

**INTEGRATED SAFEGUARDS DATASHEET  
APPRAISAL STAGE**

Report No.: 126720

Date prepared/updated: May 16, 2018

**I. Basic Information**

**1. Basic Project Data**

Country: Federal Republic of Nigeria		Project ID: P162009	
		Additional Project ID (if any):N/A	
Project Name: States Transparency, Accountability and Sustainability (SFTAS) Program for Results (PforR)			
Task Team Leader: Yue Man Lee; Rama Krishnan Venkateswaran			
Estimated Appraisal Date: May 11, 2018		Estimated Board Date: July 19, 2018	
Managing Unit: GGOAS		Lending Instrument: PforR	
Sector: Governance			
Theme:			
IBRD Amount (US\$m.): N/A			
IDA Amount (US\$m.): 750.00			
GEF Amount (US\$m.): N/A			
PCF Amount (US\$m.): N/A			
Other financing amounts by source: N/A			
Environmental Category: C			
Is this a transferred project		Yes [ ]	No [X]
Simplified Processing		Simple [X]	Repeater [ ]
Is this project processed under OP 8.00 (Rapid Response to Crises and Emergencies)		Yes [ ]	No [X]

**2. Project Objectives:**

The Program development objective (PDO) is to strengthen the fiscal transparency, accountability and sustainability in Nigerian states participating in the Program.

**3. Project Description:**

The Program will support the full and sustained implementation of a strategic subset of reforms from the Government of Nigeria programs of the Fiscal Sustainability Plan (FSP) and the Open Government Partnership (OGP) that are implemented at the state-level. The selected reforms are considered the most critical and impactful for contributing to the achievement of the development objectives of the Program. The selected reforms form the basis of the eligibility criteria, the disbursement linked indicators (DLIs) and disbursement-linked results (DLRs) of the Program for Results.

**4. Project location and salient physical characteristics relevant to the safeguard analysis:**

The Program and its technical assistance component (TA) are open, ex-ante, to all 36 states in Nigeria, as the FSP and OGP set of reforms are relevant to all States, as fiscal management and performance are weak across the board, and all States still face considerable fiscal pressures.

## 5. Environmental and Social Safeguards Specialists on the Team:

Environmental Specialist: Amos Abu  
Social Development Specialist: Olukayode O. Taiwo

6. Safeguard Policies Triggered <i>(please explain why)</i>	Yes	No
Environmental Assessment (OP/BP 4.01)		X
Natural Habitats (OP/BP 4.04)		X
Forests (OP/BP 4.36)		X
Pest Management (OP 4.09)		X
Physical Cultural Resources (OP/BP 4.11)		X
Indigenous Peoples (OP/BP 4.10)		X
Involuntary Resettlement (OP/BP 4.12)		X
Safety of Dams (OP/BP 4.37)		X
Projects on International Waterways (OP/BP 7.50)		X
Projects in Disputed Areas (OP/BP 7.60)		X

## II. 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:

In terms of environmental risks, the activities planned under the proposed Technical Assistance (TA) component of the Program do not include any physical interventions, such as construction, rehabilitation or renovation works. Hence, these activities are environmentally benign and will not cause any negative environmental effects, any loss or conversion of natural habitats, any changes in land or resource use, or any environmental pollution. Therefore, the TA poses no risk to the environment because of planned project activities.

The social management assessment carried out during the Program preparation shows that the TA operates within an adequate legal and regulatory framework which is well suited to address potential social issues that may arise from implementation of planned activities (although none are being envisaged at the time of the assessment). Given that the capacity and incentives to address potential social issues vary across the departments that will be involved in the implementation of Program, such gaps will be addressed through various trainings, as earmarked in the PAP.

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

The TA could potentially bring about positive, indirect environmental benefits through improved governance and related capacity, i.e. greater transparency or results-based management. Further, it is expected to emphasize citizen engagement as an overarching strategy for Government's core and complementary programs. Openness of budget process entails citizens' inputs from public consultations are reflected in the pre-budget statements. Citizen engagement increases local ownership, enables greater information sharing and transparency, and should be the basis of beneficiary engagement and trust building. However, citizen engagement needs to be supported by institutional capacity and a vision. The project would require dedicated staff to oversee the

social mobilization process and incorporate social concerns in all operational and M&E processes and manuals.

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

No significant safeguards risks are expected to arise from this operation. Instead, the Program will seek to enhance public accountability and transparency of the fiscal sector. The TA, expenditure framework boundary and the supported Program boundary have no impact on capital spending, since recurrent costs of State Governments will constitute the core of expenditures to be financed.

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:

N/A

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

N/A

<b><i>B. Disclosure Requirements Date</i></b>	N/A
<b>Environmental Assessment/Audit/Management Plan/Other:</b>	
Was the document disclosed <i>prior to appraisal</i> ?	N/A
Date of receipt by the Bank	N/A
Date of "in-country" disclosure	N/A
Date of submission to InfoShop	N/A
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	N/A
<b>Resettlement Action Plan/Framework/Policy Process:</b>	
Was the document disclosed <i>prior to appraisal</i> ?	N/A
Date of receipt by the Bank	N/A
Date of "in-country" disclosure	N/A
Date of submission to InfoShop	N/A
<b>Indigenous Peoples Plan/Planning Framework:</b>	
Was the document disclosed <i>prior to appraisal</i> ?	N/A
Date of receipt by the Bank	N/A
Date of "in-country" disclosure	N/A
Date of submission to InfoShop	N/A
<b>Pest Management Plan:</b>	
Was the document disclosed <i>prior to appraisal</i> ?	N/A
Date of receipt by the Bank	N/A
Date of "in-country" disclosure	N/A
Date of submission to InfoShop	N/A
<b>* 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.</b>	

<b>If in-country disclosure of any of the above documents is not expected, please explain why:</b>
N/A

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

<b>OP/BP 4.01 - Environment Assessment</b>			
Does the project require a stand-alone EA (including EMP) report?	Yes [ ]	No [ ]	N/A [ X ]
If yes, then did the Regional Environment Unit or Sector Manager (SM) review and approve the EA report?			
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?			
<b>OP/BP 4.04 - Natural Habitats</b>			
Would the project result in any significant conversion or degradation of critical natural habitats?	Yes [ ]	No [ ]	N/A [ X ]
If the project would result in significant conversion or degradation of other (non-critical) natural habitats, does the project include mitigation measures acceptable to the Bank?			
<b>OP 4.09 - Pest Management</b>			
Does the EA adequately address the pest management issues?	Yes [ ]	No [ ]	N/A [ X ]
Is a separate PMP required?	Yes [ ]	No [ ]	N/A [ X ]
If yes, has the PMP been reviewed and approved by a safeguards specialist or Sector Manager? Are PMP requirements included in project design? If yes, does the project team include a Pest Management Specialist?			
<b>OP/BP 4.11 – Physical Cultural Resources</b>			
Does the EA include adequate measures related to cultural property?	Yes [ ]	No [ ]	N/A [ X ]
Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on physical cultural resources?			
<b>OP/BP 4.10 - Indigenous Peoples</b>			
Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?	Yes [ ]	No [ ]	N/A [ X ]
If yes, then did the Regional unit responsible for safeguards or Sector Manager review the plan?			
If the whole project is designed to benefit IP, has the design been reviewed and approved by the Regional Social Development Unit?			
<b>OP/BP 4.12 - Involuntary Resettlement</b>			

Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?	Yes [ ]	No [ ]	N/A [ X ]
If yes, then did the Regional unit responsible for safeguards or Sector Manager review and approve the plan/policy framework/process framework?			
<b>OP/BP 4.36 – Forests</b>			
Has the sector-wide analysis of policy and institutional issues and constraints been carried out?	Yes [ ]	No [ ]	N/A [ X ]
Does the project design include satisfactory measures to overcome these constraints?			
Does the project finance commercial harvesting, and if so, does it include provisions for certification system?			
<b>OP/BP 4.37 - Safety of Dams</b>			
Have dam safety plans been prepared?	Yes [ ]	No [ ]	N/A [ X ]
Have the TORs as well as composition for the independent Panel of Experts (POE) been reviewed and approved by the Bank?			
Has an Emergency Preparedness Plan (EPP) been prepared and arrangements been made for public awareness and training?			
<b>OP/BP 7.50 - Projects on International Waterways</b>			
Have the other riparians been notified of the project?	Yes [ ]	No [ ]	N/A [ X ]
If the project falls under one of the exceptions to the notification requirement, has this been cleared with the Legal Department, and the memo to the RVP prepared and sent?			
What are the reasons for the exception? Please explain:			
Has the RVP approved such an exception?			
<b>OP/BP 7.60 - Projects in Disputed Areas</b>			
Has the memo conveying all pertinent information on the international aspects of the project, including the procedures to be followed, and the recommendations for dealing with the issue, been prepared	Yes [ ]	No [ ]	N/A [ X ]
Does the PAD/MOP include the standard disclaimer referred to in the OP?			
<b>The World Bank Policy on Disclosure of Information</b>			
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	Yes [ ]	No [ ]	N/A [ X ]
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?			
<b>All Safeguard Policies</b>			

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes [ ]	No [ ]	N/A [ X ]
Have costs related to safeguard policy measures been included in the project cost?			
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?			
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?			

#### ***D. Approvals***

<b><i>Signed and submitted by:</i></b>	<b><i>Name</i></b>	<b><i>Date</i></b>
Task Team Leader:	Yue Man Lee; Rama Krishnan Venkateswaran	
Environmental Specialist:	Amos Abu	
Social Development Specialist	Olukayode O. Taiwo	
Additional Environmental and/or Social Development Specialist(s):		
<b><i>Approved by:</i></b>		
Regional Safeguards Coordinator:	Maman-Sani Issa	May 25, 2018
Comments:		
Country Director:	Rachid Benmessaoud	May 16, 2018
Comments: Approved by the CPC (Indira Konjhodzic) on behalf of the CD		