CAMBODIA

SHANTI VOLUNTEER ASSOCIATION (SVA)

NURTURING EARLY SKILLS THROUGH TECHNOLOGY (NEST) PROJECT

[JAPAN SOCIAL DEVELOPMENT FUND PROJECT]

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)

June 5, 2026

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Abbreviations and Acronyms

COVID-19	- Coronavirus Disease 2019
E&S	- Environmental and Social
ECE	- Early Childhood Education
ESCOP	- Environmental and Social Codes of Practice
ESCP	- Environmental and Social Commitment Plan
ESF	- Environmental and Social Framework
ESMF	- Environmental and Social Management Framework
ESMP	- Environmental and Social Management Plan
ESS	- Environmental and Social Standards
GBV	- Gender-Based Violence
GM	- Grievance Mechanism
LMP	- Labor Management Procedures
NEST	- Nurturing Early Skills through Technology
OHS	- Occupational Health and Safety
SEA	- Sexual Exploitation and Abuse
SEP	- Stakeholder Engagement Plan
SMC	- School Management Committee
SVA	- Shanti Volunteer Association
UXO	- Unexploded Ordnance
WASH	- Water, Sanitation and Hygiene

Executive Summary

The World Bank will be supporting Shanti Volunteer Association (SVA) in implementing the Nurturing Early Skills through Technology (NEST) project. The objective of the project is to enhance access and quality of Early Childhood Education (ECE) by promoting play-based learning through digital technology integration. The project will support the following activities: in-service teacher training; establishment of an ECE Digital Resource Platform; and communication campaigns for parental engagement; construction of 17 new preschool buildings with classrooms, toilets, and hand-washing stations; renovation of 43 existing classrooms; technology integration with PCs and smart TVs; implementation of school meal programs in 6 resource preschools.

The project activities will take place in three northwestern provinces of Cambodia: Battambang, Pailin, and Banteay Meanchey. The project targets 60 preschools across seven districts. Specific locations of construction activities have been identified through comprehensive field assessments conducted in May-June 2025, with all sites confirmed as suitable for implementation.

This Environmental and Social Management Framework (ESMF) has been prepared to identify the potential environmental and social risks and impacts of proposed Project activities and propose suitable mitigation measures to manage these risks and impacts. It maps out the Cambodia laws and regulations and the World Bank policies applicable to the Project, and describes the principles, approaches, implementation arrangements, and environmental and social mitigation measures to be followed.

The potential environmental and social risks for project activities are identified as:

- **Environmental risks:** Construction-related impacts including noise, dust, and waste generation; tree removal requirements at six schools; climate vulnerabilities including flood risks and heat stress; cultural heritage proximity requiring protection protocols and chance find procedure; UXO clearance certificates, and waste management challenges in rural areas.
- **Social risks:** Temporary disruption to educational services during construction; construction worker influx requiring community and school safety management; risks on occupational health and safety, relocate food venders from the construction site to a safe place within the school premise, potential exclusion of disadvantaged and vulnerable groups; and need for enhanced child protection measures during construction.

These risks will be managed and mitigated through the application of:

- **Environmental and Social Management Plans (ESMP)** for 17 new construction sites including site-specific mitigation measures for moderate risk locations
- **Environmental and Social Codes of Practice (ESCOPs)** for 43 renovation activities
- **Labor Management Procedures (LMP)** including worker codes of conduct and GBV/SEA prevention measures
- **Stakeholder Engagement Plan (SEP)** with comprehensive grievance mechanisms
- **Cultural Heritage Chance Finds Procedures (CFP)** for one construction school in Srah Chik, Banteay Meanchey

Implementation Arrangements. SVA will establish a project implementation team (PIT) and coordinate project activities, including day-to-day implementation, coordination, supervision, and overall management. SVA will assign a dedicated E&S specialist at national and focal point at field levels to oversee ESMF implementation. District Offices of Education will provide oversight and support at the provincial level. School Management Committees and Commune Councils will participate in construction monitoring and community engagement. Training will be provided to all parties responsible for implementing the ESMF, including contractors. The total estimated budget for ESMF implementation is approximately **USD 32,220**.

Monitoring. SVA E&S specialist will be responsible for monitoring through monthly site visits, quarterly reporting from field staff, and community feedback mechanisms. The bi-annual monitoring report will be prepared and submitted to the World Bank by SVA.

A separate **Stakeholder Engagement Plan** (SEP) has been prepared for the Project, based on the World Bank's Environmental and Social Standard 10 on Stakeholder Engagement. The SEP includes comprehensive consultation protocols and a project-wide grievance mechanism.

1. Introduction

This Environmental and Social Management Framework (ESMF) is developed to support the environmental and social due diligence provisions for activities financed by Japan Social Development Fund and managed by the World Bank in the Nurturing Early Skills through Technology (NEST) project. The project will support enhancing access and quality of Early Childhood Education through digital technology integration and infrastructure development in three northwestern provinces: Battambang, Pailin, and Banteay Meanchey. Shanti Volunteer Association (SVA) will be implementing the Project activities.

This ESMF follows the World Bank Environmental and Social Framework (ESF) as well as the national and local laws and regulations of Cambodia. The objective of the ESMF is to assess and mitigate potential negative environmental and social risks and impacts of the Project consistent with the Environmental and Social Standards (ESSs) of the World Bank ESF and national requirements. More specifically, the ESMF aims to (a) assess the potential environmental and social risks and impacts of the proposed Project and propose mitigation measures; (b) establish procedures for the environmental and social screening, review, approval, and implementation of activities; (c) specify appropriate roles and responsibilities, and outline the necessary reporting procedures, for managing and monitoring environmental and social issues related to the activities; (d) identify the staffing requirements, as well as the training and capacity building needed to successfully implement the provisions of the ESMF; (e) address mechanisms for public consultation and disclosure of project documents as well as redress of possible grievances; and (f) establish the budget requirements for implementation of the ESMF.

This ESMF that includes Environmental and Social Management Plans (ESMP), Environmental and Social Codes of Practice (ESCOP), the Labor Management Procedures (LMP), the Occupational Health and Safety (OHS) procedure, and Cultural Heritage Chance Find Procedure should be read together with other plans prepared for the NEST project, including the Stakeholder Engagement Plan (SEP), the Environmental and Social Commitment Plan (ESCP),.

2. Project Description

The project comprises two main components:

Component 1: Enhance ECE Service Delivery Quality

> **Sub-component 1.1:** Provision of in-service teacher training for principals and teachers to enhance knowledge and skills in ECE, especially play-based learning methods and digital technology integration.
>
> **Sub-component 1.2:** Setting up an ECE Digital Resource Platform as a centralized repository of early childhood education resources to enhance teacher capacity.
>
> **Sub-component 1.3:** Communication Campaign to raise awareness on parenting and early learning targeting parents and communities.

Component 2: Expand Access to Quality Early Childhood Education

Sub-component 2.1: Enhancing the physical learning environment through construction of 17 new preschool buildings with classrooms, toilets, and hand-washing stations, as well as renovation of 43 existing classrooms across the three target provinces. Each new preschool building will include 3-5 classrooms, separate toilets for boys and girls, hand-washing stations, and outdoor play areas. Integrating technology into play-based learning activities by equipping preschools with essential technology tools including PCs and smart TVs to access digital learning resources and the centralized ECE Digital Resource Platform.

Sub-component 2.2: Providing School Meal Program implementation in 6 preschools that serve as resource preschools, including kitchen facilities and dining areas.

The project targets 60 preschools across seven districts in the three northwestern provinces, directly benefiting approximately 9,500 children aged 3-5 years, teachers, and parents. Physical interventions include construction of 17 new preschool buildings and renovation of 43 existing classrooms with technology integration and educational support programs.

SVA will coordinate project activities, including day-to-day implementation, coordination, supervision, and overall management of project activities. SVA will work closely with District Offices of Education, Commune Councils, and School Management Committees to ensure effective implementation and community ownership.

3. Environmental and Social Policies, Regulations, and Laws

3.1 Cambodia Legal Framework

Cambodia's legal framework for environmental and social management has evolved significantly since the 1990s, establishing comprehensive regulatory structures for development projects. The legal system encompasses environmental protection laws, labor regulations, education sector governance, and social protection measures that directly apply to infrastructure development projects like NEST.

The Ministry of Environment serves as the primary regulatory authority for environmental compliance, while the Ministry of Labor and Vocational Training oversees worker protection and safety standards. The Ministry of Education, Youth and Sports governs education sector activities, which establishes standards for school construction and educational service delivery.

The framework emphasizes participatory approaches to development, non-discrimination principles, and environmental sustainability. For projects involving construction and renovation activities such as NEST, compliance with multiple regulatory instruments is required, including environmental assessment procedures, labor protection standards, and education infrastructure requirements. The legal framework also incorporates international commitments on child rights, environmental protection, and labor standards that Cambodia has ratified.

Table 1: Cambodia Relevant Legal Framework

Law	Description and Relevance to Project Activities
Law on Construction, 2019	All building or demolition works shall have prior permission by the competent authority. Applies to all target schools prior to construction or demolition activities.

Sub-decree No. 36 on Solid Waste Management, 1999	Establish guidelines on disposal, collection, transport, storage, recycling, minimizing, and dumping of household waste in provinces and cities. Applies to daily solid waste generation and disposal during construction and operation
Sub-decree No. 27 on Water Pollution Control, 1999	Applies to all sources of pollution and all activities that cause pollution of the public water areas. Applies to daily wastewater discharge from toilet and kitchen during construction and operation
Sub-decree No. 42 on Control of Air Pollution and Noise Disturbance, 2000	Regulate air and noise pollution from mobile and fixed sources through monitoring, curbing and mitigating activities to protect the environmental quality and public health. Applies during demolition and construction activities.
E-Waste Management	No specific legislation – Applies to all electrical devices
Law on Water Resources Management (2007)	Regulates water use and wastewater discharge. Applies to WASH facilities and construction activities near water bodies.
Law on Forestry (2002)	Regulates tree removal and forest resource management. Relevant for projects requiring tree removal at construction sites.
Labor Law (1997)	Establishes working conditions, occupational health and safety standards, and worker rights. Applies to all construction workers and project staff.
The Prakas No. 106 on the Prohibition of Hazardous Child Labor (2004)	Minimum age for Hazardous Work is 18 years include construction and demolition works
Law on Education (2007) and Education Strategic Plan	Governs education sector development and school construction standards. Applies framework for preschool education and infrastructure requirements and School Based Management (SBM)
Law on Protection and Promotion of the Rights of Persons with Disabilities, 2009	Protect and promote the rights of persons with disabilities include development of programs for physical and mental rehabilitation. Applies to all children with disabilities through universal design and construction
Law on the Protection of Cultural Heritage, 1996	In case of chance find of a cultural property during construction, require stopping the work and report to local police. Applies to Srah Chik preschool.
Law on protection of domestic violence, 2005 and Criminal Code (2009)	Prohibits sexual exploitation, abuse, and violence against children. Establishes legal framework for child protection during project implementation. Applies to all construction workers and project staff.
Constitution of Cambodia (1993)	Prohibits discrimination and guarantees equal rights. Ensures non-discrimination in project benefits and employment. Applies to all construction workers and project staff.

3.2 National Environmental and Social Assessment and Permitting

The Ministry of Environment is the public authority responsible for managing environmental assessments and permitting in Cambodia. The Environmental Impact Assessment review and approval process requires project proponents to submit environmental assessment reports for review based on project scale and potential impacts.

Prakas No. 3591, issued in May 2025 in which replaces the previous Prakas No. 21 (2020), redefines the classification of development that require environmental assessment based on the severity of a project's environmental and social impacts. This new Prakas classifies development projects into three document requirements—Environmental Protection

Agreement (EPA), Initial Environmental Impact Assessment (IEIA), and Full Environmental Impact Assessment (FEIA).

Table 2: Classification of the Environmental Assessment for Development Project

No.	Types of Project	*C*lassification of the Environmental Impact Assessment (EIA)		
		Full EIA	**Initial EIA**	**EPC[1]**
1. Infrastructure Sector				
219	All building constructions (construction buildings, office, mixed use, commercial, condo, Borey, row and villa houses, supermarket and mall, and others)	Floor area > 45,000 m^2	Floor area > 15,000 – 45,000 m^2	Floor area > 3,000 – 15,000 m^2

Source: Prakas No. 3591 on the Classification of the Environmental Impact Assessment for Development Project, 2025

For the NEST project, all construction activities have floor area of less than 3,000 m^2, therefore, no requirement for any kind of environmental assessment and management. However, construction permit is required under the Law on Construction (2019) using the procedure of the Ministry of Land Management, Urban Planning, and Construction.

3.3 World Bank Standards and Key Gaps with the National Framework

The project will follow the World Bank Environmental and Social Standards (ESSs), as well as the World Bank Group Environmental, Health and Safety Guidelines. Based on these policies, the environmental and social risk of the project is categorized as **Moderate Environmental Risk** and **Low to Moderate Social Risk**. The environmental risk classification reflects construction-related impacts, tree removal requirements, and climate vulnerabilities. The social risk classification considers temporary educational disruption, construction worker management needs, and vulnerable group inclusion requirements.

Table 3: Relevant World Bank ESSs

E&S Standard	Relevance
1. Assessment and Management of Environmental and Social Risks and Impacts	ESS1 is relevant for the project because project activities are expected to pose moderate environmental and social risks, including construction impacts, waste management, climate vulnerabilities, and community safety issues requiring comprehensive management frameworks.
2. Labor and Working Conditions	ESS2 is relevant for the project because there are labor risks for project workers including (i) occupational health and safety risks during construction, (ii) need for adequate terms and conditions of employment, (iii) worker influx management, (iv) prevention of child labor and forced labor, and (v) UXO clearance required.
3. Resource Efficiency and Pollution Prevention and Management	ESS3 is relevant due to construction, demolition, and renovation activities generating construction and solid waste, dust, and noise, requiring proper management protocols and resource efficiency measures.

1 EPC means Environmental Protection Contract

4. Community Health and Safety	ESS4 is relevant because construction activities may pose risks to community members, including construction site safety, traffic safety, and potential for communicable disease transmission and GBV, SEA/SH requiring comprehensive safety protocols.
6. Biodiversity Conservation and Sustainable Management of Living Natural Resources	ESS6 is triggered due to tree removal requirements at six construction sites, requiring comprehensive tree replacement programs and biodiversity impact mitigation.
8. Cultural Heritage	ESS8 is relevant due to the proximity of one school to cultural heritage sites and potential for chance finds during excavation requiring cultural heritage protection protocols
10. Stakeholder Engagement and Information Disclosure	ESS10 is relevant for all projects given the need to engage with beneficiaries and stakeholders on development activities that affect their lives, including comprehensive consultation and grievance mechanisms.

4. Potential Environmental and Social Risk and Impacts and Mitigation Measures

This section lists relevant subproject activities and their potential environmental and social risks and impacts, along with standard mitigation measures and processes expected to be applied.

Table 4: Environmental and Social Risks and Mitigation Measures

Subcomponent Activity	**Risks and Impacts**	**Mitigation Measures**
Construction of 20 new preschool buildings	**Environmental:** - Construction noise, dust, and waste generation - Tree removal at 6 sites - Soil disturbance - Potential impact on water resources **Social:** - Temporary disruption to nearby educational activities - Construction workers influx - Community safety risks - Occupational health and safety risks *SEA/SH*	- Apply Environmental and Social Management Plan (ESMP) with site-specific measures - Implement construction waste management protocols - Schedule construction activities to minimize educational disruption - Require 3:1 tree replacement ratio for removed trees - Implement proper construction site fencing and safety measures - Apply Labor Management Procedure (LMP) including worker codes of conduct Conduct community consultations before construction begins

Renovation of 40 existing classrooms	**Environmental:** - Construction dust, noise during school hours - Renovation waste generation - Potential asbestos exposure **Social:** - Temporary classroom relocation Minor disruption to educational activities-Occupational health and safety risks, SEA/SH	- Apply Environmental and Social Codes of Practice (ESCOPs) - Schedule renovation during school breaks where possible and avoid kids entering the renovation areas - Implement dust control measures - Proper disposal of waste renovation in accordance with the national regulations and World Bank Group Health and Safety Guidelines - Follow Asbestos management protocols if detected in accordance with the World Bank Group Health and Safety Guidelines Coordinate with schools for temporary classroom arrangements
Technology integration (PCs and smart TVs)	**Environmental:** - Electronic waste generation - Increased electricity consumption **Social:** - Digital divide concerns - Equipment security risks - Occupational health and safety risks	- Implement proper e-waste management and recycling protocols to be developed by ES specialist six months after the project effectiveness - Energy efficiency measures and sustainable electricity use - Ensure equitable access to technology across all student groups Implement equipment security and maintenance protocols as per manufacture guideline
School meal program implementation	**Environmental:** - Food waste generation - Kitchen wastewater **Social:** - Food safety and hygiene risks Dietary needs for religious minorities	- Implement food waste management and composting programs to be developed by SVA - Proper wastewater management for kitchen facilities and food preparation - Food safety training for meal preparation staff to be conducted by SVA - Regular health and hygiene monitoring
In-service training	**Environmental:** - Minor waste generation of paper and plastic bottles - Potential exposure to or spread of contagious diseases through community campaign **Social:** - Internet access barriers for remote teachers in online training - Temporary disruption of classes Technical assistance activities may pose downstream implications in both positive and negative ways.	- Promote paper and plastic waste reduction and provide waste bins at training venues - Provide internet access and mobile data support; offer technical assistance as needed - Coordinate schedules with schools and inform parents in advance of class suspensions - Follow the government's regulation to prevent spread of contagious diseases The in-service training will be conducted in accordance with terms of reference acceptable to the Bank, that are consistent with the ESSs. Submit the ToRs for technical assistance activities for the bank's prior review for No Objection to

		ensure that these activities are in consistent with the ESSs.
Community campaign	**Environmental:** - Minor waste generation - Potential exposure to or spread of contagious diseases through community campaign **Social:** - Information access barrier of the remote community - Participation constraints during seasonal farm work	- Promote waste reduction - Conduct outreach to the remote community with schools and SMCs - Align campaign timing with local farming calendars - Follow the government's regulation to prevent spread of contagious diseases

4.1 Risks and Mitigation Measures Specific to Vulnerable Groups

Disadvantaged and vulnerable groups in the project area include children with disabilities, children from poor families, children affected by migration, and Cham Muslim populations in Pailin province. These groups may face additional barriers to accessing project benefits and require targeted mitigation measures:

Specific Risks:

- Physical barriers preventing access for children with disabilities
- Economic barriers for poor families accessing enhanced ECE services
- Cultural barriers for Cham Muslim children
- Geographic isolation affecting remote communities

Targeted Mitigation Measures:

- Design accessible infrastructure complying with universal design principles
- Provide targeted outreach and support for vulnerable families
- Include cultural sensitivity training for teachers and staff
- Work with DOE to seek possible transportation support
- Ensure grievance mechanisms are accessible to all community groups

4.2 Planning and Design Considerations for Avoidance of Environmental and Social Risks and Impacts

Several measures will be implemented during project planning and design to avoid and minimize potential impacts:

Site Selection and Design:

- Select construction sites within existing school boundaries to avoid land acquisition
- Design climate-resilient infrastructure incorporating flood-resistant features and natural cooling
- Plan construction scheduling to minimize disruption to educational activities

- Incorporate WASH facilities and playground areas in all new constructions. A 3-cubic meters elevated water tank will be installed in every WASH facility provided.

Environmental Design Features:

- Include proper drainage systems for flood-prone areas, particularly toilet and pit latrine
- Design buildings with natural ventilation, cooling features, and maximize natural light
- Plan for proper waste management facilities and protocols
- Integrate tree planting and garden development for environmental benefits

Social Design Considerations:

- Ensure accessible design for children with disabilities
- Plan flexible classroom spaces to accommodate varying enrollment patterns
- Include community spaces for parent engagement activities
- Design culturally appropriate facilities respecting local customs

5. Procedures and Implementation Arrangements

5.1 Environmental and Social Risk Management Procedures

The environmental and social risk management procedures have been and will be implemented through the Project's school selection and implementation process, see Table 5 the project cycle and environmental and social management procedures.

Table 5: Project Cycle and E&S Management Procedures

Project Stage	E&S Stage	E&S Management Procedures
Assessment and Analysis: Subproject identification and site confirmation	Screening, partially done in Jun-July 2025	- Ensure all schools eligibility by referring to the Exclusion List in Table 6 - Use the E&S Screening Form to identify and assess potential environmental and social risks and impacts for 43 renovation schools - E&S screenings were conducted for 17 construction schools. If any target school change, the E&S screening will be conducted with the new location - Identify documentation, construction permits, and land title clearances required under Cambodia's law and regulations - Conduct Mine and UXO clearance for 17 construction sites
Formulation and Planning: Planning for subproject activities, including human and budgetary resources and monitoring measures	Planning, partially done	- Based on Screening Form, prepare relevant environmental and social procedures and plans - For new construction activities, prepared an ESMP with site-specific measures for moderate risk sites - For renovation activities, apply ESCOP and it was prepared - Submit the ESMP for 17 new construction schools and ESCOP for 43 renovation schools for World Bank prior review and no objection - Share ESMP/ESCOP contents with stakeholders and conduct consultations per SEP

		- Complete required construction permits and land title clearances - Train staff and contractors on E&S procedures, risks and impact identification and management
Implementation and Monitoring: Implementation support and continuous monitoring	Implementation	- Ensure implementation of plans through monthly site visits and regular field reporting - Track grievances and community feedback - Continue awareness raising and training for staff, contractors, and communities - Monitor construction quality and environmental compliance - Report incidents or accidents to World Bank within 48 hours - No discrimination against women in construction workforce
Review and Evaluation: Project completion and evaluation	Completion	- Assess effective implementation of E&S plans - Ensure proper site restoration and landscaping - Resolve any pending issues before project completion - Prepare completion report on E&S compliance

Table 6 provide exclusion list of activities that cause the Project activities to be excluded from selection.

Table 6: Exclusion List

Environmental Ineligibility Criteria:

- Located within areas that would have significant negative impacts on flora or fauna or the degradation of natural resources or habitats
- Requires large-scale clearing of primary forest or mature secondary forest
- Located in areas with high risk of natural hazards (severe flooding, landslides, etc.) without feasible mitigation
- Involves activities that could cause significant pollution or environmental degradation
- Requires use of large quantities of hazardous materials
- Located in areas with significant known air or water pollution that could impact student health
- Would cause irreversible environmental impacts that cannot be effectively mitigated
- Located in archaeological (prehistoric), paleontological, historical, religious, cultural and unique natural values.

Social Ineligibility Criteria:

- Requires involuntary land acquisition and resettlement
- Would require permanent physical and economic relocation of indigenous peoples and impact their rights, land, tradition, cultural sites.
- Would significantly restrict access to natural resources or cultural sites essential for livelihoods
- Located in areas with unresolved land disputes or conflicts
- Would exacerbate existing social conflicts or create new ones
- Located in areas with active armed conflict or significant security concerns
- Would involve activities that could induce significant influx of people to fragile areas
- Would result in significant adverse impacts on cultural heritage sites

Technical and Implementation Ineligibility Criteria:

- Technically infeasible or prohibitively expensive to implement safely
- Located in areas that would be inaccessible to students, particularly girls and children with disabilities
- Would require technologies or approaches beyond the capacity of implementing agencies
- Located in areas where operation and maintenance cannot be sustained
- Does not conform with MoEYS school construction standards and guidelines
- Duplicate existing services or facilities in the same community
- Economically non-viable considering student population and accessibility

Legal and Regulatory Ineligibility Criteria:

- Non-compliant with Cambodian laws and regulations
- Inconsistent with World Bank Environmental and Social Standards
- Land ownership or use rights cannot be legally secured
- Required permits and approvals cannot be obtained
- Located in areas with legal restrictions on development

If a proposed site or activity is found ineligible based on these criteria, alternatives will be considered, including:

- Alternative location that does not trigger ineligibility criteria
- Modified design or scale to avoid ineligibility factors
- Additional mitigation measures to address concerns
- Alternative approaches to meeting the same educational objectives

5.2 Technical Assistance

SVA may request technical assistance for studies, assessment, and training as required under the ESMF and the PAD. Carry out the consultations, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project, including, inter alia, the E&S instruments or plans to be supported under the TA in accordance with terms of reference acceptable to the Bank, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.

5.3 Contingency Emergency Response

Not required under this Project.

5.4 Implementation Arrangements

The implementation of environmental and social management measures under the NEST project requires a well-coordinated, multi-level institutional framework that leverages existing structures while establishing clear roles and responsibilities for all stakeholders. The implementation arrangement is designed to ensure effective oversight, quality control, and community participation throughout the project cycle.

SVA, as the implementing agency, will establish dedicated environmental and social management capacity at both national and field levels, working in close collaboration with government institutions, local communities, and private contractors. The arrangement emphasizes a participatory approach that engages School Management Committees and Commune Councils as key partners in project oversight and community engagement.

Clear reporting lines and communication channels will be established between all levels to ensure timely information flow, effective decision-making, and prompt response to any environmental or social issues that may arise. The framework also incorporates mechanisms for capacity building, technical support, and quality assurance to maintain consistent standards across all project sites. This multi-stakeholder approach ensures that environmental and social safeguards are not viewed as external requirements but are integrated into the project's operational culture and community ownership structures.

The multi-level institutional framework with clear roles and responsibilities are:

National Level - SVA Central Office: SVA will recruit a dedicated and qualified E&S specialist responsible for overall ESMF implementation oversight, quality control, technical support to field teams, and reporting to the World Bank.

Field Level - Provincial and District Offices: SVA field office in Battambang will designate a E&S focal point responsible for day-to-day implementation of E&S measures, site monitoring, community engagement, and contractor supervision.

Local Level - Schools and Communities: School Management Committees and Commune Councils will participate in construction monitoring, community consultations, and grievance handling. They will receive training on their roles and responsibilities.

Contractors: All contractors will be required to comply with ESMP, ESCOP, LMP provisions, and national legislation. This will be specified in contractor agreements, and contractors will receive mandatory training on E&S requirements.

Table 7: Implementation Arrangement

Level/Responsible Party	Roles and Responsibilities
SVA National Level (E&S Specialist)	- Provide oversight and quality control to field staff on E&S management - Review and approve Screening Form and the ESMP/ESCOP - Oversee implementation and monitoring of E&S measures - Compile progress reports and report to World Bank bi-annual - Train to staff at subnational levels and contractors on ESMF, ESMP and ESCOP implementation - Ensure bidding documents include all relevant E&S provisions
SVA Field Level (E&S Focal Point)	- Ensure project activities comply with Exclusion List - Complete Screening Forms and site-specific measures - Oversee daily implementation and monitoring of E&S measures - Report progress to national level monthly - Provide training to contractors and communities with the technical support from E&S specialist - Manage local contracting processes with E&S requirements
Local Contractors	- Comply with ESMP, ESCOPs, site-specific measures, LMP, and national legislation

	- Implement all E&S mitigation measures as specified in contracts - Protect health and safety, hygiene and proper shelter of workers and community members - Avoid, minimize, or mitigate environmental harm from activities - Report incidents and accidents immediately to the project

5.3 Proposed Training and Capacity Building

Successful implementation of the NEST project will depend on the effective implementation of environmental and social risk management measures outlined in this ESMF. Training and capacity building are essential components to ensure all stakeholders understand their roles and responsibilities in managing environmental and social risks throughout the project cycle. The training approach follows a cascading model where knowledge and skills transfer from the World Bank to SVA national staff, then to field staff and contractors, and finally to community members and local stakeholders.

This multi-tiered approach ensures comprehensive coverage while building local capacity for sustainable project implementation. The training program addresses both technical aspects of environmental and social management and broader awareness raising on community safety, worker rights, and stakeholder engagement. Special attention is given to vulnerable groups to ensure they can meaningfully participate in project oversight and benefit from project activities. Training will be integrated into regular project operations and will be ongoing throughout the implementation period, with refresher sessions as needed. The program emphasizes practical, hands-on learning approaches adapted to different stakeholder groups' needs and literacy levels.

Table 8: Proposed Training and Capacity Building Approach

Level	Responsible Party	Audience	Topics/Themes
National and Field Level	SVA E&S specialist	PIT[2] responsible for ESMF implementation	- ESMF approach and E&S risk identification - ESMP and ESCOP application - E&S monitoring and reporting - Incident and accident reporting - LMP application including Code of Conduct and GBV/SEA prevention - SEP implementation including community engagement and consultation - Grievance mechanisms and complaint handling
Community and school Level	SVA E&S specialist and PIT	Local contractors, SMC members, parents, school principals and teachers	- Construction safety and personal protective equipment - Community health and safety and child protection measures - Worker Code of Conduct and GBV/SEA prevention - COVID-19 mitigation measures - Environmental protection during construction and waste management - Grievance redress procedures - Project benefits and activities

2 Project Implementing Team

Note: There will be two separate trainings at community and school level: one for SMC, school administrators, and parents' representative and another for contractors and workers

5.4 Estimated Budget

The following table lists estimated cost items for the implementation for the ESMF, which have been included in the overall project budget.

Table 9: ESMF Implementation Budget

Activity/Cost Item	Estimated Cost (USD)
Training for SVA staff at World Bank	No cost
Environmental and social monitoring and compliance with corrective actions	10,000
SEP and ESMF/ESMP/ESCOP implementation budget, including training to SMC, contractor and workers	20,220
External monitoring and supervision, if required	2,000
TOTAL	**32,220**

6. Stakeholder Engagement, Disclosure, and Consultations

A separate Stakeholder Engagement Plan (SEP) has been prepared for the Project, based on the World Bank's Environmental and Social Standard 10 on Stakeholder Engagement. The SEP includes comprehensive stakeholder mapping, consultation protocols, and grievance mechanisms accessible to all project stakeholders. The SEP can be found on SVA's website and local disclosure locations.

This ESMF, along with the SEP and Environmental and Social Commitment Plan (ESCP), has been disclosed for stakeholder consultations on SVA's website (https://sva.or.jp/english/news/cambodia250718/) and at District Education Offices in July 2025. Consultations were conducted with key stakeholders including District Education Directors, Commune Councils, School Management Committees, parents, and vulnerable community representatives during field E&S screening and assessment in May and June 2025 and again in July 2025 during the disclosure of the draft ESMF (including the ESMP and ESCOP) and SEP and received feedback from the participated stakeholders.

Key Findings from Combined Consultations: The comprehensive consultation process revealed unanimous community support for project implementation across all 24 target locations, with 100% willingness expressed for participation in construction oversight and quality monitoring. Environmental and social risk assessment identified overall moderate environmental risk and low to moderate social risk, with 12 schools (50%) classified as Low Risk, 6 schools (25%) as Low-Moderate Risk, and 6 schools (25%) as Moderate Risk, with no schools requiring exclusion due to substantial or high risk. Key environmental concerns included tree removal requirements (with 1:3 replacement ratio accepted), construction-related impacts, cultural heritage proximity particularly in Sras Chik preschool, and climate vulnerabilities. Social risks primarily involved temporary economic displacement, construction worker influx, and vulnerable group access challenges. The consultations identified vulnerable populations including children with disabilities (4-30 per commune across 70% of locations), poor families facing transportation and material cost barriers, migration-affected children (particularly significant in Ponley with 20% population and O Andaung with 337 migrants), and Cham Muslim communities requiring cultural sensitivity considerations including halal

meal options and appropriate dress codes. Strong advocacy emerged for gender equity, with communities requesting increased female workforce participation from 15% to 30% in construction activities and enhanced capacity building programs for teacher training beyond planned classroom-to-teacher ratios.

Critical Issues and Stakeholder Feedback Integration: Several critical implementation challenges were consistently identified across both consultation phases, including the need for enhanced formal grievance mechanisms as 75% of locations currently rely on informal reporting systems, budget constraints limiting responses to community requests for additional classrooms beyond the planned 3-room standard, and administrative clearances required for land tenure, cultural heritage compliance, and construction coordination with concurrent government projects. Technical feedback integration included requests for electric lighting in classrooms to address visibility during rainy weather, standardization of 3-cubic-meter water tanks based on local supplier compatibility, kitchen location optimization considering waste management and odor control, and accommodation of water infrastructure installation preferences between horizontal and vertical mounting. Cultural sensitivity requirements emerged prominently for Islamic communities in Pailin, necessitating appropriate meal program arrangements and culturally responsive engagement approaches.

Follow-up Actions and Recommendations: Immediate actions prioritized include expediting land tenure clearances with the Office of Cadastral, incorporating stakeholder feedback on lighting and infrastructure design, and developing concrete mechanisms to achieve the requested increased female workforce participation up to 30% of the workforce. Implementation recommendations focus on establishing robust community monitoring frameworks leveraging the demonstrated 100% willingness for oversight participation, formalizing post-project sustainability agreements with commune councils for meal program continuation, implementing specialized engagement strategies for vulnerable groups including dedicated consultations for disability advocates, mobile outreach through ID Poor identification systems, and culturally appropriate methods for Islamic communities. The project committed to maintaining standardized communication approaches while ensuring site-specific adaptations to address local conditions, developing comprehensive grievance mechanisms accessible through multiple channels including verbal and written options with clear response timelines, and conducting ongoing consultation throughout implementation phases as outlined in the Stakeholder Engagement Plan. The combined consultation findings confirm strong community readiness for project implementation while establishing clear frameworks for addressing identified risks and maximizing community participation in project success.

All feedback has been incorporated into the final ESMF and related project documents. Ongoing consultations and engagement will continue throughout project implementation as outlined in the SEP. The contractors need to establish a separate workers GM to address immediate issues related to working conditions and issues.

The project grievance mechanism provides multiple channels for stakeholders to raise concerns, provide feedback, or submit complaints about project activities. The mechanism includes verbal and written complaint options, clear timelines for response, and appeals processes ensuring accessibility for all community members including vulnerable groups.

This ESMF will be updated as needed during project implementation to reflect any changes in project scope, new risks identified, or lessons learned from implementation experience. All updates will be conducted in consultation with stakeholders and with World Bank approval.

Annexes

Annex 1: Environmental and Social Screening Form

This is an example of a screening form. The objective of the screening form is to guide the Borrower in 1) assessing the various environmental and social risks and impacts that different sub-project activities will pose, and 2) selecting the right environmental and social management plans that will be applicable to those sub-project activities.

One of the key considerations is whether the sub-project activities can use pre-prepared management measures already included in the ESMF, such as the generic ESMP, ESCOPs, the simplified LMP or a OR whether sub-project activities require the preparation of site-specific management instruments.

The example screening form below goes through each ESS and asks the Borrower whether sub-project activities will result in certain key environmental and social impacts. Based on these, it instructs the Borrower which management plans to prepare and/or use. **You may find that for your specific project, there are additional risks that may need to be considered under different ESSs.**

The Screening Form is meant to exclude certain activities as well, for example, any activity that may pose significant or high risk, degrade critical habitats or involve physical displacement.

The E&S Screening procedure comprises of two stages-process: (1) Initial screening by using the **Exclusion List** in Table 5 of the ESMF; and (2) Screening the proposed activities to identify the approach for E&S risk management. This Screening Form is the second stage of screening process and is to be used for all subproject activities. The completed forms will be signed and kept in the Project ESF file. The World Bank may review a sample of the forms during implementation support visits. It will be used to screen 40 schools with renovation activities.

1. Subproject Information:

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

2. Environmental and Social Screening Questionnaires

Questions	Answer		Next Steps
	Yes	No	
ESS1			
1. Is the subproject likely to have significant adverse environmental impacts that are sensitive and unprecedented that trigger the 'Ineligible Activities' or other exclusion criteria?			If "Yes": Exclude from project.
Questions 2 and 3 below are examples. These two are critical questions in the Screening Form, as they will determine whether a sub-project can use pre-prepared ESCOPs included in Annex 2 or needs to prepare a site-specific ESMP. If all the sub-projects are expected to be low risk, then all sub-projects may be able to use the pre-prepared ESCOPs. However, if there are some sub-project activities, such as construction of community bridges, which may propose moderate risk, these may require site-specific ESMPs to be prepared. Think of the sub-project			

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

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

			2. Include E&S risk management measures in bidding documents.
13. Does the activity rely on existing infrastructure (such as discharge points) that is inadequate to prevent environmental impacts?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.
14. Is there any potential to have impact on soil or water bodies due to construction or renovation activities (e.g., fueling, and handling of hazardous materials such as fuels, oils, chemical..etc)			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.
ESS4			
15. Is there a risk of increased community exposure to communicable disease (such as COVID-19, HIV/AIDS, Malaria), or increase in the risk of traffic related accidents?			If "Yes": Apply LMP in Annex 4 and relevant measures in SEP.
16. Is an influx of workers, from outside the community, expected? Would workers be expected to use health services of the community? Would they create pressures on existing community services (water, electricity, health, recreation, others?)			If "Yes": Apply LMP in Annex 4.
17. Is there a risk that SEA/SH may increase as a result of project works?			If "Yes": Apply LMP in Annex 4.
18. Would any public facilities, such as schools, health clinic, church be negatively affected by construction?			If "Yes": Apply relevant measures based on the ESCOPs in Annex 2 (unless one of the other questions in the screening form raises specific environmental and social risks and requires a site-specific ESMP).
19. Will the subproject require the government to retain workers to provide security to safeguard the subproject?			If "Yes": Prepare a site-specific ESMP for the proposed subproject, including an assessment of potential risks and mitigation measures of using security personnel.
ESS5			
20. Will the subproject require the involuntary acquisition of new land (will the government use eminent domain powers to acquire the land)?4			If "Yes": Refer to and apply the project Resettlement Framework (RF).
21. Will the subproject lead to temporary or permanent physical displacement (including people without legal claims to land)?			If "Yes": Refer to and apply the project RF.
22. Will the subproject lead to economic displacement (such as loss of assets or livelihoods, or access to resources due to land acquisition or access restrictions)?			If "Yes": Refer to and apply the project RF.
23. Has the site of the subproject been acquired through eminent domain in the past 5 years, in anticipation of the subproject?			If "Yes": Refer to and apply the project RF.
24. Are there any associated facilities needed for the subproject (such as access roads or electricity transmission lines) that will require the involuntary acquisition of new land?			If "Yes": Refer to and apply the project RF.

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

25. Is private land required for the subproject activity being voluntarily donated to the project?5			If "Yes": Refer to and apply the project RF.
ESS6			
26. Does the subproject involve activities that have potential to cause any significant loss or degradation of critical habitats6 whether directly or indirectly, or which would lead to adverse impacts on natural habitats7?			If "Yes": Exclude from project.
27. Will the project involve the conversion or degradation of non-critical natural habitats?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.
28. Will this activity require clearance of mangroves?			If "Yes": Exclude from project.
29. Will this activity require clearance of trees, including inland natural vegetation?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Exclude from project if more that x hectares of tree and vegetation cutting is expected. 2. Include E&S risk management measures in bidding documents.
30. Will there be any significant impact on any ecosystems of importance (especially those supporting rare, threatened or endangered species of flora and fauna)?			If "Yes": Exclude from project.
ESS7			
31. Are there any Indigenous Peoples or Sub-Saharan African Historically Underserved Traditional Local Communities present in the subproject area and are likely to be affected by the proposed subproject negatively?			If "Yes": Prepare an Indigenous Peoples Plan OR Include the requirements of an Indigenous Peoples Plan in the SEP.
ESS8			
32. Is the subproject to be located adjacent to a sensitive site (historical or archaeological or culturally significant site) or facility?			If "Yes": Apply Chance Find Procedures in Annex 5.
33. Locate near buildings, sacred trees or objects having spiritual values to local communities (e.g. memorials, graves or stones) or require excavation near there?			If "Yes": Apply Chance Find Procedures in Annex 5.

3. Conclusion

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

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

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

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

E&S Risk Management Instruments	Yes	No	Remarks
Environmental and Social Management Plan (ESMP)			
Environmental and Social Codes of Practice (ESCOP)			
Resettlement Plan (RP)			
Chance Find Procedure			

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

Annex 2: Environmental and Social Management Plan (ESMP)

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

NEST Project: Construction of 17 New Preschool Buildings

Nurturing Early Skills through Technology (NEST) Project

Shanti Volunteer Association (SVA)
Cambodia

Prepared in accordance with World Bank Environmental and Social Standard 1 (ESS1) on Assessment and Management of Environmental and Social Risks and Impacts

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This Environmental and Social Management Plan (ESMP) provides comprehensive guidance for managing environmental and social risks and impacts associated with the construction of 20 new preschool buildings under the NEST project. Key environmental impacts include construction dust and noise, waste generation, tree removal at 6 sites, climate vulnerability in flood-prone areas, and potential cultural heritage and UXO risks requiring specialized clearance procedures. Primary social risks encompass construction worker influx management, child protection during construction activities, potential educational service disruption, vulnerable group inclusion challenges, and labor standards compliance.

The ESMP establishes a comprehensive mitigation framework including site-specific environmental protection measures, community-based monitoring through School Management Committees, worker codes of conduct with GBV/SEA prevention protocols, stakeholder engagement mechanisms, and grievance redress systems accessible to all community members. Implementation will be coordinated by Shanti Volunteer Association (SVA) with dedicated E&S specialist oversight. The ESMP integrates with other project safeguard instruments including the Environmental and Social Management Framework (ESMF), Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP), and Environmental and Social Commitment Plan (ESCP) to ensure compliance with World Bank Environmental and Social Framework standards and Cambodian national regulations throughout project implementation.

1. Subproject Information

Subproject Title:	**Construction of 17 New Preschool Buildings**
Estimated Cost:	USD 32,220 (ESMF Implementation Budget) + Construction costs (to be determined by contractor)
Start/Completion Date:	

2. Site/Location Description

The NEST project involves construction of 17 new preschool buildings across three northwestern provinces of Cambodia: Battambang, Pailin, and Banteay Meanchey. The construction sites are distributed across seven districts as follows:

- **Battambang Province:** Ek Phnom, Kaos Kralar, and Thmar Kaul districts
- **Pailin Province:** Krong Pailin and Sala Krav districts
- **Banteay Meanchey Province:** O Chreuv and Phnom Srok districts

Geographic and Environmental Context:

- **Climate:** Tropical monsoon climate with distinct wet (May-October) and dry (November-April) seasons
- **Topography:** Generally flat terrain with some areas prone to seasonal flooding, particularly in Ek Phnom and Kaos Kralar districts
- **Ecological Setting:** Rural agricultural landscape with scattered residential settlements
- **Infrastructure Access:** Sites accessible via existing road networks, though some locations experience transportation challenges during rainy season

Site-Specific Characteristics:

- **9 schools** classified as **moderate risk** due to factors including tree removal requirements, flood vulnerability, cultural heritage proximity, and topographical challenges
- **8 schools** classified as **low risk** with standard construction requirements
- All construction sites are located within existing school boundaries, avoiding land acquisition issues
- Sites confirmed through comprehensive field E&S screening conducted in May-June 2025

Note: Detailed site maps and location coordinates are maintained by SVA and available upon request.

3. Subproject Description and Activities

Each of the 17 new preschool buildings will include:

Building Infrastructure:

- **3-5 classrooms** per building (depending on site requirements)

- **Separate toilet facilities** for boys and girls with proper drainage systems and water availability
- **Hand-washing stations** with clean water supply
- **Kitchen and dining room facilities** for school meal programs
- **Outdoor playground areas** with safe play equipment

Associated Infrastructure:

- **Proper drainage systems** for flood-prone areas
- **Access roads** and pathways within school compounds
- **Fencing and security installations** for student safety
- **Utility connections** (electricity, water supply where available)
- **Waste management facilities** including proper disposal systems

Technology Integration:

- Installation of **PCs and smart TVs** for digital learning resources
- Connection to **ECE Digital Resource Platform**
- Electrical infrastructure to support technology equipment

Construction Phases:

1. **Site Preparation:** Land title and UXO clearance are required for all schools, temporary facilities setup.
2. **Foundation Work:** Excavation, foundation laying (driven pile construction for weak soil areas)
3. **Structural Construction:** Building framework, roofing, walls
4. **Finishing Work:** Interior fittings, WASH facilities, playground development
5. **Technology Installation:** Equipment setup and connectivity testing
6. **Landscaping:** Tree planting, garden development, site restoration

4. ESMP Matrix: Risk and Impacts, Mitigation, Monitoring

4.1. Pre-Construction Preparedness

Anticipated E&S Risks and Impacts	**Risk Mitigation and Management Measures**	**Impact Mitigation**	**Impact/Mitigation Monitoring**		
		Location/Timing/ Frequency/Responsibility	**Parameter to be monitored**	**Methodology, including location and frequency**	**Responsibility**
Unexploded ordinance	- Arrange any necessary clearance of UXO's from the construction site - Prior to construction work, Constructor, SVA, and School Management Committee will coordinate with mine clearing agencies on mine clearance - The contractor and School Management Committee will not start the civil works until all sites are confirmed to be cleared all UXO's - If UXO's are discovered during construction, the contractor must stop the civil works until UXO are removed	Pre-construction phase before site clearance **Responsibility:** Mine clearing agencies, Construction contractors, SVA, School Management Committee	Historical review, geophysical survey conducted, clearance certification issued	**Methodology**: - report on mine survey/clearance completion report **Location:** Construction sites and in school premise Frequency: Before construction or immediate after mine survey/clearance	SVA E&S Specialist and School management committee

Stakeholder Consultation	-Regular consultation with direct stakeholders at all stages of the project, according to SEP -Consultation with indirect stakeholders as needed, according to SEP - Update SEP regularly to reflect new or different stakeholders and new or different conditions - Assure all are aware of project GRM to report any problems, complaints, or suggestions. Make available posters and other media that explain the GRM process and rights of any complaints	Pre-construction. At project site, village and community areas, affected persons, and interested stakeholders before the construction **Responsibility:** MOEYS, SVA E&S Specialist and School management committee	consultations, meetings, communication products such as media and print materials, functionality of GRM	**Methodology:** - report on consultations, meetings, number of suggestions and complaints in GRM **Location:** At project sites, village and community areas and through communication methods	SVA E&S Specialist and School management committee, village and commune members and local authority
Land title and resettlement and construction permit	-Seek for construction permit from relevant authority -Screen for possible land and resettlement issues. Avoid if possible - If not possible to avoid, contact General Department of Resettlement (GDR) of Ministry of Economy and Finance (MEF) to prepare an Abbreviated Resettlement Action Plan (A-RAP)	Pre-construction. At construction sites **Responsibility:** MOEYS, SVA E&S Specialist and School management committee	Consultation record with local authority. Land title document. Construction permit certification.	**Methodology**: Review consultation reports, land titles, permit and other relevant documents. **Location:** Construction sites **Frequency:** Before construction or immediately after mine survey/clearance	SVA E&S Specialist and School management committee
Capacity on ES risks management	Provide trainings to SVA project staff and subnational focal points, SMC and community, and contractors and workers must be conducted prior to construction activities. Refer to subsection 5 below for the detail training	Pre construction **Responsibility:** SVA E&S Specialist	Training materials, and training events	**Methodology**: Report, training materials, training/capacity building **Frequency**: After project effectiveness and before construction	SVA E&S Specialist
Project Grievances, complaints, suggestions and Workers GRM	- Establish grievance redress mechanism by adopting from GEIP mechanism or establishing a new site specific one -Provide trainings to staff or relevant focal points on GM three months after the project effective date, refer to SEP for details - Need to establish a separate GM for workers prior to construction commencement.	Three months after project effectiveness or after contract sign (contractor) **Responsibility:** SVA E&S Specialist, MoEYS, Contractor (for workers GM)	Establishment of GRM	**Methodology** Assigned focal points and GM structure **Frequency:** three months after the project effective date or after contract sign (constractor)	SVA E&S Specialist and MoEYS Contractor (Workers GM)

4.2. During Construction Mitigation Measures

Environmental Risks and Impacts

Anticipated E&S Risks and Impacts	Risk Mitigation and Management Measures	Impact Mitigation	Impact/Mitigation Monitoring		
		Location/ Timing/ Frequency/ Responsibility	**Parameter to be monitored**	**Methodology, including Location and Frequency**	**Responsibility**
Construction Dust and Air Quality					
- Dust generation during excavation and construction activities - Potential respiratory health impacts on nearby communities and school children	- Water spraying during dust-generating activities - Use of dust barriers and covers for material storage - Schedule heavy dust activities during school breaks - Maintain construction equipment in good condition	All construction sites during construction phase **Responsibility:** Construction contractors	Air quality, dust levels, visibility	**Methodology:** Visual inspection, community feedback **Location:** Construction sites and nearby areas **Frequency:** Daily during construction	Construction contractor and school administrator
Construction Noise					
- Noise from construction machinery and activities - Disruption to nearby educational activities and community life	- Restrict noisy activities to daytime hours (7 AM - 6 PM) - Use low-noise equipment where possible - Schedule heavy machinery work during school breaks - Maintain equipment to reduce noise levels - Establish noise barriers where necessary	All construction sites, particularly during school hours **Responsibility:** Construction contractors, SVA E&S Specialist	Noise levels, complaints	**Methodology:** Sound level measurements, complaint tracking **Location:** Construction site boundaries **Frequency:** Weekly during construction	SVA field staff School principal and teachers
Waste Generation and Management					
- Construction and demolition waste - Potential soil and water contamination - Visual pollution and health hazards - Solid waste generation and disposal	- Implement waste segregation at source - Establish designated waste storage areas - Regular waste collection and proper disposal - Recycling of construction materials where possible - Hazardous waste management protocols	All construction sites throughout construction phase **Responsibility:** Construction contractors	Waste generation, disposal methods, site cleanliness	**Methodology:** Waste audit, visual inspection, disposal receipts **Location:** Construction sites and waste disposal areas **Frequency:** Weekly site inspections	SVA E&S Specialist School principal and teachers Local authorities
Tree Removal and Biodiversity Impact					
- Loss of existing vegetation and trees (6 schools affected) - Habitat disruption for local wildlife - Reduced environmental benefits - Increase heat due to loss of shading	- Minimize tree removal through careful site layout planning - Obtain permits for tree removal where required - Implement 3:1 tree replacement ratio - Plant native species appropriate to local climate - Establish tree maintenance program	6 schools requiring tree removal, pre-construction phase **Responsibility:** SVA	Tree removal numbers, replacement planting	**Methodology:** Tree inventory, photographic documentation, survival rate monitoring **Location:** Construction sites and replacement planting areas **Frequency:** Pre-construction survey, monthly during growing season	SVA E&S Specialist School principal and School Management Committee
Climate Vulnerability and Flood Risks					
- Flooding during construction and operation - Heat stress impacts on workers and future users - Storm damage to infrastructure	- Implement climate-resilient design standards - Install proper drainage systems and flood mitigation measures - Elevate buildings in flood-prone areas - Include natural ventilation and cooling features - Weather monitoring and early warning systems, if available at locals	Flood-prone areas (Ek Phnom,), throughout project lifecycle **Responsibility:** SVA, construction contractors, design team	Drainage effectiveness, flood incidents	**Methodology:** Weather monitoring, drainage inspection, incident reporting **Location:** Flood-prone construction sites **Frequency:** Daily during rainy season, monthly during dry season	SVA E&S Specialist Local authorities School Management Committees
Cultural Heritage Risks					

Anticipated E&S Risks and Impacts	Risk Mitigation and Management Measures	Impact Mitigation	Impact/Mitigation Monitoring		
		Location/ Timing/ Frequency/ Responsibility	**Parameter to be monitored**	**Methodology, including Location and Frequency**	**Responsibility**
- Potential damage to cultural heritage sites - Archaeological findings during construction	- Implement Chance Find Procedures for cultural heritage - Train workers on heritage chance find protocols - Immediate work stoppage if artifacts found - Coordinate with relevant authorities for clearance	All excavation sites, particularly areas with heritage proximity **Responsibility:** SVA, specialized clearance teams	Heritage findings completion	**Methodology:** Pre-construction surveys, work stoppage protocols, authority coordination **Location:** All excavation areas **Frequency:** Pre-construction clearance, immediate response to findings	Cultural heritage authorities SVA E&S Specialist

Social Risks and Impacts

Anticipated E&S Risks and Impacts	Risk Mitigation and Management Measures	Impact Mitigation	Impact/Mitigation Monitoring		
		Location/ Timing/ Frequency/ Responsibility	**Parameter to be monitored**	**Methodology, including Location and Frequency**	**Responsibility**
Construction Worker Influx and Community Safety					
- Influx of construction workers from other areas - Potential community safety and security risks - Risk of inappropriate behavior toward local community	- Implement Worker Code of Conduct including GBV/SEA prevention - Provide mandatory orientation for all workers on community interaction - Establish clear protocols for worker accommodation and behavior - Community liaison and regular consultation - Establish worker grievance mechanisms	All construction sites during construction phase **Responsibility:** Construction contractors, SVA	Worker conduct, community complaints, safety incidents	**Methodology:** Incident reporting, community feedback, regular consultations **Location:** Construction sites and surrounding communities **Frequency:** Weekly monitoring, immediate incident response	SVA E&S Specialist and Site engineer, Commune Women and Children Committee (CWCC) Local authorities, School principal
Child Protection and Safety					
- Construction site safety risks for children - Potential disruption to ongoing educational activities - Risk of child labor in construction activities	- Install proper construction site fencing and access control - Child labor prevention measures and monitoring - Safety briefings for school communities - Coordinate construction schedules with school activities - Emergency response protocols	All construction sites, particularly those adjacent to active schools **Responsibility:** SVA, construction contractors, SMC	Child safety incidents, access control effectiveness	**Methodology:** Site safety inspections, incident reporting, age verification procedures **Location:** All construction sites **Frequency:** Daily safety checks, immediate incident response	Construction contractors, SMC, SVA E&S Specialist and Site engineer, School principal Local authorities
Educational Service Disruption					
- Temporary disruption to teaching and learning - Noise and dust affecting classroom activities - Safety concerns affecting school operations	- Schedule disruptive activities during school breaks - Coordinate with school management on construction timing - Provide temporary alternative arrangements if needed - Maintain clear communication with parents and teachers	Construction sites adjacent to operating schools **Responsibility:** SVA, construction contractors, School principal	School attendance, educational quality indicators	**Methodology:** School attendance monitoring, teacher feedback, parent consultations **Location:** Schools adjacent to construction sites **Frequency:** Weekly during school term, monthly during breaks	District Education Office School Management Committees SVA project team
Vulnerable Group Access and Inclusion					
- Potential exclusion of children with disabilities	- Design accessible infrastructure (ramps, appropriate toilets)	All construction sites and	Vulnerable group participation,	**Methodology:** Enrollment data analysis, vulnerable	SVA E&S Specialist

Anticipated E&S Risks and Impacts	Risk Mitigation and Management Measures	Impact Mitigation	Impact/Mitigation Monitoring		
		Location/ Timing/ Frequency/ Responsibility	Parameter to be monitored	Methodology, including Location and Frequency	Responsibility
- Economic barriers for poor families - Geographic isolation affecting access - Cultural barriers for Islamic minorities	- Targeted outreach to vulnerable families - Transportation support coordination with authorities - Cultural sensitivity measures for Cham Muslim families - Flexible enrollment and support policies	surrounding communities **Responsibility:** SVA, local authorities, SMC and District Office of Education (DOE)	access barriers	household census, community consultations **Location:** Target communities **Frequency:** Quarterly monitoring, Bi-annual assessment	Commune Women and Children Committee Local authorities DOE
Labor and Working Conditions					
- Poor working conditions for construction workers - Unpaid wages and contractor abandonment - Occupational health and safety risks - Potential for forced labor or exploitative practices	- Implement Labor Management Procedures (LMP) strictly - Regular monitoring of working conditions and wage payments - Occupational Health and Safety (OHS) requirements - Worker grievance mechanisms - Contractor capacity assessment and monitoring	All construction sites throughout construction period **Responsibility:** Construction contractors, SVA	Working conditions, wage payments, safety incidents	**Methodology:** Workplace inspections, worker interviews, payroll verification, safety incident reporting **Location:** All construction sites **Frequency:** Weekly site visits, monthly contractor meetings	SVA E&S Specialist Commune Women and Children Committee Local authorities

Community Health and Safety

Anticipated E&S Risks and Impacts	Risk Mitigation and Management Measures	Impact Mitigation	Impact/Mitigation Monitoring		
		Location/ Timing/ Frequency/ Responsibility	Parameter to be monitored	Methodology, including Location and Frequency	Responsibility
Construction Site Safety					
- Risk of accidents involving community members - Inadequate site security and access control - Construction material and equipment theft	- Install adequate site fencing and security measures - Provide safety signage in local language - Control site access and visitor protocols - Regular safety inspections and maintenance - Emergency response procedures	All construction sites during active construction **Responsibility:** Construction contractors	Safety incidents, site security	**Methodology:** Daily safety inspections, incident reporting, community feedback **Location:** All construction site perimeters **Frequency:** Daily inspections, immediate incident response	Construction contractors SVA field staff Local security personnel
Traffic and Transportation Safety					
- Increased heavy vehicle traffic on local roads - Risk of accidents involving construction vehicles - Road damage from heavy machinery	- Develop traffic management plans for heavy vehicle access - Schedule heavy vehicle movements to avoid peak hours - Maintain construction vehicles in safe operating condition - Coordinate with local authorities on road use - Road repair and maintenance responsibilities	Construction sites with heavy vehicle access **Responsibility:** Construction contractors, local authorities	Traffic incidents, road conditions	**Methodology:** Traffic monitoring, accident reporting, road condition assessments **Location:** Access roads to construction sites **Frequency:** Weekly monitoring, immediate incident response	Construction contractors Local traffic police Community representatives School principal
Public Health Risks					
- COVID-19 and communicable disease transmission - Vector-borne disease risks from stagnant water	- Implement COVID-19 and communicable disease prevention protocols to be prepared by SVA, if necessary	All construction sites and surrounding communities	Disease incidents, health complaints	**Methodology:** Health screening records, disease surveillance, air	Local health authorities SVA E&S Specialist

Anticipated E&S Risks and Impacts	Risk Mitigation and Management Measures	Impact Mitigation	Impact/Mitigation Monitoring		
		Location/ Timing/ Frequency/ Responsibility	Parameter to be monitored	Methodology, including Location and Frequency	Responsibility
- Air quality impacts on respiratory health	- Regular health screening for workers - Eliminate stagnant water sources - Air quality monitoring and dust control - Coordinate with local health authorities	**Responsibility:** SVA, construction contractors, health authorities		quality measurements **Location:** Construction sites and nearby communities **Frequency:** Daily health checks, weekly environmental monitoring	Construction contractors

5. Capacity Development & Training

Training Requirements for Effective ESMP Implementation:

SVA Project Staff Capacity Building:

- **E&S Management Training:** World Bank ESF standards, ESMF/ESMP/ESCOP implementation, monitoring and reporting (SVA PIT and field staff)
- **Construction Oversight Training:** Technical supervision, quality assurance, safety protocols
- **Stakeholder Engagement Training:** Community consultation techniques, grievance handling, conflict resolution
- **Budget Allocation:** Covered under SVA operational budget
- **Trainer:** SVA E&S specialist

School Management Committee (SMC) and Community Representative Training:

- **Construction Oversight Training:** Community-based monitoring, quality assessment, safety protocols
- **Grievance Mechanism Training:** Complaint handling, escalation procedures, documentation
- **Child Protection Training:** Safety measures, reporting procedures, emergency response
- **Budget:** USD 3,000 (USD 50 per school × 60 schools) included in SEP budget
- **Trainer:** SVA E&S specialist and SVA project staff

Construction Contractor and Worker Training:

- **Environmental and Social Training:** ESMP requirements, environmental protection, waste management
- **Labor Management Training:** Worker rights, OHS requirements, code of conduct
- **Cultural Sensitivity Training:** Community interaction, local customs, heritage protection
- **GBV/SEA Prevention Training:** Awareness, prevention, reporting procedures
- **Budget:** USD 3,000 (USD 50 per school × 60 schools)
- **Trainer:** SVA E&S specialist and SVA project staff

Training Implementation Schedule:

- **Pre-Construction Phase:** SVA staff and SMC training (Month 1-2)
- **Construction Commencement:** Contractor and worker orientation (Month 2-3)
- **Ongoing Training:** Refresher sessions, new worker orientation (Monthly as needed)

6. Implementation Schedule and Cost Estimates

Implementation Timeline:

Phase	Activities	Timeline	Responsible Party
Pre-Construction	Land title and UXO clearance, site preparation, contractor selection, construction permit	Months 1-2	SVA, specialized contractors
	E&S training, stakeholder consultations, permit acquisition		
Construction Phase 1	Foundation work, utility installation	Months 2-4	Construction contractors
	Site-specific mitigation implementation		SVA oversight
Construction Phase 2	Building construction, WASH facilities	Months 4-10	Construction contractors
	Environmental monitoring, community engagement		SVA E&S Specialist
Completion Phase	Technology installation, landscaping, handover	Months10-12	SVA, contractors, SMC
	Final inspections, documentation, project closure		

ESMP Implementation Cost Estimates:

Activity/Cost Item	Estimated Cost (USD)	Funding Source
Environmental and Social Monitoring	$10,000	NEST Project Budget
- implementing corrective actions/mitigation measures		
- Environmental monitoring equipment and testing, if require		
Stakeholder Engagement Plan Implementation	$14,220	NEST Project Budget
- Community consultations and meetings		
- Grievance mechanism setup and maintenance		
- Communication materials and campaigns		
Training and Capacity Building		NEST Project Budget
- SMC and community oversight training	$3,000	
- Contractor and worker training	$3,000	
External Monitoring and Supervision	$2,000	NEST Project Budget
- Third-party construction quality monitoring		
- Environmental compliance verification		
TOTAL ESMP IMPLEMENTATION BUDGET	**$32,220**	**NEST Project**

Contractor Responsibilities (Cost to be included in construction contracts):

- Site-specific mitigation measures implementation

- Environmental protection measures (dust control, waste management)
- Worker safety equipment and protocols
- Cultural heritage and UXO response procedures
- Community safety measures and site security
- Ensure female participation in workforce (up to 30%)

Cost Monitoring and Control:

- **Monthly Budget Reviews:** SVA financial management with E&S Specialist input
- **Quarterly Reporting:** Cost tracking against planned activities and deliverables
- **Cost Overrun Management:** Contingency procedures and budget reallocation protocols

Note: This ESMP shall be implemented in conjunction with the project's Environmental and Social Management Framework (ESMF), Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP), and Environmental and Social Commitment Plan (ESCP). Regular updates to this ESMP may be required based on implementation experience and changing project conditions.

Annex 3: Standard Environmental and Social Codes of Practice (ESCOP)

ENVIRONMENTAL AND SOCIAL CODES OF PRACTICE (ESCOP)

NEST Project: Construction of 43 Renovation Preschool Buildings

Nurturing Early Skills through Technology (NEST) Project

Shanti Volunteer Association (SVA)
Cambodia

Prepared in accordance with World Bank Environmental and Social Standard 1 (ESS1) on Assessment and Management of Environmental and Social Risks and Impacts

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This Environmental and Social Codes of Practice (ESCOP) has been developed for the renovation activities at 43 schools under the Cambodia Early Childhood Education Digital Technology Integration Project (NEST). The renovation activities are classified as low environmental and social risk, involving minor infrastructure improvements, painting, equipment installation, and technology integration. This ESCOP provides specific, detailed, and tangible measures to mitigate potential impacts and ensure compliance with World Bank Environmental and Social Framework (ESF) standards.

Project Overview:

- **Project Component:** School renovation and equipment installation
- **Number of Schools:** 43 schools across Battambang, Pailin, and Banteay Meanchey provinces
- **Risk Classification:** Low environmental and social risk
- **Primary Activities:** Interior painting, fan installation, furniture provision, playground equipment, floor tiling, technology integration (PCs and smart TVs)
- **Implementation Period:** 2026-2027

Key ESF Standards Triggered:

- ESS1: Assessment and Management of Environmental and Social Risks and Impacts
- ESS2: Labor and Working Conditions
- ESS4: Community Health and Safety
- ESS10: Stakeholder Engagement and Information Disclosure

1. Introduction and Context

1.1 Project Background

The NEST project aims to enhance access and quality of Early Childhood Education (ECE) by promoting play-based learning through digital technology integration. The renovation component focuses on improving existing classroom facilities and integrating modern learning technologies across 43 schools in three northwestern provinces of Cambodia.

1.2 Scope of Renovation Activities

The renovation activities covered by this ESCOP include:

Interior Improvements:

- Wall painting and minor surface repairs
- Floor tiling installation where required
- Ceiling repairs and improvements
- Door and window maintenance

Equipment and Technology Installation:

- Installation of ceiling fans and electrical fixtures
- Mounting of smart TVs and educational displays
- Setup of computer workstations
- Installation of furniture (desks, chairs, storage units)
- Playground equipment installation

Minor Infrastructure Works:

- Electrical system upgrades for technology integration
- Minor plumbing repairs for handwashing stations

- Safety improvements (railings, non-slip surfaces)

1.3 Environmental and Social Risk Profile

Based on comprehensive field assessments conducted in May-June 2025, the 43 renovation schools have been classified as **low risk** with the following characteristics:

Environmental Risk Factors:

- Minimal construction activities
- No tree removal required
- Minor excavation or earth-moving activities
- Limited waste generation
- No impact on water bodies or sensitive ecosystems

Social Risk Factors:

- No land acquisition required
- Strong community support
- No Indigenous Peoples communities affected
- No cultural heritage sites impacted
- Minimal disruption to educational services

2. Environmental and Social Codes of Practice

2.1 General ESCOP Measures for All Renovation Activities

Issues	Environmental Prevention/Mitigation Measures	Responsible Party
1. Noise during Renovation	a) Plan activities in consultation with School Principal, School Management Committees (SMCs) and communities so that noisiest activities are undertaken during periods that will result in least disturbance (e.g., during school holidays, weekends, or after school hours). (Planning phase) b) Use hand tools and low-noise equipment when possible. Limit use of power tools to specific time periods agreed with school administration. (Implementation phase) c) Inform school administrators, teachers, and parents at least 48 hours in advance of any potentially noisy activities. (Implementation phase) d) Maintain equipment in good working condition to minimize noise generation. (Implementation phase)	Contractor/SVA Implementation Team
2. Air Quality during Renovation	a) Minimize dust from painting and surface preparation activities by using dust-free preparation techniques where possible. (Implementation phase) b) Avoid burning any renovation waste materials. All waste should be collected and disposed of at designated disposal sites. (Implementation phase) c) Use low-VOC (Volatile Organic Compound) paints and adhesives where available to minimize indoor air pollution. (Implementation phase) d) Ensure adequate ventilation during painting and installation activities. Open windows and doors when weather permits. (Implementation phase)	Contractor/SVA Implementation Team

	e) Schedule painting activities during dry weather conditions to reduce curing time and minimize odor impact. (Implementation phase)	
3. Solid Waste Management	a) Segregate renovation waste as recyclable, non-hazardous, and hazardous waste (if any). (Implementation phase) b) Collect, store, and transport renovation waste to appropriately designated/controlled dump sites approved by local authorities. (Implementation phase) c) Reuse materials where possible (e.g., furniture, equipment packaging for storage). (Implementation phase) d) Store paint cans, adhesives, and other materials in secured areas away from children and unauthorized access. (Implementation phase) e) Clean up all debris and waste materials daily during renovation activities. (Implementation phase) f) After each renovation is completed, ensure all areas are thoroughly cleaned and all debris is removed. (Post-Implementation phase)	Contractor/SVA Implementation Team
4. Health and Safety	a) When planning renovation activities, discuss safety measures with school principals to ensure children and staff safety. **Safety Considerations** (Planning phase)**:** - Work area isolation: Ensure renovation areas are properly isolated from active classrooms and common areas - Equipment safety: Secure all tools and equipment when not in use - Chemical safety: Proper storage and handling of paints, adhesives, and cleaning materials - Electrical safety: Ensure all electrical work meets local standards and is performed by qualified electricians b) Mandate the use of personal protective equipment (PPE) for workers as necessary (gloves, dust masks, safety glasses, appropriate footwear). (Implementation phase) c) Ensure adequate ventilation in work areas, especially during painting activities. (Implementation phase) d) Keep work areas clean and free of debris on a daily basis. (Implementation phase) e) Provide first aid kit and ensure at least one worker is trained in basic first aid. (Implementation phase) f) Secure work areas from public access, especially children, using temporary barriers or signs. Display warning signs at potentially unsafe locations. (Implementation phase) g) Ensure all electrical installations are performed by qualified electricians and tested before handover. (Implementation phase) h) Store all tools, chemicals, and equipment in locked storage areas when not in use. (Implementation phase)	Contractor/SVA Implementation Team
5. Water Quality and Conservation	a) Renovation activities should not affect the availability of water for drinking and sanitation purposes at schools. (Implementation phase) b) No renovation waste, paint residues, or cleaning materials should be disposed of in water bodies, drains, or school water systems. (Implementation phase) c) Use water-based paints where possible to minimize environmental impact. (Implementation phase) d) Clean brushes and equipment in designated areas with proper disposal of wash water. (Implementation phase) e) Repair any water leaks discovered during renovation activities. (Implementation phase)	Contractor/SVA Implementation Team

6. Community Engagement and Education Continuity	a) Coordinate with school administrators to minimize disruption to educational activities. Plan major renovation work during school breaks where possible. (Planning and Implementation phases) b) Engage School Management Committees (SMCs) in oversight of renovation activities. (Implementation phase) c) Maintain clear communication channels with teachers, parents, and students about renovation schedules and any temporary changes to school routines. (Implementation phase) d) Ensure at least one entrance/exit remains accessible during renovation activities. (Implementation phase) e) Coordinate with local authorities and commune councils as appropriate. (Planning and Implementation phases)	SVA Implementation Team/Contractor

2.2 Specific ESCOP Measures by Activity Type

2.2.1 Interior Painting and Surface Preparation

Specific Issue	Prevention/Mitigation Measures	Responsible Party
Paint Fumes and Indoor Air Quality	a) Use water-based, low-VOC paints where available. (Implementation phase) b) Ensure cross-ventilation in painted areas by opening multiple windows and doors. (Implementation phase) c) Schedule painting during periods when buildings are not occupied (weekends, holidays). (Planning phase) d) Allow adequate drying time before areas are reoccupied. Follow manufacturer's recommendations for safe preoccupancy. (Implementation phase) e) Post signs indicating wet paint areas and restricted access. (Implementation phase)	Contractor
Surface Preparation Waste	a) Use dust-free sanding techniques where possible or contain dust with plastic sheeting. (Implementation phase) b) Clean up dust and debris immediately after surface preparation. (Implementation phase) c) Dispose of old paint chips and preparation waste properly, especially if older buildings may contain lead-based paint. (Implementation phase)	Contractor

2.2.2 Equipment and Technology Installation

Specific Issue	Prevention/Mitigation Measures	Responsible Party
Electrical Safety	a) All electrical work must be performed by qualified, licensed electricians familiar with local electrical codes. (Implementation phase) b) Test all electrical installations before handover to ensure safety and functionality. (Implementation phase) c) Install appropriate circuit protection (circuit breakers, surge protectors) for technology equipment. (Implementation phase) d) Ensure proper grounding of all electrical installations. (Implementation phase) e) Label all electrical panels and switches clearly for future maintenance. (Implementation phase)	Qualified Electricians/ Contractor
Technology Equipment Handling	a) Handle all electronic equipment with care to prevent damage during transport and installation. (Implementation phase) b) Follow manufacturer's installation guidelines for all equipment. (Implementation phase)	Contractor/ SVA Technical Team

	c) Ensure adequate ventilation around electronic equipment to prevent overheating. (Implementation phase) d) Provide training to school staff on proper operation and basic maintenance of installed equipment. (Post-Implementation phase)	
Furniture Installation	a) Ensure all furniture meets appropriate safety standards for school use. (Implementation phase) b) Secure heavy furniture and equipment to prevent tipping hazards. (Implementation phase) c) Check that all furniture is age-appropriate and ergonomically suitable for intended users. (Implementation phase) d) Provide proper assembly and installation following manufacturer specifications. (Implementation phase)	Contractor

2.2.3 Minor Infrastructure Improvements

Specific Issue	Prevention/Mitigation Measures	Responsible Party
Floor Tiling Installation	a) Ensure proper substrate preparation to prevent future tile failure. (Implementation phase) b) Use non-slip tiles in areas prone to wetness (near handwashing stations). (Implementation phase) c) Allow adequate curing time before allowing foot traffic on new tile installations. (Implementation phase) d) Ensure proper grout sealing to prevent water infiltration and facilitate cleaning. (Implementation phase) e) Dispose of tile cutting waste and adhesive containers properly. (Implementation phase)	Contractor
Playground Equipment Installation	a) Follow manufacturer's safety guidelines for installation of all playground equipment. (Implementation phase) b) Ensure adequate clearance zones around equipment as specified by safety standards. (Implementation phase) c) Secure all equipment properly to prevent movement or instability. (Implementation phase) d) Inspect all equipment after installation to ensure safety and functionality. (Implementation phase) e) Provide installation documentation and maintenance instructions to school administrators. (Post-Implementation phase)	Contractor/SVA Implementation Team

3. Special Considerations for School Environments

3.1 Child Safety and Protection

Enhanced Safety Measures:

- All renovation areas must be clearly marked and secured to prevent unauthorized access by children
- Work schedules should minimize interaction between workers and students
- All tools and equipment must be secured when not in use
- Chemical storage must comply with child-safe practices
- Workers must be briefed on appropriate behavior and interaction with school community

3.2 Educational Service Continuity

Minimizing Disruption:

- Coordinate renovation schedules with school calendars to minimize disruption to classes
- Plan noisy activities during breaks, lunch periods, or after school hours
- Ensure alternative access routes remain available during renovation
- Maintain communication with school administration about daily work schedules
- Complete work in phases to avoid disrupting entire school operations

3.3 Cultural and Social Sensitivity

Community Engagement:

- Respect local customs and practices during renovation activities
- Engage with School Management Committees and parent associations
- Maintain cultural sensitivity in worker behavior and dress codes
- Respect school prayer or chanting times and religious observances

4. Capacity Building and Training

4.1 Contractor Training

Pre-Implementation Training:

- ESCOP requirements and compliance procedures
- Child protection and safeguarding measures
- Community engagement and cultural sensitivity
- Environmental and safety protocols
- Grievance mechanism procedures

Ongoing Training:

- Daily safety briefings
- Regular refresher training on ESCOP compliance
- Specific training for specialized activities
- Incident response procedures

4.2 School Management Committee Training

- ESCOP overview and community role
- Monitoring and oversight responsibilities
- Grievance mechanism utilization
- Safety awareness and child protection

The above training will be provided by SVA E&S specialist and project staff.

Annex 4: Labor Management Procedure (LMP)

LABOR MANAGEMENT PROCEDURES

Nurturing Early Skills through Technology (NEST) Project

Shanti Volunteer Association (SVA)
Cambodia

Prepared in accordance with World Bank Environmental and Social Standard 2 (ESS2) on Labor and Working Conditions

This LMP establishes comprehensive procedures for worker management, occupational health and safety, grievance mechanisms, and compliance with national labor legislation and World Bank standards. This LMP will be applied to all activities financed under the NEST project.

The objectives of the LMP are to (i) identify the different types of project workers that are likely to be involved in the project, (ii) identify, analyze and evaluate the labor-related risks and impacts for project activities, and (iii) provide procedures to meet the requirements of ESS 2 on Labor and Working Conditions, ESS 4 on Community Health and Safety, and applicable national legislation.

1. PROJECT LABOR USE

This LMP applies to all project workers, irrespective of contracts being full-time, part-time, temporary, or casual. The types of workers that will be engaged in the project include:

- **Direct Workers:** SVA staff including project managers, field coordinators, E&S specialist, education specialists, administrative personnel, and monitoring and evaluation staff employed directly by SVA for project implementation.
- **Contracted Workers:** Construction workers for new building construction, renovation for classroom upgrades, technology installation technicians, training facilitators, meal program staff, and other specialists hired through contractors and subcontractors.
- **Community Workers:** Community members who may volunteer or be compensated for activities such as construction supervision, school management committee participation, parent engagement activities, and community mobilization for awareness campaigns.
- **Primary Supply Workers[8]:** This category of workers will not be applied under the NEST project because construction materials and other educational equipment and materials will be purchased from local market NOT directly from the primary suppliers.

2. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

Occupational Health and Safety Risks associated with Construction and Renovation Activities:

- Working at heights during roofing and elevated construction
- Use of heavy machinery and construction equipment
- Exposure to construction dust, cement, and potential asbestos in renovation activities
- Risk of workplace injuries and accidents during building construction
- Handling of heavy materials and equipment
- Electrical work and wiring installation
- Equipment handling for smart TVs and computer systems
- Risk of electrical accidents

General Project Risks:

- Payment delays and non-payment issues (identified in previous projects in the region)
- Poor living conditions for migrant workers from other provinces
- Limited systematic occupational health and safety protocols
- Potential use of child labor or forced labor
- Sexual exploitation and abuse/sexual harassment (SEA/SH) risks
- Worker influx and community safety concerns
- Lack of female labor in some specific location

Specific Regional Risk Factors

8 'Primary suppliers' are those suppliers who, on an ongoing basis, provide directly to the project goods or materials essential for the core functions of the project.

- **Migrant Worker Conditions:** Field assessments revealed that migrant workers from other provinces often experience poor living conditions in temporary shelters, including containers and converted classrooms with shared sanitation facilities.
- **Seasonal Labor Constraints:** Agricultural seasons affect labor availability, particularly in rural areas.
- **Payment Issues:** Previous construction projects in Pailin province experienced isolated cases of unpaid or delayed payments by private contractors.
- **Limited OHS Implementation:** Local authorities report that construction companies generally do not follow comprehensive occupational health and safety standards.

3. RELEVANT NATIONAL LABOR LEGISLATION

Key Legislative Framework

- **Labor Law (1997):** Establishes working conditions, occupational health and safety standards, and worker rights. Applies to all construction workers and project staff.
- **Prakas No. 106 on the Prohibition of Hazardous Child Labor (2004):** Sets minimum age for hazardous work at 18 years, including construction and demolition works.
- **Constitution of Cambodia (1993):** Prohibits discrimination and guarantees equal rights, ensuring non-discrimination in project benefits and employment.
- **Law on Construction (2019):** Requires prior permission from competent authorities for all building or demolition work.
- **Criminal Code (2009) and Law on Protection of Domestic Violence (2005):** Prohibits sexual exploitation, abuse, and violence against children and establishes legal framework for protection.

Terms and Conditions Requirements

- **Wages:** Based on field assessments, prevailing daily wages in project areas are: (i) Unskilled workers: 35,000 KHR (approximately $8.75); (ii) Skilled workers: 45,000 KHR (approximately $11.25); and (iii) Chief skilled workers: 50,000 KHR (approximately $12.50)
- **Working Hours:** Maximum 8 hours per day, 48 hours per week as per Cambodian labor law, with provisions for overtime compensation.
- **Benefits:** Workers entitled to annual leave, sick leave, maternity leave, and social security benefits as per national legislation.

Occupational Health and Safety Requirements: National legislation requires:

- Safe working conditions and proper safety equipment
- Training on occupational health and safety
- Emergency response procedures
- Reporting of workplace accidents and occupational diseases
- Regular safety inspections and risk assessments

4. GENERAL APPLICABLE PROCEDURES

SVA and all contractors will apply the following guidelines:

Non-Discrimination and Equal Opportunity

- No discrimination in recruitment, hiring, compensation, working conditions, training, job assignment, promotion, termination, or disciplinary practices
- Harassment, intimidation, and exploitation will be prevented and addressed appropriately
- Special measures for vulnerable project workers will be provided
- Equal opportunities for women, ethnic minorities, and persons with disabilities
- Special measures of protection and assistance to remedy discrimination or selection for a particular job will not be deemed as discrimination

Employment Contracts and Terms

- All workers will receive written employment contracts with clear terms and conditions
- Contracts will specify rights related to hours of work, wages, overtime, compensation, benefits, annual holiday, sick leave, maternity leave, and family leave
- Code of Conduct provisions will be included in all contracts and to be signed off by all workers
- Age verification will be conducted for all workers to ensure minimum age compliance, ensure no person under the age of 18 shall be employed

Worker Recruitment and Management

- SVA will recruit contractors (construction companies) and the contractors are encouraged to hire local labor to the extent available
- Workers shall be recruited voluntarily with no coercion or force
- Special protection will be provided for vulnerable workers
- All workers will be informed of the Worker Grievance Mechanism upon recruitment

Monitoring and Compliance

- SVA will supervise and monitor compliance with all LMP requirements
- Regular site visits will be conducted to ensure adherence to labor standards
- Non-compliance issues will be addressed through corrective actions
- Serious violations may result in contract termination

5. CONTRACTOR MANAGEMENT PROCEDURES

Documentation and Requirements

- SVA will provide relevant LMP documentation to all potential contractors
- ESMF (ESMP/ESCOP), LMP, and related documents will be included in bidding specifications
- Contractors must demonstrate understanding and capacity to implement ESMF (ESMP/ESCOP) and LMP requirements

Contractor Qualifications

- Evidence of previous experience with similar projects
- Demonstration of OHS and emergency preparedness procedures

- Proof of worker management and grievance handling capabilities

Performance Monitoring

- Regular site visits to monitor environmental and social performance
- Use of contractor reporting and external monitoring consultants where available
- Documentation of compliance and non-compliance issues

Compliance Enforcement

- Payment withholding for significant non-compliance with LMP requirements
- Graduated penalties for repeated violations
- Contract termination for serious or persistent violations

Contractor Reporting

- Monthly reports on worker numbers, hours worked, and safety incidents
- Immediate reporting of serious accidents or violations
- Regular updates on grievance cases and resolution

SVA Oversight:

- Monthly compilation of contractor reports
- Quarterly LMP implementation reports to World Bank, upon request
- Incorporate LMP performance into bi-annual report to the World Bank

6. PROCEDURES FOR PRIMARY SUPPLIERS

Not applicable under the NEST project because construction materials and other equipment and materials will be purchased from local market NOT directly from the primary suppliers.

7. PROCEDURES FOR COMMUNITY WORKERS

Community Workers for the NEST project include:

- Community members participating in construction supervision
- School Management Committee members involved in project oversight (monitoring)
- Parent volunteers for awareness campaigns, if require
- Commune Council for Women and Children participate in grievance handling

Engagement Procedures

- **Community Consultation:** (i) Conduct community meetings to explain community worker opportunities, (ii) Document community agreement to participation terms and conditions, and (iii) Establish clear criteria for community worker selection
- **Terms and Conditions:** (i) Develop standard working times and remuneration systems, if require; (ii) Define methods and timing of payment, if require; (iii) Establish community worker Code of Conduct; and (iv) Ensure voluntary participation with no coercion

Capacity Building:

- Training on LMP requirements including SEA/SH prevention
- OHS training for community workers involved in construction oversight
- Grievance mechanism training and awareness

Ongoing Support:

- Regular supervision and support for community workers
- Access to project grievance mechanisms
- Recognition and appreciation for volunteer contributions

8. WORKER ACCOMMODATION STANDARDS

Accommodation Requirements (Where provided)

- **Basic Standards:** (i) Good hygiene standards with fresh drinking water access, (ii) Clean beds, restrooms, showers, and sleeping areas, (iii) Adequate illumination and proper ventilation, (iv) Safe electrical installation with fire and lightning protection, and (v) Separate cooking and eating areas
- **Gender-Specific Provisions:** (i) Separate accommodation facilities for men and women, (ii) Appropriate privacy and security measures, and (iii) Gender-sensitive sanitation facilities

Compliance Standards

- Full compliance with IFC/EBRD Workers' Accommodation: Processes and Standards Guidelines
- Regular inspection of accommodation facilities
- Worker feedback mechanisms for accommodation quality
- Immediate addressing of accommodation-related complaints

9. RESPONSIBILITIES

SVA Responsibilities

- **Primary Implementation:** (i) Overall responsibility for LMP implementation and monitoring, (ii) Subproject identification, design preparation, and contractor procurement, (iii) Site supervision, technical quality assurance, and payment certification, and (iv) Integration of LMP requirements into bidding documents and contracts
- **Designated Personnel:** (i) **Project Manager:** Overall LMP oversight and coordination, (ii) **Site Engineer:** Day-to-day LMP implementation at district level, (iii) **Social Safeguards Specialist:** LMP compliance monitoring and reporting and Health and safety oversight and incident response

Contractor Responsibilities

- **Worker Management:** (i) Direct implementation of LMP requirements for contracted workers, (ii) Daily supervision of OHS compliance, (iii) Worker training and grievance handling, and (iv) Incident reporting and emergency response
- **Reporting and Documentation:** (i) Maintenance of worker records and training documentation, (ii) Incident reporting and investigation, and (iii) Monthly compliance reporting to SVA

Community-Level Implementation

- **Local Authorities:** (i) Commune Council oversight and support, (ii) Local monitoring of contractor compliance, and (iii) Community liaison and communication
- **School Management Committees:** (i) Construction and renovation oversight and community representation, (ii) Worker grievance receipt and initial handling, and (iii) Community safety monitoring during construction

10. WORKER GRIEVANCE MECHANISM

Grievance Mechanism Objectives: The Worker Grievance Mechanism provides culturally appropriate processes for handling concerns of direct, contracted, and community workers. The mechanism ensures confidentiality, protection against reprisals, and timely resolution of worker concerns.

Routine Grievances Procedure

- **Step 1: Initial Contractor Response (1 week):** Workers may report grievances in person, by phone, text message, mail, or email (including anonymously). Initial focal point is the contractor for information and grievance receipt. Grievances satisfactorily resolved within one week are logged and reported monthly to SVA
- **Step 2: SVA Field Level Response (2 weeks):** Unresolved grievances referred to SVA site engineer. Urgent complaints (safety-related) addressed immediately. Non-urgent complaints resolved within 2 weeks. Satisfactorily resolved cases logged and reported to SVA national level
- **Step 3: SVA National Level Response:** Unresolved field-level grievances referred to SVA national management. Additional investigation and resolution efforts. Coordination with World Bank if needed for complex cases
- **Legal Recourse:** Workers preserve all rights to refer matters to judicial proceedings under national labor law at any stage.

Serious Grievances Procedure

- **Serious Grievance Definition:** (i) Harassment, intimidation, abuse, violence, discrimination, or injustice; (ii) Sexual exploitation, abuse, or harassment; (iii) Serious safety violations or life-threatening conditions; and (iv) Major violations of worker rights or contract terms
- **Immediate Response Protocol:** (i) Direct reporting to SVA designated Focal Person for Serious Grievances, (ii) Immediate investigation respecting confidentiality and anonymity, (iii) Coordination with appropriate authorities as needed, and (iv) Protection measures for complainants and witnesses

Grievance Management System

- **Record Keeping:** (i) Unique grievance numbers reflecting year, sequence, and location, (ii) Electronic and hard copy storage of all grievance records, (iii) Monthly review and analysis of grievance patterns, (iv) Quarterly reporting to World Bank on grievance statistics and trends, upon request, (v) Include grievance statistics into Bi-annual report to the World Bank
- **Focal Person Responsibilities:** (i) SVA will designate trained Focal Persons for routine and serious grievances, (ii) Training on investigation procedures, relevant laws, and World Bank standards, (iii) Regular capacity building and performance review, and (iv) Coordination with external authorities as needed

11. CODE OF CONDUCT FOR PROJECT WORKERS

General Conduct Requirements: All project workers must:

- Treat women, children (persons under 18), and men with respect regardless of ethnicity, language, religion, political opinion, nationality, social origin, citizenship status, property, disability, birth, or other status
- Use appropriate language and behavior that is not harassing, abusive, sexually provocative, demeaning, or culturally inappropriate
- Comply with all relevant local legislation and project requirements
- Report suspected violations of this Code of Conduct through the Worker Grievance Mechanism

Prohibited Activities: Project workers must not:

- Participate in sexual activity with community members, especially children
- Engage in sexual favors or other forms of humiliating, degrading, or exploitative behavior
- Engage in any activity constituting payment for sex with community members
- Use computers, mobile phones, video, and digital cameras to exploit or harass women, children, or vulnerable persons
- Engage in any form of discrimination, violence, or abuse

Reporting Obligations: All workers must:

- Report suspected or actual gender-based violence by fellow workers
- Report breaches of this Code of Conduct immediately
- Cooperate with investigations into Code of Conduct violations
- Maintain confidentiality during investigation processes

Consequences of Violations: Violations of this Code of Conduct may result in:

- Immediate termination of employment
- Criminal liability under national law
- Civil liability for damages
- Permanent exclusion from future project work
- Reporting to relevant authorities for prosecution

Training and Awareness

- All workers receive Code of Conduct training before starting work
- Training conducted in appropriate local languages
- Written acknowledgment of Code understanding and commitment
- Regular refresher training and updates
- Public display of Code summary at all work sites
- Integration with broader project safeguards training

CONCLUSION

This Labor Management Procedure provides a comprehensive framework for managing worker-related risks and ensuring compliance with national legislation and World Bank standards throughout the NEST project implementation. The procedures outlined in this document will be regularly monitored, reviewed, and updated as needed to ensure their continued effectiveness and relevance.

SVA is committed to implementing these procedures in full cooperation with contractors, workers, communities, and relevant authorities to ensure that the NEST project achieves its development objectives while maintaining the highest standards of worker protection and rights.

Annex 5: Occupational Health and Safety (OHS) Procedures

1. OHS Management System

Procurement of Contractor: SVA will avail the ESMF to the aspiring contractors so that contractors include the budgetary requirements for OHS measures in their respective bids.

Contractor Responsibilities:

- Develop and maintain an OHS management system that is consistent with the scope of work, which must include measures and procedures to address all the topics listed below and in accordance with local legislation and GIIP (as defined by World Bank Group EHSGs). The management system must be consistent with the duration of contract and this LMP.
- Conduct workplace hazards identification and adopt all applicable E&S risk mitigation measures in accordance with local legislation requirements and WBG EHSGs
- Designates a responsible person to oversee OHS related issues at the project site and define OHS roles and responsibilities for task leaders and contract managers
- Put in place processes for workers to report work situations that they believe are not safe or healthy, and to remove themselves from a work situation which they have reasonable justification to believe presents an imminent and serious danger to their life or health, without fear of retaliation

2. Worker Protection Measures

Personal Protective Equipment (PPE):

- Provides preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances
- Contractors must provide appropriate PPE at no cost to workers
- Required PPE includes hard hats, safety boots, protective clothing, gloves, and respiratory protection
- Regular inspection and replacement of damaged PPE

Hazard Control:

- Assessment of worker exposure to hazardous agents (noise, vibration, heat, dust, chemicals)
- Implementation of adequate control measures in accordance with national regulations and World Bank Environmental Health and Safety Guidelines
- Proper handling and storage of hazardous materials

3. Workplace Facilities and Accommodation

Work Site Facilities:

- Access to clean drinking water, hygiene facilities, and appropriate rest areas
- Separate facilities for men and women
- First aid stations and emergency response equipment

Worker Accommodation (where provided):

- Good hygiene standards with fresh drinking water and clean facilities
- Separate accommodations for men and women
- Proper ventilation, safe electrical installation, and fire protection
- Compliance with IFC/IBRD Workers' Accommodation standards

4. Training and Emergency Preparedness

Worker Training:

- OHS induction training for all workers before starting work
- Regular safety training updates and refresher courses
- Training records maintenance for inspection purposes

Emergency Procedures:

- Emergency prevention, preparedness, and response arrangements
- Procedures for workplace accidents, illnesses, fires, and other emergencies
- Regular emergency drills and response training

5. Incident Reporting and Response

- Documentation and reporting of all occupational incidents, diseases, and accidents
- Investigation procedures for serious incidents
- Corrective action implementation and follow-up
- Regular reporting to SVA and World Bank as required

Annex 6: Chance Find Procedures (CFP)

Definitions:

Cultural heritage encompasses tangible and intangible heritage which may be recognized and valued at a local, regional, national or global level.

- *Tangible cultural heritage*, which includes movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Tangible cultural heritage may be in urban or rural settings and may be above or below land or under the water.

- *Intangible cultural heritage*, which includes practices, representations, expressions, knowledge, skills—as well as the instruments, objects, artefacts and cultural spaces associated therewith— that communities and groups recognize as part of their cultural heritage, as transmitted from generation to generation and constantly recreated by them in response to their environment, their interaction with nature and their history.

Primary Objectives:

This CFP are to (i) protect and preserve cultural heritage resources discovered during project implementation, (ii) ensure compliance with Cambodian cultural heritage laws and World Bank ESS8, (iii) establish clear and simple procedures for handling chance finds to minimize construction delays, (iv) ensure appropriate consultation with relevant authorities and communities, and (v) prevent theft, damage, or inappropriate handling of cultural heritage materials.

Scope of Application:

- All construction and excavation activities under the NEST project
- 17 new preschool construction sites across 3 provinces
- Associated infrastructure development (drainage, access roads, utilities)

Chance Find Procedures:

If during construction, sites, resources or artifacts of cultural value are found, the following procedures for identification, protection from theft, and treatment of discovered artefacts should be followed and included in standard bidding documents. These procedures consider requirements related to Chance Finding under the Law on the Protection of Cultural Heritage, 1996. Article 37 of this law stipulates that in case of chance find of a cultural property during construction, work should be stopped and the person who found the property should immediately make a declaration to the local police, who shall, in turn, transmit the property to the Provincial Governor without delay.

Below is the Chance Find Procedures applies to NEST project:

- Stop the construction activities in the area of chance find temporarily.
- Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a guard shall be arranged until the

responsible local authorities take over. These authorities are the local police and commune chief who shall safeguard, report, or transmit the found property to the Provincial Governor without delay.

- Notify the relevant SVA site engineer and the relevant local police immediately. The SVA site engineer will inform the SVA management.
- The relevant local police or commune chief shall promptly carry out the necessities and inform the Provincial Governor immediately from the date on which the information is received.
- The Provincial Governor with support from relevant provincial department [Provincial Department of Environment or Provincial department of Culture and Fine Arts] would be in charge of evaluation /inspection of the significance or importance of the chance finds and advise on appropriate subsequent procedures.
- If the Provincial Department of Environment or Provincial department of Culture and Fine Arts determines that chance find is a non-cultural heritage chance find, the construction process can resume.
- If the Provincial Department of Environment or Provincial department of Culture and Fine Arts determines chance find is an isolated chance find, Provincial Department of Environment or Provincial department of Culture and Fine Arts would provide technical supports/advice on chance find treatment with related expenditure on the treatment provided by the entity report the chance find.

List of 20 Schools with New Construction – E&S Screening and assessment were conducted in May-June 2025

No	Name of School	Type of School	Location					Type of Package
			Village	Commune	District	Province	Coordinates	
1	Phum Thmei	Attached with primary	Phum Thmei	Bansay Treng	Thmar Kaul	BTB	13°15'48.1"N 103°01'24.2"E	Type I
2	Veal Trea	Attached with primary	Veal Trea	O Taki	Thmar Kaul	BTB	13°12'17.6"N 103°06'35.9"E	Type III
3	Popel Khae	Attached with primary	Popel Khae	O Taki	Thmar Kaul	BTB	13°09'53.5"N 103°06'48.5"E	Type I
4	Prek Snor	Independent	Prek Snor	Prek Khporp	Ek Phnom	BTB	13°08'30.2"N 103°13'43.5"E	Type III
5	Prek Noren	Independent	Svay Chrom	Prek Noren	Ek Phnom	BTB	13°09'45.3"N 103°13'58.6"E	Type I
6	Rohal Suong Lech	Attached with primary	Rohal Soung	Prek Noren	Ek Phnom	BTB	13°11'02.1"N 103°15'06.7"E	Type I
7	Prek Chdor	Attached with primary	Prek Chdor	Peam Ek	Ek Phnom	BTB	13°10'01.7"N 103°12'38.1"E	Type I
8	Koah Kralar	Independent	Kbal Spean	Koah Kralar	Koah Kralar	BTB	12°46'14.0"N 103°15'39.4"E	Type III
9	Chhay Balaing	Independent	Cheung Tinh	Thipakdei	Koah Kralar	BTB	12°51'38.7"N 103°15'56.2"E	Type I
10	Kantuot	Attached with primary	Kantuot	Thipakdei	Koah Kralar	BTB	12°52'12.9"N 103°16'00.3"E	Type I
11	Krang Svat	Attached with primary	Krang Svat	Chhnal Moan	Koah Kralar	BTB	12°42'18.4"N 103°12'01.0"E	Type I
12	Daun Yat	Independent	Wat	Pailin	Pailin	Pailin	12°50'45.1"N 102°36'23.0"E	Type III
13	Salakrav	Independent	O Andaung	Thnal Torteung	Salakrav	Pailin	12°56'05.6"N 102°35'38.0"E	Type I
14	Bot Trong	Attached with primary	Bot Trong	Samroang	O Chreuv	BMC	13°33'54.2"N 102°49'29.1"E	Type I
15	Chong Ha	Attached with primary	Poi Wat	Chong Ha	O Chreuv	BMC	13°38'56.0"N 102°53'16.5"E	Type III
16	Seung	Attached with primary	Seung Tbaung	Seung	O Chreuv	BMC	13°42'10.5"N 102°51'33.3"E	Type I
17	Srah Chik	Independent	Srah Chik	Srah Chik	Phnom Srok	BMC	13°44'41.9"N 103°20'33.9"E	Type III

18	Trapaing Thmar	Independent	Trapaing Thmar	Poi Char	Phnom Srok	BMC	13°46'37.5"N 103°18'51.2"E	Type III
19	Ponlea Chey	Independent	Ponlea Chey	Ponlea Chey	Phnom Srok	BMC	13°48'39.3"N 103°11'09.0"E	Type I
20	Trapaing Char	Attached with primary	Trapaing Char	Poi Char	Phnom Srok	BMC	13°46'13.9"N 103°18'37.9"E	Type I

Note: Following the final school selection process, a total of 17 schools will be selected from this list as target schools for construction.