Concept Environmental and Social Review Summary
Concept Stage
(ESRS Concept Stage)

Date Prepared/Updated: 07/22/2021 | Report No: ESRSC01875
### BASIC INFORMATION

#### A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
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<tbody>
<tr>
<td>Nigeria</td>
<td>AFRICA WEST</td>
<td>P175237</td>
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<table>
<thead>
<tr>
<th>Project Name</th>
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<tr>
<td>Agro-Climatic Resilience in Semi-Arid Landscapes (ACReSAL)</td>
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<table>
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<tr>
<th>Practice Area (Lead)</th>
<th>Financing Instrument</th>
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<td>Investment Project Financing</td>
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<tr>
<th>Borrower(s)</th>
<th>Implementing Agency(ies)</th>
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<td>Federal Ministry of Finance</td>
<td>Federal Minister of Environment</td>
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**Proposed Development Objective**

The Project Development Objective (PDO) is to increase the adoption of climate resilient landscape management practices and enhance livelihoods in targeted arid/semi-arid watersheds in Northern Nigeria.

**Financing (in USD Million)**

<table>
<thead>
<tr>
<th>Financing (in USD Million)</th>
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<tr>
<td>Total Project Cost</td>
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**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]**

Background/Rationale: This project seeks to address some of the critical challenges in Northern Nigeria. The region is characterized by high poverty rates, low literacy, an environment of fragility, conflict, and violence, degradation of natural resources, poor agricultural productivity, climate risks, desertification, poor penetration of modern technology, and weak institutional capacity. Addressing these issues will require may decades of effort in multiple sectors. The proposed project will target selected States in arid and semi-arid area. The semi-arid States are located in the Sahel, Sudan Guinea Savanna and Southern Guinea Ecosystem, characterized by dry-semi-arid conditions, low precipitation, and sparse vegetative cover. An integrated and participatory catchment management approach will be
the operating framework for project implementation at field level. Appropriate modern technology will be leveraged throughout the project activities, including to manage the disruption of the ongoing COVID-19 pandemic and help build back better and smarter. In particular, the project will support activities to develop multi-sectoral approaches for desertification control and landscape management, improve community livelihoods and resilience, and strengthen institutions. This component aims to support communities with improved capacity and investments to improve sustainable livelihoods. This proposed project aligns with the Federal Government of Nigeria in restoring one million ha degraded land out of the 4 million ha targets set for broader landscape restoration by 2030. The proposed operation is well aligned with the range of COVID 19 intervention actions of Nigeria.

Project Development Objective (PDO): The Project Development Objective (PDO) is to increase the adoption of climate resilient landscape management practices and enhance livelihoods in targeted arid/semi-arid watersheds in Northern Nigeria.

Key Results: The following indicators are proposed to measure key achievements of the PDO: (i) Land area under sustainable landscape management practices (ha)-corporate indicator; (ii) Percentage of targeted catchment areas showing an increase in Normalized Difference Vegetation Index (NDVI), correcting for climate effects (%); (iii) Land area under Community Managed Natural Regeneration addressing natural resources overreach restoring and social conflicts (ha); (iv) Land area under desertification control (ha); (v) Net change in agriculture area using improved sustainable practices (ha); (vi) People (disaggregated by gender) adopting improved climate resilient management through technologies (#); (vii) Number of project beneficiaries supported through short-term COVID-19 responses (disaggregated by gender) (#); (viii) Farmers (disaggregated by gender) gaining access to water for productive use (#); and ix) Landless youth provided with green jobs (#).

Project Description: Project objectives will be achieved through the implementation of the activities in the four interrelated components:

A. Desertification Control and Landscape Management. This component aims to prepare and implement investments to arrest desertification and improve the sustainable productivity of land in targeted areas of degraded and desert landscapes. Activities are proposed to include Investment Preparation; Desertification Control; Integrated Watershed Management and Climate Resilient Conservation Works and Climate-smart Sustainable Agriculture.

B. Community Livelihoods and Resilience. This component aims to support communities with improved capacity and investments to improve sustainable livelihoods. Activities are proposed to include. Community Empowerment for Peacebuilding; Community Green Infrastructure and Services and Livelihood Improvement.

C. Institutional Strengthening and Project Management. This component aims to strengthen capacities of institutions at various levels (e.g. national, selected states) in order to modernize their work for the longer-term on integrated multi-sectoral planning, information management, and building systems for improving land and water management and sustainable agricultural productivity in northern Nigeria. Activities are proposed to include Institutional Modernization; Policy Support; Project Management and

D. Contingency Emergency Response Component (CERC) for landscape and community resilience in response to extreme weather, land movement events and other emergencies.

Institutional Arrangement: Project implementation would follow the NEWMAP model and be implemented through existing NEWMAP Project Management Units (PMUs) already in place at the federal Ministry of Environment and State Departments of Environments.

D. Environmental and Social Overview
D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]
This project seeks to address some of the critical development challenges in Northern Nigeria. The region is characterized by high poverty rates, low literacy, an environment of fragility, conflict, and violence, degradation of natural resources, poor agricultural productivity, climate risks, desertification, poor penetration of modern technology, and weak institutional capacity. The proposed project will target selected States in arid and semi-arid areas. An integrated and participatory catchment management approach will be the operating framework for project implementation at field level. Appropriate modern technology will be leveraged throughout the project activities, including to manage the disruption of the ongoing COVID-19 pandemic and help build back better and smarter. In particular, the project will support activities to develop multi-sectoral approaches for desertification control and landscape management, improve community livelihoods and resilience, and strengthen institutions. The proposed operation is well aligned with the range of COVID 19 intervention actions of Nigeria.

Project objectives will be achieved through the implementation of the activities in the four interrelated components:

Component A. Desertification Control and Landscape Management. This component aims to prepare and implement investments to arrest desertification and improve the sustainable productivity of land in targeted areas of degraded and desert landscapes. Activities are proposed to include: investment preparation; desertification control; integrated watershed management; and, climate resilient conservation works and climate-smart sustainable agriculture. Specific activities proposed under this component include: soil conservation works and green infrastructure such as gully plugging; construction and rehabilitation small-medium size dams; contour ripping and water weirs as well as drains for improved flood water management including watershed rehabilitation works.

Component B. Community Livelihoods and Resilience. This component aims to support communities with improved capacity and investments to improve sustainable livelihoods. Activities are proposed to include: community empowerment for peacebuilding; community green infrastructure; and, services and livelihood improvement such as small all scale community agro processing, common market infrastructures like water point improvement, sanitation and shared market logistic. Other similar activities proposed for intervention under this component are rehabilitation of paths/tracks/roads and other connectivity infrastructures.

Component C. Institutional Strengthening and Project Management. This component aims to strengthen capacities of institutions at various levels (e.g. national level and selected states) in order to modernize their work for the longer-term on integrated multi-sectoral planning, information management, and building systems for improving land and water management and sustainable agricultural productivity in northern Nigeria. Activities are proposed to include: institutional modernization; policy support; and project arrangement.

Component D. Contingency Emergency Response Component (CERC) for landscape and community resilience in response to extreme weather, land movement events and other emergencies. The proposed project will further enhance the preparedness of Nigeria to respond to natural hazards, climate risks, desertification, and natural disasters by restoring degraded lands in dry, semi-arid regions in the north, and increasing government, state, and community capacity to mitigate and respond to climate change. The activities in the proposed project are consistent with the four pillars of the Country Partnership Strategy.

D. 2. Borrower’s Institutional Capacity
The project will be implemented through existing Nigeria Erosion and Watershed Management Project (NEWMAP, P124905) Project Management Units (PMUs), which is already in place at the Federal Ministry of Environment and State Departments of Environments. NEWMAP is under implementation since 2013 under WB Operation Policies. The existing PMU is familiar with the Bank E&S requirements and Operation Policies, however, might benefit from capacity strengthening on Bank ESF policy and requirements.

Synergy with FADAMA and TRIMING operations/locations will be an important factor in site selection but not necessary. Therefore, the PMUs in participating States and at the national level would need to be strengthened where necessary to deliver all project activities.

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

A. Environmental and Social Risk Classification (ESRC)

Environmental Risk Rating

High

The project will support activities to develop multi-sectoral approaches for desertification control and landscape management, improve community livelihoods and resilience, and strengthen institutions which in turn will create positive environmental benefits among others. Considering potential E&S risks of project activities and Borrower’s capacity on ESF implementation, environmental risk rating is considered substantial at this stage of the Project. Component A of the Project focuses on desertification control and integrated watershed management and includes activities such as climate resilient civil works and vegetative interventions; soil conservation works and green infrastructure such as gully plugging, construction and rehabilitation small-medium size dams, contour ripping and water weirs as well as drains for improved flood water management. E&S risks and impacts typical of construction work (for example, vehicle raised dust, nuisance noise, water use and contamination, soil compaction and erosion, waste management, and worker health and safety), as well as potential impacts on biodiversity need to be assessed and managed properly. This component also focuses on climate change resilience at the farm level and includes climate-smart activities such as: restoration and management of riverbanks; reforestation and promotion of agro-forestry; improved livestock management; improved water harvesting and water storage in ponds; irrigation technologies; and, energy-efficient storage, transportation, handling, and processing facilities. E&S risks associated with pest management, vector management associated with livestock and water storage ponds, biodiversity conservation, minor to moderate civil works might have adverse E&S risks and impacts. Environmental and social assessments will be conducted, and management plans will be prepared prior to any civil works to manage the E&S risks according to mitigation hierarchy. Component B will focus on community livelihoods and resilience and will entail small infrastructure works including: water point improvement; community water supply and sanitation; rehabilitation of paths/tracks/roads and other connectivity; small-scale solar installations; bioenergy; post-harvest management and shared storage; small-scale community agro-processing; common market infrastructure; and shared market transport logistics, among others. Similar to Component A, E&S risks and impacts of small infrastructure works will be assessed prior to construction and will managed according to specified environment and social management plans (ESMPs). Component C on institutional strengthening include investments to improve monitoring (for example: in-situ monitoring of hydrometeorological and other aspects with sensors, 360° cameras and mobile apps; strengthening of laboratories for testing of soil water and other media; and, use of satellite and UAV earth observation monitoring) and improvement of institutional infrastructure (e.g. buildings, IT and office
equipment and connectivity, simple online videoconferencing, etc.). These require proper handling and managing e-waste, chemical, and hazardous waste, and good resource and energy efficiency practices among others. Potential E&S risks and impacts including for policy support will be assessed and managed according to ESMPs.

**Social Risk Rating**

Based on the currently available information, the project is expected to have positive social benefits. Components A and B of the project aim to address ecological threats through sustainable approaches to desertification and degradation control including watershed management through participatory management planning and investments in infrastructures to restore degraded landscapes and critical water supplies. The social risk is rated as high at this stage given these infrastructural interventions might attract large labor, there will be risk of labor management and working condition include risk of land acquisition and restriction of access to economic sources. While the project propose to finance soil conservation works and green infrastructure such as gully plugging, construction and rehabilitation of small-medium size dams, contour ripping and water weirs as well as drains for improved flood water management watershed rehabilitation works, there could also be risk to community health and safety and cultural resources. Furthermore, the intervention in water weirs, small medium dam rehabilitation could increase competition for resources downstream. Given that the exact states and location of these intervention are unknown at this stage, a framework approach will be adopted. To this end a Resettlement Policy Framework (RPF) that spells out the resettlement and compensation principles, organizational arrangements and design criteria to be applied to meet the needs of project-affected persons and specifies the contents of a Resettlement Action Plan (RAP) will be developed and disclosed prior to commencement of any civil work or activities that will involve land acquisition or restriction of access to livelihood sources. Similarly, an ESMF will also be developed and disclosed to address other project social risk. A labor management procedure including OHS plan to address labour health and safety will also be developed. The interventions under the project will happen in northern Nigeria including northeastern part of Nigeria that is an FCV area, there will be risk of security of both project workers and contractors. Security has become a major source of concern on WB financed projects in Nigeria with several incidences of kidnapping. In view of this, a comprehensive review of security situation and security needs on all sites are expected to be prepared jointly with the participating state governments to prepare robust security management plan prior to appraisal. The social risk classification also considered security risks for project’s staff, community workers and beneficiaries given the presence of non-State armed groups activities across the region and around some locations targeted by the project. To this end a security assessment would be conducted and a security management plan developed prior to appraisal to address security risk. This plan will be constantly updated to respond to changes in security issues in participating states. In addition, the social risk classification also considered COVID-19 related risks with respect to stakeholders engagement / community mobilization activities. This will follow Bank guidance under COVID19. Water capture and storage improvements might affect water availability to downstream farmers which could lead to conflict and violence. Plans to address these risk might include involvement of water users association and water groups set up for this purpose. The project intervention is proposed to happen in a rural /peri-urban area with very low absorption capacity for risk of sexual exploitation and abuse and sexual harassment (SEA/SH), as such the project will be screen for risk of SEA/SH and appropriate SEA/SH action plan including relevant code of conduct would be developed and implemented to address these risks including livelihood support. Considering the type, scope and geographical spread and borrower limited capacity on ESF, the risk is rated high at this stage.

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

**B.1. General Assessment**
ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The expected environmental and social impacts of the project will be generally positive given that the project focus is on building landscape resilience, watershed management, agro-climatic improvement and livelihood restoration and diversification. The proposed project activities may have potential adverse environmental and social risks and impacts due to the small to medium scale civil works in landscape restoration, soil conservation, construction and rehabilitation of water infrastructure among others.

The social issues/risks associated with the project include impacts due to land acquisition for construction (permanent and temporary), restriction of access, impacts on cultural heritage and women’s safety / exclusion if facilities are not sited properly. Other risks include labor risks due to workforce brought into rural areas by contractors, resultant impacts on community health, Sexual Exploitation and Abuse (SEA) / Sexual Harrassment (SH) issues and potential influx due to improved water and sanitation infrastructure.

The project might require land to undertake water harvesting and storage through small-scale water retention structures. It is possible that lands could be sourced through voluntary community donations. However, where land is scarce there could be need for land acquisition leading to physical and economic displacement, both temporary and permanent.

Unskilled labor may be sourced from local communities whenever possible. However, the contractors may bring in a certain number of workers which cannot be estimated at this stage. Experience indicates that, the influx of workers into a project area can lead to adverse social impacts such as SEA/SH and spread of communicable diseases and potential conflict resulting from increased competition for resources. Given the nature and scope of the project SEA/SH risks are ascertained as moderate and measures to put in place for SEA/SH prevention will be commensurate to the risk rating.

Similarly, the design and siting of facilities needs to be done in consultation with women and people living with disability in a manner that promotes inclusion and the safety of women. The design of the facilities also needs to be gender inclusive and functional with universal access. The site selection criteria therefore have associated risks of exposing women to unsafe conditions and impacting cultural heritage if women and other groups from the communities aren’t engaged in these decisions. Active consultation and engagement with women’s groups, people living with disability and other ethnic minority groups is needed to manage GBV risks.

The project design may affect vulnerable groups like elderly and persons with disabilities. The activities and sub-projects, therefore, need to be designed to include persons with disabilities and elderly groups that may have trouble accessing infrastructure that is located far from the main areas of habitation. Other vulnerable groups may include lower income households.

The activities and sub-projects may lead to labor influx as communities may migrate closer to the improved facilities, specially to bigger rural villages with potential transition to small towns. Through in-depth stakeholder consultation and planning the issue of potential influx should be addressed.

Environmental and Social Assessment: Measures to mitigate the anticipated E&S risks and impacts will be included in the Environmental and Social Management Framework (ESMF) to be prepared by the PMU, consulted upon and disclosed both in-country and in the World Bank’s Infoshop prior to project appraisal. The ESMF will provide the criteria and procedures for screening sub-project investments and guide the preparation of site-specific environmental and social impact assessments/management plans (ESIA/ESMPs) including Pest/Vector Management Plan. It will also assess the institutional capacity of the borrower and provide measures for capacity building, and an estimated budget required for implementing the ESMF.
The borrower will prepare a Resettlement Plan Framework (RPF) to guide any potential land acquisition by the selected states due to the project. The borrower will also prepare a Stakeholder Engagement Plan (SEP) to consult and include stakeholders in project design and implementation along with grievance redress procedures. To protect workforce and mitigate labor related risks the borrower will also need to prepare Labor Management Plans/Procedures (LMP). Other relevant management plans such as the Contractor’s Environmental and Social Management Plan (C-ESMP), Occupational Health and Safety Plan (OHP)/Community Health and Safety Plan (CHP), Waste Management Plan (WMP), Traffic Management Plan (TMP), Security Assessment and Management Plans (SMP) etc. would be developed. The borrower will be required, to ensure contractors, as a condition of their contracts with the Project, implement and comply with the ESIAs/ESMPs, including preparing construction management plans. In addition, codes of conduct and trainings on OHS/CHS, child abuse, SEA/SH will be developed for all skilled and unskilled workers.

The provisions and requirements of these plans and procedures will be incumbent upon the primary implementing agencies at the state level. Once the states are selected based on the eligibility criteria established by the project, the subsequent State PIU will be required to carry out site specific Environmental and Social Impact Assessments (ESIAs) and their ESMPs that will inform the E&S risks of the project once the nature, scope and geographical location of the sub-projects are known. The ESIA/ESMP will be carried out by consulting firms to be procured by the State PIU in line with the requirement of the Environmental and Social Standards (ESSs) and the Nigerian EIA Act No. 86 of 1992.

The ESIA will provide an analysis of relevant social issues such as social diversity and gender, GBV assessment and service provider mapping, social institutions, rules and behaviors, influx issues, stakeholder analysis, vulnerable groups, participation and consultation mechanisms. The assessment will begin early at the preparatory stage to help shape the project design and components and inform relevant plans and processes (SEP, Grievance Redress Mechanism (GRM), GBV mitigation plan and disability inclusion and Gender tag requirement etc.). If land acquisition is involved, then site specific Resettlement Action Plans (RAPs) or Abbreviated RAPs will need to be prepared depending on the scale of impact and number of project affected persons (PAPs). The RAP /ARAP will be disclosed and implemented before commencement of any civil work or land take. The project preparation team at the PIU should include experienced Gender/GBV specialist, as well as Environmental and Social ESF specialists including Third Party Monitoring.

Given that majority of the anticipated E&S risks and impacts will occur during the construction phase, construction contractors will be required, as a condition of their contracts with the Project, to implement and comply with the ESIAs/ESMPs, including preparing construction management plans.

**Areas where “Use of Borrower Framework” is being considered:**

The borrower has certain relevant regulations for environmental and social assessments such as EIA Act, national labor law, National gender policy and anti-human trafficking and sexual exploitation. The Borrower has a relevant legal framework for addressing environmental and social risks and impacts. However, its capacity through policies and institutional arrangements is limited. As such, the project activities will comply with local policies and regulations yet reliance on the borrower’s E&S framework is not considered to be appropriate.
The project scope and complexity will require significant coordination and inputs from different stakeholder groups including those who will be directly affected as well as those who have other interests in the project interventions. In consultation with the Bank team, the project will prepare and implement an inclusive Stakeholder Engagement Plan (SEP) proportional to the nature and scale of the project and associated risks and impacts identified. Specific identification of vulnerable groups and their inclusion in stakeholder engagement will be addressed. This engagement process will be based on the Bank COIVD-19 guidance on consultation and community engagement an also align with the relevant Nigeria Center for Disease Control (NCDC) and state COVID-19 protocols. The identified stakeholders at the stage include Federal Ministry of Water Resources, Ministry of Environment, Ministry of Agriculture, Farmers Groups, Water Users Association, CSO/CBO. These will be updated as project preparation progresses, and additional stakeholders are identified.

A draft of the SEP will be prepared and disclosed as early as possible and prior to appraisal. If major changes are made to project design during preparation, a revised SEP should be publicly disclosed. The borrower will engage in meaningful consultations with all stakeholders throughout the project life cycle taking into account the different access and communication needs of various groups and individuals particularly the vulnerable and disadvantaged groups (persons with disabilities, gender groups, elderly and vulnerable children).

Stakeholder consultations will be essential to providing inputs to the project design, environmental and social assessment and mitigation plans, Environmental and Social Commitment Plan (ESCP), monitoring reports, and further evaluation of the project. A comprehensive and project-wide GRM needs to be designed which will enable a broad range of stakeholders to channel concerns, questions, and complaints to the various implementation agencies. The GRM will address potential complaint and feedback from individuals, schools, relevant institutions/agencies and surrounding communities. Particularly the GRM will have trained GBV specialists to address any GBV related issues and complaints.

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 project includes the rehabilitation or construction of water infrastructure and soil erosion control and landscape restoration facilities. To execute the project, therefore, contractors may be hired. Unskilled labor may be sourced from local communities whenever possible. However, the contractors may bring in a certain number of workers which cannot be estimated at this stage.

In Nigeria legislation such as the Labor Act, National Minimum Wage Act (2010), Employment Compensation Act (2010), and Factories Act (2004) govern, among other things, health & safety of workers, minimum wages, and prevention of child labor. However, there is varying degrees of implementation of these legislations as many responsible agencies are under resourced and lack monitoring capacities. Further, provisions of the labor laws do not adequately protect casual/day labor as well as migrant workers.
The requirements of ESS 2 will be applicable to the direct workers of the Federal and State level PIUs and will need to meet requirements for the following: (i) Terms and conditions of employment; (ii) Non-discrimination and equal opportunity; (iii) The development and adherence to Code of conduct by all workers engaged; (iv) Worker’s organizations; (v) Child labor; (vi) Forced labor; (vii) A grievance mechanism; and, (viii) Occupational health and safety. A grievance management mechanism will have to be designed and made operational at each PIU level to address grievances of project workers.

Construction companies and consultants contracted under the project will be subject to the requirements of ESS2 including occupational health and safety and grievance mechanisms. Should this require the employment of (skilled) workers from outside the local area, worker accommodation and influx will need to be managed in line with ESS2 (and ESS4). Requirements of ESS2 will be applicable to community workers and primary supply workers as well, as they became relevant.

The borrower will prepare a labor management plan/procedure (LMP) to outline the issues related to child labor, labor influx, working conditions and how to manage the labor force in the project. The LMP will be prepared before project appraisal. As part of the mitigation measures of the LMP the borrower will require that skilled and unskilled workers be sourced locally to the extent possible to minimize importation of labor. The provisions of the LMP will need to be adapted by contractors, the PIUs and other relevant implementing agencies.

Occupational Health and Safety (OHS): To protect the health and safety of workers during the construction and operational phases of the project the implementing agencies will develop and implement an Occupational Health and Safety Plan (OHS) plan in line with World Bank Group Environment, Health and Safety (EHS) Guidelines (for construction activities) and Guidelines for Water and Sanitation. The plan will include procedures on incident investigation and reporting, recording and reporting of non-conformances, emergency preparedness and response procedures and continuous training and awareness to workers.

ESS3 Resource Efficiency and Pollution Prevention and Management

Construction works foreseen under project activities might generate air, noise, water, soil, and groundwater pollution. Solid and hazardous waste including construction waste might be generated. In case Asbestos is found in rehabilitation works it must be handled and disposed properly. Construction E&S risk will be assessed and managed in accordance with the provision of the ESMPs.

Agriculture activities might require use of pesticide, in such cases proper pesticide management plans will be prepared and handling, storage, use and disposal of pesticides will be done in accordance with the provision of the Pest Management Plan as contained in the ESMF. E-waste generation and energy efficiency might be relevant for Component C. These should be assessed and managed with ESMPs if deemed appropriate.

The project will support efficient water and natural resources use, including effects on water users located in downstream. Resource efficiency will be maintained through project design and ESMPs as appropriate.

ESS4 Community Health and Safety
Community health and safety risks associated with the project activities include exposure to physical hazards on project sites, health issues including faeces- and water-borne and vector borne diseases which may result from poor site management such as stagnant water and risk of flooding.

Experience indicates that bringing in outside workers by contractors into remote areas can lead to adverse social impacts such as sexual exploitation and abuse / sexual harassment, spread of communicable diseases like HIV/AIDS and potential conflict. The sanitation facilities and water infrastructure should be located in consultation with communities to guard against safety risks to women such as facilities located in poorly lit places or at long distances from habitations.

As part of ESIA/ESMP, the Project will evaluate site specific community health risks and impacts of the project all through its lifetime and will mitigate any potential risks and impacts.

Most of the project area located in FCV states. Therefore, the security situation will be carefully assessed, and security management plans will be prepared.

**ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

The size of land requirements/ acquisition for the project may vary depending on the extent of the intervention activities proposed under each of the project components. It is possible that lands could be sourced through voluntary community donations. However, where productive land is scarce there could be need for land acquisition leading to physical and economic displacement, both temporary and permanent. In land deficit or conflict areas it could be hard to source lands for the sub-projects and there is risk of exacerbating conflict. Similarly, where overcrowding is an issue, lands for public facilities may be scarce prompting the need for land acquisition.

Currently there is lack of clarity on the process to be followed to access land. The federal level PIU will prepare a Resettlement Plan Framework (RPF) which will be adopted by the participating state PIUs and detailed RAPs or Abbreviated RAPs will be prepared once the sites are known.

**ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

It is expected that the proposed construction/rehabilitation sites are not located in legally protected areas or areas of high biodiversity values. Any impacts on modified habitats will be assessed during the preparation of the site-specific ESIs/ESMPs prepared in accordance with the screening tools provided in the ESMF. The project might likely use raw materials for construction which will be sourced following measures described in the Good International Industry Practices (GIIPs). The ESIA/ESMP will provide guidance on screening and mitigation measures to ensure that project activities do not alter or cause destruction of any critical or sensitive natural habitats.

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

Currently the policy on IP or historically underserved communities does not apply to Nigeria.
ESS8 Cultural Heritage

The environmental and social assessment will confirm the existence of tangible or intangible cultural heritage. If sites or features are identified, then a cultural heritage management plan or plans may be required. Regardless, all construction contracts will include a “Chance Find” clause which will require contractors to stop construction in the event that cultural property sites are encountered during construction.

The execution of the project will be done in a culturally appropriate manner with due consultations with the beneficiary communities. Siting sub-project on or near community heritage sites, sacred spaces or affecting tangible or intangible cultural resources may heighten risks of opposition to the project.

ESS9 Financial Intermediaries

This standard is not relevant at this stage of the Project.

B.3 Other Relevant Project Risks

- Political and governance risk is rated Substantial. Strong political and agency support exists for NEWMAP at federal and targeted state levels, evidenced by the rising demand from states to join the project. The security situation in some parts of north may raise challenges for implementation and supervision. The project will have flexibility to move implementation to other sites should an area become too difficult to work in for short periods, and then reengage when things stabilize. Micro-economic risks, such as balance of payments constraints, might affect the ability of the government to pay any required envisaged counterpart funds.

- Sector strategies and policies risk is rated Moderate. The project will be implemented across several MDAs at national and state levels, creating the risk for overlapping mandates or gaps in mandates. This issue has largely been addressed in NEWMAP with earlier states through technical assistance by the Federal PMU. It is envisaged this process would be scaled up with states in the new project.

- Technical design of the project or program is rated Moderate. The catchment management process under NEWMAP is now a well-tested approach, although mainly for urban and peri-urban catchments in Southern States. The proven methodology that exists will allow new states to shorten their learning curve by adopting best practices and learning from other states.

- Fiduciary risk is rated High. The risk of corruption and fraud will be high and will be mitigated by supporting the procurement, financial management, and oversight systems, and building on the successful experiences in the earlier project states under NEWMAP.

- Institutional capacity for implementation and sustainability risk is rated Substantial. The project will likely face challenges in terms of state and federal implementing agencies engaging new technical specialists in a timely manner. The Bank and existing federal and state PMUs will be able to quickly develop new TORs during preparation.

- Stakeholder risk is rated Substantial. The project will implement a more holistic approach for catchment management that is centered on community participation in planning, implementation, and livelihood improvement. In some areas, there may be risks from potential elite capture of project benefits and exclusion of some stakeholders, particularly underserved members of targeted communities. To mitigate these risks, the project will implement
strong communication measures during implementation to mobilize and inform local communities using a strong consultation approach.

C. Legal Operational Policies that Apply

<table>
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<th>Policy Description</th>
<th>Compliance</th>
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<td>OP 7.50 Projects on International Waterways</td>
<td>Yes</td>
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<td>OP 7.60 Projects in Disputed Areas</td>
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III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? No

Financing Partners

Not relevant. There are no other financing partner.

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

Actions to be completed prior to Bank Board Approval:

- Preparation, consultation and disclosure of a draft Environmental and Social Commitment Plan (ESCP) – Before Appraisal;
- Preparation, consultation and disclosure of a draft Stakeholder Engagement Plan (SEP)- Before Appraisal;
- Preparation, consultation and disclosure of draft Environmental and Social Framework (ESMF) (including ESMF for CERC component and PMP); Resettlement Policy Framework (RPF) and draft Labor Management Procedures (LMP)- Before Appraisal.
- Security Risk Assessment and preparation of Security Management Plan for all participating states prior to appraisal.

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

- Institutional arrangements for the management of ESS standards, including the recruitment of a qualified environmental and social specialist at the PMU level;
- Establishment of proper Environmental and Social Management Systems (ESMS) for selected states;
- Monitoring of ESF performance of selected States (including contractor/subcontractor management);
- Finalize the draft RPF, LMP, and SEP in a timely manner;
- Preparation, consultation and disclosure of ESMF and Environmental and Social Management Plan (ESMP) in a timely manner before construction or operation; ESMF to address CERC component as well;
- Preparation of RAP, when required during project implementation;
- Preparation, implementation and supervision of SEA/SH Action Plan;
- Development and implementation of institutional environmental and social capacity strengthening plan;
• Preparation of Environment, Health and Safety (EHS) Plan as stand-alone document or part of the ESMP both for construction and operation;
• ESMP and LMP provisions to be included in the Bidding documents and contracts.
• Prepare draft grievance redress mechanism (GRM) and disseminate the structure to all stakeholders before commencement of works.

C. Timing
Tentative target date for preparing the Appraisal Stage ESRS

27-May-2021

IV. CONTACT POINTS

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VI. APPROVAL