Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 09/03/2019 | Report No: ESRSC00260
## BASIC INFORMATION

### A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nigeria</td>
<td>AFRICA</td>
<td>P169405</td>
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</table>

<table>
<thead>
<tr>
<th>Project Name</th>
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<tbody>
<tr>
<td>Sustainable Procurement, Environmental and Social Standards Enhancement Project (SPESSE)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Practice Area (Lead)</th>
<th>Financing Instrument</th>
<th>Estimated Appraisal Date</th>
<th>Estimated Board Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Governance</td>
<td>Financing</td>
<td>9/12/2019</td>
<td>10/29/2019</td>
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<tr>
<td></td>
<td>Investment Project Financing</td>
<td></td>
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<table>
<thead>
<tr>
<th>Borrower(s)</th>
<th>Implementing Agency(ies)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal Ministry of Finance</td>
<td>National University Commission, Bureau of Public Procurement, Ministry of Environment, Federal Ministry of Women Affairs &amp; Social Development</td>
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**Proposed Development Objective(s)**

The objective of the project is to develop sustainable capacity in managing procurement, environment and social safeguards in the public sector.

### Financing (in USD Million)

<table>
<thead>
<tr>
<th>Amount</th>
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<tbody>
<tr>
<td>Total Project Cost</td>
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</table>

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

No

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

The project is to develop and initiate implementation of a sustainable procurement, environmental and social risks capacity development program that addresses the needs of the public and private sectors. Secondary objectives include to: (a) achieve value for money, efficiency and effectiveness in public expenditure and private sector.
resources; (b) reduce youth unemployment; (c) promote gender equality; and (d) apply digital technology to enhance efficiency and effectiveness of the procurement, environmental and social system

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]
The project will provide Technical Assistance to BPP and NESREA to build their capacity for strategic planning, monitoring of Procurement, Environment and Social (PES) practices and certification and will finance at least six Centers of Excellence (to be selected among Federal Universities using competitive process) with the main purpose of conducting training and higher education at various levels from Short Courses to master’s degree across 5 Tracks.

D. 2. Borrower’s Institutional Capacity
The borrower has acceptable legal and institutional frameworks in the country to ensure compliance on environmental issues. When it comes to social issues here is no single point Ministry dealing with social impacts and risk management in Nigeria. The provisions of the new World Bank Environmental and Social Framework (ESF) that relate to social aspects such as labor, protection of vulnerable groups, social inclusion, community health & safety and land and livelihoods are under the purview of different ministries or department and agencies (MDAs) like Ministry of Women Affairs & Social Development, Department of Lands, Ministry of Labor etc. Typically these Ministries/Departments MDAs do not have policies and regulatory provisions that address the ESF requirements holistically. One of the key objectives of the project is the institutional strengthening and capacity building of such ministries/MDAs. Therefore the current capacity for enforcement and implementation of the social standards of the ESF within these ministries MDAs is considered low and will be enhanced through the project. As an implementation mechanism the Ministry of Women’s Affairs & Social Development will be coordinating the Technical Working Committee on social development standards which will include Department of lands and Labor of the Ministry of Power, Works & Housing and Ministry of Labor & Employment, respectively.

On the environment front, The Federal Ministry of Environment (FMEnv) in Nigeria is responsible for setting policy guidelines on environmental issues and ensuring compliance with national environmental standards. The ministry have an Environmental Assessment (EA) department charged with the responsibility of implementing the Nigerian EIA Act No. 86 of 1992 and NESREA is responsible for enforcement of environmental standards, regulations, laws, policies and guidelines. The EA department, in conjunction with NESREA ensures adequate monitoring of environmental performance during project implementation consistent with the Environmental Management Plan.

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

A. Environmental and Social Risk Classification (ESRC)

Environmental Risk Rating
The Environmental risks are expected to be low, because construction of civil works or infrastructure or buildings are not envisaged. The allocation of funding to SPESSCEs will be based on funding needs of each center. Each center’s funds will be distributed across a set of disbursement-linked indicators/results (DLIs/DLRs).

Social Risk Rating
Low

Low
On assessment of the social risks of this project, the project is categorized as low. This is because there are no expected civil works or infrastructure building that may attract labor influx, give rise to labor risks or need acquisition of lands or affect livelihoods. The expected environmental and social impacts of the project will be generally positive by enhancing quantity, quality and relevance of procurement and E&S skills development in Nigeria.

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

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:
The envisaged environmental and social impacts of the project will be generally positive by enhancing quantity, quality and relevance of PES skills development in Nigeria. Environmental risks are expected to be low and their mitigation will be guided by national and local laws and procedures. Construction or civil works are not envisaged at this point.

A few social risks and impacts are anticipated by this project and will be managed as follows:

GBV Management and Mitigation
Targeted support to women project beneficiaries could likely exacerbate workplace harassment such as verbal insults and physical abuse as women acquire skills that could earn them a better livelihood; become empowered; and are perceived to take independent decisions. As part of the project preparation, a specific project related GBV risks assessment will be carried out and an integrated GBV mitigation and response plan will be incorporated into the project. Also, the project will pay attention to social groups vulnerable to exclusion from project benefits (rural population, people living with disabilities, women, and disadvantaged youth) by monitoring participation rates and undertaking beneficiary assessments throughout the project.

Labor and Community Health and Safety
Labor: The project footprint is relatively discrete and does not entail a significant amount of labor. The project would rehabilitate existing infrastructure within the Centres of Excellence which does not require significant labor. The project ESIA will determine whether a specific labor management plan is required (in the case of significant impacts) or whether (in a low risk scenario) the ESMP can include labor related clauses.

Stakeholder Engagement
The project will ensure early, continuous and inclusive (including vulnerable/disadvantaged groups) stakeholder engagement which will be documented in a SEP (see ESS10 below).

GRM
A locally based project-wide GRM, proportionate to the potential risks and impacts of the project, will be established. In addition, a GRM specifically for direct and contracted workers will be provided. The GRMs will be designed at an early stage and will be established by project effectiveness.

Areas where “Use of Borrower Framework” is being considered:
The borrower has relevant regulations for environmental and social assessments that can be applied to the project. However, for the present project, it will be necessary to identify measures to mitigate the specific risks, such as improvement of the communication system and security conditions of regrouping, considering gender and other vulnerable persons/groups, adoption of a code of conduct, etc.

**ESS10 Stakeholder Engagement and Information Disclosure**

A Stakeholder Engagement and Information Disclosure Plan (SEIDP) will be developed and disclosed. This plan will address specific risks identified by stakeholders, including the exclusion of certain beneficiaries in target areas, risks to vulnerable peoples etc.) and it will be updated as and when necessary.

The objective is to establish a systematic approach for stakeholder engagement, maintain a constructive relationship with them, considering stakeholders’ views, promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle, and ensure that appropriate project information is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner. The project will set up a project-specific Grievance Redress and Feedback Mechanism for people to report concerns or complaints, if they feel unfairly treated or are affected by any of the sub-projects.

**B.2. Specific Risks and Impacts**

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

**ESS2 Labor and Working Conditions**

The PIUs, at minimum, will include direct workers, and will need to meet requirements for: terms and conditions of employment; non-discrimination and equal opportunity; worker’s organizations; child labor; forced labor; a grievance mechanism; and, occupational health and safety plans. Stakeholders and beneficiaries working in connection with the project full-time or part-time will remain subject to the terms and conditions of their existing public sector employment or agreement, unless there has been an effective legal transfer of their employment or engagement in the project.

The project includes a condition of effectiveness for Labor Management Procedures for both the PIU staff and for workers receiving salaries. The project will also include an Occupational Health and Safety (OHS) procedures or plans and a grievance mechanism for labor disputes.

**ESS3 Resource Efficiency and Pollution Prevention and Management**

The project is a capacity building project and it does not trigger this standard

**ESS4 Community Health and Safety**
The project will include a specific project related GBV risks assessment and an integrated GBV mitigation and response plan which will be incorporated into the project to address potential sexual and workplace harassment.

**ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**
The project is not financing activities that involve land acquisition, restrictions on land use, or involuntary resettlement.

**ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**
Not relevant at this stage, as the project does not involve biodiversity conservation and sustainable management of living natural resources.

**ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities**
There are no Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in the project area.

**ESS8 Cultural Heritage**
Not relevant at this stage, as the project will not finance activities that will affect cultural heritage.

**ESS9 Financial Intermediaries**
This project is not an FI operation.

**B.3 Other Relevant Project Risks**
Not relevant

**C. Legal Operational Policies that Apply**

**OP 7.50 Projects on International Waterways**
No

**OP 7.60 Projects in Disputed Areas**
No

**III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE**

**A. Is a common approach being considered?**
No
Financing Partners
This will not be financed by any other partner

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

Actions to be completed prior to Bank Board Approval:

- Preparation of the Environmental and Social Management Plan with measures for addressing the environmental, social and labor risks identified in the project.
- Preparation of Labor Management Plan
- Preparation of a draft Stakeholder Engagement and Information Disclosure Plan (SEIDP)

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):
Elaborate the stakeholder engagement plan and information disclosure as part of the Borrower’s Environmental and Social Commitment Plan (with a focus on measures addressing environmental and social risks as a result of project activities in the 6 participating SPESSCEs, especially for social groups vulnerable to exclusion from project benefits involved in the implementation of the project activities, fair treatment of employees, etc.). Preparation of Labor Management Procedures, Preparation of OHS procedures and plans, Preparation of a GBV/SEA plan.

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

30-Apr-2019

IV. CONTACT POINTS

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<tr>
<th>World Bank</th>
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<tbody>
<tr>
<td>Contact: Amos Abu</td>
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<tr>
<td>Telephone No: 5359+242 / 2</td>
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Implementing Agency(ies)

Implementing Agency: National University Commission
Implementing Agency: Bureau of Public Procurement
Implementing Agency: Ministry of Environment
Implementing Agency: Federal Ministry of Women Affairs & Social Development

V. FOR MORE INFORMATION CONTACT
The World Bank
1818 H Street, NW
Washington, D.C. 20433
Telephone: (202) 473-1000
Web: http://www.worldbank.org/projects

VI. APPROVAL
Task Team Leader(s): Amos Abu, Bayo Awosemusi
Safeguards Advisor ESSA Surhid P. Gautam (SAESSA) Cleared on 03-Sep-2019 at 12:44:4 EDT