

MYANMAR: MATERNAL AND CHILD CASH TRANSFERS
FOR
IMPROVED NUTRITION PROJECT

Environmental Codes of Practices for Department of Social Welfare Office Civil Works

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The Republic of The Union of Myanmar
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Overview

1.1 Project Development Objective:

The objective of the project is to expand access to a cash transfer program to improve nutrition behaviors and enhance capacity to deliver social protection programs. With the limited resources available for this project, it is essential to target the interventions wisely, i.e., maximize the impact in areas with greatest need, instead of spreading the resource thin. The Shan State and Ayeyarwady Region were selected for targeting the proposed project interventions, through intensive dialogue between the WBG team and Government officials of the four key ministries. Based on wide consultations and technical input, Shan State and Ayeyarwady Region were selected as geographic focus based on the following criteria: burden of under-nutrition (e.g., in terms of stunting prevalence among under-five children), local capacity, stability (security and access), and current level of coverage by key nutrition services. Followings are the **PDO Level Indicators** of the project.

- Number of beneficiaries of social safety nets programs¹ (disaggregated by gender²)
- Share of children between 6 to 23 months from MCCT beneficiary households consuming foods from four or more recommended food groups³
- Share of DSW offices considered functional to deliver social protection⁴
- Share of township offices that update the beneficiary registry in the MIS more often than every payment cycle

1.2 Project Description

Ministry of Social Welfare, Relief and Resettlement (MSWRR) has committed to supporting nutritionally vulnerable population groups to benefit from social and relief assistance and nutrition promotion. Specifically, MSWRR aims to increase “coverage and utilization of social safety net programs” by these groups. The Maternal and Child Cash Transfer (MCCT) program is one of eight flagship programs outlined in the Government of Myanmar’s National Social

¹ This is the corporate result indicator (CRS) for social protection. The indicator will be reporting the beneficiaries of the nutrition sensitive cash transfer program: MCCT.

² The MIS will also contain information that would permit reporting for this indicator not only by gender but also by location, ethnicity (where auto-reported by beneficiaries), religion, language, educational level, and other basic socio-economic characteristics collected at the time of program enrollment.

³ In the program management information system, the sex of the children will be reported, allowing for gender disaggregated specific analysis.

⁴ This indicator will be measured by a score card. Improved functioning will be measured by a composite index capturing the number of personnel serving the population, different programs and services provided, office capacity, and so forth, as defined in the operations manual. The functionality of the office at central level would have to be above 90 percent on the index, while at the subnational level, 80 percent would be considered acceptable.

Protection Strategic Plan (NSPSP)⁵ to address vulnerabilities along the life cycle. The objective of the program is to improve nutritional outcomes for mothers and children during the critical first 1,000 days of life. The program provides a regular cash benefit to mothers during the last 6 months of pregnancy and the children's first 2 years. To ensure that the implementation is technically and financially feasible, the flagship program is being progressively rolled out. The MCCT Program started being implemented by the Department of Social Welfare (DSW) under MSWRR in Chin State in 2017⁶, with funding from Livelihoods and Food Security Trust Fund (LIFT), and it was then expanded to Rakhine State and Naga Self-Administered Zone of the Sagaing Region in 2018.

Starting with a negligible budget only a few years ago (an estimated 0.3 percent of GDP was spent in social assistance in 2015, compared to Cambodia's 0.9 and Vietnam's 1 percent, according to the Aspire database⁷), social assistance programs expanded significantly to protect vulnerable categories. Social pensions, disability allowances and a universal maternal and child cash transfers (MCCT) in Chin and Rakhine were introduced and strengthened. The government's view is to expand the coverage of these programs, and to introduce further programs (e.g. child allowance). The commitment to building systems and ensuing proximity of the ministry for the population is commendable. The Ministry is investing in significantly deconcentrating and decentralizing progressively their operations. To date the ministry has limited capacity at Regional/State and particularly at township level.

To expanding their flagship programs and Ministry's commitment to invest in Human Capital, ministry will take proposed IDA financing of USD 100 million for MCCT program in Ayeyarwady Region and Shan State. This IDA 100 million project will lead and implement by DSW from FY 2019 to FY 2024. As the principle of MCCT program is universal and no. of beneficiaries will be in large amount in both Shan and Ayeyarwady, the Government will co-finance to cash transfer of beneficiaries. The project will benefit pregnant and lactating women, infants and young children up to age two, and their families and communities in prioritized nutritionally vulnerable geographic areas. The principle of the proposed support is to support evidence-based interventions at the community level to overcome binding constraints to optimum nutrition in the first 1,000 days of life. The intent is to improve the coverage of nutrition-related interventions, while simultaneously motivating women to seek care and improve nutrition/caring practices for themselves and their children. The proposed interventions align with the proposed Multi-Sectoral National Plan of Action for Nutrition and are packaged as three components:

Component 1: *Stimulating demand for good nutrition in the first 1,000 days in selected priority areas*

This component will finance the delivery of cash transfers to pregnant mothers and to mothers with children under two, accompanied by community outreach and social support sessions (COSS) to improve nutrition-related behaviors in selected priority areas, specifically Shan and Ayeyarwady.

⁵ The NSPSP was endorsed at the end of 2014, with an aim to promote human and socio-economic development, strengthen resilience to cope with disasters, enable productive investments and improve social cohesion.

⁶ It should be noted that the MCCT program has been already implemented, on a limited scale, in Rakhine, Dry Zone and Delta region by Save the Children, and the learning from these programs informed the design and operationalization of the Chin MCCT Program.

⁷ The State of Social Safety Nets, 2018, World Bank Publication, March 2018

Component 2: *Enhancing capacity to implement social protection programs*

This component will focus on strengthening the capacity of the MOSWRR to effectively deliver, monitor, and evaluate social protection programs and services across Myanmar. In order to do that, the project will invest in: (a) strengthening the physical and human infrastructure of MOSWRR to deliver its flagship social protection programs both at the national level and in priority states and regions; (b) developing key building blocks for effective and inclusive implementation of the country's flagship cash transfers programs; and (c) providing monitoring and evaluation and overall project management.

Component 3: Contingent Emergency Response (CERC).

This zero-dollar subcomponent would allow rapid reallocation of IDA credits proceeds to respond to unanticipated eligible crises or emergencies.

The project will also support **Oversight and Facilitation of the State/Region and Township Departments of Social Welfare** which include State/Region, District and Township-level DSWs to improve physical infrastructure of DSW offices, undertake supervision and regular monitoring, and facilitate implementation of the MCCT program in Shan State and Ayeyarwaddy Region. To do so, the DSW will select construction contractors through a transparent bidding process according to the Ministry's Procurement Guidelines. Local materials and methods will be used by the contractor, but the work plans and drawings will be designed and provided by the DSW to ensure that minimum standards are met.

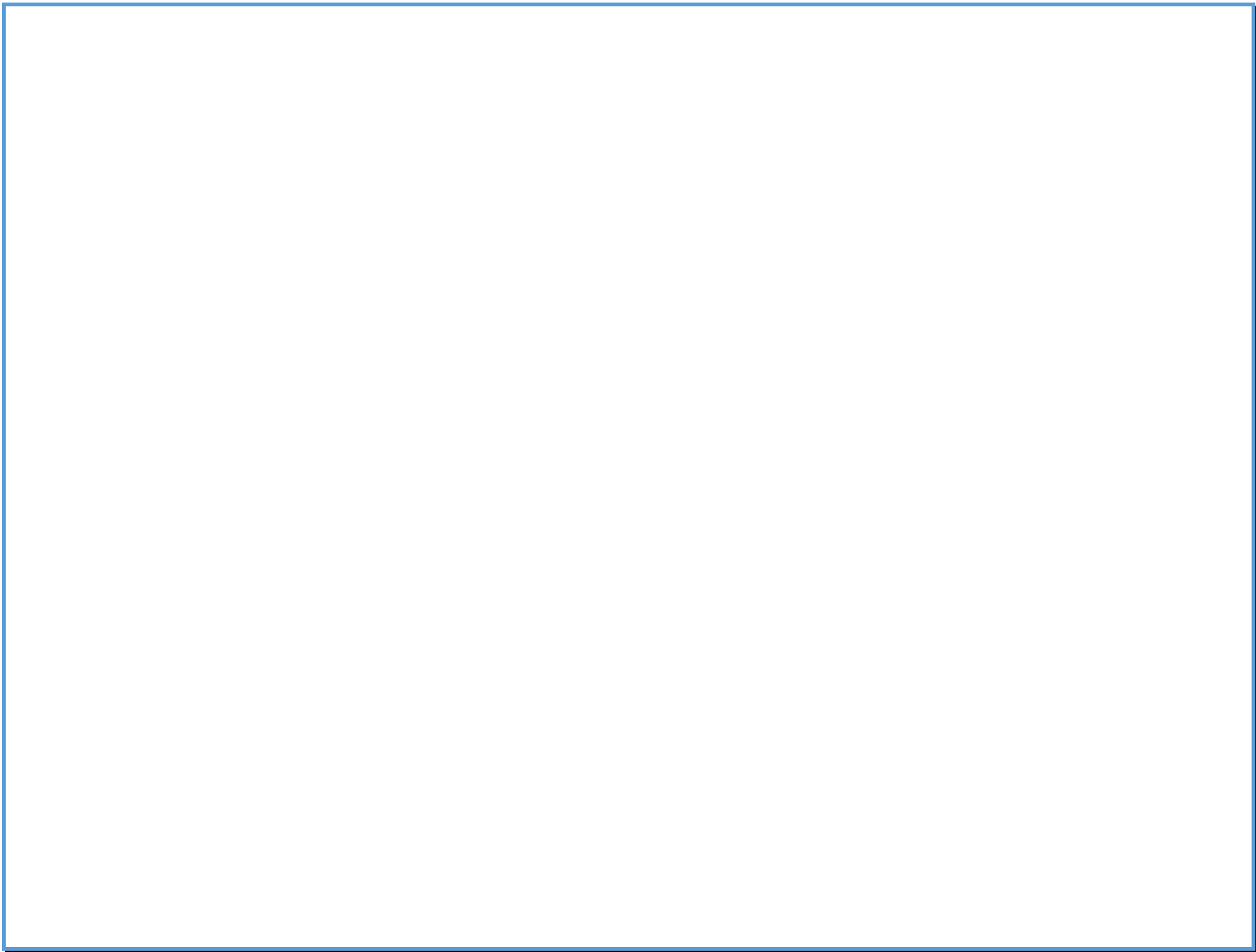
1. Applicable National Environmental Policy and Legal framework

2.1 Myanmar Environmental Regulations and Guidelines

Myanmar National Environmental Conservation Law (2012) states that the relevant Government departments, Government organizations, private organizations and individuals shall apply sound environmental and social safeguard practices in the construction works and a monitoring system is required to ensure the construction works are carried out in accord with stipulated environmental quality standards.

Environmental assessment requirements are set out in the Environmental Impact Assessment (EIA) Procedure (2015). Projects involving small scale civil works are not specifically identified in Annex A – Categorization of Economic Activities for Assessment Purposes of the EIA Procedure. Neither an EIA report or environmental management plan is required for planned office construction activities under the project. Instead an ECOP is considered appropriate to the nature of planned civil works.

The EIA Procedure and supporting EIA General Technical Guidelines provide that projects should comply with international good practice as detailed in the World Bank Group Environmental Health and Safety Guidelines. Additionally, projects are subject to national Environmental Quality Emission Guidelines (2015) which cover air emissions, waste water, noise levels, and odor. Occupational health and safety covers general facility design and operation, physical and chemical hazards, personal protective gear, and accident and disease monitoring. Similarly, community health and safety guidelines include water quality, structural safety of project infrastructure, life and fire safety, traffic safety, disease prevention, and emergency preparedness and response.



2.2 World Bank Safeguard Policies Triggered

OP/BP 4.01 Environmental Assessment is triggered for this project. Given the small scale of civil works, the project is categorized as 'environment' Category B. It is anticipated that proposed civil works involving the constructing and upgrading of offices will be typically confined to department own land premises. There are likely to be some concerns relating to inconvenience or nuisance (e.g., dust, noise, and construction waste) to surrounding areas during construction. These potential impacts are regarded as minor, site-specific, and reversible in nature, and for which mitigation measures can be readily identified. Given the small scale and nature of office civil works it is considered appropriate to prepare ECOP to address any potential adverse environmental impacts.

No other environmental safeguard policies are triggered. Specifically, OP/BP 4.04 Natural Habitats is not triggered since civil works will occur at existing department owned land compound situated in or near towns, and as such will not cause any degradation of natural habitats. Similarly, the project will not degrade critical forest areas as defined under OP/BP 4.36 Forests. The project will not involve any procurement of pesticides nor cause increased pesticide use as defined under OP 4.09 Pest Management. No significant impacts on physical cultural resources are anticipated as defined under OP/BP 4.11 Physical Cultural Resources. This ECOP includes information about the procedure for obtaining clearance from responsible authorities if physical cultural resources are affected and includes provisions for addressing chance finds should they occur. The project will not involve international waterways as defined under OP/BP 7.50 Projects on International Waterways or be located in any known disputed areas as defined under OP/BP 7.60 Projects in Disputed Areas.

2. Potential Environmental Risks and Impacts

The project will include the renovation of existing office buildings and construction of new offices in the project areas: Shan State and Ayeyawaddy Region as well as at Union level in Nay Pyi Taw Council. The construction of new offices, mainly two- storied buildings in State/ Region and three-storied in Nay Pyi Taw, which will take place from six months to one year, will have significant but site-specific environmental impacts at the construction sites. Potential environmental and social impacts associated with office civil works may include occupational and community health and safety issues arising from air pollution caused by dust and other air emissions, noise and vibration generated by construction equipment and trucks, lack of and inconsistent use of personal protective equipment (PPE), traffic safety, construction waste generation and disposal, waste water discharges to the nearby wetlands, streams or rivers, and use of child labor during construction periods. Other risks are associated with hazardous building materials such as asbestos containing materials, and paints used on office buildings. These risks are readily manageable through standard operating procedures and good construction practices. The mitigation measures, monitoring and supervision responsibilities will be included in the contracts for office building constructions.

These new office buildings will be constructed on lands, premises owned by the name of DSW which are already identified prior to appraisal. The locations of lands are within city/ town limits and the DSW will make sure the structural integrity and environmental soundness of office building and its premises. The office building sites in townships of both Ayeyarwady Region and Shan State are neither near the river nor mountainous areas. However, there may be a risk of cyclones, storm surges and flooding in Ayeyarwady region and a risk of landslides due to runoff and earthquake in Shan State and Nay Pyi Taw Council. These risks will be considered in site selections and building designs.

OP/BP 4.01 Environmental Assessment is triggered for this project. As the potential environmental impacts of project are site-specific, predictable and manageable, risk, the project environmental risk is rated as Category B. No other environmental safeguard policies are triggered by the project. Taking into consideration the type, location, sensitivity and scale of planned civil works and the characteristics and size of potential impacts, preparation of an Environmental Codes of Practice (ECOP) is considered the most appropriate environmental safeguard instrument for this project. In preparing this ECOP, references were made to applicable national environmental legal framework, World Bank operational policies and procedures, general guidelines for ECOP preparation, and municipal construction guidelines.

Rigorous application of this ECOP will ensure that any adverse impacts caused by civil works are avoided or minimized. Contractor specifications to address environmental issues, including construction dust and noise control, waste management and disposal, site management, and occupational and community health and safety measures covered in this ECOP. These contractor specifications will be included in contractor bidding documents and/or in guidance provided to site engineers of contracting company/ies in carrying out office civil works. The compliances are to be monitored throughout planning and design, during construction and post construction periods and the responsibilities for monitoring of compliance at each stage are mentioned in Annex.

3. Implementation Arrangements

Civil works implementation will be led by the Department of Social Welfare in accordance with Government and Ministry guidelines regarding construction of offices. Bidding process for construction will be carried out according to the Government Tender Process and contracting to the selected bidders will proceed according to the Government's rules. Day to day supervision of civil works will be carried out by site engineers of the contracting companies as part of their regular inspection and monitoring duties. Quality of the infrastructure/ buildings will be assured by the technical experts from a 3rd party engineering company and DSW will contract them according to the same bidding procedures. Supervision and monitoring of compliance with mitigation measures during the progress of civil works will be carried out by the DSW senior officials from the respective State and Region on a regular basis. Monitoring of compliance by the Union level DSW together with World Bank Safeguard team will be done minimum once and maximum twice during or end of the civil works. Specific implementation arrangements and guidelines relating to civil works will be prepared by the Union level DSW and disseminated to the DSW offices in Ayeyarwady Region and Shan State.

4. Environmental Codes of Practice

The Environmental Codes of Practice for office civil works under the project is prepared to establish in-house best environmental management practices and specifications relating to project development, construction and management. It contains a template for Environmental and Social Management Plan (Annex) which each sub-project will complete and implement using detailed information of site-specific environmental and social impacts/ issues, mitigation measures, monitoring and institutional arrangements before, during and post construction phases. The ECOP both sets out the

environmental management system for civil works and the duties and roles for implementing this system. General Requirements for Environmental Codes of Practice for Office Civil Works preparation and implementation are:

- The contractor must follow relevant regulations relating to civil works and cooperate with local authorities to ensure full compliance with such requirements.
- Management and supervisory units should ensure that ECOP provisions are communicated to contractors and made part of contractor obligations.
- Contractors and their subcontractors (if any) must abide by the ECOP and any other requirements specified by DSW.
- Contractors should be directed by the respective officials from DSW (i.e. designated staff from Union, State/ Region & District offices) and actively cooperate with respective party during the period of civil works.
- Contractors should designate persons to ensure implementation of the ECOP during the entire construction period.
- Construction workers should receive training on occupational and community health, and safety and environmental protection.
- Contracts must aware of core labor standards. In particular, child labor use is not allowed at construction sites, with a child being defined as a person under the age of 18⁸. A child under the age of 18 but over the age of 14 may be employed or engaged only if the work is not hazardous and it does not interfere with the child's education and is not harmful to the child's health or physical, mental, spiritual, moral or social development. When children over the age of 14 are to be employed, the employer should conduct an appropriate risk assessment before work commences and conduct regular monitoring of health, working conditions, and hours of work.
- Prior to commencing civil works contractors should communicate with the public in the vicinity of offices to inform them of the scope and timing of civil works and the mitigation measures to be taken. The contractor should provide a contact person and phone number so that the public is able to make complaints and offer suggestions. All opinions and questions from the public should be recorded, and timely answers given to questions raised by the public.
- Respective DSW and contractors should conduct a joint inspection in and around office sites prior to commencement of civil works to identify site-specific measures to be implemented during civil works. Aspects to be considered are important vegetation and trees within the office site and vicinity, potential to cause significant impacts on surrounding residences, proximity of hospitals and pagodas that might be affected by civil works noise and dust, deterioration of quality of nearby water bodies, and disruption of municipal services.
- Construction sites should be clearly marked and enclosed with temporary fencing and barriers to ensure both worker and public safety. Site access should be restricted to workers and warning signs displayed to inform the public of hazards.

⁸ ILO. 1976. Convention Concerning Minimum Age for Admission to Employment. Minimum Age Convention No. 138, International Labor Organization, Geneva.

- If municipal services such as water and electric power need to be interrupted due to civil works, notice should be given at the construction site and to affected residents, indicating the duration of service interruption.
- For any non-minor environmental or human health impacts arising from failure to comply with measures specified in the ECOP the contractor must respond in a timely manner, including immediately taking corrective measures, informing the management and supervisory units, recording the incident, and formulating preventative measures to avoid the reoccurrence of similar incidents.

ANNEX: Environmental Codes of Practices for Office Civil Works

TOPIC	Potential Impacts/ Issues	MITIGATION MEASURES	Monitoring Requirement	Budget	Responsibility for Mitigation	Responsibility for Monitoring and Supervision
Pre-Construction Phase						
General Conditions	Notification and good practice commitments	<ul style="list-style-type: none"> – Notify local authorities including municipal of planned civil works. – Acquire all required construction permits. – Post public notifications at accessible locations, including the site of planned civil works. – Carry out all work in a safe and orderly manner designed to avoid or minimize impacts on neighboring residents and the environment. 	Before construction	Construction cost	Staff at District DSW and Contractor	Union and State/ Region DSW
Natural Habitat	Protection of natural habitat	<ul style="list-style-type: none"> – All recognized natural habitats in the immediate vicinity of a construction site should not be damaged or exploited. – For large trees in the vicinity of construction, mark and cordon off with a fence and protect their root systems. In general, avoid any unnecessary damage to trees. – Adjacent wetlands and streams should be protected from construction site run-off, with appropriate erosion and sediment control features. <p>There should be no borrow pits, quarries or waste dumps in adjacent areas.</p>	Before land preparation	Construction cost	Contractor, Municipal	Union and Respective DSW
Physical Cultural Heritage	Historical structures and artifacts, and chance finds	<ul style="list-style-type: none"> – If an office building is, very close to a designated historical structure, or located in a designated historical district, notify and obtain permissions from responsible authorities. – Ensure that provisions are put in place so that artifacts or other possible chance finds encountered during 	Before land preparation	Construction cost	Contractor	Union and Respective DSW

Environment al Quality Control	Dust / air quality	<ul style="list-style-type: none"> - Utilize existing roads on and off site for construction vehicle movements. - Keep roads and paths free of debris to minimize dust. - Cover construction materials storage areas. - Suppress dust around construction site through regular water spraying and/or installation of dust screen enclosures. - Do not permit open burning of construction and other waste materials on site. - Regularly maintain construction vehicles and machinery to minimize air emissions. - Discourage excessive idling of construction vehicles on site. - Cover materials while being moved in construction vehicles off site. 	Everyday	Construction cost	Contractor, Municipal	Union and Respective DSW
Environment al Quality Control	Noise	<ul style="list-style-type: none"> - Construction noise should be limited to times agreed to in construction permits, but should generally only occur between 08:00 and 18:00. - Choose construction machinery and equipment with low noise levels if utilizing. - During operations generators, air compressors and other powered mechanical equipment should be shielded, and equipment placed as far away from residential areas as possible. - Regularly maintain construction vehicles and machinery to avoid noise emissions. - Minimize construction vehicle speeds and use of horns. 	Everyday	Construction cost	Contractor, Municipal	Union and Respective DSW
	Water pollution	<ul style="list-style-type: none"> - Establish control measures such as hay bales and/or silt fences to prevent waste water from moving off site and impacting receiving waters. - Before being discharged to municipal sewers, waste water should be treated (e.g. removal of particulate matter and petroleum, pH adjustment) in order to meet the minimal quality criteria set out by national guidelines on effluent quality. 	Everyday	Construction cost	Contractor, Municipal	Union and Respective DSW
	Sanitary facilities during construction	<ul style="list-style-type: none"> - Construction sites must be equipped with a toilet for workers. - Temporary toilets should be located at least 30 meters from existing wells or drinking water sources. 	Everyday	Construction cost	Contractor, Municipal	Union and Respective DSW

		<ul style="list-style-type: none"> Temporary toilets should be regularly emptied and removed at the completion of construction by a sanitary disposal provider. 				
Solid Waste Management	Waste management during construction	<ul style="list-style-type: none"> Construction wastes should be separated into general refuse, organic, liquid and chemical wastes by on-site sorting and stored in appropriate containers. Contractors should minimize waste generation. Construction waste should be collected and disposed properly off site to Municipal. Records of waste disposal should be maintained as proof of proper management. Whenever feasible contractors should reuse and recycle appropriate and viable materials. 	Everyday	Construction cost	Contractor, Municipal	Union and Respective DSW
Occupational and Community Health and Safety	Worker safety	<ul style="list-style-type: none"> Appropriate sign-posting of construction sites should inform workers of rules and regulations to be followed. Occupational health and safety training should be conducted regularly and reinforced by supervisory staff at construction sites. Workers' PPE should comply with industry good practice (i.e., always hard hats and safety shoes, and as needed protective masks, safety glasses, hearing protection, and harnesses). Contractors should adopt low noise equipment and reduce mechanical noise at construction sites. Contractors should ensure that any lighting of a construction site and its perimeter is sufficient to ensure the safety of workers and other pedestrians. Lighting should be located and orientated so as not to cause intrusion to adjacent residences or distract passing vehicles. 	Before and throughout construction	Construction cost	Contractor	Union and Respective DSW
	Traffic and pedestrian safety	<ul style="list-style-type: none"> Construction sites should be fully enclosed to protect the public and deter unauthorized entry. Temporary safety fences should be appropriately high above ground level. Contractors should put in place a traffic management system and conduct worker training to ensure safe public passage and to minimize traffic disruption by construction vehicles. Where reasonably practicable all loading and unloading of construction vehicles should be within the site boundary. Deliveries and collections should be scheduled to coincide 	Everyday	Construction cost	Contractor	Union and Respective DSW

		<p>with normal working hours.</p> <ul style="list-style-type: none"> – Access to and from construction sites should be organized to allow vehicles to enter and leave the site in a forward gear. When necessary a gate marshal should be deployed to ensure the safety of pedestrians using adjacent public footpaths. – Working hours should be adjusted to take into account local traffic patterns, avoiding major transport activities during school time and heavy road use times. – Contractors should ensure safe and continuous access to school buildings, office facilities, shops and residences. 				
Post-Construction Phase						
Sewage	Water quality degradation	<ul style="list-style-type: none"> – Sanitary toilet facilities – Locate source of drinking water as recommended meters away from sanitary toilet facilities 	Before construction Daily when office is used	Construction cost	Municipal	Union and Respective DSW

5. Public consultation

The public consultation on the safeguards document were done in Patheingyi of Ayeyawaddy Region, in Taunggyi, Lashio and Keng Tong of Shan State on Feb 1, March 13, 21, and 23, 2019 respectively. There were no changes made in ECOP after the consultations.