental unit and have no environment and social staff deployed. The ICT Director General of MInT to which the EDFP will be mainly anchored to also has no previous experiences in the areas of environmental and social management from other projects supported by International financers such as the World Bank and African Development Bank. The consultation discussion held with the main partner institutions also revealed that, ECA which is a new institution established recently, also have neither environmental unit nor previous experience on environmental management from other projects. MoSHE, on the other hand, have indicated that it has been practicing environmental management procedures in

relation to its other similar projects financed by International financers such as the African Development Bank and the European Union. As a result, it expressed that it has developed some experience in environmental management which need to be further strengthened. The state of environmental management capacities in the other beneficiary institutions mainly those in the health and education sector as well as MDAs remains unclear as most of the beneficiaries are only to be identified later in the course of project implementation, though there is a general expectation that most of them will be unfamiliar to ESMF and RPF procedures. Similarly, the environmental management capacities of the private sector operators (i.e. telecom operators) that will participate as potential contractors during EDFP implementation are generally expected to have certain form of capacity due to their International operational experience, though this might not be the case with the National Ethiotelecom.

In summary, the consultation discussions and assessments held with the various institutions have shown that there are huge capacity gaps in environmental and social management which needs to be filled through deploying adequate human resource and training. As a result, it is recommended that the capacity gap in risk management manpower should be filled in as follows.

- Deploy two full time professional Environment and Social risk management specialists in the PIU at the earliest possible. These specialists should be trained prior to the start of project implementation.
- Assign qualified Environment and Social Focal Persons at the main Partner Institutions; MoSHE and ECA

- Assign qualified Environment and Social Focal Persons at the main beneficiary sector institutions at regional level expected to implement multiple subprojects (e.g.: Health and Education).

The E&S risk management specialists at the PIU will contribute to the objectives of the EDFP which include:

- The preparation, together with the partner and beneficiary entities, of annual work programs and budgets to fulfill ESMF requirements of subprojects;
- Monitoring project progress as it relates to compliance with the ESMF guidelines, resolving implementation bottlenecks, and ensuring overall that project implementation proceeds smoothly;
- Collecting and managing information relevant to the subproject environmental management works (i.e. environmental monitoring and audit reports of ESMPs, and CHMPs,

- Ensuring that the implementing partner and beneficiary bodies are supported adequately and that they adhere to the principles of the project, specific to compliance with ESMF guidelines.

The environment and social focal persons to be deployed by each partner and beneficiary institutions will be responsible for the implementation of their respective subprojects in compliance with the requirements of the ESMF. The environment and social focal person will be supported by other members of the PIU, members of the technical committees, as necessary in conducting the screening.

9.1.2 Assessment of capacities and practical experiences of Regional, Zonal and City level EPAs

The role of the environmental regulatory agencies in implementing the EDFP ESMF is unavoidably important. As shown in table 4 there are environment regulatory institutions at Federal and Regional levels in all the ten regions and two city administrations of the Country. Many of the regional states also have operating environment protection office branches at zonal, woreda and city levels. Some large cities in Amhara and Oromia regions such as Dessie, Gondar, Jimma, Adama e.t.c have city EPA offices with a status of Zone level authority. Such City EPA offices are reported to be vertically accountable to their regional EPA offices and horizontally to the City Administrations. Whereas most of the city level environment protection offices are observed to be directly accountable to the Mayor of the city, the Zone level EPAs are vertically accountable to the regional EPAs. The woreda EPA offices are usually accountable to the Zone EPA offices. On the other hand, apart from the major city environment offices having a zone authority status, the responsibility of the remaining city level offices found in the regional states mainly focus on carrying environmental monitoring and inspections of development projects implemented in their jurisdiction. Similarly the responsibility of the Woreda level environment protection offices are mainly focused towards providing services to the rural parts of the Woreda found outside urban City administrations. As a result it will be important for EDFP subproject E&S screening reports to be submitted to environment protection offices at federal, regional or zonal level for review and approval procedures. For subprojects implemented in Addis Ababa and Diredawa City Administrations, the E&S screening reports will be submitted to the respective City level environment protection offices.

Most regional and zonal level environmental protection offices where World Bank funded projects has been implemented have acquired a certain level of experiences in reviewing the required environmental and social management reports such as E&S screening, partial/full ESIA, e.t.c. However, these capacities need to be further strengthened in order to fill the gaps in the area of

conducting rigorous reviews of the E&S screening and ESMP reports, gaps in conducting environmental monitoring and inspection on subproject ESMP implementations. Therefore, it is necessary that a sound understanding, and dependable level of capacity exists in these institutions that would enable the implementation of the present ESMF, RPF and the new World Bank ESSs in general.

9.1.3   Training requirements

One of the capacity building areas sought for by the Lead implementing institution (MInT) and the Partner Institutions (ECA, MoSHE) involved in the implementation of the EDFP subprojects is the provision of training. The training to be offered will also need to address target groups from different beneficiary (e.g: focal persons from regional education and health sectors & MDAs,) and stakeholder institutions (e.g: private sector operators/contractors) which will have a role in implementing the ESMF and RPF at various levels. The training is also necessary for high level project coordination and management groups, (such as members of project steering committee and technical committee) as well as to relevant members of the broader beneficiary community to create awareness on environment management aspects of the EDFP. As a result, the type of trainings necessary to these various target groups will vary and is briefly outlined as the followings:

a.   Technical training on ESMF

This detailed training will mainly focus on the technical staffs that will be involved in directly applying the ESMF and RPF procedures. It includes the E&S experts in PIU at the lead implementing agency (MInT), E&S Focal Persons at partner, beneficiary and stakeholder institutions, member of technical committees, professionals from the Regional, Zonal and City level Environment Protection Offices and etc. Members of the Federal, Regional and Zonal REPAs will have to participate in the training to facilitate for smooth implementation of EDFP ESMF and RPF. The training will focus in explaining the details of the National and World Bank environmental requirements and the procedures that need to be fulfilled to comply with it. Implementation of the ESMF and RPF including all aspects of the World Bank ESSs, environmental management, EIA, public consultation, and integration of environmental management into development planning will be the center topics for the training. The training would also cover skills upgrading refreshment topics such as, environmental and social screening and categorization processes, EIA review and quality assurance, environmental audits, environmental guidelines and others as necessary. Detailed topics that would need to be covered by the training include the following:
- ✓ Overview of enabling policy, legal and institutional framework for ESMF and RPF
- ✓ Basic principles of ESMF and RPF;

✓ Potential Environmental and Social Impacts for EDFP,

✓ Environmental and social screening process,

✓ Assignment of environmental categories,

✓ Scoping and the preparation of preliminary and full ESIAs

✓ Preparation of terms of reference for carrying out ESIA/ESMPs,

✓ Review and clearance of the screening results and separate ESIA/ESMP reports,

✓ Supervision, monitoring, evaluation and environmental reporting;

✓ Participatory public consultation and engagement,

✓ Gender Based Violence (GBV) prevention and Control

✓ Grievance Redress Mechanisms (GRM) of the EDFP, Stakeholders Engagement

✓ Public consultation process in view of the ESMF and RPF requirements,

✓ Requirements and procedures for ARAP/RAP, and

✓ Discussion of, and amendments to, the environmental and social screening form.

b. Awareness raising

Integrating environmental and social considerations into development planning will encompass defining processes, procedures and responsibilities for environment related activities and actions into the preparation of the EDFP annual plans and budgets. Thus there will be a need to carry out environmental awareness workshops for officials of project implementing and stakeholder institutions such as members of project steering committee and technical committee on environmental management principles and ESMF procedures. The awareness raising workshops and trainings should target the higher officials, EDFP program management and coordination organs including relevant directorates of the federal and regional lead, partner and beneficiary institutions. This will help to ensure that there is good knowledge of EDFP ESMF and RPF requirements at different levels in the lead implementing agency, partner and beneficiary institutions, stakeholders and other professional and technical staffs.

The awareness raising should focus on clarifying EDFP program objectives and components, its institutional arrangements for implementation and coordination, the need for complying with Environmental and Social Management Framework (ESMF) and so on. It is important to clarify the roles and responsibilities of each stakeholder based on established guidelines such as the ESMF and RPF. The awareness raising workshop will also be an important venue to introduce the contents of the new ESF and its Environmental and Social Standards (ESSs), ESMF and RPF procedures and associated implementation requirements of the World Bank and the GoE.

EDFP beneficiary institutions and relevant REPAs in the regions, zones and cities will have to obtain copies of the ESMF, RPF as well as all relevant Federal and regional laws, guidelines and procedures relating to environmental protection, cultural heritage and resettlement issues.

c. Sensitization

The beneficiary communities at the grass root level will need to be sensitized about the overall objectives of the EDFP project including the digital start up and digital business grant window subcomponents, environmental sustainability and the need to consider environmental concerns with regard to e-waste management and others while preparing proposals/applications for matching fund competitions.

9.1.4 Terms of Reference for EDFP Environmental and Social Specialists

OBJECTIVE: To provide technical advice on environmental management and mitigation and ensure that the EDFP ESMF is fully implemented.

Tasks

- Coordinate and support the system of E&S screening, review and approval process set out in this ESMF, and oversee its smooth operation including advice to Partner and beneficiary institutions on the procurement of consultants for any required ESIA studies;

- Liaise with the Federal and Regional EFCCC on a regular basis to support implementation of the ESMF

- Lead the delivery of capacity building programs on Environmental management for lead and partner implementing institutions, as well as beneficiary and other stakeholders.

- Provide technical advice to beneficiary institutions on all technical issues related to natural resources and environmental management. These issues will relate to impacts on surface water, groundwater, agricultural resources and vegetation, human health, ecology and protected areas, land and soil degradation;

- Organize training workshops to raise awareness of officials of project implementing and stakeholder institutions, technical and management officers;

- Liaise with the project beneficiary and stakeholder institutions to ensure the project's compliance with the ESMF, RPF and all resettlement aspects of the project;

- Liaise with the project beneficiary and stakeholder institutions to ensure gender mainstreaming, GBV action plan implementation ,GRM and SEP

- Provide specific technical advice on mitigation measures for subprojects as necessary;

- Spearhead/coordinate the commissioning of an independent consulting firm to carry out an environmental performance audit of EDFP on an annual basis;

- Undertake review of Preliminary ESIA/ESMP to ensure compliance with the ESMF and RPF; and in collaboration with the appropriate bodies initiate and carry periodic environmental monitoring and inspection on selected subprojects.

- Compile and submit quarterly, biannual and annual E&S performance reports of the EDFP to the PIU, PSC and the Federal and Regional EPFCCC as appropriate.

9.1.5 Proposed ESMF implementation budget

The breakdown of estimated costs for putting the ESMF into operation is provided in Table 10. This includes the costs of providing the capacity building and training set out in Chapter 8. The total estimated costs for mainstreaming environment into the EDFP subcomponent is USD 1,275,000 consisting of:

a)   USD 350,000 which will be included in the consultants procured to provide Preliminary ESIA/ESMP for EDFP subprojects involving physical construction. These consultants will be responsible for the work on preparation of ESIA, ESMP, and CHMP documents.

b)   USD 40,000 for the preparation and printing of ESMF training materials;

c)   USD 270,000 for delivery of ESMF training as described in Section 8.2

d)   USD 240,000 for provision of an Environmental and Social expert in EDFP PIU for the five years duration of the project;

e)   USD 375,000 EDFP to undertake annual external Environmental and Social Performance Audit

f)   USD 100,000 for Implementation and monitoring of GBV/SEAH action plan.

The above costs will be funded from EDFP project. The EDFP PIU Environmental and Social Specialists will report on EDFP ESMF expenditure. This will provide for another way of monitoring on the extent that environmental and social issues are being addressed by the project beneficiaries and stakeholders.

Costs related to the required mitigation measures for EDFP subprojects are not set out in the budgets presented here. These will be assessed and internalized by beneficiary institutions as part of the overall EDFP subproject cost. It is extremely difficult to estimate the proportion of project costs that can be expected to be devoted to mitigation measures. However, a rough rule of thumb is that they should be expected to cost between 2% and 5% of the total project cost. Compensation and resettlement costs will be borne by beneficiaries.

Table 9: Proposed Budget for Implementation of the EDFP ESMF

Activity	YR1	YR2	YR3	YR4	YR5	TOTAL	Notes
Technical Assistance support for preparation of ESMF & RPF Screening Reports, Preliminary ESIAs, ESMPs, CHMPs,	50,000	50,000	50,000	50,000	50,000	250,000	Assume lump sum USD 50,000 for preparation of 5 Preliminary ESIA, per year (assuming that one document prepared by 10,000USD)
Training supplier develops ESMF & RPF training modules	20,000		20,000			40,000	Assume lump sum USD 20,000 for development and printing of training materials/ modules
Training supplier delivers Technical ESMF training +	90,000		90,000		90,000	270,000	Assume 100 participants x USD 200 pd x 2 days awareness raising &sensitization workshop + 50 participants x USD 200 pd in depth technical training x 5days + stationary+ trainers cost
PIU Envi & Social risk management experts	48,000	48,000	48,000	48,000	48,000	240,000	Assume maximum USD 2000 per month total wage x 2.
Budget for external Annual Environmental and Social Performance Audit	75,000	75,000	75,000	75,000	75,000	375,000	External Environmental and social performance Audit to be carried once per year.
Implementation of GBV action Plan	30,000	20,000	20,000	20,000	10,000	100,000	Part time GBV consultant to support action plan
Total ESMF costs	313,000	193,000	303,000	193,000	273,000	**1,275,000**	

10. MONITORING OF ESMF IMPLEMENTATION

Quarterly, Biannual and Annual Internal E&S performance monitoring report on ESMF implementation will be prepared by the PIU Environmental and Social Specialists and delivered to the PSC, Federal EFCCC and the World Bank. In addition, any "Substantial or Higher Risk" subproject financed by EDFP that has been subject to an ESIA study will also be required to produce an annual performance audit report, for delivery to EPFCCC and the World Bank.

An external independently commissioned annual environmental and social risk management and performance audit will be carried out in all EDFP implementing and beneficiary institutions. This will be conducted as part of the annual performance audit of the EDFP. The external independent risk management and performance audit team will report to the EDFP and the World Bank. The annual E&S performance audit is necessary to indicate:

a) To what extent environmental and social considerations are being incorporated into the planning process;

b) That mitigation measures are being identified and implemented by partner, beneficiary, and stakeholder institutions, and

c) To check that EDFP subprojects are being correctly screened. The audit will be able to identify any amendments in the ESMF approach that are required to improve its effectiveness.

The E&S annual performance audit report will include:

- A summary of the environmental and social performance of the EDFP, based on a sample of subprojects;

- A presentation of compliance and progress in the implementation of the project ESMPs, CHMPs;

- A review of implementation of grender/GBV action plan implementation, assessment of robustness and functionality of GRM, assessment of effectiveness of stakeholders engagement

- A synopsis of the environmental and social performance audit results from individual project monitoring measures (as set out in the project ESMPs, and CHMPs).

ANNEX A: ENVIRONMENTAL SCOPING/SCREENING FORM

INTRODUCTION

This Environmental and Social Screening Form (ESSF) has been designed to assist in the evaluation of construction and refurbishment/rehabilitation activities under EDFP. The form will assist the sub-project implementers and reviewers to identify environmental and social impacts and their mitigation measures, if any. It will also assist in the determination of requirements for further environmental work (such as environmental and social management plan) if necessary.

The form helps to determine the characteristics of the prevailing local bio-physical and social environment with the aim of assessing the potential impacts of the construction and rehabilitation activities on the environment by the sub-project.

The ESSF will also assist in identifying potential socio-economic impacts that will require mitigation measures and/or resettlement and compensation.

GUIDELINES FOR SCREENING

The evaluator should undertake the assignment after:

1. Gaining adequate knowledge of baseline information of the area.

2. Gaining knowledge of proposed project activities for the area.

3. Having been briefed / trained in environmental and social screening.

The form is to be completed by consensus of at least two people, knowledgeable of the screening process.

Environmental & Social Screening Form

Guidelines: Site inspection of project site. The evaluation results to be a consensus of at least three officials.

Project Name:		District/City:
Project Location:		Nature/Size:
Type of activity : (e.g. new construction, rehabilitation, periodic maintenance):		
Name & Signature of Evaluator: 1…………………………………….. 2. ……………………………………		Date of Field Evaluation: …………………………. ………………………….

		Appraisal	Risk / Significance rating					
		Yes/No	None	Low	Moderate	Substantial	High	unknown
1	**Environmental Screening (ESS -1)**							
	Will the project generate the following impacts?							
1.1	Loss of trees							
1.2	Soil erosion/siltation in the area							
1.3	Pollution to land-diesel ,oils							
1.4	Dust emissions							
1.5	Solid and liquid wastes							
1.5	Borrow pits and pools of stagnant water							
1.6	Rubble/heaps of excavated soils							
1.7	Demolishing waste from buildings							
1.8	Long term depletion of water							
1.9	Nuisance from noise or smell							
1.11	Incidence of flooding							
1.12	Cross through, located within or nearby environmentally sensitive areas (e.g. national parks, intact natural forests, wetlands, e.t.c)?							
1.13	Cause poor water drainage and increase the risk of water-related diseases such as malaria or bilharzias?							
1.14	Will certain ES risks and adverse impacts be difficult to avoid, or minimize, or mitigate because (i) the project involves a technology that is new and/or complex, and the risks and/or impacts of this technology are not fully understood, and/or (ii) (ii) the project involves (a) complex mitigation measure(s) that its implementation success is not fully assured?							
1.15	Does the scale of the project have the potential to cause diverse and multiple ES risks and impacts extended over a large area? This applies to both direct and indirect risks and impacts.							
1.16	Does the project have associated facilities (as per							

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		Appraisal Yes/No	None	Low	Moderate	Substantial	High	unknown
	paras.11 of ESS 1) that could lead to wide-ranging ES risks and impacts? Does the project design take into consideration such associated facilities?							
2	**Labour and Working Conditions and Community safety**							
2.1	Risk of exposing the workers to extremely hazardous working conditions including concerns of structural safety.							
2.2	Will the development of the project have the potential for immigration of workers and persons seeking employment (e.gseasonal, transient)? Is there potential for employment of community workers?							
2.3	Is there any institutional impediment to fair treatment, non-discrimination and/or equal opportunity?							
2.4	Is there risk or potential for the employment of child labor and/or forced labor?							
2.5	Could the project expose communities to emergency events or hazards that involve health or safety risks and impacts?							
2.6	Are project activities, civil works or buildings located in areas prone to natural disasters or extreme weather events?							
2.7	Will the project result in potential traffic and road safety risks to workers, communities and road users throughout the project life cycle?							
2.8	Does the project involve a potential for community exposure to water-borne, water-based, water-related and vector-borne diseases, and communicable and non-communicable diseases?							
2.9	Risk of workers to extreme exposure for GBV							
2.10	Spread of HIV/AIDS and other STI							
3	**Resettlement Screening (ESS-5)**							
	Will the project generate the following negative social and economic impacts?							
3.1	Loss of land to households							
3.2	Loss of properties –houses, structures							
3.3	Loss of trees, fruit trees by households							
	Resettlement Screening (ESS-5) Contd…							
3.4	Loss of crops by people							

3.5	Loss of access to river/forests/grazing area							
3.6	Conflicts over use of local water resources							
3.7	Disruption of important pathways, footpath/roads							
3.8	Loss communal facilities –churches							
3.9	Loss of livelihood system							
4	Cultural Heritage Screening							
4.1	Impact heritage site, graveyard land							
4.2	Will the project activities involve excavations, demolitions, earth movements, flooding or changes to physical environment that could affect cultural heritage values?							
4.3	Are project activities likely to affect tangible and/or intangible cultural heritage as defined under ESS 8 (e.g., archaeological sites that comprise any combination of structural remains, artifacts, human or ecological elements, and may be located entirely beneath, partially above, or entirely above the land or water surface)?							
4.4	Are project activities located in legally recognized and/or legally protected areas or defined buffer zones designated for the protection of cultural heritage?							
4.5	Will the project activities affect cultural heritage in non-designated or legally recognized areas or protection zones?							
4.6	Will the project affect cultural heritage assets that are movable (i.e., rare books, manuscripts, paintings, etc.) that could be endangered by the project?							
5	Gender, Vulnerable and disadvantaged group screening							
5.1	Does the project present risks to and impacts on individuals or groups who, because of their circumstances, may be disadvantaged or vulnerable due to their: - Age, gender, ethnicity, or race - Religion and belief systems - Socio-cultural grouping or nationality - Sexual orientation and identity - Climate change and seasonal factors							
5.2	Is the project likely to affect disadvantaged or vulnerable individuals or groups who would require specialized approaches to participation or consultation for the project?							
5.3	Is the project likely to face any barriers to information disclosure, transparent sharing of project information among stakeholders, or other aspects that could affect meaningful consultations?							
5.4	Is there a potential for prejudice or							

discrimination in accessing project benefits for those who may be disadvantaged or vulnerable?						

Categorization & Recommendations:

After compiling the above, determine which risk category the subproject falls under based on the environmental categories High, Substantial, Moderate and Low risk. If the subproject falls under "Substantial, Moderate or low" risk categories, proceed to identify the category of the subproject (i.e. Schedule I, II or III) based on the National EIA procedural guideline issued by the Federal Environment, Forest and Climate Change Commission.

a. World Bank ESF Categorization

	High Risk	~~EDFP subproject highly unlikely to fall~~ If the subproject falls under "High Risk" the Environmental and social Assessment should be conducted in accordance with the World Bank Environmental and Social Standards (ESSs).
	Substantial Risk	~~EDFP subproject highly unlikely to fall under "Substantial Risk"~~ If the subproject falls under "Substantial Risk" the Environmental and social Assessment of the subproject should be conducted in accordance with National law and any requirements of the ESSs that the Bank deems relevant to such subprojects
	Moderate Risk	Environmental and social Assessment of the subproject should be conducted in accordance with National law and any requirements of the ESSs that the Bank deems relevant to such subprojects.
	Low Risk	~~Environmental and social Assessment of the subproject~~ Sub project is not subject to environmental assessment as no potential impacts are anticipated. However preparation/inclusion of simple ESMP or Environmental Guideline for Construction Contractors will be acceptable..

*Place tick in applicable box

b. National EIA Procedural Guideline (2003) Categorization

	Schedule 1	EDFP subproject highly unlikely to fall under "Schedule-I" Category. In the unlikely event that subproject falls under "Schedule-I" the subproject is to be fed into the standard ESIA process determined by the Federal or Regional EPFCCCs
	Schedule 2	Subproject will require a partial/preliminary ESIA, and will necessitate the preparation of Preliminary ESIA / ESMP.
	Schedule III	Subproject is not subject to environmental assessment as no potential impacts are anticipated.

*Place tick in applicable box

Note:

1. Note that the Federal EIA Procedural Guideline (2003) is widely applied in many regions as it is. However, Regional EPFCCCs such as Amhara EFWPPDA has issued ESIA guideline Directive 01/2010 that outline the list of projects to be reviewed and approved at different levels of its Zonal and

Woreda offices. Thus it is advisable to consult such regional guidelines while determining the screening Category in addition to the Federal EIA procedural guideline.

2. Note that based on the national ESIA procedural guideline, "Telecommunication" is generally put in schedule III under "Economic infrastructure and Service" section without specifying details of the type of facilities and activities involved. However, it was noted during the consultation discussion held with the Federal EPFCCC EIA Directorate that the draft EIA Procedural guideline was prepared in 2003, and it is clear that some of the development activities involved in telecommunication sector in the past two decades have brought in new telecom infrastructures with the advancement of technologies in the sector. Such new telecom infrastructure includes underground fiber optic cable and cell towers, the environmental and social impacts of construction and installation of which may not have been considered. Thus it will be important to weigh the nature, anticipated size and significance of potential impacts of the subprojects under consideration in deciding the categorization into the schedule of activities.

Reviewer

and

Approver :

Name:

Signature:

Date

ANNEX B: GUIDANCE FOR SUBPROJECT RISK CATEGORIZATION

Pursuant to the ES Policy, subprojects are classified as *High Risk*, *Substantial Risk*, *Moderate Risk* or *Low Risk* taking into account relevant potential risks and impacts.

1. A Project is classified as **High Risk** after considering, in an integrated manner, the risks and impacts of the Project, taking into account the following, as applicable.

   a. The Project is likely to generate a wide range of significant adverse risks and impacts on human populations or the environment. This could be because of the complex nature of the Project, the scale (large to very large) or the sensitivity of the location(s) of the Project. This would take into account whether the potential risks and impacts associated with the Project have the majority or all of the following characteristics:

(i) Long term, permanent and/or irreversible (e.g., loss of major natural habitat or conversion of wetland), and impossible to avoid entirely due to the nature of the Project;

(ii) High in magnitude and/or in spatial extent (the geographical area or size of the population likely to be affected is large to very large);

(iii) Significant adverse cumulative impacts;

(iv) Significant adverse transboundary impacts; and

(v) a high probability of serious adverse effects to human health and/or the environment (e.g., due to accidents, toxic waste disposal, etc.);

b. The area likely to be affected is of high value and sensitivity, for example sensitive and valuable ecosystems and habitats (legally protected and internationally recognized areas of high biodiversity value), lands or rights of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities and other vulnerable minorities, intensive or complex involuntary resettlement or land acquisition, impacts on cultural heritage or densely populated urban areas.

c. Some of the significant adverse ES risk and impacts of the Project cannot be mitigated or specific mitigation measures require complex and/or unproven mitigation, compensatory measures or technology, or sophisticated social analysis and implementation.

d. There are significant concerns that the adverse social impacts of the Project, and the associated mitigation measures, may give rise to significant social conflict or harm or significant risks to human security.

e. There is a history of unrest in the area of the Project or the sector, and there may be significant concerns regarding the activities of security forces.

f. The Project is being developed in a legal or regulatory environment where there is significant uncertainty or conflict as to jurisdiction of competing agencies, or where the legislation or regulations do not adequately address the risks and impacts of complex projects, or changes to applicable legislation are being made, or enforcement is weak.

g. The past experience of the implementing agencies in developing complex Projects is limited; their track record regarding ES issues would present significant challenges or concerns given the nature of the Project's potential risks and impacts.

h. There are significant concerns related to the capacity and commitment for, and track record of relevant Project parties, in relation to stakeholder engagement.

i. There are a number of factors outside the control of the Project that could have a significant impact on the ES performance and outcomes of the Project.

2. A Project is classified as **Substantial Risk** after considering, in an integrated manner, the risks and impacts of the Project, taking into account the following, as applicable.

a. the Project may not be as complex as High Risk Projects, its ES scale and impact may be smaller (large to medium) and the location may not be in such a highly sensitive area, and some risks and impacts may be significant. This would take into account whether the potential risks and impacts have the majority or all of the following characteristics:

(i) They are mostly temporary, predictable and/or reversible, and the nature of the Project does not preclude the possibility of avoiding or reversing them (although substantial investment and time may be required);

(ii) there are concerns that the adverse social impacts of the Project, and the associated mitigation measures, may give rise to a limited degree of social conflict, harm or risks to human security;

(iii) they are medium in magnitude and/or in spatial extent (the geographical area and size of the population likely to be affected are medium to large);

(iv) the potential for cumulative and/or transboundary impacts may exist, but they are less severe and more readily avoided or mitigated than for *High Risk* Projects; and

(v) there is medium to low probability of serious adverse effects to human health and/or the environment (e.g., due to accidents, toxic waste disposal, etc.), and there are known and reliable mechanisms available to prevent or minimize such incidents;

b. The effects of the Project on areas of high value or sensitivity are expected to be lower than High Risk Projects.

c. Mitigatory and/or compensatory measures may be designed more readily and be more reliable than those of High Risk Projects.

d. The Project is being developed in a legal or regulatory environment where there is uncertainty or conflict as to jurisdiction of competing agencies, or where the legislation or regulations do not adequately address the risks and impacts of   complex Projects, or changes to applicable legislation are being made, or enforcement is weak.

e. The past experience of the implementing agencies in developing complex Projects is limited in some respects, and their track record regarding ES issues suggests some concerns which can be readily addressed through implementation support.

f. There are some concerns over capacity and experience in managing stakeholder engagement but these could be readily addressed through implementation support.

3. A project is classified as **Moderate Risk** after considering, in an integrated manner, the risks and impacts of the Project, taking into account the following, as applicable:

a. the potential adverse risks and impacts on human populations and/or the environment are not likely to be significant. This is because the Project is not complex and/or large, does not involve activities that have a high potential for harming people or the environment, and is located away from environmentally or socially sensitive areas. As such, the potential risks and impacts and issues are likely to have the following characteristics:

    (i) Predictable and expected to be temporary and/or reversible;

    (ii) Low in magnitude;

    (iii) Site-specific, without likelihood of impacts beyond the actual footprint of the Project; and

    (iv) Low probability of serious adverse effects to human health and/or the environment (e.g., do not involve use or disposal of toxic materials, routine safety precautions are expected to be sufficient to prevent accidents, etc.).

b. The Project's risks and impacts can be easily mitigated in a predictable manner.

4. A project is classified as *Low Risk* if it's potential adverse risks to and impacts on human populations and/or the environment are likely to be minimal or negligible. These Projects, with few or no adverse risks and impacts and issues, do not require further ES assessment following the initial screening.

ANNEX C: SAMPLE CHANCE FIND PROCEDURES

Cultural, historical, natural or archaeological heritage may be damaged or lost during excavations and ensuing construction work activities. In addition, chance finds of heritages during excavations would be at risk of loss, unless due measures are taken to protect and save this heritage. Chance finds procedures will be an integral part of the project ESMP and civil works contracts. If the Contractor discovers archeological sites, historical sites, remains and objects, including graveyards and/or individual graves during excavation or construction, the Contractor shall:

Chance Find Procedures	
Step 1	Stop the construction activities in the area of the chance find;
Step 2	Delineate the discovered site or area;
Step 3	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 for Culture and Tourism or the Federal Authority for Research and Conservation of Cultural Heritages take over;
Step 4	Notify the Subproject beneficiary/implementing institution E&S Focal Persons and PIU E&S staff, Project Supervisory Engineer who in turn will notify the responsible local authorities for Culture and Tourism or the Federal Authority for Research and Conservation of Cultural Heritages (within 24 hours or less);

Step 5	The responsible local authorities for Culture and Tourism or the Federal Authority for Research and Conservation of Cultural Heritages would then be in charge of protecting and preserving the site before deciding on subsequent appropriate procedures. This would require a preliminary evaluation of the findings to be performed by the archaeologists of the local/regional or Federal Authorities. The significance and importance of the findings should be assessed according to the various criteria relevant to Proclamation No. 209/2000 on research and conservation of cultural heritage.
Step 6	Decisions on how to handle the finding shall be taken by local authorities for Culture and Tourism or the Federal Authority for Research and Conservation of Cultural Heritages This could include changes in the layout (such as when finding irremovable remains of cultural or archeological importance) conservation, preservation, restoration and salvage.
Step 7	Implementation for the authority decision concerning the management of the finding shall be communicated in writing by the relevant authorities.
Step 8	Construction work may resume only after permission is given by the relevant local/regional or Federal Authorities concerning safeguard of the heritage

Note:

According to Article 41 of Proclamation No. 209/2000 on research and conservation of cultural heritage the measures that should be taken during chance finding of heritages (i.e. Fortuitous Discovery of Cultural Heritage) are the following:

  i. Any person who discovers any Cultural Heritage in the course of an excavation connected to mining explorations, building works, road construction or other similar activities or in the course of any other fortuitous event, shall forthwith report same to the Authority, and shall protect and keep same intact, until the Authority takes delivery thereof.

 ii. 'The Authority' shall, upon receipt of a report submitted pursuant to Sub-Article (I) hereof, take all appropriate measures to examine, take delivery of, and register the Cultural Heritage so discovered.

iii. Where the Authority fails to take appropriate measures within six month in accordance with Sub-Article (2) of this Article, the 'person who has discovered the Cultural Heritage may be released from his responsibility by submitting, a written, notification with a full description of the situation to the Regional government official.

 iv. The Authority, shall ensure that the appropriate reward is granted to the person who has handed over a Cultural Heritage discovered fortuitously in accordance with sub-Articles (I) and (2) of this Article. And such person shall be entitled to reimbursement of expenses, if any, incurred in the course of discharging his duties under this Article.

ANNEX D: TERMS OF REFERENCE FOR EIA OR PRELIMINARY EIA

An environmental and social impact assessment (ESIA) report for an infrastructure project should focus on the significant environmental and social issues of the proposed project, whether it is/or includes new

construction or rehabilitation. The report's scope and level of detail should be commensurate with the project's potential impacts.

The EIA report should include the following items (not necessarily in the order shown):

a. **Executive summary**. Concisely discusses significant findings and recommended actions.

b. **Policy, legal, and administrative framework**. Discusses the policy, legal, and administrative framework within which the ESIA is carried out. Identifies relevant international environmental agreements to which the country is a party.

c. **Project description**. Concisely describes the proposed project and its geographic, ecological, social, and temporal context, including any offsite investments that may be required. Indicates the need for any resettlement plan. Normally includes a map showing the project site and the project's area of influence.

d. **Baseline data**. Assesses the dimensions of the study area and describes relevant physical, biological, and socioeconomic conditions, including any changes anticipated before the project commences. Also takes into account current and proposed development activities within the project area but not directly connected to the project. Data should be relevant to decisions about project location, design, operation, or mitigation measures. The section indicates the accuracy, reliability, and sources of the data.

e. **Environmental and social impacts/risks**. Predicts and assesses the project's likely positive and negative impacts, in quantitative terms to the extent possible. Identifies mitigation measures and any residual negative impacts that cannot be mitigated. Explores opportunities for environmental enhancement. Identifies and estimates the extent and quality of available data, key data gaps, and uncertainties associated with predictions, and specifies topics that do not require further attention.

f. **Analysis of alternatives**. Systematically compares feasible alternatives to the proposed project site, technology, design, and operation—including the "without project" situation—in terms of their potential environmental impacts; the feasibility of mitigating these impacts; their capital and recurrent costs; their suitability under local conditions; and their institutional, training, and monitoring requirements. For each of the alternatives, quantifies the environmental impacts to the extent possible, and attaches economic values where feasible. States the basis for selecting the particular project design proposed and justifies recommended emission levels and approaches to pollution prevention and abatement.

g. **Environmental and Social Management Plan (ESMP)**. Covers mitigation measures, monitoring, budget requirements and funding sources for implementation, as well as institutional strengthening and capacity buildings requirements.

h. **Appendixes**

   i.   **List of ESIA report preparers** – individuals and organizations.

   ii. **References -** written materials both published and unpublished, used in study preparation.

   iii. **Record of stakeholder and community consultation meetings**, including consultations for obtaining the informed views of the affected people and local nongovernmental organizations (NGOs). The record specifies any means other than consultations (e.g., surveys) that were used to obtain the views of affected groups and local NGOs.

   iv. **Tables presenting the relevant data** referred to or summarized in the main text.

   v.   **List of associated reports** (e.g., socio-economic baseline survey, resettlement plan)

Note:

The above ToR outlines the minimum content that should be included in a full fledge ESIA report (i.e. Schedule–I sub-projects). For Preliminary ESIA report (i.e. Schedule-II subprojects), early consultations would need to be carried with the relevant federal, regional or zonal EPFCCC offices to determine the minimum content for such report.

ANNEX E: GUIDELINE FOR ENVIRONMENTAL MANAGEMENT PLAN

When a subproject includes distinct mitigation measures (physical works or management activities), a simple Environmental Management Plan (EMP) needs to be included with the subproject. A simple EMP usually includes the following components:

- **Description of adverse effects**: the anticipated effects are identified and summarized.
- **Description of mitigation measures**: each measure is described with reference to the effect(s) it is intended to deal with. As needed, detailed plans, designs, equipment descriptions, and operating procedures are described.
- **Description of monitoring program**: Monitoring provides information on the occurrence of environmental effects. It helps identify how well mitigation measures are working, and where better mitigation may be needed. The monitoring program should identify what information will be collected, how, where and how often. It should also indicate at what level of effect there will be a need for further mitigation.
- **Responsibilities:** The people, groups, or organizations that will carry out the mitigation and monitoring activities are defined, as well as to whom they report and are responsible. There may be a

need to train people to carry out these responsibilities, and to provide them with equipment and supplies.

- **Implementation schedule:** The timing, frequency and duration of mitigation measures and monitoring are specified in an implementation schedule, and linked to the overall subproject schedule.

- **Cost estimates and sources of funds**: These are specified for the initial subproject investment and for the mitigation and monitoring activities as a subproject is implemented.

- **Monitoring Methods:** Methods for monitoring the implementation of mitigation measures or environmental effects should be as simple as possible, consistent with collecting useful information, so that community members can apply them themselves (see example below). For example, they could just be regular observations of subproject activities or sites during construction and then use.

ANNEX F: NATIOAL EIA PROCEDURAL GUIDELINE FOR SCHEDULE OF ACTIVITIES

Schedule I. List of projects that require FULL EIA.

1. Agriculture

   - water management projects for agriculture (drainage, irrigation)
   - large scale mono- culture (cash and food crops)
   - Pest control projects
   - Fertilizer and nutrient management
   - Land development schemes covering an area of 500 hectares or more to bring forest land into agricultural production
   - Agricultural programmers necessitating the resettlement of 100 families or more.
   - Development of agricultural estates covering an area of 500 hectares or more
   - Construction of dams, man-made lakes, and artificial enlargement of lakes with surface areas of 200 hectares or more.
   - Drainage of wetlands wildlife habitat or of virgin forest covering an area of 100 meters or more.
   - Introduction of new breed, species of crops, seeds or animals
   - Surface water fed irrigation projects covering more than 100 hectares
   - Ground water fed irrigation projects more than 100 hectares
   - River diversions and water transfers between catchments

2. Livestock and Range management

   - Large Scale livestock movement
   - Introduction of new breeds of livestock
   - Introduction of improved forage species
   - Large scale open range rearing of cattle, horses, sheep etc
   - Large scale livestock production in Urban area
   - Large scale slaughter house construction
   - Ectoparasite management (cattle dips, area treatment)
   - Intensive livestock rearing units

3. Forestry activities

- Timber logging and processing
- Forest plantation and afforestation and introduction of new species
- selective removal of single commercial tree species
- pest management
- Conversion of hill forest land to other land use
- Logging or conversion of forest land to other land use within the catchments area of reservoirs used for municipal water supply, irrigation or hydropower generation or in areas adjacent to parks
- Logging with special emphasis for endangered tree species
- Large scale afforestation/reforestation, mono-culture forest plantation projects which use exotic free species
- Conversion of forest areas which have a paramount importance of biodiversity conservation to other land use
- Resettlement programs in natural forest and woodland areas.

4. Fisheries activities

- Medium to large scale fisheries
- Artificial fisheries (Aqua-culture for fish, algae, crustaceans shrimps, lobster or crabs).
- Introduction of new species in water bodies commercial fisheries

5. Wildlife

- introduction of new species
- wildlife catching and trading
- hunting
- wildlife ranching and farming
- zoo and sanctuaries

6. Tourism and Recreational Development

- Construction of resort facilities or hotels along the shorelines of lakes, river, islands and oceans
- Hill top resort or hotel development
- Development of tourism or recreational facilities in protected and adjacent areas (national parks, marine parks, forestry reserves etc) on islands and in surrounding waters
- Hunting and capturing
- Camping activities walk ways and trails etc.
- sporting and race tracts/sites
- Tour operations

7. Energy Industry

- Production and distribution of electricity, gas, steam and hot water
- Storage of natural gas
- Construction of off shore pipelines in excess of 50 km in length
- High power transmission line
- Construction of combined cycle power station
- Thermal power development (i.e. coal, nuclear)
- Hydro-electric power

- Bio-mass power development
- Wind -mills power development
- Solar (i.e. Impact due to pollution during manufacture of solar devices, acid battery spillage and improper disposal of batteries)
- Nuclear energy

8. Petroleum Industry

- Oil and gas fields exploration and development, including Construction of offshore and onshore pipelines
- Construction of oil and gas separation, processing, handling and storage facilities.
- Construction of oil refineries
- Construction of product deposits for the storage of petrol, gas, diesel, tar and other products within commercial, industrial or residential areas.
- Transportation of petroleum products

9. Food and beverage industries

- manufacture of vegetable and animal oils and fats
- oil refinery and ginneries
- processing and conserving of meat
- manufacture of dairy products
- brewing distilling and malting
- fish meal factories
- slaughter - houses
- soft drinks
- tobacco processing
- caned fruits, and sources
- sugar factories
- other agro-processing industries

10. Textile in industry

- cotton and Synthetic fibres
- dye for cloth
- ginneries

11. Leather Industry

- tanning
- tanneries
- dressing factories
- other cloth factories

12. Wood, Pulp and Paper Industries

- manufacturing of veneer and plywood
- manufacturing of fiber board and of particle - board

- manufacturing of Pulp, Paper, sand-board cellulose – mills

13. Building and Civil Engineering Industries.

- industrial and housing Estate
- major urban projects (multi-storey building, motor terminals, markets etc)
- tourist installation
- construction and expansion/upgrading of roads, harbours, ship yards, fishing harbours, air fields(having an air strips of 2,500mor long) and ports, railways and pipelines
- River drainage and flood control works.
- hydro - electric and irrigation dams
- reservoir
- Storage of scrap metal.
- military installations
- construction and expansion of fishing harbours
- developments on beach fronts

14. Chemical industries

- manufacture, transportation, use and storage of pesticide or other hazardous and or toxic chemicals
- production of pharmaceutical products
- storage facilities for petroleum, petrochemical and other chemical products (i.e. filling stations)
- Production of paints vanishes, etc.

15. Extractive industry

- extraction of petroleum
- extraction and purification of natural gas
- other deep drilling - bore-holes and wells
- mining
- quarrying
- coal mining
- Sand dredging.

16. Minerals extraction and processing

- Metallic minerals such as Iron, Lead, Copper, Nickel
- Industrial minerals such as kaolin, diatomite,
- Construction Minerals
- Mineral Water
- Thermal Water
- Extraction of salts from brines.

17. Non-metallic industries (Products)

- manufacture of cement, asbestos, glass, glass-fibre, glass-wool
- processing of rubber

- plastic industry
- lime manufacturing, tiles, ceramics

18. Metal and Engineering industries.

- manufacture and assembly of motor - vehicles
- manufacture of other means of transport (trailers, motor-cycles, motor-vehicle bicycles-cycles)
- body - building
- boiler - making and manufacture of reservoirs, tanks and other sheet containers
- foundry and Forging
- manufacture of non - ferrous products
- iron and steel
- electroplating

19. Waste treatment and disposal

(a) Toxic and Hazardous waste

- construction of Incineration plants
- construction of recovery plant (off-site)
- construction of waste water treatment plant (off-site)
- construction of secure landfills facility
- construction of storage facility (off - site)
- Collection and transportation of waste.
- installation for the disposal of industrial waste

(b) Municipal Solid Waste

- construction of incineration plant
- construction of composting plant
- construction of recovery/re-cycling plant
- construction of Municipal Solid Waste landfill facility
- construction of waste depots.
- collection and transportation

(c) Municipal Sewage

- construction of waste water treatment plant
- construction of marine out fall
- Night soil collection transport and treatment.
- construction of sewage system

20. Water Supply

- canalization of water courses
- diversion of normal flow of water
- water transfers scheme
- abstraction or utilization of ground and surface water for bulk supply
- water treatment plants

- Construction of dams, impounding reservoirs with a surface area of 100 hectars
- Ground water development for industrial, agricultural or urban water supply of greater than 4000 m^3 /day
- Drainage Plans in towns close to water bodies

21. Transport

- Major urban roads
- Rural road programmes
- Rail infrastructure and railways
- Trans-regional and International high way
- Upgrading or rehabilitation of major rural roads
- Airports with basic runway

22. Health projects

- vector control projects (malaria, bilharzias, trypanosomes etc)

23. Land Reclamation and land development

- rehabilitation of degraded lands
- dredging of bars, greyone, dykes, estuaries etc.
- spoil disposal.

24. Resettlement/relocation of people and animals

- resettlement plan
- establishment of refugee camps

25. Multi-sectoral Projects

- Agro-forestry
  ♦ dispersed field - tree inter-cropping
  ♦ alley cropping
  ♦ living fences and other linear planting
  ♦ windbreak/shelterbelts
  ♦ taungya system
- Integrated conservation and development programmes e.g. protected areas.
- Integrated Pest Management (e.g. IPM)
- Diverse construction - public health facilities, schools, storage building, tree
- Nurseries, facilities for ecotourism and field research in protected areas, enclosed latrines, small enterprises, logging mills, manufacturing furniture carpentry shop, access road, well digging, camps, dams, reservoirs.
- River basin development and watershed management projects
- Food aid, humanitarian relief

26 .Trade: Importation and Exportation of the following

- hazardous Chemicals/Waste
- plastics
- petroleum products
- vehicles
- used materials
- wildlife and wildlife products
- pharmaceuticals
- food
- beverages
- GMOs and GMOs based products

27. Public instruments

- decisions to change designated status
- family planning
- technical assistance
- development strategies
- urban and rural land use development plans eg master plans,
- structural adjustment,
- national budget
- Policies and Programmes formulations, etc

28. All projects in environmentally sensitive areas should be treated as equivalent to Schedule 1 activity irrespective of the nature of the project.

Schedule. 2. **List of Projects That Require A PRELIMINARY ENVIRONMENTAL IMPACT Study.**

A List of Small - Scale Activities and Enterprises

- Fish culture
- Bee-keeping
- Small animal husbandry and urban livestock keeping
- Horticulture and floriculture
- Wildlife catching and trading
- Production of tourist handicrafts
- Charcoal production
- Fuel wood harvesting
- Wooden furniture and implement making
- Basket and other weaving
- Nuts and seeds for oil processing
- Bark for tanning processing
- Brewing and distilleries
- Bio-gas plants
- Bird catching and trading
- Hunting

- Wildlife ranching
- Zoo, and sanctuaries
- Tie and dye making
- Brick making
- Beach sailing
- Sea weed Farming
- Salt pans
- graves and cemeteries
- Urban Livestock Keeping
- Urban agriculture.
- Fish landing stations.
- Wood carving and sculpture
- Hospitals and dispensaries, Schools, Community centre and Social halls, play grounds
- Wood works e.g. boat building
- Market places (livestock and commodities).
- Technical assistance
- Rain water harvesting
- Garages
- Carpentry
- Black smith.
- Tile manufacturing
- Kaolin manufacturing
- Vector control projects e.g. Malaria, Bilharzia, trypanosomes
- Livestock stock routes
- Fire belts.
- Tobacco curing kilns
- Sugar refineries
- Tanneries
- Pulp plant
- Oil refineries and ginneries
- artisanal and small scale mining
- Rural road
- Research having the potential to affect ecosystems functions, use, or the health and welfare of the society.
- Rural water supply and sanitation
- Land drainage (small scale)
- Sewerage system

Schedule 3. Lists of Projects That May Not Require Environmental Impact Assessment

1.   Social infrastructure and services

- Educational facilities (small scale)
- Audio visual production

- Teaching facilities and equipment
- Training
- Medical centre (small scale)
- Medical supplies and equipment
- Nutrition
- Family planning

2.   Economic infrastructure and services

- Telecommunication
- Research, small scale

3.   Production Sector

- Irrigation
  - Surface water fed irrigation projects covering less than 50 hectares
  - Ground water fed irrigation projects covering less than 50 hectares
- Agriculture
      All small scale agricultural activities

- Forestry
  - Protected forest reserves (small scale)
  - Productive forest reserves (small scale)
- Livestock
- Rearing of cattle (<50 heads); pigs (<100 heads), or poultry (<500 heads)
  - Livestock fattening projects (small scale)
  - Bees keeping projects (small scale)
- Fisheries
  - Artesian fisheries (small scale)
- Industry
  - Agro industrial (small scale)
  - Other small scale industries having no impact to the environment
- Trade
  - All small scale trades except trade in endangered species and hazardous materials
- Financial assistance
  - Programme assistance
  - Non-project or special country support
  - Food aid not involving GMOs based food
- Emergency Operations
  - Assistance to refugee returned and displaced person

4. All projects involved in environmental enhancement programs

ANNEX G: LIST OF PARTICIPANTS IN CONSULTATIONS

Name	Institution and Responsibility	Contact detail
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ANNEX E: LABOR MANAGEMENT PROCEDURES

Ethiopia Digital Foundations Project Labor Management Procedures (LMP)

February 20, 2021

Addis Ababa.

1. Introduction

The Project Development Objective (**PDO**) of *Ethiopia Digital Foundations Project* is to improve Ethiopia's competitiveness in the digital age through increased inclusiveness and affordability of digital services and through digital job creation.

The purpose of Labour Management Procedure **(**LMP**)** is to facilitate planning and implementation of the project. It identifies the main labour requirements and risks associated with the project, and help to determine the resources necessary to address project labour issues. LMP lays out the project's approach on national requirements, as well as the objectives of the World Bank's Environmental and Social Framework (ESF), specifically "Environmental and Social Standard 2- "Labour and Working Conditions (ESS2)". This LMP sets out the terms and conditions of employment for employing or otherwise engaging workers on the project, specifies the requirements and standards to be met and policies and procedures to be followed, assesses risks, and proposes implementation of compliance measures. The ESMF includes measures for worker's OHS.

The LMP is developed to help avoid, mitigate, and manage risks and impacts in relation to project workers and ensure non-discrimination, equal opportunity, protection, fair treatment, and safe and healthy working conditions. The LMP is a living document to facilitate project planning, preparation, and implementation. It is anticipated that the LMP will be updated as additional information becomes available during project implementation, including in relation to workforce numbers and requirements, timing of project activities, and associated due diligence and social risk management. The project will ensure compliance with national law requirements as well as World Bank guidelines regarding the COVID-19 pandemic.

2. Project Description and Components

2.1 Project Description

The '*Digital Ethiopia*' Project is intended to lay the building blocks to develop Ethiopia's digital economy. Liberalization and the introduction of competition in the telecom sector, coupled with improved private management of the incumbent, has proven to deliver consistent results for improved access and affordability across the world. This project will support the necessary steps to introduce market competition, private sector participation, foreign investment and independent sector regulation (component 1).

The country must also expand and strengthen its basic digital infrastructure, especially the fiber network and mobile broadband, towards achieving the African Union goal of universal affordable and quality broadband access by 2030 (component 2), a pre-condition to being able to leverage digital technologies for growth in the various sector of the economy. A special area of focus will be enhancing broadband services to Government and better serving universities and Government offices in provincial areas, using

a mobilizing finance for development (MFD) approach, in which the private sector takes the lead on investment. Finally, the country can generate opportunities for new jobs it needs through its investments and reforms in digital transformation; this will require creating an ecosystem in which new digital start-ups can thrive (component 3).

There is also a need to ensure that offline citizens benefit from the push towards the digital economy, and this is addressed through the design of the matching grants program that seeks to serve both online and offline businesses. Ultimately, the project aims at enabling its citizens, businesses and Government to reap digital dividends in the form of faster growth, lower transaction costs, more jobs and greater efficiency. A Contingent Emergency Response Component (CERC) has been added to the program design to allow for greater flexibility in responding to emerging crises during the life cycle of the project.

2.2 Project Components

The overall aim of the proposed '*Digital Ethiopia*' project is to increase public access to high quality and affordable internet services, promote digital entrepreneurship and facilitate job creation, to help Ethiopia compete in the digital age. The Project has three major Components.

Component 1: Digital Economy, enabling legal and regulatory environment. The aim of this technical assistance component is to strengthen the analog foundations of the digital economy, in particular policy-making, and effective regulation for the telecommunications sector and for the development of digital entrepreneurship. This project component will support strengthening the sector regulator, the Ethiopian Communications Authority (ECA), reviewing the relevant legal and regulatory foundations of the digital economy, and the contracting the transaction advisor to support the partial privatization of Ethio Telecom.

Sub-component 1.1: Partial privatization of Ethio Telecom: This sub-component will finance technical assistance and support for the partial privatization of Ethio Telecom. Until the passage of the Communications Services Proclamation in September 2019, Ethio Telecom, which is 100 per cent state owned, enjoyed virtually a complete monopoly in the provision of telecommunication infrastructure and services.[4] The project will finance only hiring of Transaction Advisor for technical assistance, and will not fund any technical assistance on internal reform process for Telecom operations and thus also not any staffing adjustments of the said enterprises.

Sub-component 1.2: Strengthening independent ICT sector regulation: A critical part of the overall process of telecom reform is the need to strengthen the sector regulator, the ECA, so that it can function effectively as an independent, transparent, efficient and accountable regulatory body. The support to be provided to ECA will be geared towards helping it carry out these tasks in the newly competitive market.

Sub-component 1.3: Supporting the development of the Digital Economy: Although the main focus of this component is on the partial privatization of Ethio Telecom and strengthening the regulatory authority, there are a number of other tasks associated with creating a vibrant, inclusive and safe digital economy in Ethiopia, and where the project can provide support or act as a complement. The MInT has prepared a Digital Transformation Strategy[5], approved by the Council of Ministers in 2025, which sets out a vision

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[4] One exception is in the field of fiber optic networks where both the electricity and railway utilities own their own fiber networks, and do make capacity available to virtual Internet Service Providers (ISPs, such as Websprix, as well as Ethio Telecom itself. But real competition has been limited to date.

[5] Government of Ethiopia, Ministry of Innovation and Technology (2020). Digital Ethiopia 2025: A digital strategy for Ethiopia Inclusive Prosperity. The strategy identifies four main pathways for development: 1) Unleashing value from agriculture; Future global value chains in manufacturing; 3) Building IT-enabled services; and 4) Digital as a driver of tourism competitiveness.

for the development of the digital economy.

Component 2: Digital Government and Connectivity. The objective of this component is to develop the capacity of GoE to deliver digital services, and to crowd-in private sector investments to improve regional and domestic connectivity infrastructure, to connect public institutions and educational institutions to broadband internet. It will build upon the market opening measures supported in Component 1 to stimulate private-sector-led investment to expand the geographic coverage of broadband networks, to better serve Government institutions, businesses and citizens across the country. This component will support the following activities:

Sub-component 2.1: Digital Government and COVID-19 response. This sub-component will help build GoE's capacity to deliver digital services, and to respond to the COVID-19 pandemic, including by (i) developing a Government ePortal accessible by citizens and firms, (ii) improving Government facilities for remote working, and (iii) building the digital skills of Government officials.

Sub-component 2.2: Connecting targeted public institutions to broadband. This sub-component will support GoE's efforts to enhance its level of digital connectivity to Government offices and public institutions across the country. The proposed mechanism to do this would entail an upfront commitment for the pre-purchase of internet bandwidth from private sector operators under indefeasible right of use (IRU) contracts, through a competitive bidding process, over a period of 5-10 years, applying principles of geographically-averaged pricing. The locations of targeted public institutions to be served would include Ministries, Departments and Agencies (MDAs), youth community associations across the country, and especially in the first phase selected hospitals and health centers, as part of the COVID-19 response. This sub-component will seek to incentivize private sector investment in internet connectivity (roll-out of fiber-optic networks and 4G/5G mobile networks), using provision of services to public institutions as an anchor tenant for wider geographical service provision. MInT will manage the program and will be encouraged to implement progressively cost recovery among MDAs to ensure sustainability.

Sub-component 2.3: Connecting selected educational institutions to broadband. As an extension of the drive to all Government MDAs, this sub-component will focus on connecting selected educational institutions to high-speed internet services. In the first phase of the project, this will include universities, colleges of teacher's education, research institutions and TVETs, with the aim of nationwide coverage. In the second phase, should additional financing be made available at a later date, the project could connect some 200 selected secondary schools also, and eventually to connect all secondary schools in the country. This sub-component will be implemented in partnership with EthERNet, Ethiopia's National Research and Education Network (NREN), part of the Ministry of Science and Higher Education (MoSHE).

Component 3: Digital Business and Entrepreneurship. This component aims to nurture digital entrepreneurship and incentivize digital businesses to train, provide digital devices, and employ Ethiopians to participate in the digital economy, and thereby to generate income and jobs. It includes a technical assistance sub-component to MInT for digital market regulations and implementation. Following the recommendations of the "*Digital Entrepreneurship and Innovation*" diagnostic study in Ethiopia[6] as well as stakeholder feedback, the proposed interventions under this component are focused

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[6]Commissioned by the World Bank and delivered by Deloitte in March 2020. It highlighted that Ethiopia's innovation ecosystem is still at a nascent stage, and made 11 recommendations, ranging from policy reforms (4), access to finance (4), infrastructure and support (2), to skills and literacy (1 recommendation). Digital market policy and access to finance were two areas highlighted as having the highest number of bottlenecks to potential entrepreneurs.

on addressing the access to finance and digital economy skills constraints. Specially this component is expected to provide basic digital economy training and digital devices for the informal sector (e.g., individual contractors or suppliers), but with an industry focus for practical applications. This component has two main interventions that will finance: (i) Two grant funding windows for digital start-ups and digital businesses; and (ii) Technical Assistance (TA) to MInT.

Component 4: Project Management: This component will support the project implementation unit to be initially set up in MInT. The PIU and MInT taking the lead will be responsible for implementation with partnering agencies and beneficiaries, but also including MoF, ECA and EthERNet. The MoF is currently responsible for the project preparation and activities relating to component 1.

Component 5: Contingent Emergency Response Component (CERC): A **CERC** is added to the project structure. This will have an initial zero value but may be financed during the course of the project to allow for an agile response to an eligible crisis or emergency. These could include, for instance, humanitarian crises which require the provision of emergency communications services to replace facilities that have been damaged, or to facilitate emergency humanitarian payments using mobile money.

3. Rationale of the Labour Management Procedures

To deliver the project, the use of government and private human resources is anticipated at all levels from Federal to *Woreda*/*Kebele*. The Government of Ethiopia recognizes that comprehensive management of the human resources is important to augmenting the positive outcomes of the project. These Labour Management Procedures (LMP) have, therefore, been developed to:

  i.   Promote safety and health at work;
 ii.   Promote the fair treatment, non-discrimination and equal opportunity for project workers;
iii.   Protect project workers, including vulnerable workers such as women, persons with disabilities, youth (of working age, in accordance with Ethiopian legal provisions and WB's ESF-ESS2) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate.
 iv.   Prevent the use of all forms of forced Labour and child Labour;
  v.   Support the principles of freedom of association and collective bargaining of project workers in a manner consistent with Federal law;
 vi.   Provide project workers with accessible means to raise workplace concerns.

4. Overview of Labour use on the project

There are different categories of workers expected to be employed to work on the Project. It is not possible at this point to present planned numbers of workers, but given the large number of Federal institutions and lower-level regional government structures involved in the implementation of various project activities over a Project's life span, the figures can be estimated in several hundreds, if thousands, including contracted workers. With the exception of a few international technical experts, the project work will only involve male and female Ethiopian workers, with the aim of sourcing the majority locally in the cities and *woreda*s.

The majority of workers are expected to be existing government civil servants. Existing civil servants will remain subject to the terms and conditions of their existing sector employment. Additional staff who may

be directly engaged (Direct workers) to support the Project will need to be contracted in line with the requirements of ESS2 in relation to Labour and working conditions, non-discrimination and equal opportunities and occupational health and safety.

The Project will use Direct workers and Contracted workers. However, the Project will not use community workers, primary supply workers and migrant workers.

i. *Direct Workers*: these include '*Digital Ethiopia*' Project Implementation Unit (PIU) staff (project coordinator and Environmental and Social Safeguard Specialists-ESSS in all regions); consultants who work for the Project implementation/coordination unit; government civil servants assigned to work on the project by the respective Federal implementing institutions.

ii. *Contracted workers*: are those who will be recruited by the PIU for the key implementation activities of the Project. If the contracted workers are going to be sourced through an employment agency (broker), information regarding the number, type and duration of contracts must be clearly communicated to the Bank.

Workforce requirement: the requirement of the work force at different levels will be determined by the scope of the project activities operated by each implementing institution (MInT, ECA and MoSHE/EthERNet) which is variable over time. The Table below presents the estimated Labour force numbers for each type of worker. Most of these workers are government civil servants.[7] According to the information obtained from the lead implementing agency on the estimated number of workforces required for the project, "Most of the assignments are outsourced to service providers. For example, component 2 is to be done by companies that develop and integrate system, provide connectivity, etc. We can only estimate the workers that may involve", which might be of little value to indicate it here. It added "In most of the components the operators are providing the connectivity. Here too we are not sure how many people they may involve. In component 3, grants are given for start-ups and company about to join ICT business". Nonetheless, it is important to emphasize all contractors and sub-contractors that will involve in this project adhere to the legal frameworks of both the GoE and the WB's provisions of ESS2 (Labour and Working Conditions) and ESS4 (Community Health and Safety).

Table I: Number and types of workers to be employed on the project

1.1. PIU Positions

#	Position	#	Remarks
1	Project Manager	1	
2	FM Specialist	1 or 2	
3	Procurement Specialist	2	
4	Finance Officer	1	
5	Contract Management Specialist	1	
6	Social Safeguard Specialist	1	
7	Environmental Safeguard Specialist	1	
8	M&E Specialist	1	
9	Support Staff	1	

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[7] All government civil servants seconded to work on the project will remain subject to the terms and conditions of their existing public sector employment agreements/arrangements, as understood under ESS2, Scope of Application, paragraph 8.

Total	**10 *OR* 11**	

Source: ECA

1.2. Other Positions

No.	Type of Worker by Job Classification	Estimated No.	Remark
1	Direct Workers		
1.a.	Director General	1	
1.b.	Deputy Director General	1	
1.c.	Universal Access and Service Director	1	
1.d.	Chief Corporate Resource Administrator	1	
1.e.	Finance Director	1	
1.f.	Procurement Director	1	
1.g.	Spectrum Management and Monitoring Engineer	1	
1.h.	Quality of Service Engineer	1	
1.i.	IP and DNS Management Engineer	1	
	Total	**9**	

1.3. Worker by Job Classification

No.	Type of Worker by Job Classification	Estimated No.	Remark
I	**Workers on Component One**		
	International Consultant for Review of legal portfolio relating to digital business and entrepreneurship	1	The consultant may involve some more number of professionals.
No.	Type of Worker by Job Classification	Estimated No.	Remark
II	**Workers on Component Two**		
	International Consultant for the preparation of project manual	1	The consultant may involve some more number of professionals.
No.	Type of Worker by Job Classification	Estimated No.	Remark
III	**Workers on Component Three**		
	International Consultant for the preparation of grant manual	1	The consultant may involve some more number of professionals.
No.	Type of Worker by Job Classification	Estimated No.	Remark
IV	**Workers on Component Four**		
	PIU consultant for training and workshops	1	The consultant may involve some more number of professionals.
	PIU consultant for LMP	1	
	PIU consultant for social assessment	1	
	PIU consultant for stakeholder engagement plan	1	
Total		**7**	

Source: MInT

1.4. Type of Worker by Job Classification

No.	Type of Worker by Job Classification	Estimated No.	Remark

I	Direct Workers		
1	Chief Technical Officer (CTO)	1	
2	Senior Network Engineer (IP)	1	
3	Senior Network Operations Engineer	1	
4	Senior Security Engineer	1	
5	Senior Systems Engineer	2	
6	Senior Cloud Engineer	1	
7	Senior System Analyst	1	
8	NREN Service Portfolio Manager	1	
Total		9	

Source: MoSHE/EthERNet

Table 1.5: Characteristics of Project Workers

No.	Description of project workers by Job classification	Female	Male	Total
1	Local Workers			
	None			
2	National Workers			
	None			
3	International workers			
3.a.	spectrum management		1*	1
3.b.	numbering	1*		1
3.c.	pricing and interconnection		1*	1
3.d.	QoS			1
3.e.	eCommerce			1
3.f.	Certification authority establishment			1
3.g.	USF		1*	1
3.h.	Internet governance and domain name			1
3.i.	IP and DNS management			1
3.j.	legal advisor		1*	1
3	Workers between the minimum age & 18			
	None			

Source: ECA

As reiterated throughout this document, the majority of workers are expected to be existing government civil servants who will remain subject to the terms and conditions of their existing sector employment. Direct workers who may be directly engaged as additional staff, whose number can hardly be known at this stage, will need to be contracted in line with the requirements of ESS2 in relation to Labour and working conditions, non-discrimination and equal opportunities and occupational health and safety.

5. Potential Labour risks

The main labour risks associated with the project are assessed to be related to: occupational health and safety (OHS) risks, specifically in component 2 to hazards from exposure to e-waste[8], as well as workplace accidents/injuries, lack of use of personal protective equipment (PPE), and dust; community health and safety issues, including community exposure to e-waste and other hazardous materials (component 2); communicable disease (COVID-19) which may arise from the interaction of project workers with local communities, between project workers (component 2 & 3); Gender Based Violence (GBV) in relation to contacts between project workers, such as the engineers working on broad band installation, ICT experts, the consultants and others, and members of the project affected local communities and members of local communities (component 2 & 3).

Risk of discrimination*:* This includes potential inappropriate treatment or harassment of project workers related, for example, to gender, age, disability, ethnicity, or religion; potential exclusion or preferences with respect to recruitment, hiring, termination of employment, working conditions, or terms of employment made on the basis of personal characteristics unrelated to inherent work requirements; in training and development provision.

In this project, no discrimination is acceptable as per the Ethiopian Labour Law and ESS2 and it supports equal opportunities for women and men, with emphasis on equal criteria for selection, remuneration, and promotion, and equal application of those criteria. Measures to prevent harassment of project workers, including sexual harassment, in the workplace is addressed with GBV action plan. This will be addressed through the GBV Action Plan which will be prepared for this Project.

Labour Influx: It is unlikely that the project activities will experience substantial Labour influx since, as indicated in the first paragraph of this section, majority of workers are expected to be existing government civil servants. Labour migration/influx will be limited in scope, due to limited contracted services and short windows of work. In addition, even the labor force that might be recruited will be from the respective communities[9], which rules out the influx of Labour to the respective project areas. Yet, the project needs Specific requirements to manage risks associated with Labour influx, related to interaction between project workers and local communities, such as gender-based violence Action Plan, will be managed through contractual requirements, code of conduct and training. These procedures are guided by the ESS2 and Ethiopia Labour Law. The Contractor will be required to write, adopt and implement a written Labour Influx Management Plan (LIMP) as part of the bidding document and contract before employing any Labour for the work.

Managing these risks require adequate training for Direct and Contracted workers. Adequate training of the workforce will also foster reducing the risks and impacts of exposure for the affected local communities to project-related e-waste hazards and related community safety issues covered under ESS4. It is anticipated that Labour influx will be, if any, very limited in scope, due to limited contracted services and short windows of work. The project, therefore, does not appear to require a LIMP at this stage. If project circumstances change in relation to the Labour influx situation, then the PIU will produce and implement a LIMP in line with this LMP and the provisions of ESS2 and ESS4.

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[8] "Electronic wastes (e.g., nickel cadmium batteries and printed circuit boards from computer and other electronic equipment as well as backup power batteries)" (PAD, parag.75).
[9] Recruitment uses criteria, including (i) residence to the area, (ii) commitment and discipline, (iii) have basic education for writing and reporting, and (iv) community vet the process of selection.

Child Labour: The risk of child labour use is minimum in this Project because, as indicated above, majority of workers are expected to be existing government civil servants. The data generated on the human resources expected to be mobilized for the project activities by the key implementing intuitions also confirm the same (see above Tables). Moreover, in accordance with ESS2 and also as per the provisions of the Ethiopian Labour Proclamation (Art.89(3)) young workers should not be involved in any work that endangers their lives or health. Art.89(4) outlines the barred areas for young workers and Art. 90 further states that, young workers should not be assigned to night and overtime work. For the detailed legal provisions on Child Labour, see Sub-section '*Prohibition of Child and Forced Labour*' below, and for child labour risk mitigation measures, see Section 8 '*Age of Employment*'.

Gender-based violence: The likely occurrence of project related GBV risks is moderately high and will be addressed in the complementary SEA/SH Action Plan. The key SEA/SH and GBV risks to be included in the complementary SEA/SH action plan relate to both: (i) GBV/SH (sexual harassment) between project workers; and (ii) GBV/SEA/SH, namely gender-based violence perpetrated by project workers toward members of local communities. The other GBV/SEA/SH risk relates to the beneficiary selection process/targeting of the women and girls among the vulnerable and underserved communities. A robust GBV Action Plan will be prepared for preventing and mitigating possible related risks.

Moreover, contractors will maintain labour relations with local communities through a code of conduct (CoC). The CoC commits all persons engaged by the contractor, including sub-contractors and suppliers, to acceptable standards of behaviour. The CoC shall include sanctions for noncompliance, including non-compliance with specific policies related to gender-based violence, sexual exploitation and sexual harassment (e.g., termination). The CoC shall be written in a language the worker better understands (for the expatriate worker, it will be usually in English) in a reader-friendly style and signed by each worker to indicate that they have:

  i. received a copy of the CoC as part of their contract;
  ii. had the CoC explained to them as part of induction process;
  iii. acknowledged that adherence to this CoC is a mandatory condition of employment;
  iv. understood that violations of the CoC can result in serious consequences, up to and including dismissal, or referral to legal authorities.

A copy of the CoC shall be displayed in a location easily accessible to the community and project affected people. It shall be provided in Amharic (Federal working language) and the language widely spoken in the local community.

Contractors shall address the risk of gender-based violence, through:

  i. Mandatory training and awareness raising for the workforce about refraining from unacceptable conduct towards local community members, specifically women.
  ii. Informing workers about national laws that make sexual harassment and gender-based violence a punishable offence which is prosecuted;
  iii. Adopting a policy to cooperate with law enforcement agencies in investigating complaints about gender-based violence.

A system to capture gender-based violence, sexual exploitation and workplace sexual harassment related complaints/issues shall be developed. This process shall be under the portfolio of a designated Officer who shall identify and engage the relevant stakeholders on GBV issues.

In addition, the ESIA may identify additional mitigation measures related to gender and such measures will be reflected in site specific ESMPs, including the contractors ESMP or contractors specific Labour Management Plans, where required. This will include engagement with communities on gender related risks, grievance and response measures available, as identified in the manual.

COVID-19 Situation: The project will take necessary measures to address issues related with COVID-19 by using a systematic approach that emphasizes on the joint collaboration of labourers and the management through active engagement. The World Bank's interim note on "*COVID-19 Considerations in Construction/Civil Works Projects*" will have to be followed to ensure occupational health and safety of the workers.

6. Overview of Labour Legislations and WB's ESS2

The Constitution of the FDRE (1995) Art.42(1-2) contains provisions on the rights of factory and service workers, labourers, and other rural workers and these rights include forming associations, bargaining collectively with employers, expressing grievances including the right to strike, reasonable limitation of working hours, rest, periodic leave with pay, remuneration for public holidays as well as healthy and safe work environment.

6.1. Ethiopian Labour Legislation

Pursuant to the broader provision of the FDRE Constitution, the terms and conditions stipulated under various Articles of the following Proclamations apply for the Project workers (in addition to the provisions of ESS2):

  i.   Labour Proclamation No. 377/2003;
  ii.   Federal Civil Servants Proclamation 1064/2017;
  iii.   Labour Proclamation No.1156/2019 (complements, but does not replace, Labour Proc. No. 377/2003);
  iv.   Proclamation No. 632/2009, Employment Exchange Service Proclamation; and
  v.   Proclamation No. 568/2008, Right to Employment of Persons with Disability.

In case of variations between the national legislations, regulations, and the World Bank Environment and Social Standards, the more stringent provision will be applied.

The *Labour Proclamation* No. 377/2003, Part 7 provides a framework for the conditions of employment in workplaces as regards to safety, health and directs the prevention of accidents occurring to persons employed or authorized to enter the sites of work or the general public; through implementation of identified mitigation measures for the specifically identified potential hazards to safety and health. The Proclamation specifically states the responsibilities of the worker and the obligation of the employer, all of which will be adhered to under this Project.

The Labour Proclamation also provides the framework for workers management and the protection of their rights. The Proclamation regulates employment matters in terms of minimum wages, fair Labour practices, non-discrimination and prohibition of employment of children. It also promotes sound Labour relations through protection and promotion of freedom of association, encouraging collective bargaining, settling Labour complaints and disputes, establishment of disputes handling machinery in organization.

Under *Labour Proclamation* No. 1156/2019, the employer is obligated to provide the employee with work as stipulated in the employment contract; to pay the worker wages and other emoluments in accordance with this Proclamation or the collective agreement; to take all the necessary occupational safety and health measures and to abide by the standards and directives to be given by the appropriate authorities in respect of these measures. Article 55(1) provides "Wages shall be paid in cash, provided, however, that where the employer and workers agree, it may be paid in kind. Wages paid in kind may not exceed the market value in the area of the payment in kind and in no case may exceed 30% of the wages paid in cash."

On child labour, Art. 89(1-2) provides "For the purpose of this Proclamation, "young worker" means a natural person who has attained the age of 15 but is below the age of 18 years. It is prohibited to employ a person less than 15 years of age." Sub-Art. 3 further provides "It is prohibited to assign young workers on work, which on account of its nature or due to the condition in which it is carried out endangers their lives or health."

Article 4(1) of Proclamation No. 568 (2008) the *Right to Employment of Persons with Disabilities* states that a person with disability having the necessary qualification and scored more than other candidates shall have the rights without any discrimination to:

- Occupy a vacant post in any office or undertaking through recruitment, promotion, placement or transfer procedures; or
- Participate in a training program to be conducted either locally or abroad.

i. **Rest**

Art. 61(2) of Proclamation 1156/2019 provides "Normal hours[10] of work shall not exceed 8 hours a day or 48 hours a week." Article 69(1) stipulates "A worker shall be entitled to a weekly rest period covering not less than twenty-four non-interrupted hours in the course of each period of seven days". Unless otherwise determined by a collective agreement or work rule, the weekly rest day shall, whenever possible: a) Fall on a Sunday; b) Be granted simultaneously to all of the workers of the undertaking (Sub-Art.2). It further provides "The weekly rest period shall be calculated as to include the period from 6 am to the next 6 am" (Sub-Art.3) and "Notwithstanding the provisions of Sub-Article (1) of this Article, where the nature of his task did not enable the worker to make use of his weekly rest day, the employer shall grant 4 working days of rest in a month" (Sub-Art.4).

ii. Wages

Art. 53(1) of Proc. No 1156/2019 provides ""Wages" means the regular payment to which a worker is entitled in return for the performance of the work that he performs under a contract of employment." According to Article 53(2) "Wages" does not include (a) Over-time pay; (b) Amount received by way of per-diems, hardship allowances, transport allowance, relocation expenses, and similar allowance payable to the worker on the occasion of travel or change of his residence; (c) Bonus; (d) Commission; (e) Other incentives paid for additional work results; f) Service charge received from customers.

Article 28(1) of the 1977 Labour Act provides that: Any contract that exceeds three months in duration shall be made in writing by the employer. Such contract shall be written in three copies and signed by the two parties. Each party shall keep one copy and the third copy shall be deposited with the Labour Office.

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[10] "In this proclamation, "normal hours of work" means the time during which a worker actually performs work or avails himself for work in accordance with law, collective agreement or work rules." (Art. 61(1).

Article 30 gives the content of contract which should include among others "the agreed wage and the time of payment". The legislation does not mandate minimum wages.[11]

iii. Leave (annual, sick, family events, union members, special purpose, and maternity leave)

Proclamation 1156/2019, Article 76-86 amended the provisions of different leaves including the number of days under the Labour Proclamation 377/2003.

(a) *Annual Leave:* Art. 77(1)**: "**A worker pursuant to this Article shall be entitled to uninterrupted annual leave with pay. Such leave shall in no case be less than: (a) Sixteen (16) working days for the first year of service; (b) Sixteen (16) working days plus one working day for every additional two years' service." Sub-Article (5) states "Where the length of service of a worker is below one year, the worker shall be entitled to an annual leave proportional to the length of his service".

(b) *Sick Leave:* Article 85 contains detail provisions under which a worker is entitled to a sick leave: (1) Where a worker, after having completed his probation, is rendered incapable of working due to sickness other than employment injury, he shall be entitled to a sick leave. According to Art. 86 the period of sick leave provided for in Article 85 shall be granted to a worker in the following manner: (1) For the first one month, with payment of 100% of his wages; (2) For the next two months, with payment of 50% of his wage; 3/ For the next three months, without pay.

(c) *Family events***:** workers are entitled for 3 working days leave with pay for events such as marriage, death of a spouse, descendants, ascendants, brother, sister, uncle, aunt relative whether by consanguinity or affinity (Art.81(1) (a-b). Sub-Art. 3 stipulates "A worker shall be entitled to leave without pay for up to five consecutive days in the case of exceptional and serious events. However, such leave may be granted only twice in a budget year."

(d) *Union Leave***: "**Trade union leaders shall be entitled to leave with pay for the purpose of presenting cases in labour disputes, negotiating collective agreements, attending union meetings, participating in seminars or training courses. The manner of granting such leave may be determined by collective agreement" (Article 82).

(e) *Leave for Special Purposes*: Article 83(1-2) of Proclamation 1156/2019 provides "A worker who appears at hearings before bodies competent to hear labour disputes or to enforce labour laws shall be granted leave with pay only for the time utilized for the said purpose. A worker shall be granted leave with pay for the purpose of exercising his voting rights or discharging his obligation as a witness before judicial or quasi-judicial organs."

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[11] "Usually, wages are fixed by either the employer, negotiated by collective agreement, or by an employee's contract. The absence of a minimum wage floor for workers has particularly affected workers from private enterprises who often have the lowest salary, and the salary scale lacks uniformity at the company level…the recently approved Labour Proclamation (No. 1156/2019) opened a path to establish a minimum wage board and a process to set and develop minimum wages." This body is called Tripartite Labour Advisory Board (TLAB), composed of 15 members: five representing workers, five representing employers, and five representatives from the various ministries. TLAB "promotes tripartite consultations concerning the investigation of work conditions, the health and safety of workers, and labour legislation. It also provides advisory opinions to MoLSA." Labour Market Profile 2020 (ulandssekretariatet.dk)

(f) *Maternity Leave***:** In line with the provision of the Constitution of Ethiopia, Article 88 of Proclamation 1156/2019 provides:

1) An employer shall grant leave to a pregnant worker with pay, for medical examination connected with her pregnancy, provided, however, that she may be required to present a medical certificate of her examination.
2) A pregnant worker shall, upon the recommendation of a physician, be entitled to a leave with pay.
3) A pregnant worker shall be granted a period of 30 consecutive days of leave with pay of pre-natal leave and a period of 90 consecutive days of leave post- natal.
4) Where a pregnant worker does not deliver within the 30 working days of her pre-natal leave, she is entitled to an additional leave until her confinement in accordance with Sub-Article (2) of this Article. However, if birth takes place before the expiry of the pre-natal leave, the 90 working days of postnatal leave shall commence.

Art. 81(2) provides "A male employee shall be entitled to three consecutive days paternity leave with full pay".

iv.   Benefits in the Case of Employment Injuries

Article 105 of Proclamation 1156/2019 declares that, where a worker sustains employment injury, the employer shall cover the following expenses, among others, include:

i.   general and specialized medical and surgical care;
ii.   hospital and pharmaceutical care;
iii.   any necessary prosthetic or orthopaedic appliances.

According to Art. 107, a worker who has sustained employment injury shall be entitled to:

i.   periodical payment while he is temporarily disabled;
ii.   disablement pension or gratuity or compensation where he sustains permanent disablement;
iii.   Dependents' pension or gratuity or compensation to his dependent where he dies.

v.   Prohibition of Child and Forced Labour

Ethiopia has ratified ILO Conventions related to Child Labour and Forced Labour such as ILO Convention 182 on the Worst Forms of Child Labour; Minimum Age Convention No. 138/1973; The Rights of the Child Convention, 1989; Forced Labour Convention No. 29/1930; and Abolition of Forced Labour Convention, No.105/1957. According to Article 98(1) of Labour Proclamation 1156/2019, "young worker" means a natural person who has attained the age of 15 but is below the age of 18 years", replacing previous provisions under Proclamation 377/2003 which set the age of young workers at 14 years. Art. 89(3), prohibits assigning young workers on work, which on account of its nature or due to the condition in which it is carried out endangers their lives or health. Further, Sub-Article 4(a-d) outlines the barred areas for young workers. Further, Art.91(1-4) states that, young workers should not be assigned to night and overtime work, of the following nature; (i) night work between 10 pm and 6 am; (ii) over time work; and, (iii) work done on weekly rest days; or (iv) work done on Public Holidays.

6.2. World Bank Standard on Labour and Working Conditions (ESS2)

ESS2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management

relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. The objectives of ESS2 are:

- ✎ To promote safety and health at work.
- ✎ To promote the fair treatment, non-discrimination and equal opportunity of project workers.
- ✎ To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate.
- ✎ To prevent the use of all forms of forced Labour and child Labour.
- ✎ To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.
- ✎ To provide project workers with accessible means to raise workplace concerns.

7. Occupational Health and Safety and Working Environment

Ethiopia has legal frameworks on Occupational Health and Safety (OHS). The parent legislative framework of the land is the Constitution of the FDRE Proc. No. 1/1995 (21st August, 1995). This grand legislation has several articles pertaining to matters of Decent Work in general and of Safety, Health and Working Environment in particular.[12] Article 42(2) provides that "workers have the right to reasonable limitation of working hours, to rest, leisure, to periodic leaves with pay, to remuneration for public holidays as well as healthy and safe work environment". Article 89(8) provides "Government shall endeavour to protect and promote the health, welfare and living standards of the working population of the country."

The Constitution has numerous articles that ensure the protection of citizens and workers from environmental and work-related hazards. The Ethiopian Labour Proclamation has established the provisions of OHS in work places. It clearly indicates the duties and responsibilities of the three parties: employer, employee and the government inspectors as stakeholders (FDRE, 2004). There are OHS directives and guidelines used by OHS inspectors and safety officers to ensure the protection of workers (MoLSA, 2008).

Furthermore, there are different legal frameworks on OHS which include: The National Occupational Health Policy and Strategy; Occupational Health and Safety Directive (2008)[13]; Occupational Health and Safety Policy and Procedures Manual; and on Work Occupational Health and Safety Control manual for Inspectors (2017/18) which will apply to the '*Digital Ethiopia*'. Occupational Health and Safety promotion is also included as priorities in the National Health Policy Statement (1993). Ministry of Labour and Social Affairs (MoLSA) and its regional counterparts are responsible for OHS at Federal and Regional levels. MoLSA has OHS and Working Environment Department responsible for OHS.

Further, Part Seven, Articles 92-106 of Proc. No. 1156/2019 defines the occupational safety and health, and working environment focusing on: (i) preventive measures (Art. 92-4); (ii) occupational injuries (Art. 95-8); (iii) defining degree of disablement (99-102); (iv) benefits to employment injuries (103-4); (v)

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[12] National OSH Programmes (adapt.it)

[13] Ministry of Labour and Social Affairs of the Federal Republic of Ethiopia. Occupational Safety and Health Directive. Addis Ababa: May, 2008. https://scholar.google.com/scholar_lookup?title=Occupational+Safety+and+Health+Directive&publication_year=2008&

medical services (105-6). Articles 107-112 provide for 'VARIOUS KINDS OF CASH BENEFITS' to which workers are entitled.

Each administrative region has an OHS department within the Labour and Social Affairs Bureau with the responsibilities of inspection service. The Labour proclamation vests in the Regional Bureaus the power to determine standards and measures for the safety and health of workers and follow up their implementation. It is also indicated that Regional Bureaus must collect, compile and disseminate information on safety and health of workers.

It is unlawful for an employer to: (a) impede the worker in any manner in the exercise of his rights or take any measure against him/her because he/she exercises his/her right; (b) discriminate against female workers, in matters of remuneration, on the ground of their sex; (c) terminate a contract of employment contrary to the provisions of the Labour Proclamation No. 1156/2019; (d) coerce any worker by force or in any other manner to join or not to join or to cease to be a member of a trade union or to vote for or against any given candidate in elections for trade union offices; (e) require any worker to execute any work which is hazardous to his life; (f) discriminate between workers on the basis of nationality, sex, religion, political outlook or any other conditions. Ethiopian law does not specifically state that it prohibits an employer to retaliate against a worker for reporting a dangerous work situation or removing himself/herself from a dangerous work situation.

8. Age of employment

Ethiopia has ratified ILO Minimum Age Convention No. 138/1973. As per the Ethiopian Labour Proclamation No.1156/2019 Article 89(1-4) minimum age for employment is 15 years for young workers. The minimum Age for Hazardous Work is set as 18 years. Workers between the ages of 15 to 18 years are classified as young workers. It is prohibited to employ young workers to carry out work which on account of its nature or due to the condition in which it is carried out, endangers the life or health of the young workers.

Proc. No.1156/2019 states that: Normal working hours for young persons may not exceed seven hours a day. It is prohibited to employ young workers on night work between 10 p.m. and 6 a.m.; overtime work; weekly rest days; and public holidays. Because the project mainly mobilizes government civil servants and a handful of adult professionals and experts, expatriates included, it will not employ/engage any person under 18 years of age.

The PIU will undertake monitoring, at a minimum every six months, of all project workers, to ensure that there are no direct hires under 18 years of age or no community workersand that all contractors and subcontractors involved in the project are not employing/engaging anyone under 18 years of age for the project work. Further, awareness-raising sessions will be conducted regularly among the communities, as well as for Implementing Agencies (IA) and contractors to sensitize on prohibition and negative impacts of child and forced Labour.

The Project will use the following process, prior to the employment or engagement of an applicant for work on the project, to verify the person's age. The PIU will ensure that each contractor/subcontractor also uses this process and provides it (the PIU) with written confirmation that each worker they employ or

engage in relation to the project is at least the minimum age of 18 years. The following information will be kept on file in the PIU administrative offices:

- Written confirmation from the applicant of their age; and
- Where there is reasonable doubt as to the age of the applicant, requesting and reviewing available documents to verify age (such as a birth certificate, national identification card, medical or school record, or other document or community verification demonstrating age).

If a person under the minimum age of 18 years is discovered working in relation to the project, the PIU will take measures to terminate the employment or engagement of that person in a responsible manner, considering the best interest of that person.

To ensure that the best interests of the child under 18 years are considered, the PIU will undertake, and ensure that all contractors/subcontractors also undertake, remediation within a reasonable time period agreeable to the World Bank. The remediation activities could include, among other options:

- Enrolling the child in a vocational training/apprenticeship program, but which does not interfere with the child's completion of compulsory school attendance under national law.
- Employment of a member of the child's family, who is at least 18 years of age, by the primary supplier, contractor, or subcontractor for project-related or other work.

9. LMP Implementation Responsible Staff

The overview of responsible staff and oversight mechanisms will be described in further detail in the ESMF. This is an overview – the details will flow from the ESMF and can be taken further forward during the implementation stage. The '***Digital Ethiopia***' PIU has the overall responsibility to oversee all aspects of the implementation of the LMP, in particular to ensure contractors' compliance. The PIU will address all LMP aspects as part of procurement for works as well as during contractor induction.

Notwithstanding the above, this section briefly outline the roles and responsibilities of project implementing entities in: (i) engagement and management of project workers, including direct hires and workers employed/engaged in relation to contractors/subcontractors; (ii) engagement and management of contractors/subcontractors; (iii) occupational health and safety (OHS); (iv) training of workers; and (v) addressing worker grievances. The source of budget for the implementation of OHS measures is the part of the project cost.

The responsible body for workers management varies depending on the types of workers and the location. The direct workers will be managed by the MInT, in collaboration with ECA and MoSHE/EthERNet pursuant to the Federal Civil Servants Proclamation 1064/2017 at the National and regional states levels as key implementing entity. Whereas, the contracted workforce's contract terms and conditions would be determined by the laws specified under *section 6.1* above, the MInT and its partner implementing entities, i.e., ECA and MoSHE/EthERNet will provide the required workers' training and occupational health and safety equipment and procedure to address worker grievances. This responsibility of managing staff will also pass to contractors and sub-contractors.

Contractors must engage a minimum of one health and safety representative, which is responsible for monitoring the day-to-day compliance to safety precautionary measures indicated in Environmental and Social Impact Assessment (ESIA), Social Assessment (SA), Project Implementation Manual (PIM) and

LMP, and records of any incidents and report to the Federal Project Implementation Unit (FPIU). The FPIU is responsible to promptly notify the incidence and accident to the WB within 48 hours, which will be followed by formal investigation of the causes and identification of a set of corrective actions. Besides, the FPIU monitors labour and working conditions quarterly, and annually throughout the Project implementation period. Any identified non-compliance will be included in these monitoring reports accompanied by relevant corrective actions.

10. Terms and Conditions

The project will depend on the various laws: (i) Labour Proclamation No. 42/1993 (replaced by Labour Proclamation No. 377/2003); (ii) Labour Proclamation No. 377/2003; (iii) Labour Proclamation No.1156/2019 (complements (does not replace, Labour Proclamation No. 377/2003); (iv) Proclamation No. 632/2009, Employment Exchange Service Proclamation; and (v) Proclamation No. 568/2008, Right to Employment of Persons with Disability. Further, Ethiopia is a signatory to international conventions and has ratified the major international human rights instruments. Ethiopia has also ratified the following ILO conventions:

   i.   Forced Labour Convention No. 29/1930;
  ii.   Freedom of Association and Protection of the Right to Organize Convention, No. 87/1948;
 iii.   Employment Service Convention, No. 88/1948;
  iv.   Right to Organize and Collective Bargaining Convention, No. 98/1949;
   v.   Abolition of Forced Labour Convention, No.105/1957;
  vi.   Minimum Age Convention No. 138/1973;
 vii.   Occupational Safety and Health Convention, No. 156/1981;
viii.   Termination of Employment Convention, No. 158/1982;
  ix.   The Rights of the Child Convention, 1989; and
   x.   The Worst Forms of Child Labour Convention No. 182/1999.

Hence, the terms of conditions follow stringent international requirements where the gaps of the national law are filled by WB requirements and ILO conventions. The terms of conditions include the name and legal domicile of the employer; the worker's name; the worker's job title; the date employment began; where the employment is not permanent, the anticipated duration of the contract; the place of work or, where the work is mobile, the main location; benefit packages; hours of work, rest breaks, leave entitlements and other related matters; rules relating to overtime and overtime compensation; the pension and other welfare arrangements applicable to the worker; the length of notice that the worker can expect to give and receive on termination of employment; the disciplinary procedures that are applicable to the worker (including the code of conduct that relates to GBV prevention), including details of representation available to the worker and any appeals mechanism; and details of grievance procedures, including the person to whom grievances should be addressed.

As indicated above, the project will not recruit children for project related works and project monitoring will include this aspect. The WB ESS2 states that the minimum age of employment is 14 years while the newly revised Ethiopian Labour Law has extended the minimum year of employment to 15 years. However, both WB and Ethiopian law prohibit engagement of children under 18 years of age in works that have hazardous nature.

The other gap between the WB and Ethiopian law is that the latter does not clearly indicate that the employer is prohibited against retaliating a worker for reporting a dangerous work situation or removing himself/herself from a dangerous work situation. ESS2 of the World Bank's ESF provides that project workers will not be retaliated against or otherwise subject to reprisal or negative action for reporting a dangerous work situation or removing himself/herself from a dangerous work situation. The PIU will ensure that all project workers, including those engaged by contractors, will have the right to report and remove themselves from dangerous work situations without being subjected to reprisal or negative action.[14]

In case of differences between the international conventions, national legislations and regulations, and the World Bank Environment and Social Standards, the more rigorous provision will be applied.

11. Grievance Redress Mechanism (GRM)

The Project recognizes the vulnerability of the target communities, beneficiaries and the different types of workers to be involved or people affected by the project activities. The grievance redress mechanism for addressing and managing workplace and employment related conflicts or complaints as well as gender-based violence (GBV) is crucial for the '*Digital Ethiopia*' project. A project worker who has a complaint or grievance has the right to present it and obtain proper redress through the Worker Grievance Mechanism (WGM) established by the project for this purpose. In this project a grievance mechanism will be provided for all direct workers[15] and contracted workers. The GRM which will be proportionate to the nature, scale and the potential risks and impacts of the project will be put in place. The GRM will be designed in a way to promptly address concerns using an understandable and transparent process that provides timely feedback in a language they understand, without any retribution, and will operate in an independent and objective manner. The workers will be informed of the GRM at the time of recruitment and the measures put in place to protect them against reprisal for its use. Measures will be put in place to make the GRM is easily accessible to all project workers.

The MInT, under whose leadership the project will be implemented, will establish, coordinating with ECA and MoSHE/EthERNet), an accessible and functional WGM for all categories of workers described in this LMP, including direct hires, and workers hired through contractors/subcontractors. Labour Proclamation No. 1156/2019 provides "Employers and workers or their respective associations may introduce social dialogue in order to prevent and resolve labour disputes amicably" (Art.141). The government civil servants seconded to this project will also have access to grievance procedures under Ethiopian government public service laws.[16]

The project specific WGM will be established at two levels: (1) at the national level in MInT (which is entrusted with the leadership role of the Project); and 2) at the *woredas* in which project activities take place. It should be emphasized that this GRM is not a substitution to legal system for receiving and

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[14] ESS2, paragraphs 26 and 27.
[15] As indicated above (Footnote 4), "All government civil servants seconded to work on the project will remain subject to the terms and conditions of their existing public sector employment agreements/arrangements, as understood under ESS2, Scope of Application, paragraph 8." But, in the event of inaction on the part of the concerned body or dissatisfaction with its decision regarding the worker's complaints about his/her occupational health and safety and other concerns associated with the new assignment on the project, he/she may lodge grievances to the GRM established for the project, especially issues related to GBV and discrimination of some sort.
[16] Labour Proclamation No. 1156/ 2019.

handling grievances. However, this is formed to mediate and seek appropriate solutions to labour related grievances, without escalating to higher stages. At the national level, to be housed in MInT, the members of the Worker Grievance committees include: (i) HR heads of MInT, ECA, and EthERNet; (ii) Grievance focal officer; (iii) ICT Director; (iv) Women, Children and Youth Directorate Directors (or any other relevant unit, where such a Directorate does not exist in the institution); and MInT PIU representative. The *woreda* level GR committees also follow the same principle, but will include representatives of workers/labourers. To be more specific, it includes (i) *woreda* administration representative, (ii) grievance focal officer, (iii) labour/employee representative, (iv) women representative, and (v) youth representative. The National and the *Woreda* level GR Committees will be chaired by the HR head of MInT and the *woreda* administration representative, respectively.

11.1 Principles and Procedures of the GRM

- The workers GRM is not same as the grievance mechanism to be established for project affected stakeholders.
- Both direct and contracted workers will be informed of the WGM at the time of recruitment and the measures put in place to protect them against any reprisal for its use.
- The WGM will be easily accessible via the disclosure of a hotline and/or in person during office hours, suggestion box, and transparently disclosed to all employees to raise workplace concerns.
- The WGM shall be transparent in using clear procedures.
- There will be no discrimination against those who express grievances, and all grievances will be treated confidentially.
- Anonymous grievances will also be accepted and treated equally as other grievances whose origins are known.
- The PIU and other responsible project management will treat grievances seriously and take timely and appropriate action in response.
- The aggrieved parties shall be informed within 10 days of their grievance application, either with a respective solution or with a request of extension in cases where more information is needed.
- The aggrieved party shall have the option to refer to a grievance log with key information that will be established by the *woreda* level project office.
- Grievance logbook will be maintained in the project office.
- The WGM, however, does not replace or override the requirement that the PIU provides for workplace processes for project workers to report work situations that they believe are not safe or healthy, such as reporting requirements regarding workplace injuries and accidents.
- The WGM will not prevent workers to use judicial procedure or administrative remedies that might be available under the law or existing arbitration procedures or substitute for collective agreements grievance mechanisms, if preferred.
- The quarterly environment and social implementation monitoring will include reports on grievances related to project labour and working conditions issues. If not satisfied with the outcome of the *woreda* level GR committee decision, the aggrieved party shall be able to access a second level committee at the Federal level, housed in MInT.

11.2 Worker Grievance Mechanism Structure[17]

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[17] The two-tier GRM levels proposed under this section is informed by the first paragraph of '***ANNEX 1: Implementation***

Woreda level. The project focal person at the *woreda* level will serve as Grievance Focal Point (GFP) to file the grievances and appeals of the project workers. He/she will be responsible to coordinate with relevant Labour and Social Affairs offices and persons to facilitate addressing these grievances. If the issue cannot be resolved at the *woreda* level within five working days, then it will be escalated to the Federal level.

Federal level/MInT: If there is a situation in which there is no response from the *woreda* level GR committee, or if the response is not satisfactory then complainants and feedback providers have the option to contact the Focal Person at MInT, i.e., Human Resources Directorate of the MInT directly to follow up on the issue, including the review of the case by the GR committee established at the national level, i.e., in MInT.

MoLSA: Workers who are not satisfied with the decisions of the Federal level GR Committee could take their cases to the Labour dispute court at the MoLSA. This could be dealt with at two levels: (i) by taking the case to the formal Labour division courts; and (ii) through the Labour relations board for conciliation.

11.3 WORLD BANK GRIEVANCE REDRESS SYSTEM

Communities and individuals who believe that they are adversely affected by a WB supported project may submit complaints to existing project-level grievance redress mechanisms or the WB‟s Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit, http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service. For information on how to submit complaints to the World Bank Inspection Panel, please visit, www.inspectionpanel.org.

12. Contractor Management

The MInT, as a Federal Institution entrusted with the leadership role of the '*Digital Ethiopia*', will coordinate with ECA, MoSHE/EthERNet and other institutions to determine which project activities can be done in-house and which ones will be outsourced. In a situation where contractors are hired, MInT will undertake due diligence assessment of the contractors' Labour practice and adherence to the international conventions Ethiopia has ratified, national law, ESMF, ESS2 and this LMP. The contract will include clauses that refer to the Environmental and Social Commitment Plan (ESCP), Stakeholders Engagement Plan (SEP), and the LMP requirements.

Moreover, the PIU will make reasonable efforts to ascertain that third parties who engage contracted workers are legitimate and reliable entities and have in place Labour management Procedures applicable to the project that will enable them to operate in accordance with the requirements of ESS2. In making this determination in the Project contractor selection process, the PIU will review information, including

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Arrangements and Support Plan' in the PAD, which entrusts the leadership of the project to MInT.

public records, for example, corporate registers and public documents relating to violations of applicable Labour law, including reports from Labour inspectors and other enforcement bodies; business licenses, registrations, permits, and approvals; documents relating to a Labour management system, including OHS issues, for example, LMP; identification of Labour management, safety, and health personnel, their qualifications, and certifications; workers' certifications/permits/training to perform required work; records of safety and health violations, and responses; accident and fatality records and notifications to authorities; records of legally required worker benefits and proof of workers' enrolment in the related programs; worker payroll records, including hours worked and pay received; identification of safety committee members and records of meetings; and other relevant points as required.

The MInT will follow due process in monitoring the contractor's compliance with the WB ESS2, the international conventions Ethiopia has ratified, national law, ESMF, ESS2 and in this LMP. The MInT subsequently will provide regular reports (on monthly, quarterly and annual basis) regarding the performance of the contractors.

13. Operationalization of this LMP: Project Annual Work Plan and Budget

MiNT will ensure the commitments and planned activities in this LMP are operationalized through the project annual workplan and budget. Environmental and social activities included in this LMP with estimated budget should be reflected in the annual work plan and budget. The project annual workplan and budget passes through a review by Task Team Leaders (TTL) and environmental and social specialists prior to issuance of no objection.

14. **References**

FDRE, Proclamation No.1156/2019 Labour Proclamation.

Labour Proclamation No. 42/1993

Labour Proclamation No. 377/2003

MOLSA, 2006, Occupational Safety and Health profile for Ethiopia, Addis Ababa, Ethiopia.

MOLSA, 2008, Occupational Safety and Health Directive of Ethiopia, Addis Ababa, Ethiopia.

PAD, Ethiopia Digital Foundation Project ("Digital Ethiopia"), 2020.

Proclamation No. 632/2009, Employment Exchange Service Proclamation

Proclamation No. 568/2008, Right to Employment of Persons with Disability.

National OSH Programmes (adapt.it)

Labour Market Profile 2020 (ulandssekretariatet.dk)

Annex: LMP Data Collection Table

Federal Democratic Republic of Ethiopia

Ministry of Finance (MoF)
Ministry of Innovation and Technology (MInT)
Ethiopian Communications Authority (ECA)

Ethiopia Digital Foundation Project ("Digital Ethiopia")

Labour Management Procedure (LMP)

OVERVIEW OF LABOR USE ON THE PROJECT

This section describes the following, based on available information:

Number of Project Workers: The total number of workers to be employed on the project, and the different types of workers: direct workers, contracted workers and community workers. **Where numbers are not yet firm, an estimate should be provided.**

Characteristics of Project Workers: To the extent possible, a broad description and an indication of the likely characteristics of the project workers e.g., local workers, national or international migrants, female workers, workers between the minimum age and 18.

Timing of Labor Requirements: The timing and sequencing of labor requirements in terms of numbers, locations, types of jobs and skills required.

Contracted Workers: The anticipated or known contracting structure for the project, with numbers and types of contractors/subcontractors and the likely number of project workers to be employed or engaged by each contractor/subcontractor. If it is likely that project workers will be engaged through brokers, intermediaries or agents, this should be noted together with an estimate how many workers are expected to be recruited in this way.

Migrant Workers: If it is likely that migrant workers (either domestic or international) are expected to work on the project, this should be noted and details provided.

♣ **Dear respected representative of:**

> MoF, MInT, ECA, and MoSHE, within the broader understanding of the aforementioned description of key data needed to prepare the Labour Management Procedures for the '*Digital Ethiopia*' project, please let us know your respective Organization's human resource need/tentative plan (it could be an estimate) to accomplish Project (sub-) component activities tasked to your organization by filling in the Tables below.

Table I: The total number of workers to be employed on the project, and the different types of workers

No.	Type of Worker by Job Classification	Estimated No.	Remark
1	Direct Workers		
2	Contract Workers		
3	Community workers		

Name of the Institution _____

Contact Person: _____   **email**   **address:** _____

Table II: Characteristics of Project Workers

No.	Description of project workers by Job classification	Female	Male	Total
1	Local Workers			
2	National Workers			
3	International workers			
3	Workers between the minimum age & 18			

Name of the Institution _____

Contact Person: _____   **email**   **address:**

_____

ANNEX I: SOCIAL ASSEESSMENT REPORT

ETHIOPIA DIGITAL FOUNDATIONS PROJECT SOCIAL ASSEESSMENT REPORT

Assefa T. Sori, February 20, 2021

ADDIS ABABA

ETHIOPIA

Table of Contents

1.   Acronyms

AF - Additional Financing

AGP - Agricultural Growth Program

CBO - community-based organization

CEDAW - Convention on Elimination of All Forms of Discrimination Against Women

CERC - Contingent Emergency Response Component

COPCD - Channel One Programs Coordinating Directorate

DEVAW - Declaration on the Elimination of Violence against Women

DG- Director General

DPO – Disabled Peoples Organization

ECA - Ethiopian Communications Authority

ELEAP - Ethiopia Electrification Program

ERSNP – Ethiopia Rural Safety Net Program

ESMF - Environmental and Social Management Framework

ESIA- Environmental and Social Impact Assessment

ESPES - Enhancing Shared Prosperity through Equitable Services

ESS – Environmental and Social Standards

ESSA - Environmental and Social systems assessment

EthERNet - Ethiopian Research and Education Network

FDRE - Federal Democratic Republic of Ethiopia

FEAPD - Federation of Ethiopian Associations of Persons with Disabilities

GBV - Gender Based Violence

GoE - Government of Ethiopia

GRM – Grievance Redress Mechanism

GQs - Guiding Questions

GTP – Growth and Transformation Plan

HIV/AIDS – Human Immuno Virus/Acquired Immunodeficiency Syndrome

HE – Higher Education

ICT – Information Communication Technology

IT – Information Technology

IRU - indefeasible right of use

LLRP - Lowland Livelihood Resilience Project

LMP - Labour Management Procedure

MDA – Ministry, Department and Agency

MInT - Ministry of Innovation and Technology

M & E - Monitoring and Evaluation

MoF- Ministry of Finance

MoFED - Ministry of Finance and Economic Development

MoP - Ministry of Peace

MoSHE – Ministry of Science and Higher Education

MoWCYA - Ministry of Women, Children and Youth Affairs

NGO – Non-governmental Organization

NREN - Ethiopia's National Research and Education Network

PAD – Project Appraisal Document

PPA - Project Preparation Advance

PCDP/ILLRP – Pastoralist Development Program/Integrated Lowland Livelihood Resilience Project

PDO - Project Development Objective

PEHAA - Public Enterprises Holding and Administration Agency

PIM – Project Implementation Manual

PIU - Project Implementation Unit

PPA - Project Preparation Advance

PSNP – Productive Safety Net Program

RAP - Resettlement Action Plans

RLLP – Resilient Livelihood and Landscape Program

RPF – Resettlement Policy Framework

RPLRP - Regional Pastoral Livelihood Resilience Program

SA – Social Assessment

SEA/SH – Sexual Exploitation and Abuse/Sexual Harassment

SE – Sexual Harassment

SLMP – Sustainable Land Management Program

SMP - Social Management Plan

SNNPR - Southern Nations, Nationalities and Peoples Region

SOEs - State-Owned Enterprises

STIs - Sexually Transmitted Infections

TA - Technical Assistance

ToR – Terms of Reference

TVET – Technica and Vocational Education and Training

UAF - Universal Access Fund

UAS – Universal Access Service

UN - United Nations

UNICEF - United Nations Children's Fund

WB   -   World   Bank

2.   Acknowledgments

This Social Assessment report is the result of the collective efforts and generous support of different partners. First, I would like to extend my special thanks to Dr. Mesfin Belachew, Senior Strategic Advisor, Digital Transformation Program, MInT, Eng. Balcha Reba and Ato Yoseph Abate, Director General and Deputy Director General, respectively, ECA, and Dr. Zelalem Assefa, Director General, EthERNet, MoSHE for their special commitment and support of this work. They all acted on my behalf in reaching out to their colleagues and other project partners in generating the required data within a short period of time. I was given this assignment with short notice with tight schedule to produce the draft report, and it would have been practically impossible to meet the deadline without their unreserved support. Thank all once again!

Several experts from these and other key implementing federal institutions have supported this study by filling out the open-ended Guiding Questions (GQs), which have been quite informative. There were other experts, whom I got to know through my acquaintances, who have been extremely generous in filling out the GQs and a couple of them participating in phone interviews. They all deserve special acknowledgement for their support of the project. The input obtained from the Federation of Ethiopian Associations of Persons with Disabilities (FEAPD), which reflected the collective concerns and challenges of all categories of persons with disabilities, was extremely informative, for which I would like to thank Ato Abayneh Gujo, Director General of FEAPD and his team.

ICT Directors of Samara, Gambella and Mizan-Tepi Universities also deserve special recognition for sharing their thoughts on the challenges and opportunities the proposed project might have from the point of view of their respective universities and the communities surrounding them. Finally, I would like to thank my World Bank colleagues for their guidance on the assignment, critical and constructive comments on the inception report, GQs and the various drafts of the SA report.

Assefa T. Sori

February 20, 2021

3.   Executive Summary

Background and Context

Ethiopia, a growing economy with a population of over 100 million located in the conflict-affected Horn of Africa region, is experiencing unprecedented political and economic change. Since the appointment of a new Prime Minister in April 2018, a peace agreement with Eritrea has been signed and the border has been reopened following two decades of conflict. While the political situation remains fragile, the new administration has opened new political space for dialogue, released political prisoners, lifted bans on political parties and media outlets, actively engaged in regional diplomacy, and started to implement a range of economic reforms designed to revitalize the Ethiopian economy by expanding the role of the private sector. Given Ethiopia's size and location, these shifts have the potential to transform the economic and political landscape in the Horn of Africa.

The Homegrown Economic Reform Agenda, launched in September 2019, outlines macroeconomic, structural and sectoral reforms for job creation, poverty reduction, and inclusive growth. While the Government sets out its vision to transform Ethiopia from a largely agrarian low-income country to an industrialized lower-middle-income country by 2030, the initiative gives special emphasis to sectors such as agriculture, manufacturing, mining, tourism, and information and communication technologies (ICT). The Government has also initiated reforms characterized by market liberalization with partial and/or full privatization of selected State-Owned Enterprises (SOEs) in key strategic sectors, including telecom, energy, aviation and logistics. The implementation of these reforms is expected to transform the economy towards a more sustainable model by strengthening the role of the private sector, enhancing efficiency of the industry, contributing to export expansion, and spurring competition in several critical sectors.

Ethiopia was one of the last three countries in the world to retain a national telecom monopoly on all telecommunications services until the *Communication Services Proclamation*, adopted in September 2019, which liberalises the market. Moreover, the digital divide within Ethiopia is equally apparent as the disparities with its neighbours. Lack of availability, affordability, and low quality of broadband connectivity is particularly significant among socially vulnerable populations, including children and elderly, women, people with disability, low-income, and rural populations. While 80% of the Ethiopia's population lives in rural areas and the agriculture sector accounts for 85% of workforce, rural internet penetration for Ethiopian farmers is estimated to be only 4%.[18] Despite the paucity information about women's broadband access and use, one study suggests that fewer than 12% of women have internet access in Ethiopia[19]. Considering the disparities that exist in literacy rates between women and men, rural and urban areas, poor and rich, non-graduates and graduates, the discrepancy is greater for the acquisition of digital skills, which require a basic level of literacy.

The GoE recognizes that the job creation potential of improved digitalization can spread to the population through digital businesses in Ethiopia. But the location of the new jobs being created is almost as important as their number. It will be critical to extend such developments also towards rural areas and, in general, towards different social groups with less opportunities to access digital technologies such as the

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[18] Ethiopia, Ministry of Innovation and Technology. 2020. Digital Transformation Strategy, 2025.

vulnerable people in the underserved and emerging regions. Access to affordable and high-quality internet services will be critical to ensure business continuity during and after the COVID-19 pandemic.

Project Components

The Project Development Objective (**PDO**) of ***Digital Ethiopia Foundations project*** is to improve Ethiopia's competitiveness in the digital age through increased inclusiveness and affordability of digital services and through digital job creation.

The overall aim of the proposed '***Digital Ethiopia***' project is to increase public access to high quality and affordable internet services, promote digital entrepreneurship and facilitate job creation, to help Ethiopia compete in the digital age. The Project has three major Components.

Component 1: Digital Economy, enabling legal and regulatory environment. Its aim is to strengthen the analog foundations of the digital economy, in particular policy-making, and effective regulation for the telecommunications sector and for the development of digital entrepreneurship. This project component will support strengthening the sector regulator, ECA, reviewing the relevant legal and regulatory foundations of the digital economy, and the contracting the transaction advisor to support the partial privatization of Ethio Telecom.

Component 2: Digital Government and Connectivity. The objective of this component is to develop the capacity of GoE to deliver digital services (e.g., *Digital Government and COVID-19 response*), and to crowd-in private sector investments to improve regional and domestic connectivity infrastructure, to connect public institutions and educational institutions to broadband internet. It will build upon the market opening measures supported in Component 1 to stimulate private-sector-led investment to expand the geographic coverage of broadband networks, to better serve Government institutions, businesses and citizens across the country.

Component 3: Digital Business and Entrepreneurship. This component aims to nurture digital entrepreneurship and incentivize digital businesses to train, provide digital devices, and employ Ethiopians to participate in the digital economy, and thereby to generate income and jobs. It includes a technical assistance sub-component to MInT for digital market regulations and implementation. Following the recommendations of the "*Digital Entrepreneurship and Innovation*" diagnostic study in Ethiopia[20] as well as stakeholder feedback, the proposed interventions under this component are focused on addressing the access to finance and digital economy skills constraints. Specially this component is expected to provide basic digital economy training and digital devices for the informal sector (e.g., individual contractors or suppliers), but with an industry focus for practical applications. This component has two main interventions that will finance: (i) Two grant funding windows for digital start-ups and digital businesses; and (ii) Technical Assistance (TA) to MInT.

Scope of the Social Assessment (SA)

[20]Commissioned by the World Bank and delivered by Deloitte in March 2020. It highlighted that Ethiopia's innovation ecosystem is still at a nascent stage, and made 11 recommendations, ranging from policy reforms (4), access to finance (4), infrastructure and support (2), to skills and literacy (1 recommendation). Digital market policy and access to finance were two areas highlighted as having the highest number of bottlenecks to potential entrepreneurs.

This SA is a risk mitigation tool covering risks, challenges and recommendations that will impact the design of Ethiopia Digital Foundation Project ("*Digital Ethiopia*").[21] In particular, it will inform how the design of the project will be made to be appropriate for all beneficiaries, including the most vulnerable. It helps make the project responsive to social development concerns, including seeking to enhance benefits for the socially vulnerable populations, including children and elderly, women, people with disability, low-income, and rural populations. It analyzes distributional impacts of intended project benefits on different stakeholder groups, and identifies differences in assets and capabilities to access the Project benefits. It consists of the analysis of context and social issues with a participatory process of stakeholder consultations and involvement, to provide operational guidance on developing project design, implementation, and a monitoring and evaluation (M&E) framework. It also complements other standards frameworks relevant in this project, with the aim to prevent and mitigate undue harm to people and their environment in the development process.

Objectives of the SA

The SA aims to assess the social characteristics of local communities, including determining the nature and characteristics of underserved groups in the *"Digital Ethiopia"* intervention areas, with special emphasis on their cultural characteristics, social institutions and organization and establish that the project will not negatively impact the way of life of these people. It is a systemic assessment of the positive and adverse social impacts associated with project and propose the appropriate mitigation measures to address.

The SA is intended to help the project to understand key social issues and risks, and to determine social impacts on different stakeholders. It also assesses the needs and priorities of key stakeholders, outline their views on the design and proposed implementation mechanisms of the project, and build capacity and involvement. It will also provide requirements for the design of an appropriate institutional arrangement to implement, monitor, and evaluate the project on the achievement of social outcomes.

The SA is the basis for the preparation of the Social Management Plan (SMP) in which all the mitigation measures are provided as actions and if those actions require budget, an indicative budget and the timeline for the implementation will be included in the SMP.

Methodology

This SA study is a participatory process led by the Ministry of Innovation and Technology (MInT), with close coordination of Ethiopian Communications Authority (ECA) and Ministry of Science and Higher Education (MoSHE)/Ethiopian Research and Education Network (EthERNet). The *"Digital Ethiopia"* project, being one of the many development projects financed by the WB, builds on the past experiences gained by both the WB and the GoE. In view of this, this SA mined on the documents produced for these projects as secondary sources of data. Moreover, it used primary data collected from different community groups employing different data collection methods. Published works, national laws, regulations, and relevant international conventions were also reviewed.

Key Social Assessment Findings and Recommendations

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[21] The "*Digital Ethiopia*" project PAD (Parag. 82) states: "Further, dependent on the type of activities in the emerging regions and pastoralist areas, a Social Asssessment (SA) proportional to the activities under the project will be prepared."

Under this section, key SA findings, namely opportunities, potential challenges and risks of the project and the proposed mitigation measures are briefly presented. As the detailed discussions of the SA findings are treated throughout this report, only a condensed version is presented here.

Support for the Project

One key finding of the SA is that there is a strong support for the project as it is believed to address the systemic marginalization of the vulnerable people in the areas of ICT services. In this digital age, most of the people in the underserved emerging regions, hardly get the minimum ICT based services such as email, leave alone doing businesses using digital technology and services.

❖ The project has very strong support across all spectrum of the potential beneficiaries.

❖ There is huge potential for the project to benefit people, especially the vulnerable population groups among the underserved communities in the emerging regions.

❖ The commitment to realize the project objectives is very high among all implementing agencies, especially the key implementing federal institutions: MInT, ECA, and MoSHE/EthERNet.

Other key findings, challenges and recommendations drawn from the SA are briefly summarized below:

Key challenges/risks

❖ *Public institutions* in emerging regions are characterized by: lack ICT equipment and infrastructure; budget constraint; lack of digital skills; outdated-technologies; and unreliable power supplies.

❖ *Barriers for underserved communities/vulnerable people* include: digital illiteracy; unavailability of power**;** lack of ICT infrastructure; unaffordability of ICT technologies and services; unavailability of user-friendly devices for people with disability; lack of awareness of the digital businesses; lack of initial capital to start digital businesses; physical access problem for people with disabilities; and lack of awareness and readiness for the technology among the elderly.

❖ Risk of women and girls being excluded from the project beneficiaries due to embedded *gender inequality*, i.e., socio-economic and cultural marginalization of women and girls.

❖ *Women's time poverty* - women find it difficult to balance their *triple roles* competing for their equal attention.

❖ *Female household heads* may face the risk of not benefiting from the project in equal measure with male counterparts because of not being able to balance their domestic responsibilities with their other roles.

❖ *GBV* – targeting project beneficiaries might involve the risk of SEA/SH for women and girls.

❖ Beneficiary targeting – might involve *corruption*, *nepotism*, and elite capture risks.

❖ *Exclusion risk* is associated with: digital illiteracy/lack of skill; economic status; low literacy level; language barrier; non-localized technologies; unemployment; disability and poor ICT infrastructure.

❖ *GRM* - none of the institutions studied have strong, accessible and functioning GRM.

❖ Impact of the project on *existing power structures* - the educated and urban residents are more likely to benefit from any project due to access and affordability advantage they have over others. There is a risk of creating more access to educated people, so that *widening existing socio-economic gaps*.

❖ *Institutional capacity* - weak institutional capacity; poor leadership commitment; low salary and lack of other benefit schemes resulting in high staff turn-over at the lower level of the government administrative structure.

❖ *Unintended long-term impact of access to affordable internet* - young children and adolescents might fall prey to human traffickers; be addicted to unnecessary contents (gender-based violence (*GBV*) and sexual exploitation).

❖ It was observed the project might have potential *differential impacts* on beneficiaries: (i) the educated and urbanites are more likely to benefit from the project because of access and capacity to pay both for the digital technologies and the services; and (ii) the economically better-off, whether they live in rural or urban areas, might benefit more than others.

Key Recommendations

❖ Allocate budget for digital infrastructure and services capacity building including ICT equipment, buildings, training, etc.

❖ Improve the telecommunication and broadband facilities.

❖ Arrange digital literacy programs or programs to use adaptive technologies.

❖ Enhance the status of women through access to digital technologies and information that would alleviate their burden, hence allows them to engage in a wide range of activities with reduced hardship and pressure.

❖ Improve ICT knowledge by providing short courses/trainings on digital skills and entrepreneurship in both urban and rural areas.

❖ Ensure accessible, affordable, ease of use (e.g., using local languages) in accessing and using information through user friendly apparatus.

❖ Provide the vulnerable people Free/Low priced ICT devices and services, education/training, and localizing the technologies.

❖ *Or,* subsidize digital apparatuses and internet services to the vulnerable groups, including women, elderly, persons with disabilities, low-income households, etc.

❖ Build digital infrastructure, i.e., broad band internet access, office machines, solar and hydropower plants, internet rooms, and WIFI access in underserved areas.

❖ Set up long-term loan for low-income people as digital entrepreneurship start-up capital.

❖ Provide local language supporting services.

❖ Create economic opportunities through digital entrepreneurship.

❖ Develop and implement clear and transparent guidelines to mitigate the risk of corruption.

❖ ICT equipment and services developers should ensure that people with disabilities gain the same benefits as the wider population. Depending on the nature of their impairment, provide additional technological and application/software features.

❖ GRM – establish a robust, accessible and functioning GRM as an integral part of the project, which also serves as GBV GRM.

❖ Provide proper content management education and training for parents and communities to mitigate the risk of online sexual abuse and exploitation of young children and adolescents. The ECA also has to issue a regulation that helps mitigate this risk.

❖ Have a monitoring and evaluation system in place – programs such as '*Digital Ethiopia*', which are implemented not only in diverse agro-ecological settings, but also in areas where government structures are the strongest makes it very important to put in place effective and efficient M & E system.

Concluding Remarks

As reiterated in the Project Appraisal Document, Ethiopia, a growing economy with a population of over 100 million is experiencing unprecedented political and economic changes. The digital divide within Ethiopia is equally apparent as the disparities with its neighbours. Lack of availability, affordability, and low quality of broadband connectivity is particularly significant among socially vulnerable populations, including children and elderly, women, people with disability, low-income, and rural populations. The Project is a good opportunity for Ethiopia and is hoped to lay a foundation for the realization of the '*Ethiopia Digital Foundation*' goals, i.e., "to improve Ethiopia's competitiveness in the digital age through increased inclusiveness and affordability of digital services and through digital job creation". This SA has clearly shown there is a very strong support for the project, but has also identified key challenges, risks and mitigation measures. It is obvious every challenge and risk identified during this SA cannot be addressed by this project alone. The findings also identified areas that need future investments beyond the scope of this project by the GoE for the '*Digital Ethiopia*' development goal to have a sustainable and meaningful impact on the lives and livelihoods of the Ethiopian people. In light of this, all key findings and recommendations are included in this report, but those within the scope of the Project are included in the Social Management Plan (SMP) for which PIU and key implementing institutions are identified as responsible bodies for action within a proposed time frame.

4.   Introduction

4.1.   Background and Context[22]

Ethiopia, a growing economy with a population of over 100 million located in the conflict-affected Horn of Africa region, is experiencing unprecedented political and economic change. Since the appointment of a new Prime Minister in April 2018, a peace agreement with Eritrea has been signed and the border has been reopened following two decades of conflict. While the political situation remains fragile, the new administration has opened new political space for dialogue, released political prisoners, lifted bans on political parties and media outlets, actively engaged in regional diplomacy, and started to implement a range of economic reforms designed to revitalize the Ethiopian economy by expanding the role of the private sector. Given Ethiopia's size and location, these shifts have the potential to transform the economic and political landscape in the Horn of Africa.

The Homegrown Economic Reform Agenda, launched in September 2019, outlines macroeconomic, structural and sectoral reforms for job creation, poverty reduction, and inclusive growth. While the Government sets out its vision to transform Ethiopia from a largely agrarian low-income country to an industrialized lower-middle-income country by 2030, the initiative gives special emphasis to sectors such as agriculture, manufacturing, mining, tourism, and information and communication technologies (ICT). The Government has also initiated reforms characterized by market liberalization with partial and/or full privatization of selected State-Owned Enterprises (SOEs) in key strategic sectors, including telecom, energy, aviation and logistics. The implementation of these reforms is expected to transform the economy towards a more sustainable model by strengthening the role of the private sector, enhancing efficiency of the industry, contributing to export expansion, and spurring competition in several critical sectors.

In the meantime, Ethiopia continues to face considerable development challenges, not least in areas such as income inequality and extreme poverty, population growth, a low level of educational attainment. Gender disparities are profound, as signalled by the low economic, educational and empowerment status of women in the country. Gender inequality, with poorer women and girls especially facing multiple disadvantages has a long history in Ethiopia. Women experience high rates of unemployment (6.5%[23]), seasonal employment (37%), and temporary employment (13%), with these rates increasing as a result of COVID-19 [24]. Women are also less likely than men to be paid for their work, which is mainly attributed to unequal access of males and females to education and vocational training as well as to labour markets. Some 58% of Ethiopian women are illiterate. The educational attainment gap is much higher among the rural population than among the urban population. On top of these, the global coronavirus pandemic (COVID-19) outbreak is expected to have a negative impact on Ethiopia's economy and exacerbate existing socioeconomic challenges.

Ethiopia was one of the last three countries in the world (along with Eritrea and Djibouti) to retain a national telecom monopoly on all telecommunications services until the *Communication Services Proclamation*, adopted in September 2019, which liberalises the market. Moreover, the digital divide

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[22] Adopted from the PAD.
[23] Latest available data is from the 2013 Labor Force Survey.
[24] FAO. 2019. Ethiopia: National gender profile of agriculture and rural livelihoods.
http://www.fao.org/3/ca3224en/ca3224en.pdf

within Ethiopia is equally apparent as the disparities with its neighbours. Lack of availability, affordability, and low quality of broadband connectivity is particularly significant among socially vulnerable populations, including children and elderly, women, people with disability, low-income, and rural populations. While 80% of the country's population lives in rural areas and the agriculture sector accounts for 85% of the country's workforce, rural internet penetration for Ethiopian farmers is estimated to be only 4%.[25] While there is little information about women's broadband access and use, one study suggests that fewer than 12% of women have internet access in Ethiopia[26]. Considering the disparities that exist in literacy rates between women and men, rural and urban areas, poor and rich, non-graduates and graduates, the discrepancy is greater for the acquisition of digital skills, which require a basic level of literacy.

The GoE recognizes that the job creation potential of improved digitalization can spread to the population through digital businesses in Ethiopia. But the location of the new jobs being created is almost as important as their number. It will be critical to extend such developments also towards rural areas and, in general, towards different social groups with less opportunities to access digital technologies such as the vulnerable people in the underserved and emerging regions. Access to affordable and high-quality internet services will be critical to ensure business continuity during and after the COVID-19 pandemic.

This SA is, therefore, initiated to assess project risks and impacts on vulnerable (underserved peoples, women, children, aged people, people with disability, poor and other deprived segments) and other communities and recommend risk mitigation measures that will be used at both the project design and implementation phases.

4.2.   Scope of the Social Assessment

This SA is a risk mitigation tool covering risks, challenges and recommendations that will impact the design of Ethiopia Digital Foundation Project ("*Digital Ethiopia*").[27] In particular, it will inform how the design of the Project will be made to be appropriate for all beneficiaries, including the most vulnerable. SA helps make the project responsive to social development concerns, including seeking to enhance benefits for the poor and vulnerable peoples and underserved groups, while minimizing or mitigating risk and adverse impacts. It analyzes distributional impacts of intended project benefits on different stakeholder groups, and identifies differences in assets and capabilities to access the Project benefits.

The SA consists of the analysis of context and social issues with a participatory process of stakeholder consultations and involvement, to provide operational guidance on developing project design, implementation, and a monitoring and evaluation (M&E) framework. It also complements other safeguards standards relevant in this project, with the aim to prevent and mitigate undue harm to people and their environment in the development process. These standards provide guidelines for the Bank and borrower staff in the identification, preparation, and implementation of programs and projects; and more

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[25] Ethiopia, Ministry of Innovation and Technology. 2020. Digital Transformation Strategy, 2025.

[27] The "*Digital Ethiopia*" project PAD (Parag. 82) states: "Further, dependent on the type of activities in the emerging regions and pastoralist areas, a Social Asssessment (SA) proportional to the activities under the project will be prepared."

importantly, these standards provided a platform for the participation of stakeholders in this project design, and have been an important instrument for building ownership among local populations.

Different project sub-components will have varying levels of impacts on different community groups. Some will have marginal direct impact on the grassroot level communities (e.g., component 1), while others (e.g., component 2) have more direct impacts, both positive and potential negative. This means, this SA need to explore the potential risks and impacts of the project, with more emphasis on some components (e.g., sub-comp.2.2 and 2.3) and their impacts on the vulenrable segment of the population. This by no means should imply other project components and their impacts on the larger society will be less imphasized. To reiterate what was stated in the ToR, it documents the "potential risks and social impacts of the proposed project activities, identify vulnerable and underserved population groups, identify social and cultural issues relevant for the proposed project; to inform the design of the project and enhance project outcomes to ensure equitable benefits for vulnerable social groups such as the poor, women, and ethnic minorities". It will also outline "requirements for the design of an appropriate institutional arrangement to implement, monitor, and evaluate the project on the achievement of social outcomes".

4.3.   Objectives of the Social Assessment

The study aims to assess the social characteristics of local communities, including determining the nature and characteristics of underserved groups in the *"Digital Ethiopia"* intervention areas, with special emphasis on their cultural characteristics, social institutions and organization and establish that the project will not negatively impact the way of life of these people. The SA is a systemic assessment of positive and adverse social impacts associated with project and propose the appropriate mitigation measures to address.

The SA is intended to help the Project to understand key social issues and risks, and to determine social impacts on different stakeholders. It also assesses the needs and priorities of key stakeholders, outline their views on the design and proposed implementation mechanisms of the project, and build capacity and involvement. It will also provide requirements for the design of an appropriate institutional arrangement to implement, monitor, and evaluate the project on the achievement of social outcomes.

The SA is the basis for the preparation of the Social Management Plan (SMP) in which all the mitigation measures are provided as actions and if those actions require budget, an indicative budget and the timeline for the implementation will be included in the SMP.

4.4.   Methodology

4.4.1. Methodology

This SA study is a participatory process led by the MInT, with close coordination of ECA and MoSHE/EthERNet. The *"Digital Ethiopia"* project is one among the hundreds of development projects financed by Development Partners, among which WB is one. During these several years of financing development projects, thousands of documents, e.g., PADs, ESMF, ESIA, SA reports, etc. have been produced to inform project design, implementation and monitoring and evaluation processes. These

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documents have amply documented information on various issues about the beneficiary communities differentially located in the socio-economic structure of the Ethiopian society, and serve as vital secondary sources of information for this SA study.

The SA for *"Digital Ethiopia"* project used both primary and secondary sources of data. The data from the existing works was used because most of the communities intended to be covered in this project have already been studied in the past. As much primary data as possible was generated to understand the views and document the concerns of different social groups with less opportunities to access digital technologies such as the vulnerable people in the underserved and emerging regions. Moreover, relevant published works were also consulted, in addition to the review of the national laws, regulations, and relevant international conventions.

4.4.2. Sample

Under the scope of the SA, the ToR states: "The assessments will extend over all pastoral and agro-pastoral regions covered by the Project" and suggests at least 2 *woredas* in each region, totaling 12 *woredas*, being representative for the project implementation area. The concern raised in this regard from the outset was that the project implementation *woredas* were not identified, in fact to date. In light of this and the urgency with which the SA report was needed, the COVID-19 pandemic, communication constraints in many potential target areas, and the availability of a very good pool of information (discussed above) on these areas, it was agreed to cover key implementing Federal institutions, i.e., MInT, ECA and MoSHE/ EthERNet, a few purposively selected universities (in consultation with EthERNet) and experts (via acquaintances) with long experience and deep knowledge of the pastoralist and agro-pastoralist communities for the collection of primary data. Attempts were also made to collect data from organizations representing different groups of persons with disabilities, and finally the *Federation of Ethiopian Associations of Persons with Disabilities (FEAPD)*, an umbrella association of persons with physical, visual, aural and speech disabilities participated in the study by filling the open-ended Guiding Questions prepared for data collection.

Accordingly, officials and experts from MInT, ECA, and MoSHE/EthERNet and ICT Directors of three universities[28] (from the emerging regions), and a handful of experts still working with international NGOs in developing regional states participated in this SA study, most of them by responding to the open-ended GQs and some through phone interviews. A total of 14 GQs returned: 3 by officials (DGs, Deputies); 3 by university ICT Directors; 3 by experts working with international NGOs in the emerging regional states (program directors and project managers); 4 by experts from key implementing federal institutions (in one of these cases four experts discussed and filled one GQ, a product of group discussion); and one by FEAPD. Women, children and youth experts were among the federal institutions representatives who filled the GQs.

4.4.3. Methods

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[28] Though among the purposively selected samples, Addis Ababa and Jinka Universities did not return the questionnaires despite repeated reminders.

As mentioned in the forgoing sections, both primary and secondary data sources were used for this SA. The secondary data sources included, among others, SA reports of the previous and current Bank financed projects (e.g., RLLP, 2020; SEAN-Enhanced SA and Consultation, 2020; ERSNP, Enhanced SA and Consultation, 2017; AGP-II, 2015; PSNP-IV, 2014; SLMP-II, 2013; Enhancing Shared Prosperity through Equitable Services (ESPES) Additional Financing (AF) Incremental Environment and Social Systems Assessment (ESSA), 2017; ESSA for ELEAP, 2018). Moreover, primary data sources were also used for which open-ended GQs were prepared for three different categories of respondents, i.e., officials and experts from key implementing Federal institutions, officials and experts of the local and community level government structures, and experts from beneficiary institutions (including universities). As indicated under the 'samples' section, both self-filled GQs and telephone interviews were employed to generate primary data.

5. Project Components

5.1. Overview of Project Components

The '*Digital Ethiopia*' Project is intended to lay the building blocks to develop Ethiopia's digital economy. Liberalization and the introduction of competition in the telecom sector, coupled with improved private management of the incumbent, has proven to deliver consistent results for improved access and affordability across the world. This project will support the necessary steps to introduce market competition, private sector participation, foreign investment and independent sector regulation (component 1).

The country must also expand and strengthen its basic digital infrastructure, especially the fiber network and mobile broadband, towards achieving the African Union goal of universal affordable and quality broadband access by 2030 (component 2), a pre-condition to being able to leverage digital technologies for growth in the various sector of the economy. A special area of focus will be enhancing broadband services to Government and better serving universities and Government offices in provincial areas, using a mobilizing finance for development (MFD) approach, in which the private sector takes the lead on investment. Finally, the country can generate opportunities for new jobs it needs through its investments and reforms in digital transformation; this will require creating an ecosystem in which new digital start-ups can thrive (component 3).

There is also a need to ensure that offline citizens benefit from the push towards the digital economy, and this is addressed through the design of the matching grants program that seeks to serve both online and offline businesses. Ultimately, the project aims at enabling its citizens, businesses and Government to reap digital dividends in the form of faster growth, lower transaction costs, more jobs and greater efficiency. A Contingent Emergency Response Component (CERC) has been added to the program design to allow for greater flexibility in responding to emerging crises during the life cycle of the project.

5.2. Project Components

The Project Development Objective (**PDO**) of ***Digital Ethiopia Foundations project*** is to improve Ethiopia's competitiveness in the digital age through increased inclusiveness and affordability of digital services and through digital job creation.

The overall aim of the proposed '***Digital Ethiopia***' project is to increase public access to high quality and affordable internet services, promote digital entrepreneurship and facilitate job creation, to help Ethiopia compete in the digital age. The Project has three major Components.

Component 1: Digital Economy, enabling legal and regulatory environment. The aim of this technical assistance component is to strengthen the analog foundations of the digital economy, in particular policy-making, and effective regulation for the telecommunications sector and for the development of digital entrepreneurship. This project component will support strengthening the sector regulator, the Ethiopian Communications Authority (ECA), reviewing the relevant legal and regulatory foundations of the digital economy, and the contracting the transaction advisor to support the partial privatization of Ethio Telecom.

*Sub-component 1.1: Partial privatization of Ethio Telecom***:** This sub-component will finance technical assistance and support for the partial privatization of Ethio Telecom. Until the passage of the Communications Services Proclamation in September 2019, Ethio Telecom, which is 100 per cent state owned, enjoyed virtually a complete monopoly in the provision of telecommunication infrastructure and services.[29] The project will finance only hiring of Transaction Advisor for technical assistance, and will not fund any technical assistance on internal reform process for Telecom operations and thus also not any staffing adjustments of the said enterprises.

*Sub-component 1.2: Strengthening independent ICT sector regulation***:** A critical part of the overall process of telecom reform is the need to strengthen the sector regulator, the ECA, so that it can function effectively as an independent, transparent, efficient and accountable regulatory body. The support to be provided to ECA will be geared towards helping it carry out these tasks in the newly competitive market.

*Sub-component 1.3: Supporting the development of the Digital Economy***:** Although the main focus of this component is on the partial privatization of Ethio Telecom and strengthening the regulatory authority, there are a number of other tasks associated with creating a vibrant, inclusive and safe digital economy in Ethiopia, and where the project can provide support or act as a complement. The MInT has prepared a Digital Transformation Strategy[30], approved by the Council of Ministers in 2025, which sets out a vision for the development of the digital economy.

Component 2: Digital Government and Connectivity. The objective of this component is to develop the capacity of GoE to deliver digital services, and to crowd-in private sector investments to improve regional and domestic connectivity infrastructure, to connect public institutions and educational institutions to broadband internet. It will build upon the market opening measures supported in Component 1 to stimulate private-sector-led investment to expand the geographic coverage of broadband networks, to better serve Government institutions, businesses and citizens across the country. This component will support the following activities:

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[29] One exception is in the field of fiber optic networks where both the electricity and railway utilities own their own fiber networks, and do make capacity available to virtual Internet Service Providers (ISPs, such as Websprix, as well as Ethio Telecom itself. But real competition has been limited to date.

[30] Government of Ethiopia, Ministry of Innovation and Technology (2020). Digital Ethiopia 2025: A digital strategy for Ethiopia Inclusive Prosperity. The strategy identifies four main pathways for development: 1) Unleashing value from agriculture; Future global value chains in manufacturing; 3) Building IT-enabled services; and 4) Digital as a driver of tourism competitiveness.

Sub-component 2.1: Digital Government and COVID-19 response. This sub-component will help build GoE's capacity to deliver digital services, and to respond to the COVID-19 pandemic, including by (i) developing a Government ePortal accessible by citizens and firms, (ii) improving Government facilities for remote working, and (iii) building the digital skills of Government officials.

Sub-component 2.2: Connecting targeted public institutions to broadband. This sub-component will support GoE's efforts to enhance its level of digital connectivity to Government offices and public institutions across the country. The proposed mechanism to do this would entail an upfront commitment for the pre-purchase of internet bandwidth from private sector operators under indefeasible right of use (IRU) contracts, through a competitive bidding process, over a period of 5-10 years, applying principles of geographically-averaged pricing. The locations of targeted public institutions to be served would include Ministries, Departments and Agencies (MDAs), youth community associations across the country, and especially in the first phase selected hospitals and health centers, as part of the COVID-19 response. This sub-component will seek to incentivize private sector investment in internet connectivity (roll-out of fiber-optic networks and 4G/5G mobile networks), using provision of services to public institutions as an anchor tenant for wider geographical service provision. MInT will manage the program and will be encouraged to implement progressively cost recovery among MDA clients to ensure sustainability.

Sub-component 2.3: Connecting selected educational institutions to broadband. As an extension of the drive to all Government MDAs, this sub-component will focus on connecting selected educational institutions to high-speed internet services. In the first phase of the project, this will include universities, colleges of teacher's education, research institutions and TVETs, with the aim of nationwide coverage. In the second phase, should additional financing be made available at a later date, the project could connect some 200 selected secondary schools also, and eventually to connect all secondary schools in the country. This sub-component will be implemented in partnership with EthERNet, Ethiopia's National Research and Education Network (NREN), part of the Ministry of Science and Higher Education (MoSHE).

Component 3: Digital Business and Entrepreneurship. This component aims to nurture digital entrepreneurship and incentivize digital businesses to train, provide digital devices, and employ Ethiopians to participate in the digital economy, and thereby to generate income and jobs. It includes a technical assistance sub-component to MInT for digital market regulations and implementation. Following the recommendations of the "*Digital Entrepreneurship and Innovation*" diagnostic study in Ethiopia[31] as well as stakeholder feedback, the proposed interventions under this component are focused on addressing the access to finance and digital economy skills constraints. Specially this component is expected to provide basic digital economy training and digital devices for the informal sector (e.g., individual contractors or suppliers), but with an industry focus for practical applications. This component has two main interventions that will finance: (i) Two grant funding windows for digital start-ups and digital businesses; and (ii) Technical Assistance (TA) to MInT.

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[31]Commissioned by the World Bank and delivered by Deloitte in March 2020. It highlighted that Ethiopia's innovation ecosystem is still at a nascent stage, and made 11 recommendations, ranging from policy reforms (4), access to finance (4), infrastructure and support (2), to skills and literacy (1 recommendation). Digital market policy and access to finance were two areas highlighted as having the highest number of bottlenecks to potential entrepreneurs.

Component 4: Project Management. This component will support the project implementation unit to be initially set up in MInT. The PIU and MInT taking the lead will be responsible for implementation with partnering agencies and beneficiaries, but also including MoF, ECA and EthERNet. The MoF is currently responsible for the project preparation and activities relating to component 1.

Component 5: Contingent Emergency Response Component (CERC). The **CERC** is added to the project structure. This will have an initial zero value but may be financed during the course of the project to allow for an agile response to an eligible crisis or emergency. These could include, for instance, humanitarian crises which require the provision of emergency communications services to replace facilities that have been damaged, or to facilitate emergency humanitarian payments using mobile money.

Table 1: Project Components and Implementing Agencies

Component	Sub-component	Implementing Agency
1: Digital Economy, enabling legal and regulatory environment	1.1: Partial Privatization of Ethio Telecom	MoF
	1.2: Strengthening independent ICT sector regulation	ECA
	1.3: Supporting the development of the Digital Economy	MInT
2: Digital Government and Connectivity	2.1: Digital Government and COVID-19 response	MInT
	2.2: Connecting targeted public institutions to broadband	MInT
	2.3: Connecting selected educational institutions to broadband	MoSHE/EthERNet
3: Digital Business and Entrepreneurship	3.1 Grants to digital start-ups and digital businesses	MInT
	3.2. Technical Assistance to the Ministry of Innovation and Technology	MInT
4. Project Management		MInT
5. Contingent Emergency Response Component		MoF

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5.3.   Project Beneficiaries[32]

The Ethiopia Digital Foundations Project is expected to benefit all citizens of Ethiopia, who will receive improved access to broadband internet and digital services, as a result of market opening. At a macro level, the project will support increased economic growth, productivity and job creation – both within the telecommunications and IT sectors and through the creation of digital solutions and their adoption by economic sectors. At an individual level, citizens will benefit from access to lower cost, higher quality (e.g., fiber and 4G+) broadband internet services, access to digital services, digital skills development and entrepreneurship opportunities. By participating in a platform-based digital business, suppliers and contractors are expected to generate additional income and jobs. Consumers using digital means to purchase goods and services are also expected to experience welfare gains in the form of lower costs, more convenience and a greater diversity of products and services, as they would now have an expanded access to products and services from both online and offline means.

National and provincial Governments will also benefit through lower cost, higher quality access to the internet within public institutions, improved ability to store and manage data in a more secure, reliable and cost-effective manner, ability to launch new digital services much more quickly and securely in a cost-effective manner than is possible today, and by taking advantage of data analytics to improve policy and decision-making. Universities and TVET institutions will also enjoy more reliable bandwidth at much lower cost while providing their staff and students access to electronic resources and databases, including, but not limited to library and computing resources, made available through the network. Private telecom companies and investors will benefit from entering a competitive telecom market of over 100 million population, under an independent sector regulator.

The project includes a strong emphasis on closing the 'digital divide' – empowering youth, women and girls, the elderly and disabled persons, who are currently digitally-excluded, and serving all parts of the country. Digital entrepreneurship activities and partnerships will be targeted at women and youth, aiming to create jobs and nurture tomorrow's digital leaders. Connectivity and skills development for girls will receive specific emphasis in recognition of the generally lower rates of access to digital services and much lower rates of participation in digital technology fields relative to men, across both developed and developing countries. Component 3 will have explicit targets on female, rural, and disabled population as the grants are implemented to nurture digital entrepreneurs and incentivize suppliers and contractors to participate in the digital economy to stimulate income growth and generate jobs.

It is in view of the diversity of the project beneficiaries that this SA was conducted to identify the potentil risks and impacts of the project components/sub-components on different social groups with less opportunities to access and afford digital technologies (e.g., affordability of technologies and services, digital skills, literacy) such as the vulnerable people (e.g., female, rural, persons with disability, the elderly, unemployed/underemployed youth) in the underserved and emerging regions.

6.   Legal Frameworks: Basis for Social Assessment

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[32] Adopted from the PAD, Parag. 40-1.

Under this section discussion will be made about the national legislations and World Bank environmental and social safeguard policies and discussed in the following ways.

6.1. National Legislation

Various national legislations have been used during the implementation of projects. These can be emanated from the constitution of the federal democratic republic of Ethiopia and the policies, strategies, proclamations of the country. This will be discussed in the following sections.

6.2. Legal and Institutional Framework for Underserved and Vulnerable Groups

The Ethiopian Constitution recognizes the presence of different socio-cultural groups, including historically disadvantaged and underserved communities, pastoralists, agro-pastoralists, and minorities, as well as their rights to socioeconomic equity and justice.

Article 39 of the Ethiopian Constitution recognizes the rights of groups identified as "Nations, Nationalities and Peoples". They are defined as "a group of people who have or share a large measure of common culture or similar customs, mutual intelligibility of language, belief in a common or related identity, a common psychological make-up, and who inhabit an identifiable, predominantly contiguous territory." This represents some 75 out of the 80 groups who are members of the House of Federation, which is the second chamber of the Ethiopian legislature. The *Constitution recognizes the rights of these Nations, Nationalities and Peoples to: self-determination, including the right to secession; speak, write and develop their own languages; express, develop and promote their cultures; preserve their history; and, self-government, which includes the right to establish institutions of government in the territory that they inhabit and equitable representation* in state and Federal governments. This SA is conducted to document the socio-cultural, the potential risks and recommend mitigation measures for the '*Digital Ethiopia*' project which targets the pastoral and agro-pastoral communities who are largely from these population groups.

The Ethiopian Constitution also recognizes the rights of pastoral groups inhabiting the lowland areas of the country. The constitution under article 40(4) stipulates '*Ethiopian pastoralists have a right to free land for grazing and cultivation as well as a right not to be displaced from their own lands'*. The Constitution under Article 41(8) also affirms that "*Ethiopian pastoralists have the right to receive fair prices for their products, that would lead to improvement in their conditions of life and to enable them to obtain an equitable share of the national wealth commensurate with their contribution. This objective shall guide the State in the formulation of economic, social and development policies.*" Pastoralist regions/areas recognized by the government are: Afar; Somali; Borena Zone and Fentale *Woreda* (Oromia); South Omo Zone, Bench-Maji Zone, and parts of Decha *Wereda* in Keffa Zone (SNNPR); and, Nuer Zone (Gambella).

The pastoralists comprise approximately 12-15 million people that belong to 29 groups of Nations, Nationalities and Peoples.[33] Whilst government policies have strengthened and resource allocations

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[33]Pastoralist Forum Ethiopia, http://www.pfe-ethiopia.org/about.html

increased over the last decade,[34] pastoralist areas are still amongst the least served in terms of basic services. Education indicators for pastoralist areas are among the lowest in the country: lowest literacy rates, highest dropout rates and greatest distance from schools (Jennings et al., 2011). Some pastoral households view formal education as a threat to the contributions that children make to the household and the pastoralist way of life and girls' access to education is also constrained by the perceptions of parents that schooling compromises girls' reputation, makes them less compliant which, in turn, reduces their worth as marriage partners (Brocklesby et al. 2011).

Article 54(1) of the Constitution also recognizes another group called "national minorities", i.e., Nationalities and Peoples whose total population is "less than 100,000 members and most [of them] live in the 'Developing Regional States'". Owing to their limited access to socioeconomic development and underserved status over decades, the GoE has designated four regions, i.e., *Afar, Somali, Benishangul-Gumz, and Gambella as Developing Regional States (DRS)*. In this respect, Article 89(2) of the Ethiopian Constitution stipulates: 'The Government has the obligation to ensure that all Ethiopians get equal opportunity to improve their economic situations and to promote equitable distribution of wealth among them'. Article 89(4) in particular states: 'Nations, Nationalities and Peoples least advantaged in economic and social development shall receive special assistance'.

Moreover, Ethiopia's 'Growth and Transformation Plan' (GTP I & II) is a national five-year plan created by the Ethiopian Government to improve the country's economy by achieving a projected gross domestic product (GDP) growth of 11-15 percent per year from 2015/2016 to 2019/2020. Among others, GTP II envisages strengthening the empowerment of women so as to ensure their active participation in the political, social and economic processes that are taking place in the country. All public development programs will be designed in such a way that they engage women and ensure their equity in the outcomes of such programs. During GTP II, the political empowerment of women will be realized by establishing mechanisms for women's equal participation and equitable representation at all levels of the political process and public life in society. A critical element in this endeavour is promoting women organizations that articulate and advance women's concerns, needs and priority agendas, and that influence public policies and actions" (p.3)[35].

6.3.   The Nexus between Ethiopian Policies and Laws and the World Bank Environment and Social Framework

The Federal Democratic Republic of Ethiopia has formulated several development policies, strategies, proclamations, programs and projects to improve the livelihood and to promote sustainable development of Ethiopian people in general and the pastoral as well as agro-pastoral communities in particular. The government has also made certain shift in the thinking of pastoral development from its predecessors by bringing pastoralists themselves to participate in the policy making processes that affect their livelihoods.

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[34]PASDEP (2005 -2010), the previous five-year poverty reduction plan to GTP promoted more targeted assistance to marginalized areas – the emerging regions and pastoralist/agro-pastoralist areas (MoFED 2010).
[35] Enhancing Shared Prosperity through Equitable Services (ESPES) Additional Financing (AF) Incremental Environment and Social Systems Assessment (ESSA). http://documents1.worldbank.org/curated/en/280901496649106913/pdf/115609-EA-P161373-Box402912B-PUBLIC-Disclosed-6-2-2017.pdf

Detail review of Ethiopia's relevant policies, strategies and proclamations on Social and Environmental issues along with the pertinent social and environmental safeguard framework of the World Bank is tasked to the ESMF/ESIA. Here suffice it to say, pastoralists and agro-pastoralists as well as disadvantaged communities are considered in the Ethiopian constitution and this concurs with the World Bank's Environmental and Social Standards (ESS) (ESS 1, 5, 7 and 8)[36]. This will help '*Digital Ethiopia*' Project give due attention to the vulnerable and underserved communities during implementation that in turn enables it to meet the intents of World Bank's ESF in a socially and culturally appropriate ways. It is, therefore, duly recognizing the peculiar characteristics of the underserved and vulnerable groups of the nations in the pastoral and agropastoral areas. As reinforced by the constitution of Ethiopia, majority of the target population identify themselves as having the characteristics defined under ESS7.

7. Social Assessment Findings

7.1. Key Social Assessment Findings

Under this section, key community consultation findings will be summarised, divided into two broad categories of respondents, namely experts and communities at the grass root levels and officials and experts of the beneficiary institutions.

7.1.1. Experts and communities at the grass root levels

7.1.1.1. *Key Social Issues and Potential Challenges*

The most vulnerable and underserved groups in the Project context/*area*.

❖ Persons with disabilities; women; elderly; unemployed youth (men and women); low-income households; people with low literacy status; minority groups; people with chronic illness like HIV/AIDS; widows; female-headed as well child headed households; children, especially of pastoralist communities, because they are always on a move.

Public institutions in emerging regions are characterized with:

❖ Lack of computers, ICT equipment and building infrastructure; lack of sufficient budget for capacity building; lack of digital skills.

Barriers for vulnerable people to equally access and benefit from the project/digital services.

❖ Unaffordability of both the apparatuses and the internet services [including electricity bill which is the backbone of the digital business/E- commerce in Ethiopia];

❖ **For emerging/underserved regions:** Lack of ICT infrastructure, power interruption, and unreliable networks. Another important barrier that needs attentions is the way of life (i.e.,

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[36] ESS1 – Assessment and Management of Environmental and Social Risks and Impacts; ESS5 – Land Acquisitions, Restrictions on Land Use and Involuntary Resettlement; ESS7 - Sub-Saharan African Historically Underserved Traditional Local Communities; and ESS8 – Cultural Heritage.

pastoralist livelihood and mobility) so the project should reflect this basic need and this requires further study to contextualize the project.

❖ Persons with disability – lack of access to information [sign language is not commonly used by the projects making it difficult for persons with disability to access the services]; lack of user-friendly technologies suitable to the special needs of people with disabilities.

❖ Poor telecommunication service in the emerging regions; lack of awareness about ICT; poor internet infrastructures.

Persons/community groups who will be **particularly benefiting** from project activities: (i) in the short term, community members who have relatives in the government structure will particularly benefit; (ii) in the long-run, rural youths (pastoral and farmer), women, persons with disabilities, women and other vulnerable groups in the emerging regions benefit through access to reliable and affordable ICT services.

Persons/community groups who will be **adversely affected**: (i) pastoralist communities are not likely to benefit from this project, because there is no evidence showing that the project is pastoralist context (just they are like a people on the move!) (ii) because of societal attitudes towards women/girls, they cannot actively participate in such projects.

Traditional/indigenous organizations (clan leaders, Abba Gadas, *balabats*, religious leaders/institutions) can help the Project:

❖ Need to consulted during the design the project [they are opinion makers among their respective communities]; help in project beneficiary targeting [esp. for the most vulnerable groups]; influence project participants to change the skill and use opportunities to be provided by the project for digital entrepreneurial development; create conducive environment for project implementation through their symbolic power in collaboration with the local governments.

Impact of the project on **existing power structures**: The educated and urban residents are more likely to benefit from any project due to access and affordability advantage they have over others. But the Digital project can narrow the inequality gap if it is properly implemented.

Inclusiveness of the Project: **(**equitably supportive of vulnerable and underserved populations**)**

❖ **Yes,** in the long-run for people with disabilities, once they are able to access the web, value the health information and other services provided on it. Online communities can be particularly empowering for those with hearing or visual impairments or autistic spectrum conditions because they overcome barriers experienced in face-to-face contact. People with disabilities who are isolated value the Internet in enabling them to interact with others and potentially to conceal their difference. In the digital world, information is power and if access to information is improved the social participation of underserved population will increase.

❖ **No,** because most of the projects before this were not inclusive the vulnerable groups in the merging regions, and it could be worse in this project for instance, in some communities like pastoralists in Somali Region, there are communities that even have no access to education let

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alone digital services. And also due to lack of infrastructure in the majority of the urban and rural areas of the country.

◈ It depends on the way and by whom it's implemented. If the monitoring and evaluation procedure is done regularly, the project can be inclusive and will equally be supportive.

Exclusion risk for certain sections of the community:

❖ **Yes,** persons with disabilities; uneducated people; low income/poor households, especially women and girls, people moving with their children and livestock are likely to be unintentionally excluded.

Any known/potential **conflicts of interests** arising among different groups in relation to the Project that may affect its implementation.

❖ Hiring an unqualified relative in the project work; owning part of a business that sells goods or services to one's employer; doing business or work for a competitor; accepting consulting fees and providing advice to another company for personal gain; and taking advantage of confidential information learned on the job for one's own benefit.

Women/girls are likely to be involved in the Project: They should be consulted throughout the project cycle; should be given attention during awareness creation and trainings about the project.

Women/girls **benefiting** from this Project.

❖ It will help women with disabilities to overcome their hitherto significantly lower rates of ICT use (in some instances, they may be unable to access even basic products and services such as telephones, television and the Internet).

❖ It will empower them and enhance their social participation and result into gender equality.

Women and girls might be at a **disadvantaged position** as a result of the project because they constitute the largest segment of the unskilled labours in their respective communities.

Possible social impacts including **GBV and SE** that could occur due to the implementation of the Project. The responses on this question tend to concur that the project might not bring additional GBV and sexual exploitation risks. But they emphasize these problems are already common, whether the project is implemented or not and the project need to be put in place effective and accessible GBV GRM. They also strongly recommend continuous community engagement on these and similar issues.

Potential constraints that might have **differential impacts** on beneficiaries. According to Federation of Ethiopian Associations of Persons with Disabilities *(*FEAPD*)*:

Surveys on access to and the use of digital media in different countries have found that disabled people are half as likely as non-disabled people to have a computer at home, and even less likely to have Internet access at home. The concept of the digital divide refers not only to physical access to computers,

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connectivity, and infrastructure but also to the geographical, economic, cultural and social factors – such as illiteracy – that create barriers to social inclusion.

Moreover, (i) the educated and urbanites are more likely to benefit from the project because of access and capacity to pay both for the apparatuses and the services; and (ii) the economically better-off, whether they live in rural or urban areas, might benefit more than others.

Stakeholder groups/people that **might be affected negatively** due to the implementation of the Project/sub-projects in the area.

- ❖ People with cognitive impairments, including age-related changes in memory, and older adults may find the various devices and online services difficult to understand.

The **commitment of the local administration** in **supporting women's**, youth, people with disability and other vulnerable groups participation in development is judged as **very low**. The **capacity and facilities** at the grassroots government structures to support the implementation of the Project is believed to be low, but still varies from region to region/place to place. Therefore, it needs site specific focused assessment to get a clearer picture the facts on the ground.

The **institutional capacity limitations** that might affect program implementation in underserved/emerging and other regions include: (i) high level illiteracy rate; (ii) poor infrastructure, including ICT; (iii) low salary and poor incentives. Inadequate capacity will further widen the inequality gap among the differentially positioned project beneficiaries, such as urban and rural, women and men, poor and rich, illiterate and the educated, youth and elderly, persons with disability and others, etc.

The chances of targeting project beneficiaries being based on informal networks [e.g., **nepotism, corruption, elite capture,** etc.], its impacts and lessons that can learned. One of the experts from an international NGO working in one of the emerging regions wrote "*Sure, totally, the project failed due to nepotism and big corruption*".

GRM for individuals/groups to express their complaints:

- ❖ Persons with disabilities normally express their complaints through their DPOs at the regional levels and there is a need to collaborate with the FEAPD which is serving as a common voice of persons with disabilities in order to ensure smooth project implementation.

- ❖ No report from other respondents on existence of this specific issue as institutionalized structure.

Lessons learned from the implementation of previous development projects; **(i)** beneficiaries should be involved from the project design to the project evaluation; **(ii)** the project should be based on the needs of the people and should also be context specific and inclusive; **(iii)** political commitment should be there; **(iv)** beneficiaries should be involved in the monitoring missions; **(v)** strengthening community

engagement and ownership of the projects; **(vi)** consultation and collaboration with project beneficiaries in the entire life cycle of projects.

7.1.1.2. Proposed Recommendations to mitigate the challenges

❖ Allocate sufficient budget for digital infrastructure and services capacity building including ICT equipment and building infrastructure, training, etc.

❖ Improve the telecommunication and broadband facilities.

❖ Improve the ICT knowledge by providing short course/training on digital skills and businesses in both urban and rural areas.

❖ Provide digital skill training for the marginalized communities to help them build digital service businesses.

❖ Build digital infrastructure, i.e., broad band internet access, office machines, solar and hydropower plants, internet rooms, WIFI access in underserved areas.

❖ Awareness creation to reduce the gender parity and the use of digital technologies.

❖ Enhance the status of women through access to digital technologies and information that alleviate their burden and allow them greater time and freedom to engage in a wide range of activities with reduced hardship and pressure.

❖ ICT equipment and services developers should ensure that people with disabilities gain the same benefits as the wider population, depending on the nature of their impairment, provide additional technological and application/software features.

❖ People with disabilities should have the same choice in everyday telecommunications as other people – in access, quality, and price. For example, people with hearing and speech impairments, including the deaf blind, need public or personal telephones with audio outputs adjustable in volume and quality, and equipment compatible with hearing aids.

❖ Ensure accessible, affordable, ease of usability (e.g., using local languages) in accessing and using information through user friendly apparatus.

❖ Provide the vulnerable Free/Low priced ICT devices and services, education/training, accessibility, localizing the technologies.

❖ *Or,* subsidize digital apparatuses and internet services to the vulnerable groups, including women, elderly, persons with disabilities, low-income households, etc.

❖ Improve access to social services such as electricity, communication and internet to underserved communities.

- ❖ Conduct participatory research on the pastoralists' livelihoods, movement patterns, etc. to make the project fit into the pastoralists' contexts.

- ❖ Strengthen anti-corruption and complaints handling mechanisms to solve any conflict of interest among the firms or companies and individuals involved in the project.

- ❖ On **GBV/SEA** the following are proposed: (i) Hotline number; (ii) suggestion/complaint boxes; and (iii) accountability committees. It was further noted, hotline number is effective provided the users are not charged and when the number is posted at the project sites and the beneficiaries are informed and oriented on how to forward their complaints or grievances.

- ❖ On **GRM** – establish a robust, accessible and functional GRM, which also serves as GBV GRM as an integral part of the project.

7.1.2. Officials and Experts of the beneficiary Institutions

7.1.2.1. Key Social Issues and Potential Challenges

Regulations to be developed under the sector, and the social issues [realize **inclusiveness**] that can be considered in these regulations.

- ❖ ECA is currently preparing and finalizing several regulatory documents – frameworks, regulation, and directives. Out of these Universal Access Service Framework and Universal Access Fund Regulation focus on a fair distribution of Telecommunication Services and related projects in reaching un-served and/or under-served communities.

- ❖ Special attention should be given for women as they have limited access devices. The regulation should also consider special needs and disabled students in TEVT and HE.

- ❖ There will be various regulations to be developed including guidelines on how to use the technologies/Acceptable use of digital infrastructures/Guidelines to select Digital Businesses to be supported.

Needs and barriers of public institutions and emerging regions to equally access and benefit from this project/digital services:

Needs: Universities, government offices, digital businesses - require high quality, high bandwidth, reliable, affordable voice, data, and Internet access to run their daily business.

Needs: Emerging regions: (i) remote and rural communities require basic and affordable voice, data, and internet access to engage in their regular communication; (ii) affordable internet service; and (iii) accessible and affordable digital services with ease of use.

The **barriers** are almost similar with what was summarized under *section 4.1.1.1.* above, except: lack of initial capital, weak leadership commitment, outdated technologies, state monopoly of the telecom sector, and language barrier to use digital systems.

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The major needs and barriers for the **vulnerable people** (people with disability, the elderly, women, girls, youth, etc.) to equally access and benefit from the project/digital services.

❖ *Needs*: Free/low priced ICT services, training, accessibility (acquired and easily operated by the vulnerable), localized technologies (taking the culture and language into account)

❖ *Barriers:* Lack of ICT infrastructure; unaffordability of service and digital equipment; lack of skill/digital divide; language barriers; the elderly (awareness and readiness for the technology); unavailability of user devices for persons with disability; unawareness of the digital businesses.

Persons/community groups **particularly benefiting** from the project: youths, educated individuals and digital businesses; communication device manufacturers and sellers; application developers; bank and other financial institutions; IT companies.

Potential **targeting criteria** to select beneficiaries under the different project components.

❖ Incubators and business accelerators should consider the special needs of women and physically impaired individuals.

❖ Individuals working in traditional businesses must be encouraged to go digital.

❖ Fair and just beneficiary selection/targeting criteria need to be employed, and special attention should be given to the emerging regions.

The Project might **promote**:

❖ **Social capital:** (i) facilitating access to the internet; (ii) alternative source of capital and training to new businesses; and (iii) creates new opportunities and can serve as a basis for good governance.

❖ **Social inclusion**: creates the basis for good governance that will enhance inclusiveness.

❖ **Existing power structures**: possibility of creating more access to educated individuals, so that widening the existing socio-economic gaps.

Inclusiveness and equitably supportive to vulnerable and underserved populations; (i) because the infrastructure part is directly benefiting public organization that will directly give services to the community; (ii) by providing Free/Low priced ICT devices and services, Education/Training, Accessibility, Localizing the technologies.

Exclusion risk of certain sections of the community indicated on the following grounds: (i) digital illiteracy/education; (ii) physical access/physically impaired individuals; (iii) low-income society groups – women and children, those living in lone parent households and single pensioner households; (iv) people living in low infrastructure areas; (v) information gap; (vi) low literacy level; (vii) language barrier; (viii) non-localized technologies; and (ix) the unemployed.

The **potential for conflict of interest** likely to affect the implementation project:

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❖ The incumbent operator might try to impose high price on new operators for infrastructure sharing and national roaming there by increasing the cost of operation of new operators, which in turn increases service price on users *affecting the affordability of digital services*.

Women benefiting from the project: in digital entrepreneurship (helps women run their own businesses from home); accessing connectivity in the campus around their dorm and women library; relieving her day-to-day activities with technologies; providing easy and affordable access to technologies; takes off additional burden from their shoulder making them effective in running their business as well as in managing their home and household stuffs; and empowering women.

Possible **social impacts** including **GBV and SE** that could occur due to the implementation of the Project in the area.

❖ **ECA** - does not think of such specific impact due to the implementation of the project, but keen to address any unforeseen such incidents through regular assessment and monitoring.

❖ People, particularly of the youth, may spend valuable time searching for unnecessary digital materials/contents that hinder their productivity, and ultimately create social crisis.

❖ Children may be victims of sexual abuses; psychological problems and loneliness caused by being technology addicted, thus suffering health problem.

❖ Without proper monitoring from parents and content management, access to such technology might have its own disadvantage, especially for young children and adolescents. They might be prey to human traffickers and victims of GBV and SE.

❖ It might affect family bond and interaction if there is no proper management of internet access as people might get hooked on the internet.

Risks of project **beneficiary targeting influenced by/based on informal networks**: (i) recruiting Digital businesses can be exposed to nepotism; etc.; (ii) unfit individuals may get the benefit which can discourage individuals with high potential to work in the project.

Project **implementation arrangement**:

❖ At Federal level **MInT** coordinates the project; in the regions Regional Bureaus/Agencies working on Science and Technology will coordinate the implementation.

❖ **ECA**- the setup is clearly put in its UAS Framework and UAF Regulation documents. A Department "Universal Access Service" at ECA is established to oversee the requirements study and implementation status. The Department is equipped with all essential personnel for the identified needs. If needed, when the size of the project is beyond the current capacity of ECA, outsourcing some of the activities might be suggested.

❖ **MoSHE** is a national institution to which all public Universities and TVET are accountable and reporting. In addition, ICT Directors of these Universities and TVET are working directly with

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EthERNet, and also there is an ICT Directors Forum for HE institutions and TVET reporting to EthERNet.

Capacity and facilities that exist in grassroots government structures to support the Project.

❖ TVET and HE have a better capacity and institutional organizational structure. There is also an ICT directorate and ICT related departments at TVET, and HE is working on the implementation of the project.

❖ In most of the *woredas* there is a *WoredaNet* access points.

❖ ECA- currently, we have not assessed the grassroots government structures' capacities.

❖ Low level of IT capacity; Low level of facility and infrastructure.

Low capacity and poor facilities will have adverse impact on the successful realization of the planned project. It would affect the vulnerable groups by making them excluded from the benefits of digitalization and technology.

The main **capacity problems** that limit/constrain in social management and program implementation in underserved/emerging and other regions include:

❖ Lack of skilled human resources in emerging regions.

❖ It is difficult to keep IT experts in *Woredas*. 'The more you train them they will leave to cities for better jobs. So, in some areas it is difficult to get experts who can check the daily operations of systems.'

❖ Lack of proper training; lack of ownership; poor incentive package; low salary and absence of benefit schemes resulting in high staff turn-over.[37]

❖ Low project management skill, and lack of knowledge.

The **GRM** procedures that exist or recommended for individuals/groups to express their complaints/grievances.

❖ There are grievance rules and procedures in the institutions at both TVET and HE.

❖ The Ministry can implement online complaint management systems.

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[37] "For example, consider **ECA**, the regulator and one of the main implementing agents of the project. To properly regulate the communications sector and implement the assigned tasks, it needs to be equipped with skilled human and regulatory resources. However, very low salary, absence of benefit schemes for employees, absence of professional trainings and absence of other resources that strengthen the Authority, will have an effect on the effectiveness of the authority in regulating the sector." (ECA experts written comments)

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❖ Directives are underway to handle complaints related to telecom services; internet use policy on online content to address GBV/SEA.

Lessons learned from the implementation of previous development projects that could be used here.

❖ The need to shorten the '**No objection'** process from the World Bank. Of course, there are many areas that need to be improved from the MDA's side which will be seriously considered.

❖ Check the capacities of the local public offices and prepare relevant trainings.

❖ Solve power related problems before implementing digital systems.

❖ Develop clear guideline to select digital businesses to be supported by the project.

❖ Adopt a beneficiary participatory model of project design and implementation.

❖ Strong leadership commitment; regular and effective monitoring and evaluation; proper capacity building; availing broad national level ICT strategy from which to cascade; participatory implementation of projects; strategy-based project prioritization; and inclusiveness.

7.1.2.2. Proposed Recommendations to mitigate the challenges

Under this section, recommendations that were not discussed under *section 4.1.2.2* will be briefly outlined to avoid redundancy.

❖ Develop more infrastructures, such as telecom towers; Fiber-To-Home cable infrastructure, which are getting more traction in urban areas in need of more bandwidth of Internet connectivity.[38]

❖ There should be enough (accessible) and affordable internet services inside the TVET and HE campuses, which will also serv the surrounding communities.

❖ Provide loans and incentives for ICT innovations;

❖ Support institutional capacity building; strengthening leadership commitment; modernizing organizational structure and project prioritization process; and introduce state of the art technologies.

❖ Support privatizing the telecom sector so as to enable fair competition which in turn benefits the end user.

❖ Improve the broadband coverage with appropriate universal service access.

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[38] "More infrastructures, such as Telecom Towers, are required in remote areas to provide access to Telecommunication Services. Fiber-To-Home cable infrastructure requirements are getting more traction among urban areas in need of more bandwidth of Internet connectivity." (ECA leadership written response to **Q. No. 4** under '*Guiding Questions for Officials of Implementing Institutions*'). This recommendation should be seen as a general recommendation for future investment by the GoE.

❖ Promote digital entrepreneurship; customizable local digital business.

❖ Websites and applications should follow strict rules in order to assist the vulnerable sections of the society (e.g., persons with disability) get the services which such systems and applications are meant to provide.

❖ Awareness and technical trainings are required to enable software developers meeting such requirements in the systems/application they develop in the future.

❖ The vulnerable people should be consulted and take part in the project and their views solicited.

❖ Training for vulnerable people on digital entrepreneurship; improve economic capacity of vulnerable people.

❖ Motivate the development of easy-to-use apps for the vulnerable people.

❖ Supporting vulnerable and underserved people with basic Digital equipment and resources with affordability (includes term-based payment mechanisms).

❖ Setting up long-term loan for people with low economic status.

❖ Off grid power solutions.

❖ Proper regulation should be put in place to address conflicts of interests. The regulator should take action for balancing the service provision. To properly regulate the sector, the Regulator should be strong and well equipped with skilled manpower and required resources.

❖ The Law should address the crimes and other problems that evolve with the dynamism of the technology; to devise the technology in a way to tackle the abusive use thereof.

❖ To overcome high staff-turn over, outsource some of the technical supports to local companies, this might work but needs further discussion whether or not companies that can do the job are available in the area, its sustainability, cost effectiveness, etc.

7.2.   Characteristics of Vulnerability and Underserved Target Communities

In the Ethiopian context, according to the National Social Protection Policy of the Government of Ethiopia (GoE), vulnerability is associated with low agricultural growth, natural calamities, economic shocks, health and nutrition risks, and population explosion. It is also connected with environmental degradation and dependence on rain-fed agriculture, which are the contributory factors of chronic food insecurity, one of the major challenges in Ethiopia today[39], as well as with unemployment and underemployment. Broadly defined, the term vulnerability applies to all social groups that find themselves disadvantaged because of the deprivation of access to socioeconomic benefits, or the adverse

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[39] "Overall, an estimated 12.9 million people are expected to be facing high levels of acute food insecurity (IPC Phase 3 or above) in the presence of currently planned and funded humanitarian response interventions from January to June 2021." Ethiopia: IPC Acute Food Insecurity Analysis October 2020 – September 2021, Issued December 2020 - Ethiopia | ReliefWeb

consequences suffered as a result of mainstream development interventions and exacerbated by lack of access to ICT.

Vulnerability describes the factors which expose people to the negative impacts of their living circumstances, and render them less resilient to cope with these impacts. Economic poverty is obviously a vulnerability factor; other factors include sudden shocks such as economic collapse or natural disasters (price hikes, sudden conflict, prolonged drought, or desert locus invasion as observed in the horn of Africa in 2020). Further vulnerability factors are: lack of adequate understanding and awareness resulting from insufficient or inappropriate communication of information and ideas, which '*Digital Ethiopia*' project aims to address; embedded social and cultural attitudes and practices which discriminate against or give precedence to certain people on certain grounds (gender, age, ethnicity, religion, and occupation) also sustained by lack of information about the national and international standards on human rights and respect for human dignity; attitudes towards people manifesting certain behaviours, or reactions to people with certain conditions (people with disabilities, people living with HIV/AIDS and other chronic health problems such as people with leprosy). Vulnerability can also be seen in terms of biophysical environment such as people who live in semi-arid lowland areas, where poverty, gender-based inequalities, forms of agricultural livelihood, customary practices, and spatial disparities in resource potential are the key factors affecting people's abilities to access services that would enhance their means of livelihoods. Irrespective of their vulnerability, no community members in the selected project implementation areas will be intended to be excluded from the '*Digital Ethiopia*' Project.

The socioeconomic and cultural profile of the population groups described as underserved and considered as potential beneficiaries of the "***Digital Ethiopia***" Project are presented below.

7.2.1. Women

In line with the broader development goal of GTP II, the '*Digital Ethiopia*' PAD (paragraph 20) states: "**The proposed project will further aim to start addressing the gender digital divide by empowering women**, including through increased access to the internet and inclusive digital skills training programs. During project design and implementation, the project will ensure that women are fully represented in the target beneficiary groups and consider interventions to better enable access and adoption of the internet by women and girls, in line with the UN Sustainable Development Goals." Addressing the issues of gender-based social exclusion, discrimination and differential treatment constitutes an important entry point to the design and implementation of development programs such as '*Digital Ethiopia*'. By and large, women become vulnerable because of lack of education, gender bias, traditional and cultural norms, and their reproductive and productive roles and more importantly lack of access to up to date and reliable information which the '*Digital Ethiopia*' project aims to address through '*access and adoption of the internet by women and girls, in line with the UN Sustainable Development Goals*'.

In large part, socially constructed determinants mainly societal attitudes towards women, women's socioeconomic status, their levels of education, and the awareness of their rights define women's roles and position in society. In relation to this, specific issues for deeper examination are: societal attitudes placing the burden of domestic responsibilities on women, their low economic status evidenced by their limited property rights (land and livestock), little or no access to education and unaffordability of ICT

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services with its ramifications of rights conscious deficiency at all levels, and their vulnerable status emanating from the difficulty to balance their triple roles competing for their equal attention in male-headed households and single-handedly running the households in female-headed households.

7.2.2. Women's time poverty

Document review of the SA studies of various development projects (e.g., RLLP, 2020; SEAN-Enhanced SA and Consultation, 2020; ERSNP, Enhanced SA and Consultation, 2017; AGP-II, 2015; PSNP-IV, 2014; SLMP-II, 2013) show women play a significant role in farm activities, domestic chores, and off-farm tasks in addition to their reproductive roles and maternal responsibilities towards their children. There were also cases in which women found it difficult to balance their triple roles competing for their equal attention: bearing and rearing children, maintenance of household members and domestic work, community managing role and productive role such as harvesting, weeding, threshing the harvest, etc. The difficulty of balancing these equally important responsibilities resulted in the risk of losing project benefits in varying degrees (e.g., SLMP-2).

Besides, women are responsible for much of the buying and selling at the local markets to earn additional sources of income for the household. Despite the embeddedness of gender-based division of labor in many communities, women often perform the jobs assigned to men. For instance, among the Gumz and Majanger women normally perform all the tasks considered to be in the domain of men such as forest clearing, hoeing farm plots, planting, weeding, and threshing (AGP-II SA report, 2015:31) Women's multiple roles in productive, reproductive and community-related activities which all compete for their effort and attention result in what is often called *time poverty*. With their time and attention divided among these commitments, they find it difficult to balance their responsibilities including participation in development programs which would, at the end of the day, benefit them and their families (AGP-II SA report, 2015:31-2).

Women's vulnerability is further aggravated by out-migration of male adults and youths among some of the communities (e.g., Enmor ena Ener *Woreda* of SNNPR). This deprives households of male labor for agricultural engagements, forcing women to carry the entire burden of farm and domestic work. Being labor intensive and the exclusive domain of women, the chore of *enset* processing is another taxing duty that adds pressure to women and causing them *time poverty* in Enmor ena Ener *Woreda*, as in other *enset* growing areas of the country.

Women's drudgery is exacerbated by economic hardships, exposing them to even higher vulnerability. Hence, the worse off women are, the greater their burden of work, with the consequence of increased time poverty. Hence, '*Digital Ethiopia*', building on previous and existing development projects such as PSNP, AGP, SLMP, PCDP/ILLRP, Women Entrepreneurship, etc., will further enhance the status of women through accessible and affordable digital technologies and information that alleviate their burden and allow them greater time and freedom to engage in a wide range of activities with reduced hardship and pressure.

7.2.3. Female-Headed Households

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It is a common to see female-headed households struggling to sustain their families in both rural and urban settings of Ethiopia. However, data on the number of female-headed households are not easy to come by. Female-headed households are challenged not only because of absence of adult male to shoulder the responsibility assigned to him, but also by access to only small farmland (often 0.25 hectare in Tigray and Amhara) with large household size.

A significant proportion of the female household heads are widows in childbearing age with small family size. Due to the shortage of manpower in the household, these widows mostly depend on external labor, which they find through land rent or share-cropping. Having to share the produce with others in both cases, they are left with reduced benefit, not being able to get the full amount of what their land can offer them. Female-headed households with small farmland and shortage of draft power (e.g., Kafta Humera *Woreda*) are extremely vulnerable groups (e.g., they lease out the land because of lack of money to hire draft oxen or machinery, which means forfeiting the income they would otherwise be able to earn, when dispute arises between the female leaser and male leaser, in the traditional dispute settlement mechanisms disputes are mostly handled in favor of the better offs, i.e., male leaser. Because of lack of resources, time and money, the leaser female household heads do not pursue the disputes through the formal legal channels, which are often time consuming and expensive.

In this respect, '*Digital Ethiopia*' project will create the means of economic empowerment and opportunity that women with land but without labor or draft animals need through accessible and affordable digital technologies which is the vehicle for easy access to information, or follow-up their cases digitally.

The fact that gender inequality is embedded in the societal fabric in Ethiopia, i.e., women experience higher rate of unemployment, far less participating in seasonal (37%) and temporary (13%) employment, poorer women and girls especially facing multiple disadvantages, 58 percent of women being illiterate, and less than 12 percent of women access internet, the risk of women and girls being left out from the project beneficiary is very high. Despite all good intentions and commitment of the project implementers, the '*Digital Ethiopia*' project is likely to favour the educated, the resourced (e.g., financial capacity to cover the cost of mobile telephone apparatus), the urbanites, the male, and people with decision making power at the household level, etc.

To provide equitable benefits and opportunities, the project will ensure active participation of women in the project implementation units (PIU) and various committees including the Project Steering and Technical Committees. Through Technical Assistance to the ECA and the Women Affairs Directorate, it will: (i) conduct a study on the different constraints that men and women face in the telecom sector; and (ii) propose actions that need to be put in place to improve the participation and benefiting of women in the sector. The project will also engage women groups to ensure that men and women have access to information on project related business opportunities. Gender-disaggregated data will be collected as part of the routine tracking and monitoring system of the project. This will be used to inform the design of possible later stages of the project

The results framework of the project is to track the progress of women in several of the key activities of the project. One of the key PDO indicators, tracking the increase in the number of internet users, has a

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sub-indicator for female users. Similarly, the PDO indicator on the number of jobs created, or sustained, in the digital economy, will focus on the percentage of jobs created for women, as well as for disabled persons and the rural population. Among the intermediate indicators, both the number of students benefitting from enhanced internet access and the number of government officials receiving training in digital skills are tracked for their gender balance. Similarly, women founders of digital start-ups will be tracked for component 3.

7.2.4. Youth

Ethiopia is a country of youthful population and the issue of youth has received greater attention in Ethiopia over the last one and half decades. Ethiopia's ***National Youth Policy*** (2004) marks a major step in recognizing and promoting the rights of young people in the country. The policy "aims to bring about the active participation of youth in the building of a democratic system and good governance as well as in the economic, social and cultural activities and to enable them to fairly benefit from the results". It envisions "a young generation with democratic outlook and ideals, equipped with knowledge and professional skills." Ethiopia's youth has the potential to play a significant role in the country's socio-economic and political development and its participation is increasingly recognized by the public authorities, following the government's strategy to involve youth in decision-making processes.[40]

Currently the youth are facing various challenges to be involved in economic activities. Some of these challenges include acquiring productive farmland in rural areas (Schmidt and Bekele, 2016), work place in the towns, start-up capital, skills and smart ICT. Unemployment and underemployment, compounded with other challenges, are the main drivers of youth vulnerability. Unemployed youths include local boys and girls who have, for various reasons, dropped out of school at primary, secondary or preparatory levels. Others are young men and women who have returned to live in their natal villages, not being able to find work in the towns/cities after completing technical and vocational training or college education. The underemployed are by and large rural youths who have not had access to school and continue to live with their parents assisting them with farm work or it includes those who have married and survive on small portions of farm plots transferred to them by their parents. Both groups are underemployed because the small farm plots on which they work can hardly fully engage them and support themselves. These problems are pronounced among the pastoral and agro-pastoral communities due to natural and man-made challenges such as recurrent drought, flood, inter-and intra-group conflict, cattle raids, low schooling and lack of access to affordable ICT services, and high risk of community wide impoverishment.

The '*Digital Ethiopia*' project PAD (Parag. 45) is unequivocal on the need to invest on the youth and states "**The project includes a strong emphasis on closing the 'digital divide' – empowering youth, women and girls, the elderly and disabled persons**, who are currently digitally-excluded, and serving all parts of the country." Down the line in the paragraph, it explicitly states that the youth will be among the targets of the "Digital entrepreneurship activities and partnerships" that aims to "create jobs and nurture tomorrow's digital leaders". Among the youth, "Connectivity and skills development for girls will receive specific emphasis in recognition of the generally lower rates of access to digital services and

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[40] (http://www.oecd.org/dev/inclusivesocietiesanddevelopment/youth-issues-in-ethiopia.htm).

much lower rates of participation in digital technology fields relative to men, across both developed and developing countries".

As reflected in the findings of this SA, "The educated and urban residents are more likely to benefit from any project due to access and affordability advantage they have over others". Likewise, the '*Digital Ethiopia*' project might involve this selectivity bias in favour of the educated, the resourced/financed, the urbanites, people with strong connection to the politically and economically privileged, etc., the risk that the unemployed/underemployed youth (women and men), the rural youth, and youth from the low-income households, particularly girls might be left out in beneficiary targeting process is high. Moreover, corruption/nepotism and elite capture risks are also high, including political corruption where affiliation to the ruling party might make one a stronger candidate for selection (e.g., PSNP-IV SA report). In this SA findings, similar concerns were raised. When asked who will benefit from the Project, respondents said "***community members who have relatives in the government structure will particularly benefit***". As a way forward, it is recommended to involve the youth, from all the differentially positioned groups, represented in the committees to be established, especially in the selection of beneficiaries for digital entrepreneurship in the form of start-up capitals, grants, or different forms of incentives to participate in the digital economy.

7.2.5. Chronically ill and people living with HIV/AIDS

Chronic illness and HIV/AIDS cause labour shortages in resource-poor households, preventing them from diversifying income activities. These people endure extended periods of pain and suffering and face high costs for treatment and medication, which may erode savings and make them dependent on family and friends. The chronic illness leads to the loss of their ability to earn a livelihood and support themselves. Although development programs such as the '*Digital Ethiopia*' project are meant to address the major health, information and mobility challenges of the chronically ill persons of the project target communities, their chances of being excluded from the actual beneficiary groups is high due to the financial, information and may be literacy constraints they have. That is why, beneficiary selection needs to be carefully planned and executed in a participatory way, namely involving direct project beneficiaries and the existing traditional/indigenous institutions renowned for their integrity in their respective communities.

7.2.6. Elderly

According to the UN definition, older people are those people whose age is 60 years and above. This also corresponds with Ethiopia's official retirement age.[41] Although gradually being eroded/diminishing due to urbanisation and "modernisation" "older people in Ethiopia used to be treated with respect and love, and they received support from their families, relatives and the community" (ibid.). Their accumulated knowledge and experience are recognized

However, when families or communities themselves face problems, it is difficult for older persons to get the support and assistance they need. Some elderly persons who lack a social support network and cannot find work may turn to begging. It is also recognized that the Ethiopians' long-standing culture of

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[41] [Vulnerability of Older People in Ethiopia The Case of Oromia, Amhara and SNNP Regional States | Humanitarian Library](#)

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intergenerational solidarity and mutual support may be declining due to urbanization, "modernization", and economic stress on the younger generation, in turn caused by unemployment and underemployment, resulting in increasing vulnerability, particularly among older persons. The interaction of several factors exacerbates the vulnerability of the elderly people.

Poverty has become more acute among older people and it is much more difficult for them to come out of it. Ill health, unsuitable residential areas, diminishing family and community support, limited social security services, lack of education and training opportunities, limited employment and income generating opportunities, and lack of balanced diet and shelter are some of the factors contributing to the poverty of older people. (ibid.)

Access to affordable digital technologies and internet services, definitely help the elderly people in many respects, such as sharing their experiences and challenges of life, including communication with potential supporters and families and friends who live far away from where they are. The big question, however, is what is the likelihood of their inclusion in the project given all the aforementioned challenges that exacerbate their vulnerability? Therefore, there is a need for an honest community consultation and a *localized mini-survey* to assess the scale of this challenge and in consultation with the respective local community devise a workable and inclusive project implementation plan.

7.2.7. People with disability

Disability of one sort or the other is one of the major challenges In Ethiopia. According to UNICEF: "Using survey data from 2015/16, nearly 7.8 million people in Ethiopia are estimated to live with some form of disability, or 9.3 percent of the country's total population. Of these, up to 2.2 million people (2.4 percent) have very profound difficulties. The estimated number of people with severe disabilities in Addis Ababa is around 47,000, and 324,000 in other urban areas of the country."[42]

The underlying causes of physical disability are often misunderstood in rural Ethiopia, often thought of as 'a curse from God.' As a result, disabled people's access to education is a challenge and rejection by family and society is common. Health care challenges also mean that mobility aids are not widely available; those who are unable to walk unassisted have no choice but to crawl.

This SA benefitted from the thoughtful and enlightening responses obtained from the *Federation of Ethiopian Associations of Persons with Disabilities (*FEAPD*)*. According to FEAPD*:*

A lack of accessible communication and information affects the life of many disabled people. Individuals with communication difficulties, such as hearing impairment or speech impairment, are at a significant social disadvantage, in both developing and developed countries. This disadvantage is particularly experienced in sectors where effective communication is critical – such as those of health care, education, local government, and justice.

FEAPD, based on a survey conducted in different countries on access to and the use of digital media, argues "disabled people are half as likely as non-disabled people to have a computer at home, and even less likely to have Internet access at home. The concept of the digital divide refers not only to physical

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[42] 3.Situation and access to services of persons with disabilities in Addis Ababa Briefing Note.pdf (unicef.org)

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access to computers, connectivity, and infrastructure but also to the geographical, economic, cultural and social factors – such as illiteracy – that create barriers to social inclusion." The positive impact of affordable access to digital technologies and ICT for the people with disability is too obvious to tell, as FEAPD argues:

Once they are able to access the web, they value the health information and other services provided on it. Online communities can be particularly empowering for those with hearing or visual impairments or autistic spectrum conditions because they overcome barriers experienced in face-to-face contact. People with disabilities who are isolated value the Internet in enabling them to interact with others and potentially to conceal their difference.

According to FEAPD the risk of exclusion is there, at least based on past experiences and proposes the mechanism to address the problem: "People with disabilities should have the same choice in everyday telecommunications as other people – *in access, quality, and price*. For example, people with hearing and speech impairments, including the deaf blind, need public or personal telephones with audio outputs adjustable in volume and quality, and equipment compatible with hearing aids." To a question if women could particularly benefit from this Project, FEAPD said: "Available empirical evidence suggests that women with disabilities have significantly lower rates of ICT use than non-disabled people. In some cases, they may be unable to access even basic products and services such as telephones, television and the Internet. Hence the project will help them in availing accessible and affordable information."

Finally, on the best ways to address the adverse impacts or promote equitable access to Project benefits, FEAPD says: "*Future innovations in ICT could benefit people with disabilities and older persons by helping them overcome barriers of mobility, communication*, and so on. When designing and distributing ICT equipment and services, *developers should ensure that people with disabilities gain the same benefits as the wider population and that accessibility affordability, and ease of usability like using local languages are taken into account from the outset*". (emphasis added). For persons with disability, depending on the nature of their impairment, is also recommended to provide additional technological and application/software features a project package.

7.2.8. Occupational Minorities

Occupational minorities constitute potters, smiths, weavers, tanners and carpenters, who have been historically despised and marginalized because of their occupation. In the PSNP *woreda*s of Amhara and SNNPR regional states, occupational minorities used to be excluded for generations from mainstream social and economic activities including access to land. Although there are improvements in attitudes and practices that facilitated the integration of the occupational minorities into the mainstream society, there are still challenges.

The Manja, who live in the Konta and Decha *woredas* of SNNPR, are a largely despised and vulnerable occupational minority. They are associated with a number of stereotypes related to their eating habits and personal hygiene. It is said that they eat the meat of religiously prohibited animals and that they do not keep themselves and their cloths clean. Such views and attitudes have led to the treatment of the Manja as social outcasts, resulting in their exclusion from all forms of interaction in the community including engaging in agricultural activities.

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Access to affordable and ICT services, which '*Digital Ethiopia*' project aims to expand, contribute to the social and cultural integration of occupational minorities, and enhance their standing in the socio-cultural and economic life of the so-called "mainstream" society. ICT provides learning and training opportunities for occupational minorities, fostering their language and cultural skills, fighting illiteracy, and training digital skills, thus promoting social integration. Occupational minorities are diverse and live distributed in different parts of the country, hence one-model-fits-all approach might not work to ensure they all benefit from this project. This, therefore, necessitates careful planning and implementation exercise informed by continuous community engagement and a localized mini-survey to assess the scale of this challenge.

7.2.9. Ethnic Minorities and Shifting Cultivators

The other vulnerable groups include 'ethnic minorities' and 'shifting cultivators. The former is either indigenous to the area where they currently live (e.g., Tsemai, Nyangatom, Dassanech, Benna in SNNPR) or recent immigrants (i.e., the Irob, Saho and Kunama in Tahtay Adiabo and Kafta Humera *woredas* of Tigray, and the Gumz and Shinasha in Guangua *Woreda* of Awi Zone of Amhara region). The latter are the people wo occupy the western borderlands of Ethiopia, stretching from western Tigray and running through the frontier districts of the regions of Benishangul-Gumz and Gambella is spoken an interrelated set of languages belonging to the Nilo-Saharan. The Ethiopian Nilo-Saharan language speakers consist, among others, of the Kunama, Gumz, Berta, Anuak, Majanger and Mao-Komo. Most of the shifting cultivators occupy the hot lowlands from the slopes of the western edges of the Ethiopian plateau and penetrating deep into the inhospitable gorges and valleys of the Dinder, the Abay River, and the Anger-Diddessa rivers and many of their tributaries.

They practice a system of shifting hoe cultivation and in times of food shortages, they also resort to the more ancient practices of hunting and gathering, as well as fishing and honey collection[43]. These communities are exposed to all sorts of risks (i.e., conflict, drought, flood, communicable diseases, etc.) due to the fragile natural environment which they inhabit and their minority status among the majority ethnic groups, and projects such as the '*Digital Ethiopia*' need to take into account their vulnerability and ensure digital technologies benefit them.

7.2.10. Pastoralists and Agro-pastoralists

In addition to the constraints which most Ethiopian rural communities encounter such as poor IT infrastructure, power interruption, and unreliable networks that could be solved through investment, pastoralist communities face additional challenges because of their mobile livelihood strategies in connection to '*Digital Ethiopia*' project. Experts with long experience working among the pastoralist communities underscore the peculiar vulnerability risks related to mobility and literacy status that already declared "not subject of this project" sections of the society such as girls, boys, women and the elderly people among the pastoralists. The major challenges identified among the pastoralist communities include: lack of IT infrastructure, power interruption, unreliable networks (both telephone and internet), low literacy level, low economic status, lack of digital skills and mobile livelihood strategies. They recommend tailored participatory research on the pastoralists' livelihoods, movement patterns, etc. to

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[43] Wolde-Selassie Abbute (1997) "The Dynamics of Socio-Economic Differentiation and Change in the Beles-Valley /Pawe/ Resettlement Area, North Western Ethiopia". Department of Social Anthropology, Addis Ababa University, MA Thesis.

contextualize the design and implementation plan and ensure '*Digital Ethiopia*' project is inclusive enough of the youth, women and girls, the elderly, people with low economic status, persons with disability, and the general public with lower digital skills among the pastoralist communities.

7.3.   Community Institutions

Community institutions are mechanisms of social order that govern the behaviour of a set of individuals within a given community, which promote cultural, social, political and economic aspects of local communities. During this social assessment, in the study areas, commonly, there are local/informal and formal forms of institutions. Local/informal community institutions rely on local communities' cultures that have distinctive structures or forms. They play important roles in shaping the capacities of communities to respond to changes in natural and socio-economic systems of their respective communities. Thus, it is imperative to see how local community institutions facilitate or enable interaction between the local communities and external actors. Formal community institutions depend on written laws by government or other bodies. The two forms of local institutions were existent in the selected pastoral and agro-pastoral communities and are briefly discussed below.

Several SA studies documented among the pastoral and agro-pastoral communities of Ethiopia, both the formal and informal authority structures function side by side, in fact, in practice, with more power to enforce rules vested in the informal structure (e.g., LLRP, 2019[44]; PSNP-IV, 2014). For instance, the SA report for the LLRP (2019: vii) stated: "Participants in all of the Woredas selected for the assessment indicated that in the Pastoral and Agro-pastoral (PAP) communities, concurrent with formal government structure, the community uses the traditional administration system. Besides government structure, there are several formal organizations such as community-based organization (CBO) in all regions."

Informal community institutions rely on local communities' cultures that have distinctive structures or forms. They play important role in shaping the capacities of communities to respond to changes in natural and social systems. Thus, it is imperative to see how local community institutions facilitate or enable interaction between the local communities and external actors. Pastoral and agro-pastoral communities have their own local institutions that are very strong and enable them ease their daily activities. The *Balabat* system is an informal institution found in all PAP communities in South Omo, for example, in Hamar, Kara, Bashada and Benna ethnic groups where all members of the group are loyal to their respective *Bittas/balabat* and believe they perform all traditional rituals and religious practices for their members. There are also social positions in these communities such as *Donza*, *Zarsi*, and *Ayo* for communal political decisions or solution of problems of public concern.

Likewise, the Oromo people have the *Gada* system, which is based on an age-set system that cross-cuts kinship organization. The *Jarsumma (*elders council) institution particularly plays significant role in mediating various problems encountering the community including solving intra- and inter-clan conflicts as well as conflicts with other ethnic groups (e.g., with the Somali, Konso). Similarly, among the Afar co-operation is based on the local community structure of clan, sub-clan, family, etc. and the higher units are clan (*Mela*) and the level below it is the local community (*Kaidoh*), and the next lower level is the

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[44] FDRE, Ministry of Peace, Final Social Assessment Report for Lowland Livelihood Resilience Project (LLRP) (P164336), March 15, 2019, Addis Ababa, Ethiopia.

extended family (*Dahla*), followed by the household (*Burra*). For that reason, the Sultanates are clan leaders, *Firma* or *Balabat* are community leaders, and household heads that reflect their daily socio-cultural aspects.

The Somali also have their own traditional institution called *Ugas* System for making decision and it is inevitably recognized by all members of the ethnic group. Every clan has their own representatives that take messages from the *Ugas* and pass down to their respective community members. *Gudi*/elders committee, composed of clan representatives, is another structure that plays the role of solving problems that encounter the community. In the event where the *Gudi* could not solve the problems, the cases are brought to the formal government structures. The Anyawa uses *Juatut* traditional conflict redress mechanism while the Nuer practices *Ruach*.

In short, in one way or the other, the significances/contributions of various traditional institutions, particularly the local informal institutions were emphasized as important factors to be adequately involved in the project design (esp. sub-project design and implementation) in their respective communities (p. viii). According to ECA experts, **Gada** systems and Elders councils can greatly contribute to make the project successful by creating a sense of ownership. The organized nature of these traditional institutions (including *Idir* and *Ekub*) provides easy access to members in such a way that it makes it easier for awareness creation, beneficiary targeting, conflict resolution and other activities. Participants in this SA concur that indigenous/traditional institutions can help in creating a conducive environment for project implementation through their symbolic power in collaboration with the local governments.

7.4.   Land Acquisitions, Restrictions in Land Use and Involuntary Resettlement

This section briefly deals with the World Bank's **ESS5**, which 'recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons'. The 'Digital Ethiopia' project will be implemented throughout Ethiopia (in rural areas and urban centers). Nevertheless, 'the specific locations where the project activities will be implemented have not been yet identified'. An overview of the project activities such as 'last-mile conncectivity', 'ICT expansion', 'financing digital entrepreneurship', and 'incentivizing digital businesses' sound like compassionate to the potential project affected communities and areas and pose no risk of *Land Acquistion, Restrictions in Land Use and Involuntary Resettlement*.

Ethiopia Digital Foundation Project documents emphasize in the proposed phase of the project, the project design does not involve any involuntary loss of assets and properties and excludes any respective investments. Physical investments will only be implemented on land currently used by government, e.g., university campus, health and education facilities, government offices, etc. In this connection, respective screening-out requirements are trusted to the ESMF. The project will also finance the design of procedures for future digital infrastructure investments, which may lead to land acquisition down the line. In this connection, it will provide technical assistance (TA) to ECA to adopt regulatory standards on siting, design, construction and operation of telecommunication infrastructure which will be imposed on private sector operators. Such TA will thus include the development of Resettlement Policy Framework (RPF) consistent with ESS5 in manner acceptable to the World Bank.

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7.5.   Social Capital

As in other traditional institutions, there is a wealth of social capital in communities likely to be covered by the '*Digital Ethiopia*' project. The social capital exists in the form of self-help groups, mutual assistance mechanisms, religious associations, and conflict resolution mechanisms.

The informal societal institutions refer to the kind of long-established rotating credit associations (*Ekub*), burial associations (*Idir*), and socio-religious groups (*Mahiber* and *Senbete*). Although the latter social institutions are intended to serve respective establishment purposes, they still perform certain economic functions that the project may properly tap. The formal institutions include saving and credit, marketing and multi-purpose service cooperatives that are the formal cooperatives established and operated by relevant government sector offices, NGOs, women and youth associations (RLLP, 2020:10-1).[45] These institutions could be involved in the project design and implementation at local levels. For instance, saving and rotating credit associations such as *Iqup* could be a source of collateral for entrepreneurial start-up loan, alternate source of capital and training to new businesses; create new opportunities and can serve as a basis for good governance.

7.6.   Institutional Arrangement and Capacity Issues

Strong institutions significantly encourage trust, promote property rights and avoid or at least reduce the exclusion risks of different sections of the population. Particularly grassroots level institutions play important roles in upholding the interest of the local people, safeguarding their physical cultural resources, facilitating development initiatives, as well as mitigating unexpected adverse effects. Currently, lower-level government structures are increasingly involved in community development efforts in Ethiopia. These structures include the different government and non-government organizations at *woreda* and *kebele* levels. The *woreda* level administration structure is more or less similar in all regional states (MCB, 2007). Almost all sector ministries and bureaus at federal and regional levels are represented at *woreda* level (AGP-I SA report, p. 44).

Almost all SA reports reviewed for this study concur on capacity limitation of the implementing institutions which compromises the quality of services provided. The '*Digital Ethiopia*' project PAD (parag.79) also states: "Experience from other Bank financed projects shows that MInT's capacity to manage environmental and social risks needs considerable improvement". The SA finding concurs with the above argument. For instance, when asked about the institutional capacity of the lower level govt structure, ECA Officials' response was: "Currently, we have not assessed the grassroots government structures' capacities" and acknowledges "It surely has an adverse impact on the successful realization of the planned projects." The finding further documents the level of leadership commitment at the grass-root level: "The commitment of the local administration in supporting women's, youth, people with disability and other vulnerable groups' participation in development is judged as *very low*." The capacity and facilities to support the implementation of the project at the grassroots government structures is believed to be *low*, but still varies from region to region or place to place.

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[45] Sustainable Land Management Program Resilient Landscapes and Livelihoods Project (RLLP) Social Assessment Report (Updated final) February 2020 Addis Ababa.

MoSHE, on the other hand, argues the implementation of the Project will be smooth in HE and TVET institutions because "TVET and HE have a better capacity and institutional organizational structure. There is also an ICT directorate and ICT related departments at TVET, and HE is working on the implementation of the project." Although we do not know the technical skills and competency levels of the staff of these Directorates and Departments, MoSHE's assertion makes sense because these are institutions of higher learning, which under normal circumstances are expected to be much more organized, staffed with competent people and better resourced than other institutions that might benefit from this Project in their surroundings.

At the Federal level MInT coordinates the project; in the regions Regional Bureaus/Agencies working on Science and Technology will coordinate the implementation. In terms of capacity, MInT is a relatively young Federal institution that needs support to play its overall leadership role of the Project. Moreover, "as a new Ministry, MInT has only limited experience implementing World Bank ICT projects, but support will be provided from Bank specialists" (PAD, Parag. 53).

The implementation arrangement proposed for this project is described in the PAD, part: *III Implementation Arrangements*, section 'A' *Institutional and Implementation Arrangement'*, Parag. 53. It reiterates, the project will be implemented under the leadership of the Ministry of Innovation and Technology (MinT), building upon the initial work under the PPA led by the Ministry of Finance (MoF), and coordinating the work of the different agencies, including MoF, the Public Enterprises Holding and Administration Agency (PEHAA), the Ethiopian Communications Authority (ECA) and the Ethiopian Research and Education Network. Initially, the Channel One Programs Coordinating Directorate (COPCD) is acting as a transitional PIU, for implementation of activities funded under the Project Preparation Advance (PPA). During this phase, the PIU will support with recruitment of project staff for the future PIU, experts to support ECA, as well as the transaction advisor to restructure Ethio Telecom. Once the project becomes effective, MInT will assume overall implementation leadership, and will host the PIU for the remaining of the project life, under "Channel Two" procedures. MoF and PEHAA will partner with MInT as implementing agency for subcomponent 1.1 and ECA for subcomponent 1.2 respectively, while MInT will deliver most of the activities under subcomponents 1.3, 2.1 and Component 3. EthERNet will partner for activities under subcomponent 2.3. MInT will also liaise with the Ministry of Peace (MoP) for sub-component 1.3, on the aspects relevant to Digital ID.

Despite its promises for the long-term capacity development initiative, the desire for implementing 'Digital Ethiopia' project poses a number of challenges in the areas of institutional arrangement and capacity. The first challenge relates to its pioneer nature in terms of promises (i.e., envisioning 'Digital Ethiopia') and scope, both regional and component activities. The second, relates to its multiple institutional involvement, but with vague statement of who does what, especially when it comes to the role of the regional states where most of the potential project beneficiaries are found. Added to the inherent capacity limitations of most of the institutions involved, the implementation of this Project might be a rough road. Early detection of these challenges helps initiating a thorough and open discussion among the various implementing institutions and other stakeholders, from which a workable institutional arrangement that realizes the implementation plan can be developed.

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The multiplicity of stakeholders often involves the risk of some institutions shying away from responsibility with the excuse that it is someone else's job, not mine. Social Assessment reports of some of other Bank financed projects documented similar experience: "*The multiplicity of sector stakeholders also complicated who should do what, apparently that is why the AGP Coordinator of Enmorena Ener Woreda described AGP as a "**mad man's bag**".*" (AGP-II SA Report, 2015:75). Clear description of mandate and responsibilities is very important.

It is also important to unequivocally state in the Project Implementation Manual (PIM) that the '*Digital Ethiopia*' project is an integral part of the activities of all the institutions involved, not an *add on*, as was often reported for some Bank financed development projects: "*AGP is something like an '**add on**', and at times things have to wait for the goodwill of the authorities to move forward*" (AGP-II SA Report, 2015:76). This kind of thinking is not only irresponsible, but also counterproductive and need to be avoided through transparent and accountable institutional arrangement. ECA has devised a mechanism in its Institutional structure where the needs of the marginalized section of the society/community will be well integrated into the planning process: "The ECA has a department dedicated to monitor and make sure marginalized part of the society get the basic needs of Telecommunication Services" (ECA, written response to GQs).

Acknowledging the potential impact of limited grassroot level government institutional capacity, ECA plans to conduct an assessment to get a clear picture of the 'limited institutional capacity'. It says "We are going to make an assessment on the ground during the projects' feasibility study phases" because, as one NGO expert with long experience of working among the pastoralist and underserved communities said, grassroot level government institutional capacity "differs from region to region/place to place", and warrants locality specific needs assessment. According to ECA experts, lower-level government structures are constrained by low level of IT capacity, facility and infrastructure, poor accessibility, unaffordability of services (including the devices) and difficulty to use. They add problems such as lack of proper training, lack of ownership, poor incentive package and low salary limit program implementation. One MoSHE official acknowledges lower '*digital literacy level of the community inside the institutions at TVET and HE*' as one of the potential challenges of the Project.

ECA experts underscored problems such as non-participatory nature of projects [for stakeholders, including the intended beneficiaries], poor leadership commitment, weak/poor monitoring and evaluation, lack of proper capacity building, and forced implementation of developed technologies have always been the challenges and the '*Digital Ethiopia*' project needs to learn from this experience. In a telephone interview (05.01.21) one project manager working in an International NGO in Assosa said that lack of leadership commitment and corruption pose serious challenges to development project implementation. He added "when you ask the officials to support an approved project that benefits the lowest segments of the society, they would say 'What do I get out of'". Another challenge documented in the SA reports reviewed and reiterated during phone interview with the same Project Manager is the staff turn-over in the government structure, due to transfer because of appointment at the leadership level, resignation of experts seeking better opportunities such as better salary and other employment benefits. An Official in MInT acknowledges the challenges of staff turn-over: "It is difficult to keep IT experts in *Woredas*. The more you train them they will leave to cities for better jobs. So, in some areas it is difficult to get experts who can check the daily operations of systems." ECA experts also emphasized very low salary, absence

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of benefit schemes, lack of professional trainings and other resources will have an effect on the effectiveness of the ECA in regulating the sector.

Capacity building training should also be an integral part of this Project to address the capacity limitation problem of the implementing institutions along with competitive/better salary and other employment benefit schemes such as health insurance, housing allowance, etc. **OR,** outsource some of the technical supports to local companies, this might work but needs further discussion whether or not companies that can do the job are available in the area, its sustainability, cost effectiveness, etc.

Detailed capacity building needs of each implementing agency upon which capacity building proposals might be based cannot be adequately captured in this SA report. In a nut shell, however, lack of ICT infrastructure; unreliable telecommunication service; lack of access to accessible and affordable internet services; digital literacy trainings; budget constraints to procure ICT technologies and services; staff salary and other incentive schemes, to mention a few, need particular attention. For institutions in the emerging regions, unreliable power supply, lack of leadership commitment, even road infrastructure are the major capacity building constraints that need special attention in addition to the aforementioned project capacity building needs.

7.7.   Gender-Based Violence

Gender-based violence (GBV) is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially-ascribed (i.e., gender) differences between males and females. It includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private (2015 Inter-Agency Standing Committee Gender-based Violence Guidelines, pg. 5). The term GBV is used to underscore systemic inequality between males and females (which exists in every society in the world) and acts as a unifying and foundational characteristic of most forms of violence perpetrated against women and girls. The 1993 United Nations Declaration on the Elimination of Violence against Women defines violence against women as "any act of gender-based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women" (Art.1). Besides, sexual exploitation and abuse (SEA) and sexual harassment (SH), (together referred to SEA/SH), can generally be considered a form of GBV, as victims of SEA/SH are often abused because of their vulnerable status as community women, girls, boys, or, in some circumstances, even men.

7.7.1.   Context of GBV in Ethiopia

Gender Based Violence is among the major challenges to human dignity and is a violation of women's rights as human beings. This necessitated the international community to come up with legal instruments to address the problem that are coherent with the Universal Declaration of Human Rights. The major legal instruments and strategies which recognized and addressed GBV are Convention on Elimination of All Forms of Discrimination Against Women (CEDAW), Declaration on the Elimination of Violence against Women (DEVAW), Beijing Declaration and Platform for Action, and the SDGs Goal 5. In line with the international legal instruments, the Ethiopian Constitution, as the supreme law of the land, devotes over a quarter of its provisions to human rights in which women and children's rights are guaranteed. The Criminal Code of Ethiopia also hosts a number of provisions, which criminalize GBV and its different

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forms. Article 561 to 570 criminalizes harmful traditional practices, including domestic violence (564), and female circumcision (565, 566). On the other hand, the Ethiopian Criminal Codes do not adequately address SH. Until now, victims have no legal recourse to redress either the short or long-term consequences of the acts perpetrated against them which leave sexual harassment, go unreported. Positively, Proclamation No. 1064/2017 on the Federal civil servants and the new Labour Proclamation No. 1161/2019 provide for the prohibition of sexual harassment.

Several studies[46] show the underlying causes of violence against women include, among others, women's low status and limited power, their low access to social and economic resources, limited enforcement of the available gender sensitive laws, and lack of legal protection to women and girls. This lack of power makes women more vulnerable to acts of violence and exposes them to more severe forms of violence and more serious injuries. On the other hand, the consequences of GBV are many, among which physical, psychological and emotional damages are common. Violence against women, such as rape, abduction and early marriage put women and girls at risk of sexually transmitted infections (STIs), HIV/AIDS, unwanted multiple pregnancies and unsafe abortions. Early marriage, for instance, compromises girls' educational opportunities and limits them from realizing their full potential.

7.7.2. Potential Risks of SEA/SH

Data from around the world suggests increased risk of gender-based and domestic violence during the COVID-19 pandemic. The project is not expected to directly increase the risk of SEA/SH. However, targeting project beneficiaries might involve the risk of SEA for women and girls who constitute disproportionately high number among the unemployed and underemployed youth which the '*Digital Ethiopia*' project aims to reach in large number both in terms of access to affordable digital connectivity and ICT and potential job creation through the expansion of digital entrepreneurship. Generally, the vulnerability of women and girls increases the risk of SEA/SH because the Project is likely to select men over women and girls, the educated over the uneducated, and the better-off over the poor.

GBV is a common daily observation in some areas (interview with an NGO staff, Jan.05, 2021), the introduction of the project into those areas, with potential labour influx into the area, might heighten the risk SEA/SH. ECA also argues "Though we do not perceive such specific impact due to the implementations, we are keen to address any unpredictable incidents that may arise throughout the process applying assessment and monitoring." It also proposes mitigation measure: "Regular and periodic assessment and monitoring are the major tools employed to address the impacts." (written response to GQs)

Therefore, extra precaution needs to be taken to mitigate any risk of SEA/SH through sub-project activities. The project (including all implementing partners and subprojects) will share the statement on SEA/SH[47] with all project participants and affected communities and provide community members the toll-free hotline information to report any incidents or concerns. For effective mitigation, GRM which also handles GBV (SEA/SH) grievances will be established and operate as an integral part of this Project.

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[46] Ministry of Women, Children and Youth Affairs (MoWCYA), 2013; EDHS 2016
[47] For detail information, see Good Practice Note – Addressing SEA/SH in IPF Involving Major Civil Works. GBV_ESFGoodPracticeNoteonGBVinMajorCivilWorksv2.pdf

A group of experts are of the opinion that without proper monitoring of parents and content management, access to such technology might have its own disadvantages especially for young children. They might be prey to human traffickers; youngsters would be addicted to unnecessary contents (gender-based violence (GBV) and sexual exploitation); and it might affect family bond and interaction if there is no proper management of internet access as people might spend long time on it. The mitigation mechanisms recommended include proper content management to avoid sexual exploitation; and educating and training communities on protecting its society from such activities. The federal regular, ECA, should also issue a regulation that helps mitigate this risk.

7.8.   Grievance Redress Mechanism

Effective grievance handling mechanisms constitute an important aspect of human relationship. For these arrangements to serve their purpose, they need to be developed and operated in such a way that they meet the needs of the target populations, being cost effective, accessible and working on the basis of a well-defined time schedule. Of course, such grievance handling arrangements do not replace the formal justice system, and so complainants who feel their grievance have not been fairly handled may seek justice in the court of law.

As was discussed under the '*Local Institutions*' section of this report, there is a wealth of indigenous grievance handling and conflict resolution mechanisms practiced by different communities of Ethiopia. In fact, in some areas like Somali, Afar, and Oromia regional states, traditional management systems are well established and acknowledged and often used by the government structure. For example, the *denb* in SNNPR, *odiyash deganka* in Somali*, jarsuma* in Oromia, and *mebloo* in Afar, were used though not always, by the government to solve interethnic conflict. Among the Somali and *Borana* pastoralists and agro-pastoralists, the type of penalty imposed on the offender is set in written form which varies in accordance with the type of offense and the extent of damage inflicted. Among the pastoralists and agro-pastoralists in SNNPR, the conflict resolution system is more traditional and well established. Though the *balabats* are the main agents in conflict resolution, they are less educated, highly traditional, and important in the day-to-day life of their ethnic group.

These well-established institutions can be mobilized both in project design, implementation and to support the formal GRM to be institutionalized as per the safeguards' requirements of the GoE and the WB, which will be discussed at length in the ESMF of the Project. In the institutions under the jurisdiction of MoSHE, notwithstanding their organization and capacity, "There are grievance rules and procedures in the institutions at both TVET and HE" (MoSHE official, written response to **GQs**). Moreover, according to FEAPD, persons with disabilities normally express their complaints through organizations for people with disability at the regional levels and there is a need to collaborate with the FEAPD which is serving as a common voice of persons with disabilities in order to ensure smooth project implementation. Apart from official claims, none of the participants of this SA said there was a strong functioning GRM in their respective institutions.

In view of this, it is worth noting here that, as clearly stated in the PAD (p.39-40), the Project has to "ensure that the GRM is suitable to address more sensitive type of grievances such as Gender Based Violence (GBV) and Sexual Exploitation and Abuse related issues". The GRM committees that will be

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established at the various levels should address such complaints, including logging, tracking, and resolving grievances promptly during and after the implementation of the Project. The GRM need to have specific procedures for GBV including confidential reporting with safe and ethical documenting of GBV cases; and have project workers and local community undergo training on SEA and SH. The project needs to identify GBV service providers to effectively respond in case of incidents of SEA/SH and build this into the existing GRM.

8. Lessons Learned from past projects

8.1. Unintended Exclusion Risk

The SA for SLMP II (SLMP-II SA, 2013:25) revealed that the the implementation of the '*Rural Land Administration and Certification*' sub-component of the project, designed to ensure the tenure security of smallholder farmers, and thereby motivate them to adopt sustainable land management, ***unintentionally*** tended to exclude the section of the population who do not possess land (due to age, economic status, gender, etc.) where individual land possession by households was the norm, or pastoralist communities, hunting and gathering, and shifting cultivating groups where individual/family landholding system did not exist. Such unintended exclusionary practices need to be carefully studied and appropriate mitigation measures put in place.

As discussed under the 'Key Social Assessment' section, despite good intentions, there are risks of some sections of the society being excluded (accessibility and affordability challenges) from benefitting from the project. These include the elderly, low-income households, unemployed youth (men and women), persons with disability, pastoralists, and people with low/no digital literacy.

8.2. Corruption and Nepotism

On the other hand, the PSNP IV Social Assessment (2014) documented problems of both ***targeting exclusion and inclusion errors*** both during community consultation and the discussion with the experts. These errors were attributed to nepotism, corruption and clientelism[48], which both the *kebele* leadership and some economically powerful (social or economic) community members practiced to benefit themselves (PSNP IV, 2014:36). For instance, the Meket *Woreda* FSTF members and PSNP staff at the *woreda* argue that targeting is susceptible to abuse in a situation where resources are scarce and wealth ranking, which the PSNP uses for beneficiary targeting, is not based on community level baseline information on households' wealth or food security status.[49] The *Woreda* FSTF members were unanimous that a few *kebele* chairmen used their power to favour their associates and some economically powerful members of the community organized their supporters to be included in the beneficiaries' list or used their

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[48] Although there are different angles from which clientelism is understood, in this context PSNP-IV SA it was taken to describe the relationship between individuals with unequal economic and social status ("the economically powerful" and "the poor") that entails the reciprocal exchange of favours, goods and services based on a personal link that is generally perceived in terms of "moral" obligation. Although this information was based on field data gathered from two *kebeles*, experts observed that these problems are by no means limited to these *kebeles* alone

[49] It was stated in the targeting PIM that "Community targeting is a method of selecting safety net program beneficiaries by the community based on their own knowledge about the food security situation of their locality area and of each other on individual basis." The major points that need to be taken into account include, among others, asset ownership, access to asset, remittance, family size and food aid recipient for three consecutive years. (Food Security Coordination Bureau, *Safety Net Targeting Guideline*, p. 14-15.)

established status to influence the targeted poor households from their villages to register their children as family members, since refusal to do so costs the latter a lot, e.g., helping hands when they are in need of cash, pack animals, seed to plant, etc. (ibid.:42)

Other observations from some of the projects, such as the Urban Productive Safety Net include risks such as "(ii)social exclusion and elite capture for targeting (Assessments conducted in the country indicate that young people and women are at a significant disadvantaged position in the urban labour market. These groups of people will face further exclusion in this project unless a careful targeting system is put in place.), (iii) insufficient community engagement". (p.6)[50]

The SA finding also indicates the risk of corruption and nepotism in the imeplemention of this project. Responding to whether targeting project beneficiaries could be influenced by informal networks (e.g., **nepotism, corruption, elite capture,** etc.], an official from one of the Federal implementing institutions warned "recruiting Digital businesses can be exposed to nepotism", which could result in unfit individuals taking advantage of the project implementation, in turn discouraging 'individuals with high potential' to work in the project. Many respondents also indicated the risk of "community members who have relatives in the government structure" unfairly benefiting from the project.

According to ECA experts, people living in low-infrastructure, low-income and underserved parts of the country, the less educted, the unemployed, and people with information gap might experience exclusion, which could be aggravated by language barrier and non-localized technologies.

They recommend free/low priced ICT devices and services, sharing relevant information, Ease of Use technologies, awareness creation, providing the technology with the language easily understood by the user, localized technologies, and in the long-run invest in the economic empowerment of the population.

8.3.   The Missing Links

Under **component 1**, the project aims to "Increase the number of citizens able to receive *alerts* via their phone (e.g., for extreme weather events)" (PAD, p.13). This has a special resonance for the pastoral and agro-pastoral communities exposed to the whims of natural behaviours such as recurrent drought, flood, and desert locast invasion the likes of what we witnessed this year [2020]. Eventhough the 770 *woredas* (i.e., local administrative units) in Ethiopia are believed to have been connected through the satellite-based connectivity (*WoredaNet*), they rarely have reliable connection to access routine sectoral information let alone receive *alerts* (weather, conflict, etc.) due to poor design, lack of complementary infrastructure, high usage costs and lack of capacity. Therefore, the project needs to identify regions, zones and *woredas* more vulnerable to these challanges and ensure that they are not only included, but are also the principal beneficiary of the Project.

The Project also aims to increase the percentage of population covered by at least 3G and 4G mobile network signal (PAD, p.13). This is absolutely necessary for the 'Digital Economy' goal to be attained. However, there is *unaffordability* concern, both to buy smart phones and subscription fees constraint to sustainably use the 3G or 4G mobile network, especially for the women, the poor, the unemployed and

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[50]   http://documents1.worldbank.org/curated/en/687631598884711169/pdf/Environmental-and-Social-Review-Summary-Urban-Productive-Safety-Net-and-Jobs-Project-P169943.pdf

underemployed youth, female-headed households, the elderly, the chronically ill, and the majority of the pastoral and agro-pastoral communities where such services are needed the most. Experts from ECA list some of the barriers that institutions located in underserved/emerging regions face to equally access and benefit from the '*Digital Ethiopia*' project, including, among others, lack of ICT infrastructure, digital illiteracy, expensiveness of the ICT devices and unaffordability of Internet and related services, leadership commitment, and out-dated technologies. Particularly, the vulnerable people face lack of ICT infrastructure, unaffordability of ICT devices and Internet services, lack of skill, and language barriers.

8.4.   Recommendations

Therefore, the '*Digital Ethiopia*' project should learn from the challenges of past or current development projects financed by the Bank and devise mechanisms in targeting project beneficiaries to ensure both *exclusion* and *inclusion errors* are unlikely to occur due to the influence of traditional structures (social and economic), corruption, clientelism and lack of awareness, especially at the grassroots levels. Adequate community consultation and transparent and accountable institutional arrangements are the key antidotes of *exclusion* and *inclusion errors* likely to take place due to the aforementioned reasons.

Priority should be given to the institutions closer to the vulnerable population and the service costs need to be competitive, in fact for a certain period of time be subsidized for the vulnerable and the underserved communities. ECA experts recommend: "Free/Low priced ICT services, Education/Training, Accessibility (acquired and easily operated by the vulnerable), Localized technologies (taking the culture and language into account)]". According to ECA experts, which sounds a reasonable recommendation is, the first and critical step is the "vulnerable community groups should be consulted and take part in the project and their views solicited" from day one.

Since corruption and nepotism could be a serious risk, the PIU should develop and implement clear and transparent guidelines to mitigate this risk.

9.   Monitoring and Evaluation

The need to build sustainable institutions at grassroots level can never be overemphasized, since they are crucial for the delivery of services and the attainment of project objectives. Lessons from various development programs/projects financed by the WB (e.g., AGP, PSNP, SLMP, PCDP/RLLP, etc.) show that the quality of project implementation and outcomes registered were good where local implementation structures were better organized and manned with the requisite number and right combination of experts. The implementation structure, especially at the grassroots levels, need to be well organized, nurtured, and sustained through targeted capacity building work, and proper reward and incentive schemes put in place for the staff.

Programs such as '*Digital Ethiopia*', which are implemented not only in diverse agro-ecological settings, but also in areas where government implementation structures are not the strongest makes it critically important to put in place effective and efficient monitoring and evaluation system.

Monitoring and Evaluation (M & E) should serve the intended purpose, and help the program implementers to learn from their shortcomings and further boost their strengths, and for the higher-level

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program structures to monitor performances and evaluate the impact of the program on the program beneficiary and institutional capacity building at all levels of the program implementation structures. M & E is not a routine activity reporting exercise meant to meet the reporting requirement, which has been the major problem of some of these projects. Rather it is an integral component of the program in which the information generated through the M & E system is used to guide management decisions at both the local and higher levels of the program implementation structure.

As a new initiative with its own unique characteristics, the 'Digital Ethiopia' project should learn from the past projects by not repeating their mistakes (where M & E is seen as routine activity reporting exercise) and build on their strengths where M & E becomes not only an integral part of the project implementation plans, but also an inbuilt system of the Project implementing institutions.

10. Potential Social Benefits, Risks and Recommendations

This section aims to achieve two things. First, to briefly summarize the potential social risks, implementation risks and challenges, and secondly, based on this, it proposes the way forward to mitigate the risks and address the identified challenges that also include specific social management plan. Since some of the risks and challenges recur under different project components and sub-components, presenting them as project level key social issues, rather than as component risks was adopted a reasonable approach.

Based on the SA findings, **Table 2** presents the key social issues, potential risks, and recommendations with a responsible body and timeframe as a *Social Management Plan* for the 'Digital Ethiopia' project.

It is important to note that these recommendations are forwarded based on the findings of the SA and some of them are at times beyond the scope of the proposed project activities. They are included in this report as general recommendations that would complement the 'Digital Ethiopia' project activities and which the GoE should seriously consider working on it parallelly with this project and in the future as well for the Project to have a long-lasting and meaning impact on the lives and livelihoods of Ethiopians, especially the vulnerable sections of the society. As a result, only the recommendations within the scope of the Project are entrusted to the PIU and key implementing agencies in the SMP Table below, while those recommendations beyond the project's scope are indicated as GoE's responsibility.

Table 2: Ethiopia Digital Foundation Project Social Management Plan

Key social issues	Potential risks and challenges	Recommendations	Responsible Body	Time Frame
Gender	***Gender inequality***: Risk of women and girls being excluded	• Provide the vulnerable Low priced ICT devices and services, education/tr	• PIU	• Throughout the project cycle

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Key social issues	Potential risks and challenges	Recommendations	Responsible Body	Time Frame
		aining, accessibility, localizing the technologies.		
		• Subsidize digital technology and services for the vulnerable groups, including women, elderly, persons with disabilities, low-income households, etc.	• GoE	• Always
	Women's time poverty - women find it difficult to balance their *triple roles* competing for their equal attention	• Enhance the status of women through access to digital technologies and information that alleviate their burden and allow them greater time and freedom to engage in a wide range of activities with reduced hardship and	• PIU	• Throughout the project cycle

Key social issues	Potential risks and challenges	Recommendations	Responsible Body	Time Frame
		pressure.		
		• Set up long-term loan for low-income people as digital entrepreneurship start-up capital.	• GoE	• Throughout the project cycle
	Risk of exclusion for female household heads because of not being able to balance their domestic responsibilities with their other roles.	• Provide special support (e.g., training and loan) through the creation of economic opportunities (e.g., digital entrepreneurship).	• PIU	• Throughout the project cycle
Barriers for underserved communities to equally access & benefit from the project	• Lack of digital infrastructure • Digital Illiteracy • Unavailability of power • Lack of initial capital • Language barrier	• Allocate budget for digital infrastructure and services capacity building • Organize digital literacy trainings & programs to use adaptive technologie	• PIU • MInT	• Throughout the project cycle • Always

Key social issues	Potential risks and challenges	Recommendations	Responsible Body	Time Frame
		s • Provide Off-grid power solutions • Provide local language supporting services.		
		• Avail loans for digital entrepreneurship start-up capital.	• GoE	• Throughout the project cycle
Barriers for vulnerable people to equally access & benefit from the project	• Technology that doesn't consider special needs of persons with disability • physical access Problem • Unavailability of user-friendly devices for people with disability • Limited exposure to digital world	• Usage of adaptive technologies • Create suitable access centers • Motive development of easy-to-use apps for vulnerable people • Training for vulnerable people on digital entrepreneu	• PIU • MInT	• Throughout the project cycle • Always

Key social issues	Potential risks and challenges	Recommendations	Responsible Body	Time Frame
		rship • Ensure accessibility, affordability, ease of usability (e.g., using local languages), awareness creation on accessing and using information through user friendly apparatus, etc. • Ensure ICT equipment and services developers take the special needs of persons with disabilities, depending on the nature of their impairment, provide additional technologic		

Key social issues	Potential risks and challenges	Recommendations	Responsible Body	Time Frame
		al and application/ software features.		
GBV	Targeting project beneficiaries might involve *the risk of SEA/SH* for women and girls	• Extra precaution needs to be taken to mitigate any risk of SEA/SH • Establish an effective GBV grievance redress mechanism (GRM) with multiple channels to initiate a complaint. • Provide community members the toll-free hotline information to report any incidents or concerns in line with the project; • Train project workers and	• PIU	• Throughout the project cycle

Key social issues	Potential risks and challenges	Recommendations	Responsible Body	Time Frame
		local communities on SEA and SH (e.g., specific procedures and confidential reporting) • Create linkage with GBV service providers to effectively respond in case of incidents of SEA/SH and build this into the existing GRM.		
Beneficiary targeting for digital entrepreneurs hip (start-up capitals, grants, or different forms of incentives to participate in the digital economy) may involve	• Corruption • Nepotism • Elite capture risks	• Institute adequate community consultation. • Establish Beneficiary Targeting Committees composed of the youth from all the differentiall y positioned	• PIU	• Throughout the project cycle

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Key social issues	Potential risks and challenges	Recommendations	Responsible Body	Time Frame
the risks of:		groups. • Put in place transparent and accountable institutional arrangement and targeting criteria to mitigate the risks.		
Institutional arrangement and capacity	• Weak institutional capacity; • Poor leadership commitment; • Low salary and lack of other incentives resulting in high staff turn-over, esp. at the lower-level administrative structure. • Lack of clear picture of lower-level institutional capacity as it "differs from region to region/place to	• Training • Introduce employment benefit packages • Clear and transparent institutional arrangement • Introduce competitive salary and other benefit packages (e.g., health insurance, housing allowance, etc.) • OR, outsource some of the	• PIU	• Throughout the project cycle

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Key social issues	Potential risks and challenges	Recommendations	Responsible Body	Time Frame
	place.	technical supports to Local companies. • Conduct capacity assessment study to understand the facts on the ground in specific project implementation area, specifically among the pastoral and underserved communities.		
Exclusion risk	• Local administrative structures in the pastoral and agro-pastoral areas might be left out	• Identify regions, zones and *woredas* more vulnerable and ensure that they are not only included, but are also the principal beneficiaries of the project.	• PIU	• Throughout the project cycle

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Key social issues	Potential risks and challenges	Recommendations	Responsible Body	Time Frame
	• Pastoralists' economic status, literacy level and mobile livelihood strategy involve the risk of exclusion	• Conduct tailored participatory research on the pastoralists' livelihoods, movement patterns, etc. to contextualize the design and implementation plan to ensure inclusiveness.	• PIU	• Throughout the project cycle
	• Unaffordability risk of 3G and 4G mobile network for the vulnerable and underserved communities, including women, elderly, un/underemployed women and men, etc.	• Service costs need to be competitive.	• PIU	• Throughout the project cycle
	• Unaffordability (cost of smart phone and service fees) risk of 3G and 4G	• Provide the vulnerable Low priced ICT devices and services,	• GoE	• Always

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Key social issues	Potential risks and challenges	Recommendations	Responsible Body	Time Frame
	mobile network for the vulnerable and underserved communities, including women, elderly, un/underemployed women and men, etc.	education/training, accessibility, localizing the technologies. • Subsidize digital apparatuses and internet services to the vulnerable groups, including women, elderly, persons with disabilities, low-income households, etc.		
Unintended long-term risk of access to affordable internet	• Young children and adolescents might fall prey to human traffickers; • Might be addicted to unnecessary contents GBV and sexual exploitation.	Proper content management and educating and training communities • ECA should also issue a regulation that helps mitigate this risk.	• MoSHE, MInT • ECA	• Throughout the project cycle • Within 12 months of the commencement of the project

Key social issues	Potential risks and challenges	Recommendations	Responsible Body	Time Frame
GRM	• None of the institutions studied have strong, accessible and functioning GRM.	• Establish a robust, accessible and functioning GRM as an integral part of the project, which also serves as GBV GRM.	• PIU	• During the first year, maintain throughout the project cycle
M & E		• Establish an effective and participatory M & E system	• PIU	• Throughout the project cycle

11. Conclusion and Recommendation

11.1. Conclusion

The SA findings showed a very strong support for the '*Digital Ethiopia*' project across the wide spectrum of the potential project beneficiaries and experts with deep knowledge of the livelihoods of the vulnerable and historically underserved groups. Since conducting actual field visit was not possible due, largely, to COVID-19 pandemic, data were collected by distributing open-ended guiding questions for three different categories of respondents, i.e., experts and officials at the local community levels, experts from beneficiary institutions, and officials and experts of the key implementing agencies. In a couple of instances, phone interviews were conducted with experts working with international NGOs among the vulnerable groups in the underserved and emerging regions.

Generally, there is a strong support for the project as it is believed to address the systemic marginalization of the vulnerable people in the areas of ICT services. In this digital age, most of the people in the underserved emerging regions, hardly get the minimum ICT based services such as email, leave alone doing businesses using digital technology and services.

❖ The project has very strong support across all spectrum of the potential beneficiaries.

❖ There is huge potential for the project to benefit people, especially the vulnerable population groups among the underserved communities in the emerging regions.

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❖ The commitment to realize the project objectives is very high among all implementing agencies, especially the key implementing federal institutions: MInT, ECA, and MoSHE/EthERNet.

Other key findings, challenges and recommendations drawn from the SA are briefly summarized below:

Key challenges/risks

❖ *Public institutions* in emerging regions are characterized by: lack ICT equipment and infrastructure; budget constraint; lack of digital skills; outdated-technologies; and unreliable power supplies.

❖ *Barriers for underserved communities/vulnerable people* include: digital illiteracy; unavailability of power**;** lack of ICT infrastructure; unaffordability of ICT technologies and services; unavailability of user-friendly devices for people with disability; lack of awareness of the digital businesses; lack of initial capital to start digital businesses; physical access problem for people with disabilities; and lack of awareness and readiness for the technology among the elderly.

❖ Risk of women and girls being excluded from the project beneficiaries due to embedded *gender inequality*, i.e., socio-economic and cultural marginalization of women and girls.

❖ *Women's time poverty* - women find it difficult to balance their *triple roles* competing for their equal attention.

❖ *Female household heads* may face the risk of not benefiting from the project in equal measure with male counterparts because of not being able to balance their domestic responsibilities with their other roles.

❖ *GBV/SEA* – targeting project beneficiaries might involve the risk of SEA/SH for women and girls.

❖ Beneficiary targeting – might involve *corruption*, *nepotism*, and elite capture risks.

❖ *Exclusion risk* is associated with: digital illiteracy/lack of skill; economic status; low literacy level; language barrier; non-localized technologies; unemployment; disability and poor ICT infrastructure.

❖ *GRM* **-** none of the institutions studied have strong, accessible and functioning GRM.

❖ Impact of the project on *existing power structures* **-** the educated and urban residents are more likely to benefit from any project due to access and affordability advantage they have over others. There is a risk of creating more access to educated people, so that *widening existing socio-economic gaps*.

❖ *Institutional capacity* - weak institutional capacity; poor leadership commitment; low salary and lack of other benefit schemes resulting in high staff turn-over at the lower level of the government administrative structure.

❖ *Unintended long-term impact of access to affordable internet* - young children and adolescents might fall prey to human traffickers; be addicted to unnecessary contents (gender-based violence (GBV) and sexual exploitation).

❖ It was observed the project might have potential *differential impacts* on beneficiaries: (i) the educated and urbanites are more likely to benefit from the project because of access and capacity to pay both for the digital technologies and the services; and (ii) the economically better-off, whether they live in rural or urban areas, might benefit more than others.

11.2. Recommendations

❖ Allocate sufficient budget for digital infrastructure and services capacity building including ICT equipment and building infrastructure, training, etc.

❖ Improve the telecommunication and broadband facilities.

❖ Arrange digital literacy programs or programs to use adaptive technologies.

❖ Enhance the status of women through access to digital technologies and information that alleviate their burden and allow them greater time and freedom to engage in a wide range of activities with reduced hardship and pressure.

❖ Improve ICT knowledges by providing short course/training on digital skills and businesses in both urban and rural areas.

❖ Ensure accessible, affordable, ease of use (e.g., using local languages) in accessing and using information through user friendly apparatus.

❖ Provide the vulnerable people Free/Low priced ICT devices and services, education/training, and localizing the technologies.

❖ *Or,* subsidize digital apparatuses and internet services to the vulnerable groups, including women, elderly, persons with disabilities, low-income households, etc.

❖ Build digital infrastructure, i.e., broad band internet access, office machines, solar and hydropower plants, internet rooms, and WIFI access in underserved areas.

❖ Set up long-term loan for low-income people as digital entrepreneurship start-up capital.

❖ Provide local language supporting services.

❖ Create economic opportunities through digital entrepreneurship.

❖ Develop and implement clear and transparent guidelines to mitigate the risk of corruption.

❖ ICT equipment and services developers should ensure that people with disabilities gain the same benefits as the wider population. Depending on the nature of their impairment, provide additional technological and application/software features.

❖ GRM – establish a robust, accessible and functioning GRM as an integral part of the project, which also serves as GBV GRM.

❖ Provide proper content management education and training for parents and communities to mitigate the risk of online sexual abuse and exploitation of young children and adolescents. The ECA also has to issue a regulation that helps mitigate this risk.

Finally, despite the potential challenges and risks documented in this SA report, the proposed '*Digital Ethiopia*' project has a very strong support from all corners and the higher-level leadership commitment is also very strong. The recommendations presented throughout this report are useful, but not all of them are within the scope of this project as shown in the **SMP Table 2** above.

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13. Annexes

14. Terms of Reference

Federal Democratic Republic of Ethiopia

Ministry   of   Finance   (MoF)
and the Public Enterprises Holding and Administration Agency (PEHAA)

and the Ministry of Innovation and Technology (MInT)

Terms of Reference

Consultancy to conduct Social Assessment and Labor Management Procedure

1. Background

In June 2018 Ethiopia declared to privatize and liberalize its economy to spur competition in several critical sectors, including telecommunications. Sanctioned by Proclamation No. 197/2010, Ethio Telecom has been operating in Ethiopia effectively as a telecommunications monopoly. Ethiopia has now called for the restructuring of the incumbent, distinguishing between the infrastructure and services arms of the enterprise, to spur competition. In a Policy Options paper for Ethiopia's telecommunications Sector adopted in September 2018, the Government has determined that the market for telecom services in Ethiopia is to be opened progressively to competition, starting with cellular services and internet. The introduction of private participation in Ethio Telecom would be carried out in parallel with the market liberalization process.

The Ministry of Finance (MoF) is working with the Ethiopian Communications Authority (ECA), the Ministry of Innovation and Technology (MInT) and the Public Enterprises Holding and Administration Agency (PEHAA) of the Federal Democratic Republic of Ethiopia in supporting telecommunications sector reform. It is in view of this, the Government of Ethiopia (GoE) has applied for financing from the World Bank (WB) toward the cost of the Ethiopia Digital Foundation Project ("Digital Ethiopia") to be implemented over a five-year period, and is granted an early access to a project preparation advance (PPA).

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The overall aim of the proposed Digital Ethiopia Foundations project is to increase public access to high quality and affordable internet services, promote digital entrepreneurship and facilitate job creation, to help Ethiopia compete in the digital age. The Project has three major Components.

Component 1- Digital Economy, Enabling Legal and Regulatory Environment - seeks to strengthen the analog foundations of the digital economy, in particular policy-making and effective regulation for telecommunications sector. Component 1 also includes support for the restructuring of Ethio Telecom, including possible financing of retrenchment.

Component 2 - Digital Connectivity and Skills - plans to assist Ethiopia in extending affordable broadband internet access and digital skills development, with specific focus to connect all ministry, departments, and agencies (MDAs), higher education institutions, and remote rural areas.

Component 3 – Nurturing Digital Entrepreneurship - seeks to assist Ethiopia in strengthening the innovation ecosystem by improving its access to markets and technology.

Experiences of the World Bank and those of Government of Ethiopia indicate that proper assessment/documentation and management of social risks and impacts add to the sustainability of development works. Likewise, project risks and impacts on vulnerable (indigenous peoples, women, children, aged people, poor and other deprived segments) and other communities need to be properly documented and managed.

The MoF seeks to hire a lead consultant to review the social context within which the project will be implemented and conduct an analysis of social impacts on key stakeholders.

2. **Objective**

Social assessment (SA) is the process used by the Borrowers to assess the likely impacts of projects on key stakeholders. The Social Assessment is intended to help the Project to understand key social issues and risks, and to determine social impacts on different stakeholders. It needs to include needs and priorities of key stakeholders, outline their views on the design and proposed implementation mechanisms

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of the project, and build capacity and involvement. It will also provide requirements for the design of an appropriate institutional arrangement to implement, monitor, and evaluate the project on the achievement of social outcomes.

The SA is the basis for the preparation of the Social Management Plan (SMP) in which all the mitigation measures are provided as actions and if those actions require budget, an indicative budget and the timeline for the implementation will be included in the SMP.

Under World Bank's ESS2 on Labor and Working Conditions, the borrower is required to develop labor management procedures (LMP). The purpose of the LMP is to facilitate planning and implementation of the project. The LMP identifies the main labor requirements and risks associated with the project and help the Borrower to determine the resources necessary to address project labor issues.

The objective of this assignment is to provide assistance to the MoF, MInT, and other project beneficiaries in undertaking targeted social assessment for the proposed project and identify potential list of indicators for monitoring and evaluation of project effectiveness as far as social impacts are concerned. Furthermore, assistance will be provided to develop Labor Management procedure (LMP) proportionate to the nature and scale of the Project and its potential risks and impacts.

3. Methodological approach and process

3.1. Indicative Methodology

Development of the Social Assessment (SA) is a participatory process led by the MoF and MInT. The consultant is required to consult, next to the project design team members, also with federal, regional, and local public authorities as well as randomly selected beneficiaries on the project as they related to the context of the SA document.

An inception report to be developed by the Consultant(s), and approved by MInT, will outline structure methodology, timeframe, and resources for conducting the assessment and development of the LMP. The data for social assessment, is expected to be collected both from primary and secondary sources. The data

collection process will be supported by MInTt following the development of a user-friendly data collection template by the Consultant. The Consultant required coming up with data collection tool(s) that also allow producing analytical reports mainly on qualitative description. Other data collection tools as may deem necessary can be employed by the Consultant,

The primary data will be collected through conducting various consultations, interviews, Focus Group Discussion (FGD), field level observations, and others. As secondary data, relevant documents to be shared from implementing partners as reflected in the annex are considered, as well as any additional document, the consultant may be aware of.

3.2. Scope of the assessment

The assessments will extend over all pastoral and agro pastoral regions covered by the Project. To delineate the data collection process, the Consultant will randomly select at least 2 woredas in each region, totaling 12 Woredas, being representative for the project implementation area. The inception report will furthermore outline any suggestion on data collection if necessary to achieve a balanced and comprehensive picture.

The documents should thereby integrate from earlier pastoralist support projects:

- Existing, applicable procedures

- Assessments of challenges

- Lessons-learned by earlier pastoralist support projects

- Required changes to eventually already existing institutions (programmatic structure, coordination mechanisms and operational modalities; key opportunities, and newly emerging issues for consideration and related issues)

3.3 Tentative Outline of the Social assessment document

The Report shall encompass the following structure:

- Introduction / SA team / data collection and research methods

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- Background information / Project Description

- Description of the socio-cultural, institutional, historical and political context

- Legislative and regulatory considerations & institutional framework

- Key social issues including social diversity and gender; institutions, rules and behavior; stakeholders; participation; and social risks

- Stakeholder consultations and stakeholder management plan

- Strategy to achieve social development outcomes / Recommendations for project design and implementation arrangements

- Monitoring Plan

- Outputs, schedule, and reporting

Labor Management Procedure

The labor management procedure will encompass the following:

- The project's implementation arrangement.

- Overview of labor use in the Project

- Categories of workers that will be engaged in the project including terms and conditions of employment as per ESS2

- Key labor risks including the potential risks of the project on child labor, forced labor and on OHS

- Labor legislations (international and national)

- A grievance mechanism for workers proportionate to the nature and scale and the potential risks and impacts of the project.

4. **Scope of Services, Tasks, and Expected Deliverables**

The Consultant will be a team member of the Project Implementation Unit (PIU) supporting the implementation of the "Ethiopia Digital Foundations Project" and will report to the PIU Director / PIU Coordinator. The scope of these ToR is to ensure a systemic assessment of positive and adverse social

impacts associated with project and that the appropriate mitigation measures will be in place. Moreover, LMP will be developed proportionate to the projects risks and impacts. The drafts must be disclosed as soon as possible and before project appraisal and the Borrower will seek the views of stakeholders, including on the identification of stakeholders and the proposals for future engagement.

Specific tasks to be carried out by the individual consultant include but are not limited to the following components:

- Understand the ToR and better foundation of the project nature and issues;

- Review relevant information at federal and regional levels,

- Conduct an in-depth desk review of available progress and annual reports from participating Government institutions and WB on earlier projects,

- Develop data collection tools, if need be and get the approval of the design team through MoF;

- Identify the most significant social and cultural features that differentiate social groups in the study area, and ensure proper capturing and consolidation of stakeholders' views and opinions;

- Examine social groups' characteristics, intra- group & inter-group relationships, and the relationships of those groups with public and private (e.g. Market) institutions (including the norms, values and behavior that have been institutionalized through those relationships).

- Describe the institutional environment; consider both the presence and function of public, private and social institutions relevant to the operation,

- Identify the type of social impacts including gender-based violence and sexual exploitation that could be occurred due to the implementation of the new project in the area,

- Identify the stakeholder groups/people who may be affected negatively or positively due to the implementation of the sub projects in the area,

- Identify social inclusion and exclusion related risks and impacts

- Define the type of adverse social impacts in terms of the following key indicators:1) Loss of cultivated land 2) Loss of grazing and other resources including water, 3) Loss of structure, 4) Loss of livelihood, and 5) Loss of crops/trees

- Examine how people are organized into different social groups, and its implication for sub project implementation,

- Recommend mitigation measures for any adverse social impacts that could be occurred in the study area,

- Organize national project design team and other partner consultation workshops;

- Regional consultations, meetings conducted with key regional stakeholders;

- Deliver the above described reports;

- Present the social assessment and potential recommendations; and

- Review and compile the final reports with all the deliverables and specific objectives met

For the LMP

- Review the project's implementation arrangement.

- Provide an Overview of labor use in the Project

- Identify key labor risks

- Review labor legislations (international and national)

- Identify different categories of workers that will be engaged in the project including terms and conditions of employment as per ESS2

- Identify the potential risks of the project on child labor, forced labor and on OHS

- A grievance mechanism proportionate to the nature and scale and the potential risks and impacts of the project.

Documents to be consulted include:

- Social assessments of other projects; LMP of other projects

- World Bank Development Assistance Framework and safeguards policies;

- The GoE environmental and social policy and legal documents;

- Growth and Transformation Plan of the country;

- Any sectoral documents at federal and regional levels

5. **Duration of the Assignment**

The **Project Preparation stage** of this assignment is expected to be completed in about **4 weeks.**

Prepare an inception report which includes information on stakeholders and groups that need to be consulted and involved as well as the methodology to be implemented for the assignment.

6. Qualification and Experience

The individual consultant should be able to offer all, or at least most, of the following qualifications and experience:

- A Bachelor's degree in economics, international development, sociology, or relevant field. (Postgraduate degree in a related field would be an added advantage);

- Minimum of 10 years progressive experience in development related work;

- Strong analytical skills, a demonstrated ability to conduct interviews with a range of stakeholders, and experience in pulling together analysis and data into reports;

- Experience in reviewing and compiling multiple data sets and strong understanding of quantitative and qualitative analysis with Social Assessment;

- Work experience as a social specialist in/ with World Bank funded activities and knowledge of the World Bank safeguard policies and requirements will be a strong asset;

- Prior experience of working with complex national level social assessment or strategic plans involving multiple stakeholders;

- Ability to identify implementation issues and operational challenges, and provide recommendations to remedy these issues to accelerate program delivery;

- Adequate understanding of human rights-based approach to development, gender equality, environmental sustainability, results-based management;

- Experience of carrying out similar assignment is an asset;

- Excellent proficiency in English is required;

- Strong writing abilities is required

15. Guiding Questions:

16. **Local/Community Level Officials and Experts**

Federal Democratic Republic of Ethiopia

Ministry of Finance (**MoF**)
Public Enterprises Holding and Administration Agency (**PEHAA**)

Ministry of Innovation and Technology (**MInT**)

Ethiopian Communications Authority (**ECA**)

Ministry of Science and Higher Education (**MoSHE**)

Ethiopia Digital Foundation Project ("Digital Ethiopia")

Social Assessment (SA)

Dear Participant,

Thank you for your generosity in taking a few minutes of your precious time to answer the questions outlined below. Your honest and critical reflection is invaluable not only for the timely completion of this study, but also will have an immense positive impact on the design and implementation of the '*Digital Ethiopia*' project by bringing out key social issues, potential risks and recommending practical mitigation measures.

Project Goal and Objective of the SA

The overall aim of the proposed *Digital Ethiopia* project is to increase public access to high quality and affordable internet services, promote digital entrepreneurship and facilitate job creation, to help Ethiopia compete in the digital age. This Social Assessment is intended to help the Project implementers understand key social issues and risks, and to determine social impacts on different stakeholders. The *objective of this assignment* is thus to provide assistance to the MoF, MInT, ECA, MoSHE and other project beneficiaries in undertaking targeted social assessment for the proposed project and identify potential list of indicators for monitoring and evaluation of project effectiveness.

Guiding Questions for Local/Community Level Officials and Experts:

1. What are the most significant social and cultural features that differentiate social groups in the Project area? [Ensure proper capturing and consolidation of stakeholders' views and opinions.]

2. Who are the most vulnerable and underserved groups in the Project *area*? [*Probe for* the poor; the poorest of the poor; women and girls/children; the elderly; people with disability; female-headed households; people living with HIV/AIDS (PLHIV); outcast and underserved occupational groups.]

3. ***For emerging /underserved regions only:***

3.1. What are the major needs and barriers for your communities (as well as universities, government offices, Digital businesses located in your regions) to equally access and benefit from this project/ digital services? What are the specific recommendations to address the needs and barriers of such communities and institutions/offices based there?

3.2. What are the major needs and barriers for vulnerable people (people with disability, the elderly, women, girls, youth etc.) to equally access and benefit from the project/ digital services? What are the specific recommendations to address the needs and barriers?

4. Are there persons/community groups who will be adversely affected by or particularly benefiting from project activities?

- ✓ If yes, who are:
  - adversely affected?
  - particularly benefiting?
- ✓ In what ways are they:
  - adversely affected?
  - positively affected?

5. In your opinion, what are the best ways to address the adverse impacts or promote equitable access to Project benefits?

6. What traditional or indigenous social organizations exist in the Project area?

7. How do you envisage their impacts on the Project?

8. In what ways do you think the Project might promote:

- ✓ social capital [self-help groups, mutual assistance mechanisms, dispute settlement institutions, and indigenous natural resources use and conservation knowledge and practice];
- ✓ social inclusion; and

✓ existing power structures [i.e., the risk of further concentration of power due to beneficiary selectivity factors that tend to tilt towards certain sections of the population, e.g., the educated, the haves, able-bodied, the credit worthy better-offs, youths, male, etc. over the others.]

9. Do you think the project will be inclusive and equitably supportive of vulnerable and underserved populations?

    ✓ If yes, how so?

    ✓ If no, why so?

10. Is there a risk of exclusion of certain sections of the community?

    ✓ If yes, what are the possible/likely basis of exclusion? [e.g., gender, economic status, education, employment, age, etc.]

    ✓ If yes, what are the mechanisms to mitigate these risks?

11. Are there any known conflicts of interests arising among different groups in relation to the Project that may affect its implementation?

12. If yes, what possible mechanisms can be used to address the problem?

13. In what ways are women and girls likely to be involved in the Project?

14. In what particular ways are women, girls (other vulnerable groups such as people with disability and the elderly) benefiting from this Project?

15. Or, are women, girls at a disadvantaged position as a result of the Project? If yes, how?

16. How do you evaluate the commitment of the local administration in supporting women's, youth, people with disability and other vulnerable groups participation in development?

17. What are the possible social impacts including gender-based violence (GBV) and sexual exploitation (SE) that could occur due to the implementation of the Project in the area?

18. What possible mechanisms can be used to address these impacts?

19. Do you recall any past development project in which targeting project beneficiaries was based on informal networks? [e.g., nepotism, corruption, elite capture, etc.]

    ✓ How did it impact the implementation of the project?

    ✓ What lessons can we learn from that project?

20. Do you envisage any potential constraint that might have differential impacts on beneficiaries? (economic status, urban vs. rural, literacy level, gender, age, livelihood strategies, etc.)

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21. Who are the stakeholder groups/people that might be affected negatively due to the implementation of the Project/sub-projects in the area and what are these impacts?

22. What do you recommend to mitigate the impacts?

23. What level of capacity and facilities exist in grassroots government structures to support the implementation of the Project?

24. In what ways can low capacity and poor facilities contribute to marginalize and exacerbate challenges of the vulnerable groups and underserved local communities?

25. What are the main capacity problems that limit/constrain program implementation in underserved/ emerging and other regions? (e.g., lack of knowledge and skill, low salary and other benefit schemes resulting in high staff turn-over, etc.)

26. What grievance procedures exist for individuals/groups to express their complaints? Are these procedures/mechanisms accessible and effective? If yes, in what way? What are the strengths and constraints of the grievance procedures? What Grievance redress mechanism can be applied for the project to address environment & Social issues including GBV/SEA?

27. What were the lessons learned from the implementation of the previous development projects that could be used here? [*Probe for* adequate community consultation, capacity building, leadership commitment, inclusiveness, regular monitoring, etc.]

THANK YOU!

Name: _____ Responsibility _____

Email address: _____

17. Officials of Implementing Institutions

Federal Democratic Republic of Ethiopia

Ministry of Finance (**MoF**)
Public Enterprises Holding and Administration Agency (**PEHAA**)

Ministry of Innovation and Technology (**MInT**)

Ethiopian Communications Authority (**ECA**)

Ministry of Science and Higher Education (**MoSHE**)

Ethiopia Digital Foundation Project ("Digital Ethiopia")

> *Dear Participant,*
>
> Thank you for your generosity in taking a few minutes of your precious time to answer the questions outlined below. Your honest and critical reflection is invaluable not only for the timely completion of this study, but also will have an immense positive impact on the design and implementation of the '***Digital Ethiopia***' project by bringing out key social issues, potential risks and recommending practical mitigation measures.

Social Assessment (SA)

Project Goal and Objective of the SA

The overall aim of the proposed *Digital Ethiopia* project is to increase public access to high quality and affordable internet services, promote digital entrepreneurship and facilitate job creation, to help Ethiopia compete in the digital age. This Social Assessment is intended to help the Project implementers understand key social issues and risks, and to determine social impacts on different stakeholders. The *objective of this assignment* is thus to provide assistance to the MoF, MInT, ECA, MoSHE and other project beneficiaries in undertaking targeted social assessment for the proposed project and identify potential list of indicators for monitoring and evaluation of project effectiveness.

Guiding Questions for Officials of Implementing Institutions: (*Qs 1 & 2 are Optional*)

1. What are the most significant social and cultural features that differentiate social groups in the Project area? [Ensure proper capturing and consolidation of stakeholders' views and opinions.]

2. Who are the most vulnerable and underserved groups in the Project *area*? [*Probe for* the poor; the poorest of the poor; women and children; the elderly; people with disability; female-headed households; people living with HIV/AIDS (PLHIV); outcast and underserved occupational groups.]

3. What are the potential regulations to be developed under the sector, what social issues can be considered in these regulations? How can these regulations be   inclusive?

4. What are the major needs and barriers for underserved communities (universities, government offices, Digital businesses located there) to equally access   and benefit from this project/digital services? What are the specific recommendations to address the mentioned needs and barriers of such communities and institutions/offices based there?

5. What are the major needs and barriers for vulnerable people (people with disability, the elderly, women, girls, youth etc.) to equally access and benefit from the project/ digital services? What are the specific recommendations to address the mentioned needs and barriers?

6. Are there persons/community groups who will be adversely affected by or particularly benefiting from project activities?

    ✓ If yes, who are:

        ▪ adversely affected?

        ▪ particularly benefiting?

    ✓ In what ways are they:

        ▪ adversely affected?

        ▪ positively affected?

7. In your opinion, what are the best ways to address the adverse impacts or promote equitable access to Project benefits?

8. What are the potential targeting criteria to select beneficiaries under the different project components? What are/can be considered to make these criteria inclusive?

9. What traditional or indigenous social organizations exist in the Project area?

10. How do you envisage their impacts on the Project?

11. In what ways do you think the Project might promote:

    ✓ social capital [self-help groups, mutual assistance mechanisms, dispute settlement institutions, and indigenous natural resources use and conservation knowledge and practice];

    ✓ social inclusion; and

     ✓   existing power structures [i.e., the risk of further concentration of power due to beneficiary selectivity factors that tend to tilt towards certain sections of the population, e.g., the educated, the haves, able-bodied, the credit worthy better-offs, youths, male, etc. over the others.]

12. Do you think the project will be inclusive and equitably supportive of vulnerable and underserved populations?

     ✓   If yes, how so?

     ✓   If no, why so?

13. Is there a risk of exclusion of certain sections of the community?

     ✓   If yes, what are the possible/likely basis of exclusion? [e.g., gender, economic status, education, employment, age, etc.]

     ✓   If yes, what are the mechanisms to mitigate these risks?

14. Are there any known conflicts of interests arising among different groups in relation to the Project that may affect its implementation?

15. If yes, what possible mechanisms can be used to address the problem?

16. In what ways are women likely to be involved in the Project?

17. In what particular ways are women benefiting from this Project?

18. Or, are women at a disadvantaged position as a result of the Project? If yes, how?

19. How do you evaluate the commitment of the local administration in supporting women's participation in development?

20. What are the possible social impacts including gender-based violence (GBV) and sexual exploitation (SE) that could occur due to the implementation of the Project in the area?

21. What possible mechanisms can be used to address the impacts?

22. Do you recall any past development project in which targeting project beneficiaries was based on informal networks? [e.g., nepotism, corruption, elite capture, etc.]

     ✓   How did it impact the implementation of the project?

     ✓   What lessons can we learn from that project?

23. Do you envisage any potential constraint that might have differential impacts on beneficiaries? (economic status, urban vs. rural, literacy level, gender, age, livelihood strategies, etc.)

24. Who are the stakeholder groups/people that might be affected negatively due to the implementation of the Project/sub-projects in the area and what are these impacts?

25. What do you recommend to mitigate the impacts?

26. What is the project implementation arrangement from National to local level? What is the implementation arrangement for social management including GRM and reporting? What is the existing capacity (in terms of human, technical and financial resources) and what are the related recommendations to manage potential social risks, ensure social inclusion and address the capacity gaps identified?

27. What level of capacity and facilities exist in grassroots government structures to support the implementation of the Project?

28. In what ways can low capacity and poor facilities contribute to marginalize and exacerbate challenges of the vulnerable groups and underserved local communities?

29. What are the main capacity problems that limit/constrain in social management and program implementation in underserved/ emerging and other regions? (e.g., lack of knowledge and skill, low salary and other benefit schemes resulting in high staff turn-over, etc.)

30. What grievance procedures exist for individuals/groups to express their complaints? Are these procedures/mechanisms accessible and effective? If yes, in what way? What are the strengths and constraints of the grievance procedures? What Grievance redress mechanism can be applied for the project to address environment & Social issues including GBV/SEA?

31. What were the lessons learned from the implementation of the previous development projects that could be used here? [*Probe for* adequate community consultation, capacity building, leadership commitment, inclusiveness, regular monitoring, etc.]

THANK YOU!

Name: _____ Responsibility _____

Email address: _____

18. Experts from Beneficiary Institutions

Federal Democratic Republic of Ethiopia

Ministry   of   Finance   (**MoF**)
Public Enterprises Holding and Administration Agency (**PEHAA**)

Ministry of Innovation and Technology (**MInT**)

Ethiopian Communications Authority (**ECA**)

Ministry of Science and Higher Education (**MoSHE**)

Ethiopia Digital Foundation Project ("Digital Ethiopia")

Social Assessment (SA)

> *Dear Participant,*
>
> Thank you for your generosity in taking a few minutes of your precious time to answer the questions outlined below. Your honest and critical reflection is invaluable not only for the timely completion of this study, but also will have an immense positive impact on the design and implementation of the '*Digital Ethiopia*' project by bringing out key social issues, potential risks and recommending practical mitigation measures.

Project Goal and Objective of the SA

The overall aim of the proposed *Digital Ethiopia* project is to increase public access to high quality and affordable internet services, promote digital entrepreneurship and facilitate job creation, to help Ethiopia compete in the digital age. This Social Assessment is intended to help the Project implementers understand key social issues and risks, and to determine social impacts on different stakeholders. The *objective of this assignment* is thus to provide assistance to the MoF, MInT, ECA, MoSHE and other project beneficiaries in undertaking targeted social assessment for the proposed project and identify potential list of indicators for monitoring and evaluation of project effectiveness.

Guiding Questions for Experts from Beneficiary Institutions:

1. What are the most significant social and cultural features that differentiate social groups in the Project area? [Ensure proper capturing and consolidation of stakeholders' views and opinions.]

2. Who are the most vulnerable and underserved groups in the Project context/*area*? [*Probe for* the poor; the poorest of the poor; women and children; the elderly; people with disability; female-headed households; people living with HIV/AIDS (PLHIV); outcast and underserved occupational groups.]

3. What are the major needs and barriers for institutions (universities, government offices, Digital businesses) located in underserved/emerging regions to equally access   and benefit from this project/ digital services? What are the specific recommendations to address the needs and barriers of such communities and institutions/offices based there?

4. What are the major needs and barriers for vulnerable people (people with disability, the elderly, women, girls, youth etc.) to equally access and benefit from the project/ digital services? What are the specific recommendations to address the needs and barriers?

5. Are there persons/community groups who will be adversely affected by or particularly benefiting from project activities?

   ✓ If yes, who are:

        ▪ adversely affected?

        ▪ particularly benefiting?

   ✓ In what ways are they:

        ▪ adversely affected?

        ▪ positively affected?

6. In your opinion, what are the best ways to address the adverse impacts or promote equitable access top Project benefits?

7. What traditional or indigenous social organizations exist in the Project area?

8. How do you envisage their impacts on the Project?

9. In what ways do you think the Project might promote:

   ✓ social capital [self-help groups, mutual assistance mechanisms, dispute settlement institutions, and indigenous natural resources use and conservation knowledge and practice];

   ✓ social inclusion; and

   ✓ existing power structures [i.e., the risk of further concentration of power due to beneficiary selectivity factors that tend to tilt towards certain sections of the population, e.g., the educated, the haves, able-bodied, the credit worthy better-offs, youths, male, etc. over the others.]

10. Do you think the project will be inclusive and equitably supportive of vulnerable and underserved populations?

   ✓ If yes, how so?

   ✓ If no, why so?

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11. Is there a risk of exclusion of certain sections of the community?

- ✓ If yes, what are the possible/likely basis of exclusion? [i.e., gender, economic status, education, employment, age, etc.]

- ✓ If yes, what are the mechanisms to mitigate these risks?

12. Are there any known conflicts of interests arising among different groups in relation to the Project that may affect its implementation?

13. If yes, what possible mechanisms can be used to address the problem?

14. In what ways are women likely to be involved in the Project?

15. In what particular ways are women benefiting from this Project?

16. Or, are women at a disadvantaged position as a result of the project? If yes, how?

17. How do you evaluate the commitment of the local administration in supporting women's participation in development?

18. What are the possible social impacts including gender-based violence (GBV) and sexual exploitation (SE) that could occur due to the implementation of the Project in the area?

19. What possible mechanisms can be used to address the impacts?

20. Do you recall any past development project in which targeting project beneficiaries was based on informal networks? [e.g., nepotism, corruption, elite capture, etc.]

- ✓ How did it impact the implementation of the project?

- ✓ What lessons can we learn from that project?

21. Do you envisage any potential constraint that might have differential impacts on beneficiaries? (economic status, urban vs. rural, literacy level, gender, age, livelihood strategies, etc.)

22. Who are the stakeholder groups/people that might be affected negatively due to the implementation of the Project/sub-projects in the area?

23. What do you recommend to mitigate the impacts?

24. What level of capacity and facilities exist in grassroots government structures to support the implementation of the Project?

25. In what ways can low capacity and poor facilities contribute to marginalize and exacerbate challenges of the vulnerable groups?

26. What are the main capacity problems that limit/constrain program implementation? (e.g., lack of knowledge and skill, low salary and other benefit schemes resulting in high staff turn-over, etc.)

27. What grievance procedures exist for individuals/groups to express their complaints? Are these procedures/mechanisms effective? If yes, in what way? What are the strengths and constraints of the grievance procedures? What Grievance redress mechanism can be applied for the project to address environment & Social issues including GBV/SEA?

28. What were the lessons learned from the implementation of the previous development projects that could be used here? [*Probe for* adequate community consultation, capacity building, leadership commitment, inclusiveness, regular monitoring, etc.]

THANK YOU!

Name: _____ Responsibility _____

Email address: _____

Annex J: Gender Based Violence Assessment and Action Plan

Ethiopian Digital Foundations Project

Gender Based Violence Risk Assessment and Action Plan

March 2021

List of Acronyms

AIDS	Acquired Immunodeficiency Syndrome
CEDAW	Convention on the Elimination of all Forms of Discrimination against Women
CSOs	Civil Society Organizations
ECA	Ethiopian Communication Authority
EDHS	Ethiopian Demography and health Survey
ESF	Environmental and Social Framework
FCDO	Foreign, Commonwealth & Development Office
FGM	Female Genital Mutilation
GBV	Gender Based Violence
GRM	Grievance Redress Mechanism
HTPEC	Harmful traditional Practices Eradication Committee (National)
ICT	Information and Communication Technology
IPV	Intimate Partners Violence
MDAs	Ministries, Directorates and Agencies
MInT	Ministry of Innovation and Technology
MoSHE	Ministry of Science and Higher Education
PSEAH	Protection against Sexual Exploitation, Abuse and Harassment
SEA	Sexual Exploitation and Abuse

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MoH	Ministry of Health
MoWYCA	Ministry of Women, Youth and Children Affairs
NGOs	Non-Government Organizations
TVETs	Technical and Vocational Educational Training
UNICEF	United Nations Children's Fund
VAWG	Violence Against Women and Girls
WB	World Bank

Definition of Key Terms[51]

Gender Based Violence (GBV): is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (i.e. gender) differences between males and females. It includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private (IASC 2015). Women and girls are disproportionately affected by GBV across the globe

Sexual HARASSMENT (SH): Unwelcome sexual advances, requests for sexual favors, and other unwanted verbal or physical conduct of a sexual nature. SH differs from SEA in that it occurs between personnel/staff working on the project, and not between staff and project beneficiaries or communities. The distinction between SEA and SH is important so that agency policies and staff training can include specific instructions on the procedures to report each. Both women and men can experience SH

Sexual Exploitation and Abuse (SEA): Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. Sexual abuse is further defined as "the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions." Women, girls, boys and men can experience SEA. In the context of World Bank supported projects, project beneficiaries or members of project-affected communities may experience SEA

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[51] *GN: Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works, WB, 2018; Systematic Literature Review of Gender-Based Violence in Ethiopia Magnitude, Policies, and Interventions, 2018*

Child/ Early Marriage: is a formal marriage or informal union before age 18. Even though some countries permit marriage before age 18, international human rights standards classify these as child marriages, reasoning that those under age 18 are unable to give informed consent. Therefore, child marriage is a form of forced marriage as children are not legally competent to agree to such unions (IASC 2015)

Intimate Partner Violence (IPV): refers to behavior within an intimate relationship that causes physical, sexual or psychological harm, including acts of physical aggression, sexual coercion, psychological abuse and controlling behaviors. This definition covers violence by both current and former spouses and partners

Female genital mutilation or cutting (FGM/C): refers to the procedures involved in the partial or total removal of external portions of the female genital organs for non-medical purposes

Multi-sectoral GBV prevention and Response: refers to a holistic inter-organizational and inter-agency efforts that promote participation of people of concern, interdisciplinary and inter-organizational cooperation, and collaboration and coordination across key sectors, including (but not limited to) health, psychosocial, legal/justice and security.

Violence Against Women and Girls (VAWG): The 1993 UN Declaration on the Elimination of Violence against Women defined violence against women and girls as any act of gender-based violence that results in, or is likely to result in, physical, sexual or mental harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life (Article 1).Violence against women and girls shall be understood to encompass, but not be limited to, the following:

- Physical, sexual and psychological violence occurring in the family, including battering, sexual abuse of female children in the household, dowry-related violence, marital rape, female genital mutilation and other traditional practices harmful to women, non-spousal violence and violence related to exploitation;

- Physical, sexual and psychological violence occurring within the general community, including rape, sexual abuse, sexual harassment and intimidation at work, in educational institutions and elsewhere, trafficking in women and forced sex work;

- Physical, sexual and psychological violence perpetrated or condoned by the State, wherever it occurs (Article 2).

- Violence against women and girls is a manifestation of historically unequal power relations between men and women, which have led to domination over and discrimination against women by men and to the prevention of the full advancement of women

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1.INTRODUCTION

The Federal Government of Ethiopia is preparing a Digital Foundation Project. The Ethiopia Digital Foundations Project is intended to lay the building blocks to develop Ethiopia's digital economy by supporting the policy and regulatory environment and opening up the telecom market, improving infrastructure and quality of broadband connectivity and support the digitalization of services, and promote digital entrepreneurship.

Environmental and social issues related to the proposed project are assessed using the World Bank's Environmental and Social Standards (ESS) set out under its new Environment and Social Framework (ESF). Under the ESF, the project is required to assess and have in place safeguards and reporting mechanisms to guard against the risk of the program being a source of Gender Based Violence (GBV).

Gender-based violence (GBV) is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (i.e., gender) differences between males and females. It includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private[52]

The Digital Foundation project development objective is to improve Ethiopia's competitiveness in the digital age through increased inclusiveness and affordability of digital services and through digital job creation. The project activities focus on training and capacity building, provision of broad band and highspeed internet for public institutions, expansion and improvement of telecom and broadband to rural and underserved communities and the provision of grants for startups, small businesses and suppliers.

The project will be implemented in all the regions of the country and has a wide-ranging stakeholder including MDAs (Ministries, Directorates and Agencies), public institutions (Universities and TVETs), regional and woreda offices, secondary cities and community youth centers. The expansion of coverage of telecom and broad band services will require limited construction activities and deployment of workers in rural areas.

The potential GBV risks of the project activities and outcomes vary across different contexts. This report gives a general framework to guide actions against GBV risks in the project when the specific sites where the project will be implemented are determined.

The report covers an overview of both country context and project related GBB risks, overview of the legal and institutional framework related to GBV/SEAH project activity related risks and findings from applying the GBV risk assessment tools to determine the risk level for the project. The report gives

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[52] Inter-Agency Standing Committee Gender-based Violence Guidelines, (2015) pg. 5

recommendations and an action plan that will build the project's capacity to monitor and report on incidents of GBV and SEAH

1.1 GENERAL AND SPECIFIC OBJECTIVES

Under World Bank's ESS1, borrowers must assess risks related with gender including gender-based violence; equally, it requires assessment of community health and safety as outlined in ESS4. Ministry of Innovation and Technology (MInT) is required to conduct GBV/SEAH risk assessment for its Ethiopian Digital Foundations Project as part of the Environmental and Social Management Framework and propose action plans based on an in-depth understanding of the country and project GBV context.

The overall objective of this assessment is to identify potential GBV risks within the scope of the project and develop a framework of action plan to help avoid the occurrence of GBV/SEAH in project specific sites.

The assessment's specific objectives are to:

i. Assess and analyze potential risks of GBV/SEA in the project

ii. Assess the capacity of institutions to address GBV/SEAH risks

iii. Make recommendations on risk mitigation and GBV action plan to address the potential GBV/SEAH risks in the project

1.2 SCOPE AND METHODOLOGY

The report incorporates the findings of the broader GBV Assessment based on GBV Risk Assessment Tool extracted from the Environmental and Social Framework (ESF) good practice note. The GBV Risk Assessment Tool and findings from recent project assessments were used to provide a rating of the anticipated risk level of the project. Secondary sources were also used to highlight risks within the project context. The GBV Assessment focused primarily on Sexual Exploitation and Abuse/Sexual Harassment (SEAH) within the country. Considering limited GBV risks related to construction activities for future expansion of telecom and broadband services in rural and underserved areas the report also covers aspects of GBV risks. Availability of data and information especially on SEAH was a challenge in compiling this report.

2. FINDINGS OF THE GBV/SEAH RISK ASSESSMENT

2.1 OVERVIEW AND PREVALENCE OF GBV IN ETHIOPIA

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The diversity of cultures, norms, demography and religion makes it difficult task to summarize all aspects of gender-based violence during the lifecycle of women for a lager country like Ethiopia. The most common and widespread forms of violence in Ethiopia relate to intimate partner violence (IPV), child marriage and other harmful traditional practices such as FGM. In addition, the country context rating as per the World Banks's Risk Assessment Tool pre-populated is available[53].

One element that is rarely covered in program review in Ethiopia is incidence of Sexual Abuse, Exploitation and Harassment (SEAH). To date, there is no data in Ethiopia on magnitude or occurrence of SEAH in aid sector or linked with development interventions. There is no study or data does not, however, mean that the abuse is not happening. In recent years organizations are being challenged to look into their programming and organizational culture due to shocking founded allegations of using aid as bargaining chip to engage in sexual relation with children, rampant use of money in exchange for sex with community members they serve (in effect increasing the demand and supply for sex work in localities where aid workers are in large number).

2.2 SEXUAL VIOLENCE IN HIGHER EDUCATION

Estimates of sexual violence/rape in Ethiopia ranged from 1%-75.6% across the studies reviewed. Findings from the 2016 Ethiopia DHS showed that among women aged 15-49 years old, 10% have experienced sexual violence at some point in their lives, and 7% reported having experienced any sexual violence in the past 12 months. Around 5% of women reported having experienced sexual violence by age 18 and 2% by age 15.

Sexual violence is as prevalent in the university and colleges as it is in the general population. Female students experience sexual violence perpetrated by fellow students, faculty and university employees, librarians, campus police, persons that enter university compounds as well on the streets. The impact of sexual violence on female students resulted in unwanted pregnancy and dropping out of colleges in addition to the psychological impacts of depression and other health issues.

A recent study[54] on sexual violence in *Wolaita Sodo* university compass found out that out of the 462 female students interviewed, 36.1 percent reported they had experienced sexual violence since they joined the university and the figure was 45.4 percent for their experience over their whole lifetime. Similar study in *Madawalabu* University found that out of 411 female students in its sample, 41.1 percent had experienced sexual violence over their lifetime and 25.4 percent had experienced it in the previous 12 months. Exploring why female students drop out, a study at *Jimma* University found that 82.4 percent of the respondents (out of 108 students who had dropped out) said it was related to sexual harassment; 57.4 percent said pregnancy was among the reasons for dropping out. Similar study[55] showed that female students do not feel safe in libraries, dormitories, cafeterias, in classrooms or moving around in the campuses (eg. going from library to dormitory at night).

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[53] Annex 1

[54] A. Wolderiyorgis, Journal of International Higher Education-Sexual Violence in Ethiopian Higher Education (#94) (summer 2018) p8 accessed on https://ejournals.bc.edu/index.php/ihe/article/view/10556/9075

[55] http://repository.smuc.edu.et/bitstream/123456789/3010/1/Mulugeta.pdf

Universities have gender offices where students can report to GBV/SEAH cases but only very few of them come forward to report due to cultural norms and fear of consequences. The gender offices in universities are insufficiently resourced to address such a widespread problem in campuses and as a result the survivors do not get adequate counselling and other critical support needed to overcome their trauma. In some cases, the gender offices do not enjoy the support of senior managers and are sometimes dismissed for following up on sensitive cases. As the digitalization will benefit such higher institutions, female students could continue to suffer sexual violence or continue to face challenge to access the digital services because of the identified GBV/SEAH risks in libraries, ICT centers, dormitories and other venues.

2.3 DIGITAL TECHNOLOGY ENABLED GBV/SEAH

Digital technology facilitated GBV is a world-wide challenge faced by all citizens with serious psychological and social impacts. Technology-facilitated GBV/SEAH is action by one or more people that harms others based on their sexual or gender identity or by enforcing harmful gender norms. This action is carried out using the internet and/or mobile technology and includes stalking, bullying, sexual harassment, defamation, hate speech and exploitation.

The extent of digitally enabled GBV and its consequences in Africa in general, and in Ethiopia are not well studied. Some sources[56] indicate that the problem is widespread among digital technology users in Ethiopia. According to one study, a third of a 3000 women interviewed in Ethiopia, Kenya, Uganda, Senegal and South Africa between ages 18-65 have experienced interviewed had experienced some form of online harassment. About 41 percent of these respondents believed that their gender was a primary reason for these attacks. The impacts of online GBV takes a monumental toll on mental health, including depression, anxiety and fear that follows women offline at home, school, work and other social spaces. Most these crimes are not reported and may not even be considered crimes. Women reporting such crimes can be trivialized with poor punitive actions taken by authorities further exacerbated by victim-blaming. The low level of awareness among the public and especially law enforcement agencies and the inadequacy or absence of regulations to protect such crimes is a major gap in addressing the issue.

Digital technology has huge potential to addressing GBV/SEAH if well designed and supported. Digital technology enables immediate reporting and digital documentation and sharing of evidences of GBV/SEAH crimes with authorities and technology allows faster treatment of survivors by availing fast information on location of nearest health service and accessing transportation in some cases. Furthermore, the digital technology can enable the creation of a platform for awareness and information exchange to address GBV/SEAH within regions and institutions. Digitization could help diversify and improve quality of hotlines across regions and enable remote tech-based capacity building of GBV service providers.

2.4 GBV/SEAH RISKS AND PROJECT ACTIVITIES

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[56] **Toward a cyberfeminist future: A new study centers African women as protagonists online** quoted by a blog accessed through internet; https://advox.globalvoices.org/2020/09/30/toward-a-cyberfeminist-future-a-new-study-centers-african-women-as-protagonists-online/

The GBV/SEASH risks are a result of complex contextual factors that go beyond projects and these risks can materialize during project implementation irrespective of the type of project activity. Experience suggests that typically projects with of significant construction activities that deploy large number of work force pose higher GBV risks.

The Ethiopia Digital Foundations project is a technical assistance and capacity building project. As the project has limited infrastructure development, the main risk of the project is SEAH although other GBV risks cannot be ruled out. Project services of such as improved access to quality internet, broad band and 3G/4G telecom services are expected to reach large category of beneficiaries including college and university students, government officials and employees, telecom service users including vulnerable and underserved communities in primarily pastoral and agropastoral regions.

Three potential areas of GBV/SEAH risks identified within the project scope.

- The project training and capacity building activities would involve a process recruitment of trainees including application, short listing, assessment and selection. The processes may potentially expose female candidates to SEASH risks such as in form of demand for exchange of sexual favors to qualify for training. Similarly, the competitive process for selection of start-ups and ICT (Information and Communication Technology) businesses for various types of support may expose female participants to risks. SEAH could also occur in the context where the ICT businesses partner with and support other farmers, service sector and other small businesses to train and provide them with digital equipment to improve their businesses.

- The expansion of coverage of telecom and broadband services involves construction activities such as laying out of fiber optics, cell towers and backbones age routers, international bandwidths, and Wi-Fi and lay down last mile infrastructure for connectivity. This may pose GBV risks, sexual exploitation and harassments by workers. Similarly, project activities related to installation of broadband services to be implemented within existing public premises and may involve last mile construction activities within these premises posing limited GBVSEAH risks

- The venues and service points such as University and college libraries, Internet Centers and community youth association centers could pose potential GBV/SEAH risks.

3. OVERVIEW OF LEGAL FRAMEWORKS

3.1 LEGAL PROVISIONS RELATED TO GBV/VAWG

There is no single, consolidated law on GBV or VAWG, but there are various provisions related to specific forms of GBV. The following summarizes the key ones.

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- Revised laws of marriageable age from 15 (under the civil code of 1960) to 18 in the family laws of regions except those who have not revised their family law- Afar and Somali- Art 648 and 647 of the Criminal Law provides

- Under the revised Criminal Law (2005), domestic violence is recognized as a crime explicitly (Art 564). However, sexual violence within marriage is not criminalized.

- Female Genital Mutilation/Cutting is criminalized (Art 565-566) including participation and incitement for people to confirm to harmful traditional practices (Art 569-570).

- The criminal code (Article 625) prohibits sexual exploitation of women: "Whoever procures from a woman sexual intercourse or any other indecent act by taking advantage of her material or mental distress or of the authority he exercises over her by virtue of his position, function or capacity as protector, teacher, master or employer or by virtue of any other like relationship",

3.2 LEGAL PROVISIONS AGAINST SEAH

- The labor law governing all non-civil servants (private organization, government enterprises, non-governmental organizations) recently included prohibition of sexual harassment. Under the labor law sexual harassment is defined broadly, does not give example of specific acts and has included consent as a determining factor. [57]

- The Civil Servants Proclamation 1016/2017 under Article 2(13) provides extensive definition of sexual harassment unlike the labor law as an "act of unwelcome sexual advance or request or other verbal or physical conduct of a sexual nature and includes unwelcome kisses, patting, pinching or making other similar bodily contact; following the victim or blocking the path of the victim in a manner of sexual nature; put sexual favor as prerequisite for employment, promotion, transfer, redeployment, training, education, benefits or for executing or authorizing any human resource management act".

- Sexual relations with a minor (child under 18 years old) is prohibited under the criminal law (Art. 626). However, the reporting system to the organization and from the organization to the formal authorities is a very sensitive matter. Reporting obligations (legal and/or organizational) and confidentiality or survivor-centered-approach are key issues that need attention and clear guidance before implementing a GBV and PSEAH procedure for a program.

3.3 GAPS AND CHALLENGES IN ADDRESSING GBV AND SEAH

- **Reporting and addressing SEAH in workplace**: The CEDAW committee[58] has expressed concern over the pervasive prejudice and discrimination and sexual harassment against women in the work force. The Committee was not convinced that the provision in the labor law was not

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[57] Proclamation no 1156/2019 (art 2 (11)
[58] *CEDAW (2019). CEDAW/C/ETH/CO/8 Committee on the Convention for the Elimination of All Forms of Violence against Women [accessed on 13 April 2020]* https://uhri.ohchr.org/

enough and additional measures to effectively implement the provision were necessary. There is no data on extent of sexual harassment, pattern of reporting and measures taken in any sector.

- **Gaps in accessibility of services and justice**: The Ethiopian government has established institutions, federally and regionally, such as the Ministry of Women, Children, Youth Affairs Offices (MOWCYA), special police units aimed at protecting children and women, and a Special Bench within the federal criminal court specifically for cases that relate to violence against women. However, there are limitations in terms of the capacity for geographic coverage as most of the offices are located in cities that makes the services inaccessible to the majority of the population.

- **Role of community institutions**: Community-based and religious legal structures often are the primary system to mitigate the impact of GBV issues. These systems do not operate in tandem which complicates the enforcement of GBV laws. These structures are also patriarchal in nature and tend to settle GBV issues as a family matter considering the interests of family members with little emphasis to the needs and wishes of the survivor

To address some of these gaps the 2010 Strategic Plan, and operation plan for an Integrated and Multi-Sectoral Response to VAWC in collaboration with other actors plans to scale up the GBV response system, including coordination mechanisms, referral pathways, and one-stop centers. The Federal Attorney General's Office in collaboration with civil society stakeholders and MoWCA (Ministry of Women and Children's Affairs) regularly facilitate trainings on survivor centered investigative techniques and key principles such as maintain confidentiality and the available integrated GBV response services to public prosecutors and judges, justice sector officials and police59. However, despite the fact that the government has passed laws and implemented policies declaring gender equality and the protection of women's rights, the GBV prevalence indicates that they are not effectively bringing an end to this violence in some cases due to the gaps in the laws while others are so poorly implemented and enforced that they fail to be effective.

4. MULTI-SECTORAL PREVENTION AND RESPONSE

The Digital Foundation Project will be implemented in cities and rural areas with varying levels of availability of services for GBV/SEAH survivors. The types of services vary with the different type of gender-based violence. A recent mapping of GBV services in relation to primary health care providers conducted in Amhara, Oromia, SNNP (Southern Nations, Nationalities and Peoples) and Tigray[60] was reviewed to fill in the gap to some extent. This study could serve as a basis to show the gaps in the system with caution that no two places have the same situation. Larger cities and intermediary cities are likely to have better services while those in some rural areas and underserved communities are likely to have weak

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[59] *Civil Society Joint Report on VAW in Ethiopia, 2018*
[60] *Encompass LLC (2019). Gender Based Violence Landscape Analysis. USAID/Ethiopia Transform: Primary Heath Care Project (Contract No. AID-663-A-17-00002)*

capacity if available. Therefore, service mapping needs to be done at the outset for each of the future project sites for the Digital Foundations Project.

The study concluded that capacity and resource constraint on the side of health care providers, lack of psychosocial service and weak multi-sectoral links has created a disjointed pathway of care for survivors of violence. It also added that norms that foster stigma for survivors and normalization of violence are big obstacles for survivors of violence to seek help.

Reporting of GBV/SEA by survivors is generally low. EDHS 2016 confirms what was already known that most survivors (65%) of violence do not tell anyone about the abuse. Among those who told anyone, majority rely on neighbors and friends. Same study shows that women are more likely to report when the violence is severe (physical and sexual). In most cases, they seek services from police than other service providers (such as medical and psychosocial). Since 2013 a Standard of Operation (SOP) was developed under the leadership of Ministry of Health (MoH) to establish referral system for sexual abuse cases.

One-stop centers are available only in major regional towns. Women, Children and Youth Affairs at kebele[61] and woreda level are involved in receiving reports and have taken a coordination role however limited capacity in terms of budget and skilled human resource has negatively affected the coordination role of the machinery[62]. Criminal cases are investigated and managed by police supervised by the public prosecutors in Attorney Generals' offices from Federal to woreda level. Before 2014, the Ethiopian Human Rights Commission used to run 111 free legal aid support clinics around the country[63]. The coverage is mostly in urban areas mostly around main roads. Currently, the service is limited to 4 regional main towns and the Commission is undergoing an extensive reform process to identify the most vulnerable groups and areas where the need is high to avail the service in a most meaningful way. In 2013 a Legal Aid Providers Network for child rights related issues was established under the Supreme Court of Ethiopia, however currently the project is discontinued, and the formal referral linkage is discontinued except the legal aid service in Addis Ababa. The referral linkage is mostly driven by informal communications and is barely covering victims who have suffered severe physical and sexual violence and does not cater for needs of other survivors of violence. Up to date and functional woreda specific service providers mapping is required by all programs irrespective of their GBV risk rating before responding to GBV[64].

In Ethiopia, a PSEA (Protection against Sexual Exploitation, Abuse and Harassment) network is established (UN Women-network chair) and trying to fill data gap on SEAH (at least in emergency interventions and camp setting) and FCDO (Foreign, Commonwealth & Development Office of United Kingdom) is in the process of setting up an online resource Hub which compiles nationally available researches, tools and service providers, in addition to providing technical support to smaller organizations. The Hub is also intended to serve as convener for community of practice. There is no single complaints reporting system.

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[62] *FAO. 2019. National gender profile of agriculture and rural livelihoods – Ethiopia. Country Gender Assessment Series, Addis Ababa. 84 pp. Licence: CC BY-NC-SA 3.0 IGO*
[63] *UN Women (2014). Preliminary Gender Profile of Ethiopia*
[64] *World Bank (2018). Good Practice Notes- Addressing Gender Based Violence in Investment Project Financing Major Civil Works, page 30*

4.1 STAKEHOLDERS AND SERVICES AVAILABLE TO SURVIVORS OF GBV

Several institutions and individuals have a stake in one or another way to work on the prevention and mitigation[65] of GBV against women and girls. At regional and local levels, there is a formal platform called the Harmful Traditional Practices Eradication Committee (HTPEC) led by Bureau of Women, Children Affairs (BWCA) and where other sectors like justice, labor and social affairs, education, agriculture, schools, administration, police, and health bureaus are represented. Teachers, health extension workers, development agents, schools, parents-teachers associations, police, courts, individual households (parents and guardians), traditional and religious institutions are playing key roles as members of the HTPEC (MoE, 2013).

In addition, national and international UN agencies like UNFPA are also working with government sector offices like Women and Children Affairs and other members of the platform, both on the prevention and mitigation aspects of GBV issues through system strengthening, awareness raising, and provision of legal aid and safe houses for survivors. Safe houses (shelters) are only located in the capitals of the regional states making them inaccessible to the vast majority of rural women. Most of the shelters are understaffed and underequipped. In terms of the availability of comprehensive services, only some of the shelters provided healthcare services, economic empowerment initiatives, counseling and therapeutic activities, and referral to legal aid services.

Thus, local NGOs, CBOs working on common objectives on Sexual, Reproductive Health and Gender Based Violence (SRGBV) have also been identified as important players to address the issue of gender-based violence. The platform is closely working with law enforcement bodies, mainly the justice bureaus, together with the police who are among key stakeholders enforcing the law of the country that can protect girls and women from GBV risks and provide legal support for survivors. However, despite their mandate and responsibility, in most areas the platform is not active enough, members have capacity gaps on how to handle the issues, and highly limited by traditional factors.

Almost all government offices have gender units and so do higher education institutions and colleges. However, these units are understaffed and under resourced and there is loose coordination, weak accountability and monitoring system.

4.2 CAPACITY OF IMPLEMENTERS IN PREVENTION FROM AND RESPONSE TO GBV

At macro level, the GoE (Government of Ethiopia), through its legal frameworks and institutional arrangement, has demonstrated relatively improved commitment to address GBV/SEAH issue in the country. When it comes to translation of the policy and legal frameworks into action weak coordination and accountability system pose major challenge. GBV prevention and response system requires strong multi-sectoral engagement. Among others, sector offices such as women and children affairs, education,

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[65] *There is a distinction made between **'prevention'** and **'mitigation'** of GBV. While there will inevitably be overlap between these two areas, **prevention** generally refers to taking action to stop GBV from first occurring (e.g. scaling up activities that promote gender equality; working with communities, particularly men and boys, to address practices that contribute to GBV; etc.). **Mitigation** refers to reducing the risk of exposure to GBV (e.g. ensuring that reports of 'hot spots' are immediately addressed through risk-reduction strategies; ensuring sufficient lighting and security patrols are in place from the onset of establishing displacement camps; etc.)*

health, agriculture, labor and social affairs, and justice (attorney general, court, police) are mandated to ensure addressing gender inequality and GBV issues. Almost all government offices have gender units and so do higher education institutions and colleges. However, these units are understaffed and under resourced and there is loose coordination, weak accountability and monitoring system.

In addition to the government structure, all actors including international organizations, as stated in the recently revised CSO (Civil Society Organizations) legislation, and local development stakeholders are equally responsible to work on gender issues including GBV/SEAH.

Accordingly, despite it is limited to a few types of GBV and in small parts of the country, Ethiopia in general has made some progress over the past decades in reducing some GBV cases. For instance, child marriage, with prevalence rates dropping from 59 per cent of females (aged 20-24) married or in union by age 18 in 2005 to 40 per cent in 2015[66].

However, despite macro level commitment and progress being achieved in some components of GBV/SEAH, the general response towards GBV at national level is still very weak and not to the level of its commitment. Reasons for such less performance are related to implementation capacity especially at frontline implementers' level, coordination among stakeholders, monitoring, evaluation and accountability issues.

5. ASSESSMENT OF RISK LEVEL OF GBV

The project's risk level assessed using risk assessment tool falls under the category of 'moderate' (annex1)

The main project potential risks are summarized below:

- Currently the project does not involve construction activities. However future expansion of services may require limited infrastructural development that require deployment of workforce in rural and underserved regions increasing the GBV risks in these areas.

- The project activities of selection and training of large number of employees including government officials and workers at federal, regional and woreda administration may expose female workers to SEASH risks.

- The project capacity building activities such as provision of faster internet, broadband and wi-fi services may aggravate technology enabled and both on and off line in SEASH risks in education institutions and offices.

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[66] *UNICEF Ethiopia, March 2020 Child Marriage and Ethiopia's Productive Safety Net Programme: Analysis of Protective Pathways in Amhara Region*

https://owsd.net/sites/default/files/National%20Assessment%20on%20Gender%20and%20STI%20-%20Ethiopia.pdf

- The physical spaces (venues) and entry points for ICT services within the higher education institutions, youth community associations and woreda offices such as libraries, ICT centers, dormitories and internet -cafes could increase the exposure of female students, workers, teachers, youth service users to GBV/ SEAH risks.

- Expansion of telecom and broad band services and digital devices in rural areas may expose vulnerable people to GBV risks and facilitate human trafficking, fraud, theft and other criminal activities.

- The nation-wide competitive process for selection of start-ups and ICT businesses exposes female participants to SEA in order to gain access to project benefits. Selection of business partners such as farmers, suppliers, service providers by ICT businesses supported by the project may expose women entrepreneurs SEA risks.

6. CONCLUSION AND RECOMMENDATION

The project GBV risk is moderate. The project being implemented in both rural and urban areas there is potential for GBV/SEASH risks. The main risk within the scope of the project in cities is the SEAH risk. Due to construction activities expected in the future in the rural areas including in pastoral areas GBV risk is also considered.

The main risks associated with the project context include the high level of GBV/SEAH risks within educational institutions (Universities and TVETs) and the digital technology enabled GBV/SEAH within these institutions and government offices. The use of mobile phones and digital technologies expose especially women to potential risks of human trafficking, theft and fraud due to the low level of awareness particularly in rural areas. GBV/SEAH risk can also occur in existing venues and spaces within educational institutions and offices where project services such as fast internet, broadband and wifi services are accessed. Training and business competition processes may expose female workers, startups and business owners to potential SEAHS.

As the specific project sites are not determined, the project will, as part of the screening of specific cites conduct GBV service mapping and develop GBV pathways. The project GRM will be designed to ensure the confidential reporting and handling of cases and GRCs will be trained. Code of conduct by workers hired by the project and those of the contracted employer will contribute to reducing GBV risks.

Awareness raising on use of internet, protection of privacy and personal data and the enforcement of code of conduct on use of digital technologies in public spaces such as libraries, dormitories and internet cafes could improve the SEAH risks. The project can also contribute to mitigate GBV/SEAH risks and the broader GBV related issues by supporting digitally enhanced awareness on GBV/SEAH issues in project areas. The digital technology can provide resources and advices on GBV/SEAH and facilitate timely reporting of cases.

GBV/SEAH RISKS COMPLAINTS HANDLING

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Most of the institutions such as MDAs, Regional and Woreda offices and Education and health institutions have gender offices that handle GBV/SEAH issues. Some of the universities and colleges give some counselling, a GBV reporting mechanisms and referral system for survivors. The situation is different in rural and underserved areas. The project should, as part of the Environmental and Social screening process, assess the GBV risks and existing prevention and handling mechanisms in specific project sites. develop measures for handling GBV related grievances.

GBV Service Mapping

The project being implemented in wide range of contexts and institutions will conduct specific GBV risk assessments and mapping of service providers for the specific project sites. The mapping of service providers and capacity assessment of service providers for survivor-centered services including case management and referral will be conducted as part of the environmental and social mitigation measures guided by the ESMF. The project will develop and put in place a clear service referral pathways and systems for anonymous and confidential reporting and GBV/SEAH GRM handling mechanism. Community awareness arising and capacity building of service providers and GRCs (Grievance Redress Committees) will form part of the support that should be provided during implementation.

TRANSPARENCY OF TRAINING AND CAPACITY BUILDING

A transparent process involving key stakeholders from participating institutions including the gender office should be put in place for managing the recruitment of trainees and conducting training. Clear guidelines on required qualification, application process, screening and selection should be communicated to all potential trainees. Information on complaint procedures on any issues related to the training process such as unfair practices, nepotism, corruption or SEAH related grievances as outlined in ESMF should be clearly communicated to participants. Safe and anonymous reporting and handling of SEAH complaints should be adhered to strictly. In order to realize the project intentions to target more women through the training, it is important to state the intention clearly and disseminate the information in the participating ministries, agencies and regional and woreda offices.

CODE OF CONDUCT FOR USE OF ICT SERVICES:

The project in collaboration with relevant stakeholders in the respective offices and institutions should develop code of conduct on use of ICT in public spaces such as information centers, libraries, community youth centers and public office and content filter for internet use. Awareness and guidance on safe use of internet, protection of privacy and data and prevention and reporting of digital technology enabled GBV. The code of conduct should be displayed in public places where the services are provided.

CODE OF CONDUCT FOR WORKERS

Project should develop CoC (Code of Conduct) for project staff on SEA/SH that is applicable to project staff. Similar CoC should be implemented by implementing partners and beneficiary institutions involved in implementation. Contractors and market operators that are engaged with the project should be required to develop CoC for workers on SEA/SH and provide adequate capacity and resources to create awareness,

train and monitor their workers. Training and awareness raising on GBV for workers and staff contributes to reduction of risks.

CAPACITY BUILDING ACTIVITIES

The findings from the Project ESMF highlights the capacity gaps in Environmental and Social risk management within the implementing agency and implementing partners. MiNT the implementing agency and ECA one of the implementing partners do not have environmental and social management unit or staff. MoSHE, another implementing partner has some experience as it has been practicing environmental management procedures in relation to its other similar projects financed by World Bank and other financiers. Other capacity in other participating MDA is largely unknown as the specific MDAs that will take part in the project are not yet identified. The ESMF also identified capacity gaps and need for streamlining of roles and responsibilities at regional, woreda and city levels on screening, risk assessment and mitigation measures.

The ESMF recommends, (in addition to the placement of environmental and social specialists within PIU MiNT) capacity building training and awareness creation on environmental and social risks for key project management and project steering committee, technical training on ESMF ,including project GBV prevention and response, for environmental and social risk management teams in the respective agencies. The capacity building activities for GBV/SEAH will include the key institutions involved in the referral pathways and case management. General sensitization of project beneficiaries on environmental and social risks as well as GBV is key to effectiveness of risk management mechanisms put in place by the project.

GBV awareness raising should be provided to project staff, implementing partners, workers and project grievance redress structures as well as project beneficiaries and users of project services. The awareness raising should include digital technology assisted GBVs and ways to use digital technology to report GBV and protection of personal data and privacy.

In order to support the widespread GBV/SEAH challenges in rural areas the project can support through its ICT capacity building activities for Regional and Woreda offices the digitalization of the regional and woreda platforms for Harmful Traditional Practices Eradication Committee (HTPEC) and use the capacity for community mobilization, education, monitoring activities to to address the harmful social norms.

RETAINING A PART TIME GENDER SPECIALIST

The retention of a part time gender specialist is recommended considering the geographic coverage and the limited capacity within the project implementing agency and implementing partners to effectively support and monitor GBV/SEAH issues. A part time gender specialist will support the following activities: 1) GBV risks and mapping and developing a referral pathways 2) community mobilization and awareness raising including digitalization of GBV/SEAH platforms 3) developing code of conduct for use of digital services in institutions and offices 4) Develop/ adopt guideline for the GBV/SEA prevention, response, and GBV related complaint handling mechanism 5) Capacity building support to implementers 6) regular monitoring and reporting.

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7. GBV ACTION PLAN AND BUDGET

Actions	Timeline	Implementation body	M & E	Remark
1.Recruitument of part time Gender Specialist	Years 1,maintained throughout	MiNT		Collaborate with implementing partners
2.Mapping of GBV response Services & development of referral pathways	Year 1 & 2	MInT-PIU MoSHE/ ECA	MInT, MoSHE/ ECA	As target institutions and geographic locations are identified this should be undertaken as part of the social and environmental screening process.
3.Provide capacity building training /orientation to the project related GBV service providers, focal persons and institutions	Year 1 and 2	MInT-PIU	MInT, MoSHE/ ECA	Social Development specialist in MInT PIU and Gender/GBV specialist
4.Stakeholders identification and consultation	Year 1 and 2	MInT-PIU MoSHE/ ECA	MInT, MoSHE/ ECA	This includes awareness and consultation to all potential project trainees/project affected people based on clear guidelines on required qualification, application

Actions	Timeline	Implementation body	M & E	Remark
				process, screening and selection as well as compliant handling.
5.Develop/ adopt guideline for the GBV/SEA prevention, response, and GBV related complaint handling mechanism for the project	Year 1	MInT,-PIU ECA MoSHE	MInT, MoSHE/ ECA	This should be completed before project implementation commences
6. Support digitalization of regional and woreda GBV/SEAH platforms to strengthen prevention activities	Year 2 and 3	MiNT	MiNT	This will be implemented in collaboration with relevant agencies.
6. Develop: a) codes of conduct in collaboration with MInT on the use of ICT services in pubic spaces (libraries, information centers, etc), b) installing filters for web content in education institutions and public offices, c) guidelines for personal data protection and safety, reporting abuse via digital devices, etc	Year 1 and 2	MInT/PIU	MInT, MoSHE/ ECA	At the start of implementation
7.Develop and ensure signing by project staff code of conduct	Year 1 and 2 and throughout	MiNT-PIU,	MInT,	Ensure that market operators and contractors include

Actions	Timeline	Implementation body	M & E	Remark
related to GBV and create awareness on HR policies and government proclamations on sexual harassment	the project life	MoSHE ECA	MoSHE/ ECA	GBV/SEA in the workers code of conduct
8.Carry out awareness sessions to institutions and project service users on the role of GBV referral and reporting system in the project context	through	MiNT-PIU MoSHE ECA	MInT, MoSHE/ ECA	

- **8. BUDGET**

	Budget for GBV Action Plan		
	Communications and ToT development	Unit Cost	Total (over 5 years)
1	Project specific institutional mapping and development of referral system	MInT, MoSHE ECA,	10,000 USD
2	Develop Booklets/ information kit/ and posters on GBV targeting community, service users such as libraries, information centers, offices and project participant beneficiaries such as start-ups and ICT businesses	MInT, MoSHE, ECA	10,000 USD
3.	Develop/adopt guideline on the Project GBV/SEASH potential risks, prevention and response activities including Code of Conducts for staff and use of the ICT services.	MInT, MoSHE, ECA	15,000 USD
4.	Capacity building support and training to GBV/SEA prevention, reporting and referral service institutions, staff, project service users and beneficiaries	MInT, MoSHE, ECA	15,000 USD
5	Support digitalization of GBV/SEAH platforms and training for users	MiNT	20,000 USD
5.	Stakeholder identification and consultation and awareness raising	MInT, MoSHE, ECA	15,000 USD
6.	Engage a part time gender specialist to support GBV/SEA activities (3 months/year)	MInT/PIU	15,000 USD
	TOTAL		100,000 USD

ANNEX 1

GBV RISK ASSESSMENT TOOL[67]

Section A: Country Context	
1. "Prevalence of intimate partner violence (select the country then in the 'Common Indicators' tab and scroll to "Physical or sexual violence by a husband/partner)"	0 Lower than regional average. Spousal violence: 34% of ever-married women age 15-49 have experienced spousal physical, sexual, or emotional violence. (EDHS, 2016). Regional average to 66 % (WHO,2013)
2. "Prevalence of any form of sexual violence (select the country then in the 'Complete List' tab and click the "Domestic Violence" tab. Select the "Experience of sexual violence" option, then select "Women who ever experience sexual violence" option)"	0 Lower than regional average. High levels of women and girls have been subjected to violence 26% of women aged 15 to 49 report either physical or sexual violence, or both (EDHS, 2016).
3. Prevalence of child marriage (defined as marriage before exact age 18 reported by women)	1 High prevalence ,40.3 % of women and 5 % of men were married before the legal age of 18 (EDHS, 2016)
4. State Department Trafficking in Persons report (Tier 1-3, with one low and 3 high risk)	0.25 The exact magnitude and extent of trafficking in Ethiopia has not yet been systematically documented

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[67] *The questions are meant only as a starting point and are not intended to be exhaustive. As multiple forms of GBV have the same risk factors and drivers, the tool can be used to understand the overall context and how the project may interact with this context in relation to multiple forms of GBV, not just SEA/SH*

5. Presence of Peace-keeping mission	0 Not present – key Informants from Attorney General
6. "Laws on domestic violence (click on the "domestic violence" tab, scroll to the given country and in the second column, see the response to "Is there domestic violence legislation")"	0 Low risk. The Criminal Code of Ethiopia also hosts a number of provisions, which criminalize GBV and its different forms. The Code, unlike the previous Penal Law of 1957, clearly criminalizes many of the GBV types and has also improved the punishments in some of the offenses committed against women. Article 561 to 570 criminalizes harmful traditional practices, including domestic violence (564), and female circumcision (565, 566).
7."Laws on marital rape (click on the "marital rape" tab, scroll to the given country and in the first column, see the response to "Does legislation explicitly criminalize marital rape?")"	1 High risk
8. "Laws on sexual harassment (click on the "sexual harassment" tab, scroll to the given country and in the first column, see the response to "Is there legislation that specifically addresses sexual harassment")"	0 Low risk, Criminal code not included Public service –yes
9. "Justification of wife beating (Select Country in ""Country"" menu, --> click on Indicator box -->Complete List-->Select ""Women's Empowerment"" category--> Select indicator ""Attitude toward wife beating"" --> select ""Wife-beating justified for at least one specific reason"""	0.5 High risk, the data shows 70% of women and 31% of men in rural areas agreeing that wife beating is justified compared with 39% of women and 15% of men in urban areas. (EDHS, 2016)
10.Help seeking to stop violence (Select Country in "Country" menu, --> click on Indicator box -->Complete	1.High Risk Help seeking: About one-quarter

List-->Select "Domestic Violence" category--> Select indicator "Help-seeking to stop violence" --> select "Sought help to stop violence" or "told someone about the violence"	of women 25% who have experienced physical or sexual violence has sought help. (EDHS, 2016).
11. National level capacity to respond to Gender-based violence	0.5 Moderate Risk, even if there is legal instruments and institutional mechanism including one stop services and safe house, implementation, availability and quality of services needs strengthening
12. GBV working group (national and regional working group)	0 High Risk
13. National referral pathway protocol	0 Low risk
Sub Total	4.25
Section B: Project Context	
Indicator	Score and Comments
1. Is project in a humanitarian area of the country? [Scoring: Yes = Higher risk is humanitarian or emergency situation in project area = 2; No = Lower risk is no presence of humanitarian or emergency situation in project area = 0]	0 No Lower risk – the project activities are cover cities, small cities, woredas and rural and underserved areas
2. How much infrastructure construction, upgrading or rehabilitation does your project entail? [Scoring: Higher risk is major rehabilitation and construction = 1; Medium risk is moderate rehabilitation and construction = 0.5; Lower risk is low rehabilitation and construction = 0]	0.0– currently the project does not involve construction but there may be minor construction activities for installation of hard wares and other related work. There may be

	small scale construction activities in the future by market operators in rural and underserved areas.
3. According to the guidance from the labor influx note, rate your project as high, medium or low risk related to the level of labor influx. If there is no labor influx, choose the low risk option. This determination is a self-judgement based on project parameters, using the labor influx note guidelines. [Scoring: Higher risk can be associated with large number of workers, small remote community (low absorption capacity) context with pre-existing social conflicts, high prevalence of GBV, weak law enforcement, presence of specific marginalized, vulnerable, ethnic groups, etc. = 0 or 1 or 2]	1-Medium risk- the project will be hiring market operators to install hardware and small telecom gadgets. The labor requirement is likely to be low. The market operators may engage in limited infrastructure activities in rural and underserved areas further down the line.
4. During project preparation, consultation was undertaken with women's groups, groups that advocate for children and adolescent rights, and other stakeholders. (Please note consultations should have provided a safe enabling environment for open conversation by women, recognizing that power dynamics in communities often limit women's full participation). [Scoring: Higher risk is no engagement with women's children's and adolescents' rights groups = 1; Lower risk is engagement with women's, children's and adolescents' rights groups = 0; Unknown = 0.5]	1 –High risk. Consultation was limited to implementing agencies and review of secondary sources.
5. During community consultations and project appraisal, issues related to GBV and GBV-related concerns about the project have arisen in the community engagement discussions. [Scoring: Higher risk is Yes = 2; Lower risk is No = 0; Unknown = 1]	1 – community engagement has not been done.
6. Are military or paid security forces being contracted as part of the project? [Scoring: Higher risk is Yes = 1; Lower risk is No = 0; Unknown = 0.5]	0.5 Medium, May be some security accompanying necessary in some areas.
7. Poverty in the project area is in bottom quartile of country? [Scoring: Higher risk is being in the bottom quartile of poverty = 1; Lower risk is not being in the bottom	0.5 project is implemented in mainly in government offices, cities and institutions and in rural and underserved areas. The level

quartile of poverty = 0; Unknown = 0.5]	of poverty is high in underserved areas but future activities in these areas are limited
8. Project in hard-to-supervise areas? (For instance, very remote or geographically diffuse projects) [Scoring: Higher risk is hard-to-supervise areas = 2; Lower risk is compact or easily accessed project areas = 1]	2 High Risk. The project implementation will involve cities and woredas and in the future include some of the areas could be hard to supervise such as pastoralist areas
9. Urban, peri-urban or rural? [Scoring: Higher risk is rural = 1; Medium risk is peri-urban = 0.5; Lower risk is urban = 0]	0.5 project targets intermediate cities and urban areas and rural areas in the future
10. Project construction near school route or other pedestrian access that women and girls use for their daily activities? [Scoring - Higher risk is Yes = 1; Lower risk is No = 0]	0 Low Risk, No major construction
11. Project able to monitor GBV and SEA risks across the full span of the work? [Scoring: Higher risk is No = 2 Lower risk is Yes = 0; Unknown = 1]	2 High Risk, Project covers geographically wide areas vertically and horizontally and dealing with diverse institutions
12. Female workers in close proximity to male workers with limited supervision? [Scoring: Higher risk is Yes = 1; Lower risk is No = 0; Unknown = 0.5]	0 Low risk. Main project activities will be in educational institutions and public office settings.
MODERATE RISK	Sub-total score = 12.5

Risk Tier	Lower risk 0 – 12.25	Moderate risk 12.5-16	Substantial Risk 16.25-18	High Risk 18.25-25