Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

Appraisal Stage | Date Prepared/Updated: 20-Apr-2018 | Report No: PIDISDSA24036
## BASIC INFORMATION

### A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Project ID</th>
<th>Project Name</th>
<th>Parent Project ID (if any)</th>
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<tbody>
<tr>
<td>Nigeria</td>
<td>P161364</td>
<td>Nigeria For Women Project</td>
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<table>
<thead>
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<th>Estimated Board Date</th>
<th>Practice Area (Lead)</th>
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<td>14-Jun-2018</td>
<td>Social, Urban, Rural and Resilience Global Practice</td>
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<tr>
<th>Financing Instrument</th>
<th>Borrower(s)</th>
<th>Implementing Agency</th>
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<tr>
<td>Investment Project Financing</td>
<td>Federal Ministry of Finance</td>
<td>Federal Ministry of Women Affairs and Social Development</td>
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### Proposed Development Objective(s)

To support improved livelihoods for women in targeted areas of Nigeria.

### Components

- Building Social Capital
- Livelihoods Program
- Innovations and Partnerships
- Project Management, Monitoring and Evaluation and Learning

### Financing (in USD Million)

<table>
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<tr>
<th>Financing Source</th>
<th>Amount</th>
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<tr>
<td><strong>Total Project Cost</strong></td>
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### Environmental Assessment Category

B - Partial Assessment

### Decision

The review did authorize the preparation to continue
B. Introduction and Context

Country Context

1. **Nigeria experienced sustained overall economic growth of about 5 to 8 percent in the last decade.** Gross domestic product (GDP) has been driven by the expansion of domestic demand concentrated primarily in trade, agriculture, and telecommunications complementing the predominantly oil-based economy. These three sectors alone accounted for roughly 80 percent of GDP growth during 2009–2012.

2. **Recent major global economic transitions have had a significant negative impact on the Nigerian economy.** The slowdown and rebalancing of the global economy, lower commodity and oil prices, tightening financial conditions, and risk aversion of international investors have been major contributors. Due to a sharp decline in oil prices, revenues dropped from 10.5 percent of GDP in 2014 to 7.8 percent in 2016. Inflation also accelerated and reached about 16.5 percent in June 2016 (year-on-year). In this context, GDP growth fell from 6.3 percent in 2014 to 2.7 percent in 2015, and further into negative territory in 2016. The economy has since recovered from recession.

3. **These challenging economic conditions have been coupled with a deteriorating security situation.** The conflict in northeast Nigeria has taken more than 20,000 lives, displaced about 2 million people, and has negatively affected the livelihoods of 6 million more. The impact of the insurgency has transcended the geographic borders of the country, imposing economic and security costs on neighboring countries. In parallel, the pastoralist-agriculturalist conflicts have intensified across the country due to increased desertification in the Sahel; and the Boko Haram impeding grazing and trading routes. Other security challenges include crime especially kidnapping, particularly in urban areas, attacks on oil and gas infrastructure, and threats of renewed militancy in the Niger Delta. At the root of the security challenges are faulty governance mechanisms, high levels of poverty and inequality, high unemployment rates—particularly among youth, as well as natural resource degradation and climate change induced stresses.

4. **Nigeria has experienced poverty reduction in recent years, but this varies considerably across geographic areas and demographic groups due to entrenched inequalities.** After 2004, the poverty rate in Nigeria fell by almost half in urban areas, but barely declined in rural areas, where 50 percent of the population is currently living below the poverty line. Moreover, while the total number of poor in the south declined by almost 6 million, it increased by almost 7 million in the north. Significant rural-urban differences in income distribution affect women, particularly the 54 million of Nigeria’s 80.2 million women who live and work in rural areas and provide 60–79 percent of the rural labor force.\(^1\) Therefore, increased rural poverty has translated into increased female poverty.

**B. Sectoral and Institutional Context**

5. **Investments in improving the livelihoods of women in Nigeria have the potential to boost the country’s macroeconomic outcomes.** There is growing global evidence that shows that ensuring economic opportunities for women is an important entry point for addressing gender inequality and ensuring better education, health, and nutrition outcomes for families. Gender equality has been linked to a more equal income distribution, higher diversification of output and export products, higher profitability of firms and healthier financial assets. The ratio of female-to-male labor force participation in Nigeria has been rising, with now almost three women

participating in the labor force for every four men (International Labour Organization estimate; ratio higher according to National Bureau of Statistics), up from just about 50 percent in the 1990s. This presents a unique opportunity for the Nigerian economy as investments to improve economic productivity of women could have a significant effect on overall economic growth. The International Monetary Fund estimates that growth in Nigeria could be higher by more than 1.25 percentage points annually, on average, if gender inequality was decreased to levels of countries at similar levels of development in the region.

6. **Over the last three decades, the Federal Government of Nigeria (FGN) has shown an increasing commitment to support gender equality.** The country also ratified the United Nations Convention on the Elimination of all Forms of Discrimination against Women in 1985 and ratified the Women’s Rights Protocol of the African Charter in 2004. In 2011, the Legal Aid Act was reviewed and expanded to cover crimes against human body and sexual offences. The government also approved a Federal Executive memo that directed all Government Ministries, Departments and Agencies (MDAs) to appoint gender focal persons within the directorate cadre. In 1995, the Federal Ministry of Women Affairs and Social Development (FMWASD) was created to provide an institutional home to address women’s issues in Nigeria. The 1999 Nigerian Constitution Chapter IV Section 42 (I), (a) and (b); (2); and (3) proposes nondiscrimination based on gender, religion, ethnicity, age, or circumstances of birth. The first National Women Policy was drafted in 2000, followed by the National Gender Policy in 2006, with a goal to make gender equality a driver of growth and good governance. The policy is anchored in four pillars: policy and legislation; systems and structures; processes, procedures, and mechanisms; and services, goods, and products.

7. **The National Gender Policy was followed by the National Plan of Action, which has a five-year target period (2014–2019) with a comprehensive plan of action for the delivery of the National Gender Policy.** The Vision 2020—Nigeria’s National Development Plan recognizes that women’s contribution to the economy remains largely undocumented and makes a national commitment to redressing long-term systemic discrimination against women, identifying and overcoming the limitations to gender equality as integral to guaranteeing well-being and productivity of all Nigerians, and ultimately creating a society that values gender balance and equity. The Buhari administration increased the budgetary allocation of ministries that have direct bearing on the lives of women, particularly health and education, with greater emphasis on girl-child education. Critical Government strategies, such as the Buhari Plan for the reconstruction of the Nigerian Northeast, have paid attention to the specific needs of women. There are a number of legislative and policy frameworks addressing gender equality at the state level as well.

8. **The current government has sustained previous momentum and has shown a strong commitment to improve the living conditions of Nigerian women.** President Buhari created the Government Enterprise and Empowerment Program (GEEP) and the Nigeria Women Empowerment Fund (NAWEF), both initiatives aimed at improving women’s economic participation and access to finance. The design of the proposed project has benefitted from lessons learned from various government and development partner programs benefitting women in Nigeria.

9. **Gender gaps in economic activities across Nigeria are largely explained by four main institutional and market failures—discriminatory social norms, information and knowledge asymmetries, non-competitive markets, and limited gender-inclusiveness in formal and informal institutions.** The analysis of existing data and research indicates that discriminatory social norms limit women’s access to economic opportunities, productive assets, and knowledge. Nigeria is among the 10 percent of countries worldwide that exhibit the highest levels of gender discrimination according to the OECD’s Social Institutions and Gender Index, with an assessment of ‘high’ or ‘very high’ in all of the evaluated categories (discriminatory family code, restricted physical integrity, son bias, restricted resources and assets, and restricted civil liberties). It also falls into the group of countries
with highest gender inequality in human development outcomes.\textsuperscript{2} Given the strong link between social norms and women’s economic participation and access to productive assets (especially land), addressing discriminatory practices impeding gender equality requires a systematic and tailored approach to the Nigerian context.

10. \textbf{Asymmetries of knowledge and information negatively affect access to economic opportunities, improved inputs, and practices, also explaining why women remain stuck in low-productivity sectors along key agricultural commodity value chains, particularly pertinent for Nigeria.} Women engaged as small-scale producers in certain commodity value chains such as rice, tomatoes, maize, catfish, and cassava are unable to produce high-quality produce and reach economies of scale due to lack of access to quality inputs (seeds, fertilizers), mechanization, and knowledge of good agricultural practices. A World Bank study found that the returns of the harvest value for all crops (subsistence and cash crops) combined in male-managed plots are five times higher than their female counterparts. Female processors of agricultural goods engaged in groundnut, potato, cassava, and wheat value chains face productivity challenges as they are forced to rely on more traditional manual methods of processing, which are time consuming and physically strenuous. They are often unaware or have limited access to affordable small-scale machinery that can reduce processing time and enable them to earn more. Retailing, which employs most trading women, is a sector where market entry barriers such as reaching economies of scale, poor storage facilities, and lack of market information severely constrain women’s ability to access and benefit from economic growth and expand income beyond subsistence levels.

11. \textbf{Nonfunctional markets severely constrain women’s economic outcomes and ability to earn a sustained income.} As small producers and asset holders, Nigerian women have greater difficulty reaching economies of scale both upstream and downstream, which affects their competitiveness. As a result, they have limited bargaining power with suppliers and buyers, restricting their ability to earn profits or grow their businesses.

12. \textbf{Structural limitations in the financial sector also prevent women from having sustained access to finance.} Over 40 percent of Nigerian adults are excluded from financial services, as banks and microfinance institutions have little to no presence in rural areas.\textsuperscript{3} Only 15 percent of women in Nigeria have a bank account and within the agricultural sector, only 3 percent of female farmers have a formal bank account, compared to 10 percent of men. Financial institutions are also polarized, having a missing middle, as the banking sector is made up of highly capitalized banks in one extreme and microfinance institutions with limited capitalization on the other extreme. These large banks avoid sectors like agriculture to cater to the commercial sector especially oil companies, whereas microfinance institutions are too few and poorly capitalized to make a revolutionary impact on microenterprises and small and medium enterprises. This, together with high operational and transactional costs caused, in turn, by dealing with many small clients in rural areas, creates little incentives for financial institutions to expand their services beyond select urban areas. Women in rural areas also prefer family, friends, and community-saving schemes above commercial and microfinance banks, due to the perception of low risks associated with using ‘dependable’ sources of finance and also their inability to produce excessive documentation that is often a pre-requisite for accessing loans from the latter. These structural issues have, in turn, incentivized the emergence of informal and often unregulated savings and lending groups\textsuperscript{4} in rural areas of Nigeria. Nearly 25 percent of women in rural areas reported relying on these mechanisms for their

\textsuperscript{2} UNDP, Gender Inequality Index, Human Development Report, 2017.

\textsuperscript{3} EFINA 2016, “EFInA Access to Financial Services in Nigeria” (Updated July 2017).

\textsuperscript{4} Such informal and unregulated saving mechanisms include lending groups, savings collectors, Esusus or rotational saving schemes and credit associations, village community organizations, and cooperatives.
financial needs, as compared to 18 percent of men, as regulated systems were seen to expose consumers to potential abuses in interest rates and repayment mechanisms, potentially leading to further impoverishment.

13. **Gender-based violence (GBV) remains a pervasive challenge in Nigeria, significantly, constraining women’s autonomy and life chances.** The 2013 Demographic Health Survey indicates that nationally 38 percent of women between the ages of 15 and 49 have experienced some form of physical or sexual violence and 11 percent experienced physical violence within the 12 months before the survey. Nearly 45 percent of women who experienced violence never sought help or told anyone about the violence. Besides interpersonal and sexual violence, child marriage and female genital mutilation are the other harmful cultural practices prevalent across Nigeria. Conflict in the northeast has further contributed to a steep rise in targeted violence against women and children by Boko Haram increasingly for abduction and violence. Women are increasingly being used as instruments of war, including suicide bombing and forced marriages, making them vulnerable to stigmatization and rejection from their families and communities.

14. **Most programming for women in Nigeria has so far focused on mainstreaming gender into broader sectoral responses, rather than stand-alone initiatives dedicated to addressing the specific constraints that limit women’s productivity and upward socioeconomic mobility.** Scale and sustainability also seem to be systemic issues in programming, with initiatives being either too small in scale to make an impact or becoming unviable as soon as funding ends. Gaps in targeting and geographic coverage were also identified. Most existing programs either target established female entrepreneurs in cities such as Lagos and Abuja through dedicated financing lines or networking services, or extremely vulnerable women, through conditional cash transfers and other safety net mechanisms. Therefore, women who are on or just above the poverty line and economically active - those owning unipersonal businesses and are small-scale farmers constitute the ‘underserved middle’ and a significant gap in programming. The proposed Nigeria For Women Project (NFWP) seeks to target and support this population segment for improving their access to economic opportunities.

**C. Proposed Development Objective(s)**

**Development Objective(s) (From PAD)**

15. To support improved livelihoods for women in targeted areas of Nigeria.

**Key Results**

16. The key performance indicators for the proposed five-year project include the following:

(a) Number of beneficiaries that have improved livelihoods with project support
(b) Increase in productive assets of WAG members
(c) Increase in contribution of women to household expenditure
(d) Number of project beneficiaries disaggregated by gender and states

**D. Project Description**

17. The NFWP will facilitate women’s access to improved livelihoods through targeted assistance following key principles of inclusion, objective targeting, transparency and accountability, enabling culture, and openness to learning. NFWP will support the enhancement of voice and participation in decision making at the household and community level, responding to the demands of the participating women. The project will focus on creating an enabling environment for women to overcome institutional failures (including market) and barriers to enhance productive livelihoods and socioeconomic advancement. To accomplish the PDO, the project will develop and strengthen new and existing WAGs with a strong livelihood focus to enhance household income.
Component 1: Building Social Capital (approximately US$14 million)

18. This component aims to build social capital by galvanizing women to become members of WAGs and strengthening both new and existing WAGs that can serve as institutional platforms for women in Nigeria. The project will aim to create an enabling environment to ensure the buy-in of key stakeholders and adequate support at the household level to facilitate investments focused on women. In doing so, activities under Component 1 will be implemented under two subcomponents.

Subcomponent 1.1: Influencing Social Norms (approximately US$4 million)

19. The project will carry out a strategic Communications Campaign (CC) with an overall objective of behavioral change, awareness generation and project information dissemination. In doing so, the campaign will focus on Behavioral Change Communications (BCC) and Operational Project Communications (OPC). The BCC will be designed and implemented at the federal, state, LGA, and community levels to create an enabling environment to facilitate changes in social norms that reproduce gender stereotypes that are detrimental to women’s socioeconomic well-being. The OPC will leverage communication tools and activities to strategically support and strengthen achievement of the PDO and to disseminate project information, including project intended activities and benefits. This will contribute toward project buy-in and ensure the identification of project “champions” at the federal, state, LGA, and community levels.

Subcomponent 1.2: Women Affinity Groups (approximately US$10 million)

20. The project will support the mobilization of women to form WAGs and support the strengthening of new and existing WAGs to create social capital for women at the community level. The process will be facilitated by Ward Facilitators who will operate at the community level reinforcing the messages disseminated through the CC. All women above the age of 18 will be provided information about the project and WAGs, and willing women will be organized into WAGs. WAG members will be provided holistic psychology based training on group management, record keeping, financial literacy, confidence building, leadership, GBV risk monitoring and response, and negotiation skills. This training will complement practical skills and knowledge gained by women being part of WAGs including household financial planning, savings and credit concepts (interest rates, estimated monthly installments, risk management, consumption and productive expenditures), and group decision making. Performance of WAGs will be evaluated based on predetermined criteria on rotational leadership, regular meetings, recording of meeting agreements, and group-based decision making. This will be applicable to both existing and new WAGs and their performance will be tracked separately. WAGs will be instrumental in (a) influencing social norms that limit women’s voice and participation in community- and household-level decision making and access to critical economic opportunities; (b) improving practical skills and knowledge; and, eventually, (c) improving access to basic services.

Component 2: Livelihoods Program (approximately US$70 million)

21. This component aims to support economically active women in WAGs through provision of livelihoods grants and holistic, as well as targeted skills trainings to include psycho-emotional entrepreneurship skills, market responsive technical skills, and life skills, based on sound analysis of the livelihood sectors and market demand. Business plans prepared through this process of capacity building will support the implementation of livelihood grants to meet both capital and operational costs as detailed in the business plans while clearly

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5 Sub-indicators of WAG performance include: (i) Discussion of priority issues based on a defined agenda; (ii) maintaining clear records of meetings agreements and follow-up actions; (iii) ability to reach decisions based on open debate and discussion.
highlighting the use of funds and its contribution to livelihood enhancement. This component will have two subcomponents.

**Subcomponent 2.1: Support to Individual Livelihoods (approximately US$50 million)**

22. The NFWP will provide three windows of livelihood support to suit the needs of project beneficiary women focusing on Window 1 for consolidation of existing livelihoods, improving production and productivity and making them resilient to shocks; Window 2 for improving existing livelihoods through exploiting value chain opportunities including reaching bigger markets, and Window 3 for exploration of new economic opportunities. An estimated 200,000 women will benefit from livelihoods grants, with the beneficiaries of the three windows at 50, 40, and 10 percent, respectively. Members of WAGs who fulfill the eligibility criteria for comprehensive skills enhancement and livelihood grants will be supported in three tranches of three members per tranche in the key areas, including agriculture and allied sectors, trade, and jobs/employment.

23. Livelihood beneficiaries to be supported under the three windows will be selected through a facilitated consultative process in the WAGs. Three members per WAG per tranche will be selected for receiving livelihoods grants by an initial screening process at the Ward level. The eligible members will be provided Business Advisory Services (BAS) in the form of knowledge and technical inputs for preparation and implementation of business plans to maximize the impact of planned investments. These business plans will be appraised for technical and financial feasibility by a committee at the LGA level. The LGA-level livelihoods assessment will inform individual member’s business plan to value chain of select commodities, training and exposure visit of eligible WAG members, and support from relevant sector line ministries and agencies, CSOs, Community Resource Persons, and the other private sector partners.

**Subcomponent 2.2: Support to Livelihoods Collectives (approximately US$20 million)**

24. Activities under this component aim to support existing or new livelihood collectives by supporting the aggregation and creation of scaled-up livelihood enterprises among members of WAGs, including those who have been supported with livelihood grants under Subcomponent 2.1. In doing so, the project will include provision of grants to support business plans of livelihood collectives, either start-up activities such as training and exposure visits, incorporation, office setup; some initial operational costs; and/or business promotion to support collective livelihoods directly. This includes support in the form of storage facilities, drying yards, high-volume weighing scales, an automated system to manage inventory or accounting, and likewise.

**Component 3: Innovations and Partnerships (approximately US$6 million)**

25. This component aims to use ‘Nigeria’s talent pool’ to identify and deploy innovations that can (a) transform women’s social and livelihood outcomes, and (b) improve project delivery and overall impact. For NFWP, innovation is defined as “cost-effective, context-relevant, resourceful or opportunistic solution that will allow women to reduce barriers to their socio-economic empowerment and in particular their access to productive livelihoods and entrepreneurship development.” These innovations will be identified through a development marketplace approach where innovators, social entrepreneurs from public, private, and civil society sectors, funders, investors, and development agencies will convene. Taking advantage of Nigeria’s high mobile penetration rate (about 150 million people), digital solutions such as mobile applications will be offered to women. This platform will be used to facilitate strategic relationships among innovators and partners to showcase, scale up, and replicate successful innovations aligned with the project both at the national and regional levels. The project will also support strategic partnerships for improving project delivery and impact. Models that have demonstrated scalable impact for improving women’s socioeconomic well-being in Nigeria or other countries will be scaled up with project support.
Component 4: Project Management, Monitoring and Evaluation, and Learning (approximately US$10 million)

26. The aim of this component is to support the socioeconomic upliftment of women by supporting the advancement of policy dialogue; strengthening technical and implementation capacity; and better coordination among implementing partners at the federal, state, and LGA levels through deployment of highly qualified technical professionals. This component will have provision for supporting technology-based solutions for project management and project-related service delivery and monitoring. Support will be provided for designing the project’s management information system (MIS), evaluation of outcome and impacts, participatory M&E and internal learning, and environmental and social safeguards monitoring. M&E activities will include regular monitoring of progress and performance of implementation, independent process monitoring of the community-level planning and effectiveness and quality of capacity-building efforts, and undertaking annual thematic studies and outcome as well as impact assessment of the project.

Gender Based Violence (GBV) risks as a result of the project and mitigation measures

27. Project activities are likely to trigger specific GBV risks including (i) Intimate Partner Violence (IPV), (ii) increased vulnerability to rape, (iii) harassment of women, and (iv) harmful widowhood practices.

28. To address these identified risks, the project has built in specific measures to effectively prevent and respond to the GBV risks in a survivor-centered manner including to: (i) conduct a GBV Service mapping as part of the LGA diagnostics before project implementation begins; (ii) reinforce messages aimed at addressing negative social norms that perpetuate GBV as part of the Behavioral Change Communication (BCC) under component 1 of the project; (iii) equip WAGs to become first responders of GBV; (iv) use of Safe Spaces for meetings, trainings and other project activities; (v) conduct trainings for project implementers to effectively prevent and respond to GBV in a survivor center manner; (vi) ensure that project contractors adhere to specific codes of conduct; (vii) carry out baseline study to measure GBV incidence and perceptions through proxy indicators; (viii) include specific protocols to monitor GBV risk into the project GRM and social accountability framework; (ix) link and expand the presence to the Domestic Violence and Sexual Abuse Response Teams (DVSART) to project states; (x) establish partnerships with the Donor Partner Group on Gender, GBV Sub-sector Working Group and other Development Partners working on the GBV agenda; (xi) conduct a study tour to Lagos State in which the FMWASD will learn from the successful experience of this state in establishing Government institutions for GBV response; and, (xii) work closely and establish partnerships with the Sexual Assault Response Center.

E. Implementation
Institutional and Implementation Arrangements

29. The project’s institutional and implementation arrangements are categorized into (a) policy guidance, ministerial coordination, and institutional arrangements, and (b) program management, monitoring, and implementation (along with provision for technical assistance and partner agencies)

30. For policy guidance, ministerial coordination, and institutional arrangements, a Federal Steering Committee (FSC) will be set up to be chaired by the Honorable Minister, FMWASD, with representation from other relevant line ministries. The commissioners from each State Ministry for Women Affairs and Social Development (SMWASD) will be part of the FSC and representatives from six of the selected LGAs across the 6 states will also be part of the FSC on a rotational basis. Project-related policy decisions and guidance from the
FSC will be administered through the Federal Technical Committee (FTC) which will be constituted for the project and chaired by the Permanent Secretary (PS), FMWASD, and PSs from other relevant line ministries will be represented in this committee and will provide strategic guidance to the Federal Project Coordination Unit (FPCU). The representation from the other relevant lines ministries will be finalized included with details in the Project Implementation Manual (PIM).

31. At the state level, there will be a State Technical Committee chaired by the PS, SMWASD, with a representative from a CSO as co-chair on an annual rotational basis. Similarly, at the LGA level, there will be an LGA Technical Committee chaired by either the Women’s Development Officer (where available) or any other representative of the SMWASD with other relevant representatives as part of the committee. This committee will also have representation from the CSOs and community-based organizations operational at the LGA level. The representation from the other relevant lines ministries will be finalized and included with details in the PIM. The program management, monitoring, and implementation functions will be operationalized through an FPCU, State Project Coordination Unit (SPCU), LGA Project Implementation Unit (LPIU), and Ward Facilitation Team (WFT).

32. **Federal Level:** The FPSC will provide guidance to the FPCU for NFWP headed by the Federal Project Coordinator (FPC). The dedicated full-time FPC will provide leadership for project implementation and will be responsible for overall coordination and will be supported by a dedicated executive assistant and Young Professional (YP) in the programmatic and analytical areas. The FPCU will have a multi-disciplinary team of staff and technical consultants who will work exclusively for NFWP. The team will include thematic coordinators in the areas of Livelihoods, Behavior Change Communication (BCC), Community Institution Building, Social Development (including Social Safeguards) and Gender, and Innovations and Partnerships. All thematic coordinators and coordinators of systems-related functions – Human Resources, M&E, Financial Management and Procurement; will be supported by YPs. YPs will perform dedicated sub-functions under the coordinators. For example, the Livelihoods Coordinator will have two YPs one focused on on-farm livelihoods and other on non-farm or Business Advisory Services. To ensure, synergy and transfer of skills and capacities, each thematic coordinator will be paired with relevant FMWASD staff. Administrative assistants will support the FPC and technical coordinators on administrative aspects.

33. **State Level:** The SPCU for NFWP will be established in each of the 6 States within the SMWASD. The SPCU will be responsible for implementation of the project through the LPIU, with guidance from the FPCU for all technical and policy matters related to the project. The SPCU will be headed by a dedicated and full time State Project Coordinator (SPC) who will function under the overall policy and strategic guidance of the SPSC. The SPCU will be staffed with a multi-disciplinary team of technical experts in Livelihoods, BCC, Community Institution Building, and Safeguards & Gender, and systems function experts on Financial Management, Procurement and M&E. Each State-level thematic lead will be supported by one YP each. Where possible, SMWASD staff will be paired with the SPCU thematic leads. The project will make provision for 3 administrative assistants to support the thematic leads and YPs in office administrative tasks.

34. **LGA Level:** Each of the 18 LGAs will establish an LGA PIU headed by an LGA Project Coordinator (LPC) for NFWP. The LPC in addition to coordination will be responsible for the M&E function and ensure all M&E activities and information flow between the LGA and Wards. Four LGA level Thematic Coordinators on Livelihoods, BCC, Community Institution Building and Accounting (including Financial Literacy) will provide implementation support and coordination services to each ward of about 300-500 households. The LPIU as a unit will be responsible for implementation of project activities at the ward level as well as creating linkage with local partners and technical experts in undertaking appraisal of business plans and provisioning of business advisory
services. The LPIU will work under close supervision and technical guidance of SPCU. An office administrator will support the LGA team.

35. **Ward Level:** At the ward level there will be 2-3 facilitators per ward (depending on population size and geographical spread) to work closely with champions at the community level. The Ward Level Facilitators will work with communities and then with women beneficiaries and responsible for information dissemination, the formation of WAGs, monitoring functioning and strengthening of WAGs, and respond to emergent needs of WAGs. They will receive thematic and technical guidance and support from the State and LGA teams.

36. The hiring of project staff at all levels will be conducted through a transparent, open and competitive process in line with the processes and procedures and the TORs detailed in the Human Resource Manual for the project. All positions to be hired for the project as per the organogram will be done through independent recruitment agency, that will be hired through a competitive process. Performance of staff will also be managed per the processes in the HR Manual.

37. **Technical Assistance, Business Advisory Support and Partnerships:** The project will enter into partnerships with a range of technical service providers, and academic institutions for technical support like development of package of practices, training of trainers for extension, etc. CSO could support field level implementation in specific thematic and geographical areas after due assessment of their credentials and capacity to provide support through a due diligence process. Partnerships with agencies working on models for linking markets with producers are envisaged and turnkey projects will be designed and implemented by the selected agencies.

38. The management and technical configuration of the program management, monitoring, and implementation functions will be elaborated in the PIM with details on roles, functions, and skills requirement for staffing the implementation architecture. In addition, the process of partnering with or hiring technical assistance and implementing partners at various levels will also be detailed in the PIM.

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### F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)

Specific project locations are yet to be determined. However, the first phase of the project will be implemented in Edo, Ogun, Niger, Abia, Kebbi and Taraba states in the Six Geopolitical zones in Nigeria focusing in the rural areas in the selected states. The implementing ministry and Project Coordination Units both in the federal and state levels lack effective institutional mechanism and capacity for coordination, documentation, monitoring and reporting on environmental and social safeguards. Therefore, the project will address these challenges by hiring or designating a safeguards officer in the FPCU and provide capacity building support for strengthening the coordination mechanism, monitoring, documentation and reporting on environmental and social safeguards matters.

### G. Environmental and Social Safeguards Specialists on the Team

Michael Gboyega Ilesanmi, Social Safeguards Specialist  
Lucky Erhaze, Environmental Safeguards Specialist
### SAFEGUARD POLICIES THAT MIGHT APPLY

<table>
<thead>
<tr>
<th>Safeguard Policies</th>
<th>Triggered?</th>
<th>Explanation (Optional)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Environmental Assessment OP/BP 4.01</strong></td>
<td>Yes</td>
<td>The proposed project is not expected to have adverse environmental impact and is assigned as EA Category “B” according to WB safeguards policy requirements, mostly site specific, reversible and can easily be avoided or managed. The project triggered four out of the ten safeguard polices: Environmental Assessment (OP/BP4.01), Pest Management (OP/BP4.09), Physical Cultural Resources (OP/BP 4.11) and Involuntary Resettlement (OP/BP4.12). The environmental issues of the project are primarily associated with the activities of Components 1 and 2 which may have environmental and social impacts, though reversible. The Specific activities that will be financed under this project are not yet determined. The borrower has prepared and consulted upon an Environmental and Social Management Framework (ESMF) which will be disclosed in-country and on the World Bank’s external website prior to appraisal in accordance with Bank requirements. The ESMF outlines steps which will be followed in preparing site specific safeguards instruments (ESIA, ESMP, EMP) when the locations of the project activities are determined during implementation.</td>
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<td><strong>Natural Habitats OP/BP 4.04</strong></td>
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<td><strong>Forests OP/BP 4.36</strong></td>
<td>No</td>
<td>The project will not affect or involve forests or forestry.</td>
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<td><strong>Pest Management OP 4.09</strong></td>
<td>Yes</td>
<td>The project will support agricultural livelihoods and while it will not procure pesticides directly, beneficiaries may acquire them using productive grants provided by the project. A pest management plan (PMP) has been prepared for the project, consulted upon and approved by the the Bank. The PMP will be disclosed in-country and on the Bank’s external website prior to appraisal in accordance with Bank requirements.</td>
</tr>
<tr>
<td>Topic</td>
<td>Requirement</td>
<td>Details</td>
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<tr>
<td>Physical Cultural Resources OP/BP 4.11</td>
<td>Yes</td>
<td>The project will not directly affect physical cultural resources. However, given its focus on rural areas there is a higher risk of chance findings. Management of physical cultural resources has been included in the ESMF.</td>
</tr>
<tr>
<td>Indigenous Peoples OP/BP 4.10</td>
<td>No</td>
<td>There are no Indigenous Peoples in the project area.</td>
</tr>
<tr>
<td>Involuntary Resettlement OP/BP 4.12</td>
<td>Yes</td>
<td>The project triggers the World Bank's Policy OP 4.12 on Involuntary Resettlement. Given the fact that all the actual subprojects are not known at the project appraisal, the borrower has prepared a Resettlement Policy Framework (RPF) in accordance with the Bank Safeguards policy on Involuntary Resettlement (OP/BP 4.12). The RPF is being finalized, consulted upon and reviewed by the Bank. The RPF would be and disclosed in-country and on the Bank’s external website in before appraisal. The RPF sets out the policies, principles, institutional arrangements, likely categories of affected people, eligibility criteria and categories, compensation rates, methods of valuing affected assets, community participation and information dissemination, Grievance Redress Mechanism and effective monitoring and evaluation. These arrangements shall also ensure that there is a systematic process (as against a hoc one) for the different stages of the implementation of a framework that assures participation of affected persons, involvement of relevant institutions and stakeholders, adherence to both World Bank and Government procedures and requirements, and outline compensation for affected persons.</td>
</tr>
<tr>
<td>Safety of Dams OP/BP 4.37</td>
<td>No</td>
<td>The project will not support the construction of new dams or entail the rehabilitation of existing dams.</td>
</tr>
<tr>
<td>Projects on International Waterways OP/BP 7.50</td>
<td>No</td>
<td>The project will not affect water use, neither in quantity or quality.</td>
</tr>
<tr>
<td>Projects in Disputed Areas OP/BP 7.60</td>
<td>No</td>
<td>The project will not be implemented in any disputed areas.</td>
</tr>
</tbody>
</table>
KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

The Project is not envisaged to cause potential large scale, significant and /or irreversible or cumulative impacts. The environmental risks and the environmental category of is B, implying that potential environmental and social impacts will be less adverse, easily remediable and site-specific. The borrower has prepared and ESMF, and it outlines steps which will be followed in preparing site specific safeguards instruments (ESIA, ESMP, EMP) when the locations of the project activities are determined during implementation.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:

This Project falls into Environmental Category B as no adverse long-term impacts are anticipated. No long-term adverse impacts were identified in the safeguards instruments: Environmental and Social Management Framework (ESMF); Resettlement Policy Framework (RPF); and Integrated Pest Management Plan (IPMP).

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.

Not applicable

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.

Nigeria has demonstrated its commitment to mitigating adverse social and environmental impacts in the implementation of a range of World Bank projects. There are adequate legal and institutional frameworks in the country to ensure compliance with World Bank safeguards policies. The client has prepared ESMF, IPMP and. RPF. These instruments have been consulted upon and reviewed by the Bank. The instruments will be disclosed in country and on the Bank’s external website before Appraisal. These safeguards instruments have provided mechanisms to identify impacts beyond the generic ones for which standard mitigation measures are built and to be applied during the implementation phase.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.

The key stakeholders are the Federal Ministry of Women Affairs and Social Development, State Ministries of Women Affairs of the participating that will implement the project, LGAs, NGOs, Donor partners; other relevant institutions and participating communities.

Relevant stakeholders have been informed of the project; however public consultation will be an on-going activity taking place throughout the entire project process. Community participation and consultation are an integral selection of community infrastructure and services to be supported under the project.
## B. Disclosure Requirements

<table>
<thead>
<tr>
<th>Environmental Assessment/Audit/Management Plan/Other</th>
<th>For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of receipt by the Bank</td>
<td>Date of submission for disclosure</td>
</tr>
<tr>
<td>26-Mar-2018</td>
<td>03-Apr-2018</td>
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</table>

"In country" Disclosure
Nigeria
03-Apr-2018

Comments
Daily Trust and Guardian Newspapers

<table>
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<tr>
<th>Resettlement Action Plan/Framework/Policy Process</th>
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<tr>
<td>Date of receipt by the Bank</td>
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<td>26-Mar-2018</td>
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"In country" Disclosure
Nigeria
03-Apr-2018

Comments
Daily Trust and Guardian Newspapers

<table>
<thead>
<tr>
<th>Pest Management Plan</th>
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<tr>
<td>Was the document disclosed prior to appraisal?</td>
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<tr>
<td>NA</td>
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</table>

"In country" Disclosure
Nigeria
03-Apr-2018

Comments
Daily Trust and Guardian Newspaper

If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.
If in-country disclosure of any of the above documents is not expected, please explain why:

C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting)

OP/BP/GP 4.01 - Environment Assessment

Does the project require a stand-alone EA (including EMP) report?
Yes
If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report?
Yes
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?
Yes

OP 4.09 - Pest Management

Does the EA adequately address the pest management issues?
Yes
Is a separate PMP required?
Yes
If yes, has the PMP been reviewed and approved by a safeguards specialist or PM? Are PMP requirements included in project design? If yes, does the project team include a Pest Management Specialist?
Yes

OP/BP 4.11 - Physical Cultural Resources

Does the EA include adequate measures related to cultural property?
Yes
Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?
Yes

OP/BP 4.12 - Involuntary Resettlement

Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?
Yes
If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?
Yes

The World Bank Policy on Disclosure of Information
Have relevant safeguard policies documents been sent to the World Bank for disclosure?
No

Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?
No

All Safeguard Policies

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?
Yes

Have costs related to safeguard policy measures been included in the project cost?
Yes

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?
NA

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?
NA

CONTACT POINT

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**Borrower/Client/Recipient**

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**Implementing Agencies**

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APPROVAL

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<tr>
<th>Task Team Leader(s):</th>
<th>Varalakshmi Vemuru</th>
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**Approved By**

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<tr>
<th>Safeguards Advisor:</th>
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<tbody>
<tr>
<td>Practice Manager/Manager:</td>
<td>Senait Nigiru Assefa</td>
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<tr>
<td>Country Director:</td>
<td>Rachid Benmessaoud</td>
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