The World Bank
Digital Governance Capacity for Africa (P172935)

Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

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BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Africa	AFRICA	P172935	

Project Name	Digital Governance Capacity for Africa

Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Governance	Investment Project Financing	1/11/2021	3/30/2021

Borrower(s)	Implementing Agency(ies)		
African Union Commission	African Union Commission		

Proposed Development Objective(s)

The Project Development Objective (PDO) is to strengthen the capacity of the African Union Commission (AUC) and participating countries to serve African citizens, businesses, and governments through adoption of selected digital public sector platforms.

Financing (in USD Million)	Amount
Total Project Cost	**300.00**

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 proposed project is an investment project, with an indicative amount of financing at US$300 million. The amount will be allocated between two funding windows comprised of: (i) a regional IDA grant to AUC regional bodies (around US$30 million); and (ii) regional IDA and IDA credits to selected national governments (around US$270 million total). The funding under the second window to national governments will be channeled through a combination of Performance Based Financing as well as an input-based component (technical assistance and investment lending). Project management unit will be created at the regional body level for the implementation of the regional grant. In

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addition, distinct project units will be created in each selected country for the implementation of each national portion of the project.

The project will support developing the capability of regional bodies and national governments to efficiently conduct digital transformation and fully deliver maximum benefits of such transformation to people, in the form of service delivery. Technology adoption can be transformational in improving governance and government performance. It has the potential to boost government efficiency, transparency, responsiveness, citizen trust, and service delivery. However, the achievement of such objectives requires not only the use of digital tools, technology, and digitalized processes, but also must be accompanied with the relevant "analog" reforms of regulations, institutions, processes for delivery, and human capacity and skills. Maximized benefits to service delivery are also achieved through a whole-of-government approach to digitalization. This requires reducing silos of information and services, improving flow of information, fostering collaboration across institutions to create economies of scale, and reduce burden for citizens to access government services.
The objectives of each component and their respective activities are described below.

Component 1: Strengthening the capacity of the AUC-level mechanisms to implement the AU Digital Transformation Strategy (USD 30 million)

This component seeks to support the AUC-level mechanisms in fostering the conditions for public sector digital transformation and adoption of public digital platforms across the continent. The objectives are: (i) to foster economies of scale and efficiency gain in public digital transformation across the continent, (ii) to implement the basis for interoperable cross-border digital platforms, (iii) to improve the institutional capacity of the AUC to implement its digital transformation strategy, and (iv) to provide a framework to support the capacity of AUC member countries and foster peer-to-peer learning for digital transformation. The component will support the AUC and related regional bodies.

   Subcomponent 1.1: Regional framework for public digital platforms

This subcomponent will support the establishment of the harmonized policy, legal, and regulatory frameworks and guidelines for public sector digital governance at the regional level. Through this subcomponent, the proposed project will support the definition of public goods and shared guidelines and frameworks to be considered and implemented by AUC member countries in their efforts toward digital transformation. This aims at developing shared regional frameworks that would foster the adoption of public digital platforms at country level, as well as create economies of scale and conditions for improved cross-border public sector platforms interoperability. Proposed activities could include:

(i)   Strengthening of regional cybersecurity and data protection framework. Review of cybersecurity and data protection convention and establishment of related guidelines and institutional arrangement for enforcement at the regional level.
(ii)   Fostering the adoption of open standards for government digital platforms. Definition of guidelines to make better use of open standards for digital systems in order to avoid dependencies on certain suppliers ("provider lock-in").
(iii)   Fostering transparency and open government. Definition of guidelines and standards on application of open government and open data approaches.

(iv)   Strengthening the capacity of governments to ensure security of digital systems. Technical guidelines for assessing threats and vulnerabilities to e-Government security systems and define mitigation.

(v)   Fostering data governance, improved cross-border collaboration and interoperability. Data management framework, including policies and specifications for governing information flow across governments and borders, as well as setting core standards for data and information integration and management and the implementation of e-Government Metadata Standard across the public sector. Additional support will also be provided toward the development of policy toward regional interoperability of different government services, such as development of common standards and open standards software tools, development of standard solution for specific eservices, and corresponding IT architecture frameworks.

(vi)   Fostering the implementation of citizen-centric government digital services. Guidelines for the implementation and design of user-centric digital service that are universally accessible.

(vii)   Promoting environmentally responsible practices in public sector digital transformation. Developing regional environmental guidelines for assessing and mitigating environmental impact of digital transformation.

(viii)   Providing a framework for the adoption and use of emerging and disruptive technologies. Policy and framework that address emerging technologies such as blockchain, Internet of Things (IoT), and Artificial Intelligence (AI).

Subcomponent 1.2: Shared framework supporting public sector digital capacity and innovation:

This subcomponent will support the development of shared resources at regional level to support the capacity of governments to implement public sector digital transformation. Through this subcomponent, the project will support the development of mechanisms under the auspices of AUC, to provide capacity support and knowledge sharing platforms on digital transformation to country members. Proposed activities would include:

(i)   Set up regional public sector digital transformation center of excellence and an African Union e-Governance Academy: The project will provide technical assistance and institutional support for the development of an AUC Public sector digital transformation Center of Excellence which will support (a) the development of public goods, regulations and standards, (b) the setup of incentive mechanisms and regional qualification framework based on a certification process for African institutions and schools of public administrations to develop and deliver digital programs in line with public sector digital transformation needs, and (c) deliver certified training supporting public sector digital transformation for governments. In that sense, under the African Capacity Building Foundation, an AUC level mechanism, the project will develop trainers' capacity on digital government and governance to support Schools of Public Administration (SIPAs) across the continent in developing and implementing curriculum on public digital transformation. Additional support will also be allocated toward the development of certified curricula and e-learning platforms and programs as well as the development and delivery of specific trainings supporting both different level of technological skills and specific soft skills necessary for supporting public sector digital transformation.

(ii)   Foster knowledge sharing and innovation among public sector professionals: The project will provide support for (a) the development of electronic collaborative learning, knowledge exchange platforms and community of practices, (b) the development and implementation of mechanisms for peer- learning and exchanges between countries and government under the auspices of the AUC and bodies (internship, secondment programs and scholarships for ICT professionals and managers of digital transformation efforts), and (c) the development of regional initiatives for co-creation of innovative digital public sector solutions (regional innovation camps and innovation lab).

(iii)   Strengthen AUC's institutional capacity for the implementation of its digital transformation strategy: The project will provide resources to AUC to develop its capacity on monitoring the implementation of the AUC digital transformation strategy through the development of Monitoring and Evaluation framework and system.

Component 2: Supporting citizen-centric digital transformation and integration at country level (USD 270 million)

The component seeks to support countries in the implementation of their public sector digital transformation agenda. Proposed interventions under this component will seek to support the implementation of government digital platforms based upon the proposed AUC regional guidelines and frameworks developed under Component 1. This component will be a combination of input-based lending (investment and TA), as well as performance-based financing. The interventions will support the implementation of the whole-of-government approach to digital transformation and citizen centric digital platforms to foster improved governance of digital transformation, economies of scale, efficiency gains and improved service delivery to citizens.   Interventions will be tailored to the country specific context. A proposed menu of eligible activities would include:

(i)   Institutional capacity building for the implementation of the whole-of-government approach to digitalization. Specific interventions may include institutional support for the governance and coordination of the implementation of public sector digital transformation (e.g., support to digital government units at the center of government); and implementation of frameworks for planning the fit-for-purpose digital skill and capacity development across public sector.

(ii)   Development of digital platforms focused on citizen-centric service delivery (service delivery platforms, CivicTech, and shared services). Project interventions will focus on supporting governments to implement citizen-centric public service delivery platforms. This may be achieved by:

•   G2G shared services: integrating government services through shared services, such as unique government portal, data governance standards, interoperability framework, and/or digital system security framework, resulting on improved secured information sharing across government entity and improving service delivery. The integration of government services allows for the implementation of a "once-only" approach, reducing transaction costs for both citizens and government; and
•   G2C/G2B services: leveraging digital solutions to address actual citizen's and business' needs and deliver services through citizen-facing portals, mobile applications, and other instruments, offering transactional services (E-health services, E-tax, E-Procurement, E-registration for business etc.);
•   Feedback loop for citizen engagement: Leverage digital solutions to foster platforms for citizens to interact with the government and promote accountability (CivicTech).

(iii)   Human digital capacity building in the public sector. The project will support countries in developing trainings and tools to ensure the availability of fit-for-purpose digital skills in the public sector. This will be done through:
•   supporting SIPAs to design and implement AUC certified e-government curricula for new and existing public servants (initial training and on-the-job training), local government officials and training of trainers;
•   acquisition of appropriate hardware and software supporting capacity building; and
•   implementation of access points for learning platforms across the country, including rural and/or remote areas.

(iv)   Technical assistance to strengthen government transparency and support foundational legal and regulatory reforms in line with regional standards. The project will provide support for legal reviews and related TA to ensure adoption of foundational legislation in line with international good practices and regional standards in areas such as data security and privacy, digital transaction and signature, cybersecurity, and cybercriminality. Additional support will also be provided to foster the adoption of legal and regulatory frameworks, including the application of open government principles.

Country selection:
The selection of countries that will benefit from Component 2 financing will be based on the following criteria based on the pre-concept consultations and scoping:
1.   Eligible countries will be IDA countries
2.   Availability of country IDA allocation (1:2 national IDA to Regional IDA matching)
3.   Existence of good analytical foundations on the digital economy and digital governance (e.g., country completed a DE4A diagnostic in FY19 or FY20, and/or other related analytical work)
4.   A fundamental level of development of digital government (i.e., connectivity among government offices), so that government digital platforms are enabled; (NB: this can be assessed through indicators such as the Digital Adoption Index, and the UN E-Government Development Index)
5.   Country interest and existence of champions (both within the Governments and in the WB CMUs)
6.   Interest and logic of intervention based on complementarities, needs, and gaps in the digital transformation support and intervention in the country, including the existing IDA financing (current and pipeline).

The selection criteria will consider countries which have existing /relevant legal and regulatory frameworks or those which are willing to enact such frameworks with the project's technical assistance, so that potential risks associated with e-waste, data protection, and security and inclusion can be avoided or minimized.

The proposed project will begin intervention with a manageable number of countries (up to six initially). This can be scaled up under additional financing or through a series of projects, to ensure broad application of the shared standards, as well as to foster spillover effects and cross-border integration. Country groupings (or at least pairings) in the same linguistic/civil service tradition will also be considered to leverage the regionality of the project (e.g., to facilitate learning, peer exchange, and sub-regional spillover effects). The project design will follow an iterative process followed by a detailed stock take of existing governance, digital development and other operations that are at preparation or implementation stage, so as to complement their scope by building on areas they do not cover. The latest list (May 2020) of Africa Region projects (IPFs and DPOs) with elements of digital development is included in Annex 3. Given the above parameters, the initial short list of countries following the preliminary scoping includes the following:
•   Anglophone West AFR Group: Nigeria; Ghana; Sierra Leone
•   Anglophone East/Southern AFR Group: Kenya; Rwanda; Uganda; Malawi
•   Francophone AFR Group: Cote d'Ivoire; Cameroon

Component 3: Contingent Emergency Response Component (CERC)

The component will provide funding following an eligible emergency. The component will include conditions for the use of funds, and will only be triggered when certain actions, as agreed by the Government and Bank teams, are met. These actions include the following: (i) the country experiences an eligible emergency; and (ii) the country presents a

sound and actionable country-level response plan. This component provides a platform for country-level discussions about the importance and need for country-level readiness to respond to disease outbreaks. Once triggered, the component will be guided by Investment Project Financing (IPF) Policy, Paragraph 12, which enables rapid reallocation of funds between project components following an emergency. Together with the operational, fiduciary, procurement, disbursement and financial management arrangements that underpin its implementation, the component provides a conduit for additional emergency funds into the project.

D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

Environmental pollution is a growing problem and the environmental consequences of sustainable development and impacts on health and livelihoods cannot be ignored. The quantity and generation of waste in Africa has been increasing with a need for improved management. Digital pollution is on the rise from production of IT hardware, e-waste and daily human exposure to digital use. The African continent generates about 2.2 million tonnes annually of e-waste (UNU 2016) from imports of new and used equipment and a few local assembly plants. Locally derived e-waste generation constitute about 50- 85% while the rest is from the trans-boundary illegal imports. Infrastructure for solid waste management is weak in Africa and there is a lack of regulatory enforcement. Additional e-waste from the digital technology program will exacerbate e-waste management issues if not addressed from a regulatory, institutional and infra point of view. Many of the AU member countries may not have enacted legislation manage e-waste.

Digital technology can influence the way governments operate and interact with citizens allowing for increased transparency and more efficient service delivery. Digital technology in Africa has already provided opportunities for mobile money, avoiding the need to access physical banks; online identification to allow access to services and the expansion of small and medium businesses etc. However, increased digital capacity requires that all citizens have access to the digital technology needed to access e-services. Within sub-Saharan Africa 82/100 people have access to mobile cellular phones but only 25% of the population have access to the internet (International Telecommunication Union). There is significant variation within and between countries with lower access in rural areas and low income groups due to the relatively high costs associated with accessing digital technology. This affects community's ability to access the digital economy. Within the context of this digital divide, vulnerable groups and indigenous people are even less likely to be able to access digital technology. Failure to address these challenges could result in an increase in the digital divide.

The project activities are not expected to account for irreversible environmental and social impacts, conversion of natural habitats, degradation of biodiversity, loss of forest resources or large-scale resettlement as the project is not expected to finance large civil works. However, the project activities (technical assistance and capacity development) could have indirect environmental and social impacts that need to be properly identified and managed e.g. increased energy consumption for ICT, increased demand for raw materials needed for digital infrastructure and unsustainable consumption of these resources. Africa's fight against the digital divide could result in imports of computers and accessories that could generate e-wastes. Potential future investments in digital infrastructure in the African continent may cause small-scale short-term alteration of terrestrial and aquatic habitats during the construction of communications infrastructure. Potential impacts to habitat and communities may arise during construction and installation of infrastructure. However, there are also considerable environmental benefits from ICT development on climate change mitigation such as reduction in GHG emissions and cost optimization while using green ICT equipment.

People also need to trust that digital services will use the data collected only for the intended purposes and that their personal data is secure. Legislation is varied but key elements which provide data protection and consumer protection are often weak. Misuse of data (or its theft) has the potential to place vulnerable groups, such as the LGBTQ community, young mothers and pregnant girls, people living with HIV/AIDS and ethnic groups at risk of discrimination, or worse, if data is leaked or misused.

D. 2. Borrower's Institutional Capacity

Window 1 will provide a grant to the African Union Commission (AUC) to establish a digital enabling environment regionally. The AUC will need to ensure that the requirements of the Environmental and Social Framework (ESF) are incorporated into their activities. The capacity of the AUC to address environmental and social (E&S) risks related to digital governance and platforms will be assessed during preparation stage. However, the AUC has working with the World Bank in other projects (such as Africa CDC Regional Investment Financing project (P167916), AUC Child Trust Fund Additional Financing Project (P147508), Support for Capacity Development of the AUC and other AU Organs (P126848)) and is therefore expected to have an understanding of the requirements of the ESF and concerns around key issues associated with data protection and security; inclusion and e-waste management.

Window 2 will provide credit directly to individual selected borrower countries throughout the region, which will be identified prior to appraisal based on the selection criteria. As such, the borrower's capacity to manage E&S risks will need to be determined by appraisal as the countries and associated ministries and implementing agencies are identified. While the selection criteria will require the countries to demonstrate preparedness for establishment of systems, capacity to understand and address risks related to digital governance including issues such as data protection, cyber security and e-waste are likely to be limited. National legislation in many countries on these issues is likely to be absent or will contain grey areas. Furthermore, given that that ESF was only introduced in 2018, it is expected that the individual countries will have limited experience and experts in managing environmental and social risks in line with the requirements of the ESF.

National Digital Economy Diagnostic Reports developed as part of the operation preparation (e.g., in Ghana, Kenya, Mozambique, Nigeria and Rwanda) put a lot of emphasis on the assessment of the current state digital platforms, importance of digital infrastructure and platforms in the studied countries. Emphasis has also been given to the need for legal and regulatory framework for strengthening the ICT, electronic communications and transactions. However, no mention has been made on the need to develop and strengthen the legal and regulatory frameworks for managing potential E and S risks associated with the digital technologies. There should be technical assistance embedded in the project design to ensure that both the AUC and individual borrower countries will have appropriate policy and regulatory frameworks related to e-waste management, data protection and security (where such legal frameworks have not been enacted) and implementation. Furthermore, the selection criteria for Window 2 funding need to consider countries which have existing /relevant legal and regulatory frameworks or those which are willing to enact such frameworks with the project's technical assistance so that potential risks associated with e-waste, data protection and security and inclusion can be avoided or minimized.

With appropriate legal framework for e-waste management, the e-waste can be recycled and reused providing economic opportunities through collection, recovery and recycling businesses. Hence, there should be a regulatory framework to safely recycle and dispose of e-waste in African countries. The management of e-waste would entail the implementation of plans and protocols for disposal and recycling and the remediation of environmental risks. To address these gaps, AU and borrower countries selected for the Window 2 will conduct Strategic Environmental and Social Assessments (SESAs) during the implementation stage based on which each of the countries will prepare Environmental and Social Management Plans (with e-waste management component) for specific investments once identified.

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

A. Environmental and Social Risk Classification (ESRC)   Moderate

Environmental Risk Rating   Moderate

The project is expected to significantly contribute to sustainable development endeavors in Africa and no direct environmental risks and impacts may arise as a result of the project activities. One of the anticipated long-term indirect risk of the project is an increase in generation of e-waste and its improper management in the absence of relevant regulatory and institutional framework. Environmental impacts from informal e-waste recycling are increasing in Africa. E-waste contains toxic substances such as lead, cadmium, mercury, and brominated flame retardants. E-waste handling and disposal also exposes people to non-dioxin-like polychlorinated biphenyls (PCB), polycyclic aromatic hydrocarbons (PAH), polychlorinated dibenzo-p-dioxins (PCDD), polychlorinated dibenzofurans (PBDF) and dioxin-like polychlorinated biphenyls (DL-PCB). Most of these compounds are endocrine disrupters, and most are neuro- and immune-toxic as well. E-waste-related toxic elements can enter living organisms through air (e.g. open burning), soil (e.g. disposal), water via ingestion (e.g. food chains contamination due to disposal and primitive recycling processes), inhalation, and dermal absorption (e.g. dust and direct exposure of workers who labor in primitive recycling areas and their families). E-waste is resistant to biodegradation with strong tendency to bio-accumulate in agricultural lands and be available for uptake by grazing livestock. Elevated levels of e-waste pollutants in water, air, soil, dust and human matrices (blood, urine, breast milk) indicate that not only are e-waste workers at risk from exposure to e-waste, but the general population and future generations as well.

In addition to e-wastes, the project activities could indirectly lead to an increased consumption of raw materials and minerals, which are necessary for the digital development infrastructure. The impact of the large number of new cell towers and antennae that will be needed for networks, as well as the buildings housing servers and data centers may have additional unknown environmental impacts. It is necessary to review the possible impacts of the use of IT equipment throughout their life cycle to ensure that those impacts do not offset the expected gains. These potential indirect and long-term risks could be minimized with appropriate e-waste management and efficient resource management strategies. Environmentally sound e-waste management system in line with the concept of sustainable development and green ICT could help to minimize the risks. Given that the borrowers' capacity to handle e-wastes and other indirect environmental risks is weak, the environmental risk of this of project is assessed as moderate.

Social Risk Rating   Moderate

The Social Risk Rating is considered to be moderate at this stage as the Project does not involve activities with a high potential to harm the population. The likely impacts are expected to be reversible and can be managed with the application of appropriate mitigation measures. Key social concerns relate to (i) ensuring that any systems established under the project such as those to support tax, health or procurement include considerations of digital data protection and security both within the country and the region; (ii) there is appropriate stakeholder engagement at the national and local level with all stakeholders in a manner that is understandable and transparent and explains the benefits and impacts of the activities; (iii) the rights of vulnerable and indigenous peoples are considered in the project to ensure their inclusion and data protection covers such groups as needed. While there is likely to be limited

experience within the implementing agencies the limited nature of the proposed social risks means that impacts should be possible to mitigate and the agencies should with support be able to address the risks.

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:

Although no direct environmental risks and impacts may arise as a result of the project activities, the outcomes of technical assistance support may however have environmental implications going forward causing: i) increased quantities of electrical and electronic wastes that would be added to the waste stream in Africa, resulting in environmental risks and potentially inducing adverse health impacts; ii) indirect effects, such as increased use of energy and of primary resources; and iii) alteration of habitats, as a result of potential future investments in small scale construction and installation of linear digital infrastructure.

Direct social impacts associated with the project may relate to data protection and use associated with the establishment of sector specific systems in areas such as health, tax and procurement. Data collected as part of such systems should be maintained only the intended use and protocols/ agreements should be established for the sharing of the data within and between countries recognizing its potential usefulness. Vulnerable groups such as pregnant girls, the disabled, LGBTQ individuals etc. and indigenous peoples may be placed at risk if data is collected or shared inappropriately. While not envisaged at this stage it is possible that selected countries may request for small-scale civil works to renovate office buildings for data centers or to house hardware appropriately. Risks associated with any such construction activities would need to be assessed and mitigation developed as needed.

The development of any legal, regulatory or operational frameworks as part of the project at the regional or national level will need to be undertaken in line with the requirements for the ESSs to protect both the environment and people from any potential harm. Overall, policy and regulatory mitigation measures should encourage reducing digital environmental footprint via responsible purchasing, optimizing equipment rate and re-using or recycling hardware; promote eco-design best practices for software applications, data and hardware; and explore innovative ways how IT can support the environment.

As part of project, AUC and the borrower countries will conduct Strategic Environmental and Social Assessments (SESAs) which can serve as basis for the identification and management of any potential environmental and social risks of the project. This should inform the development of a strategic guidance document (handbook) by the AUC which will assist countries to develop policy frameworks to manage E&S risks and impacts. This will need to be developed during implementation with input from borrower countries to maximize buy-in. The SESA should cover issues such as ICT, data security, data protection, cybersecurity, e-waste management and perceptions and concerns around digitization. In addition, risks associated with dependence on the current system should also be identified for example loss of livelihoods for people dependent on the current systems such as waste pickers who may collect e-waste.   The terms of reference for SESAs will be developed and cleared prior to project appraisal. Site-specific environmental and social management plans (including e-waste management) will be prepared by each borrower country. The client will follow the WBG EHS Guidelines for Telecommunications to address environment, health and safety risks. The AUC and individual borrower countries will also prepare Environmental and Social Commitment Plan

(ESCPs) which outline the measures and actions required to avoid, minimize, reduce or otherwise mitigate the potential environmental and social risks and impacts of the project.

In line with the WB Policy for Investment Project Financing, the terms of reference, work plans or other documents defining the scope and outputs of technical assistance activities will be drafted so that the advice and other support provided is consistent with ESSs 1–10. Activities implemented by the Borrower following the completion of the project that are not financed by the Bank, or activities that are not directly related to the technical assistance, are not subject to the Policy, and therefore the requirements of the ESF

Areas where "Use of Borrower Framework" is being considered:

None

ESS10 Stakeholder Engagement and Information Disclosure

Stakeholder engagement is a critical tool for social and environmental risk management, project sustainability and success. In consultation with the Bank the borrowers will prepare and implement inclusive Stakeholder Engagement Plans (SEPs) proportional to the nature and scale of the project and associated risks and impacts. This will need to consider regional, national and local stakeholders who may be affected by the Project. The SEPs will need to take into account sharing information on the project activities, incorporating stakeholder feedback into the Project and reporting and disclosure of project documents. In addition, the needs of different groups including vulnerable and Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities (IP/SSAHUTLC) will need to be taken into account in planning such activities where relevant.

A draft of the SEPs will be prepared and disclosed prior to appraisal which will outline the engagement during project preparation and implementation including stakeholder identification and mapping, proposed approaches to engagement for different stakeholder groups as well as timings. The Borrowers will undertake meaningful engagement with stakeholders ensuring the provision of timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.

The SEPs will also consider how engagement can be undertaken in line with any restrictions that may be in place as a result of social distancing or restrictions on gatherings as a result of COVID-19 within the selected countries. This may involve the use of technology as well as more traditional means of communication including radios and traditional leaders.

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 majority of workers are expected to be existing government civil servants or employees of the AU. Existing civil servants will remain subject to the terms and conditions of their existing sector employment. Additional staff may be directly engaged (direct workers) to support the Project both within the AUC and national PIUs and will need to be contracted in line with the requirements of ESS2 in relation to labor and working conditions, non-discrimination and equal opportunities and occupational health and safety.

Any contractors hired to undertake construction or install hardware required to implement the project will also be subject to the requirements of ESS2 including occupational health and safety requirements and establishment of workers grievance redress mechanisms, taking into account the General Environmental Health and Safety Guidelines (EHSGs) and, as appropriate, the Telecommunications EHSGs and other Good International Industry Practice (GIIP). Should this require the employment of workers from outside the local area, if relevant, worker accommodation and influx will need to be managed in line with ESS2 (and ESS4). Likewise, any technical consultants contracted by the Project will also need to adhere to such standards.

As hardware and software will need to be procured the borrowers will need to identify or outline a process to identify potential risks associated with child labor, forced labor and serious safety issues in the supply chain and associated corrective actions. The borrowers will need to develop and implement written labor management procedures that will set out the way in which project workers will be managed throughout the project. Sexual harassment as well as Sexual Exploitation and Abuse (SEA) in the workplace and in association with access to opportunities such as training will also need to be addressed in the LMP.

ESS3 Resource Efficiency and Pollution Prevention and Management

The outcomes of the technical assistance activities may indirectly lead to an increase in e-waste stream in Africa in the long run. Hence, appropriate digital pollution prevention and management including e-waste management planning will be necessary. Greenhouse gas emissions from future investments may also result from the use of backup power generators, and the use of cooling and fire suppression systems. These potential indirect and long-term risks could be minimized with appropriate e-waste management and efficient resource management strategies. Proper recovery of materials from ICT/e-waste has economic, social and env value, can create job opportunities, etc.

The country-level ESMPs will include application of the mitigation hierarchy to manage of e-waste, during design, construction, operation, closure, and decommissioning. Environmentally-sound and safe management of e-waste, including measures to avoid or minimize the creation of nonhazardous wastes and ensure the recycling, reuse, or safe disposal of such wastes, and the obligations to manage such waste will be included as part of technical assistance to strengthen capacity and the overall governance for public sector digitalization.

ESS4 Community Health and Safety

If e-wastes are not properly managed, they could have considerable impacts on community health. For example, people can be exposed to e-waste-related toxicants though air (e.g. open burning of e-wastes), soil (e.g. random disposal of e-waste), water via ingestion (e.g. food chains contamination due to disposal and primitive recycling processes), inhalation, and dermal absorption (e.g. dust and direct exposure of workers who labor in primitive recycling areas and their families). E-waste is not biodegradable with strong tendency to bioaccumulate in agricultural lands posing a community health concern. Other impacts/risks could be linked to data security/personal security of data (e.g., health), data sanitization, theft when digital equipment is used (cells, computers, scan, etc.). Additionally, human exposure to use of digital technology (cellphones, towers) has been perceived to affect negatively the health and safety long term to communities and especially children.

Small scale civil works and installation of hardware may result in the presence of workers with the potential to impact community health. Gender-based violence (GBV), sexual exploitation and abuse (SEA), and the spread of sexually transmitted and communicable diseases, may occur although given the likely scale of any proposed works would be limited. The project will assess the risk of such activities to community health and include measures to mitigate the risk as required in the ESMPs which will be developed for the project.

Digital security needs to be considered in relation to both data protection and cyber-security. During appraisal the project will need to assess the extent to which digital security is already enacted in the countries selected as part of Window 2 and the implementation of the same. Country level Digital Stock Taking Reviews prepared by the World Bank are likely to inform both the selection of borrower countries as well as the readiness of countries to manage social risks associated with digital security. The SESA will need to consider the impacts of digitization in Africa focusing on data protection, cyber security and issues of inclusion building on this work. The SESA will also need to determine perceptions of risk within African countries to manage data security. During appraisal it will be determined if this work should be led by the AUC or the individual countries, once they have been identified depending on their capacity and potential risks.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Land acquisition, restrictions on land use and involuntary resettlement are not anticipated as part of the project. In the event of any civil works, beyond refurbishment of existing facilities, the ownership and use of land will be determined and if land does need to be acquired or is being used for economic activities a Resettlement Action Plan would need to be prepared. In addition, as outlined in ESS1 any loss of livelihoods associated with dependence on the current systems such as waste pickers will need to be identified and mitigation proposed.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

At this stage of the project, no direct impact on biodiversity and living natural resources is anticipated. However, the outcomes of the technical assistance activities could lead to infrastructure development such as installation of communication facilities (e.g cable laying). Potential impacts to habitat may be more significant during construction and installation of linear infrastructure, such as long-distance fixed line cables, as well as access roads to other types

of infrastructure along. Any potential risks to biodiversity and living natural resources will be managed following the procedure to be set in the environmental and social management framework.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (IPs/SSAHUTLC) may be present in the selected countries. However, given the nature of the Project differential impacts are not expected to occur to IP/SSAHUTLC. The SESAs will need to identify the presence of IP/SSAHUTLC and determine if there are any risks or impacts to such groups that will need to be addressed and the need for further assessments or development of specific plans during implementation. This will require engagement with IP/SSAHUTLC to determine their perceptions and concerns around digital governance capacity. The Stakeholder Engagement Plan (SEP) which be developed by each borrower country will outline the approach to engagement with IP/SSAHUTLC to determine if they have any specific concerns which need to be addressed in the project design or via mitigation.

ESS8 Cultural Heritage

This standard has been considered as relevant for precautionary reasons. Although large scale infrastructure development is not anticipated, future infrastructure development activities such as construction of data centers may have impacts on cultural heritage. The environmental and social assessment will confirm if there any potential risks associated with the project on tangible or intangible cultural heritage.

ESS9 Financial Intermediaries

This standard is not currently relevant as the use of Financial Intermediaries is not proposed.

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

NA

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

Actions to be completed prior to Bank Board Approval:

The following E&S risk management documents will be prepared before appraisal:
(i)   Terms of reference for Strategic Environmental and Social Assessment for both AUC and borrower countries
(ii)   Environmental and Social Commitment Plans (ESCPs)
(iii)   Stakeholder Engagement Plans (SEPs)

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

The environmental and social commitment plan will among others include borrower's commitment to:
a)   establish a functioning E&S risk management system including deployment of qualified staff
b)   develop the SESA during implementation which will feed into the development of policies and frameworks
c)   prepare and implement site specific environmental and social risk management tools such as ESMPs including e-waste management plan
d)   compliance monitoring and reporting
e)   implement the project in compliance with the applicable environmental and social standards
f)   establish all legal, regulatory and operational frameworks in line with the requirements of the ESSs.

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS   04-Jan-2021

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: African Union Commission

Implementing Agency(ies)

Implementing Agency: African Union Commission

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s):	Jana Kunicova, Heriniaina Andrianasy
Practice Manager (ENR/Social)	Robin Mearns Recommended on 21-May-2020 at 13:25:36 EDT
Safeguards Advisor ESSA	Nathalie S. Munzberg (SAESSA) Cleared on 22-Jun-2020 at 19:06:24 EDT