



The World Bank

GPSA UKRAINE: EMPOWERING CIVIL SOCIETY AND JOURNALISTS IN OVERSIGHT AND PROMOTION OF EFFECTIVE ANTI-CORRUPTION ENVIRONMENT PROJECT (P172392)

Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 12/12/2019 | Report No: ESRSC01008



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Ukraine	EUROPE AND CENTRAL ASIA	P172392	
Project Name	GPSA UKRAINE: EMPOWERING CIVIL SOCIETY AND JOURNALISTS IN OVERSIGHT AND PROMOTION OF EFFECTIVE ANTI-CORRUPTION ENVIRONMENT PROJECT		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Social	Investment Project Financing		7/9/2019
Borrower(s)	Implementing Agency(ies)		
Anti-Corruption Action Center (AntAC)	Anti-Corruption Action Center (AntAC)		

Proposed Development Objective(s)

The Project Development Objective (PDO) is to improve the implementation of anti-corruption legislation in Ukraine by strengthening the country’s anti-corruption coalition’s capacities to enhance and enforce said legislation through collaborative social accountability processes at the national and sub-national levels.

Financing (in USD Million)	Amount
Total Project Cost	0.45

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

No

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

The project will rely on a collaborative social accountability approach aimed at strengthening the capacities for multi-stakeholder collective action and cooperation in Ukraine’s anti-corruption reform. Lessons learned from both the GPSA and AntAC’s experience were considered in developing the project’s design. The project strategy will consist in deploying resources for supporting integrated and coordinated actions by both civil society groups and state institutions leading the AC agenda. Project activities will engage all three branches of government in project



implementation and promote collaborative dialogues to address challenges and solving problems with regards to anti-corruption legislation and its implementation. Likewise, activities will engage both state and civil society stakeholders -including journalists and local civil society and community-based organizations- in capacity building and peer learning at the regional level.

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]

The proposal’s geographical scope will be both national and regional. National level activities will focus on monitoring anti-corruption legislation and its enforcement through AC agencies in the judicial, legislative and executive branches. At the sub-national level, capacity development of investigative journalists and members of local Civil Society Organizations (CSOs) will be undertaken on an on-demand basis. The project anticipates that at least nine regions will be engaged in Component 2 (and 3) activities.

D. 2. Borrower’s Institutional Capacity

The Anti-Corruption Action Center (AntAC) will be the lead project implementing agency. As such, it will be responsible for the overall management, coordination and implementation of project activities, monitoring and evaluation. AntAC has vast experience in the implementation of social accountability initiatives in the anti-corruption sector within in the country. AntAC will be also responsible for implementation of the component 1 of the project. AntAC has identified Nashi Groshi as its main partner for project implementation, primarily to lead implementation of 2 activities. Nashi Groshi (founded in 2012) is a CSO dedicated to tackling misuse of public finances by discovering, investigating and communicating such cases in a highly professional manner to a wide audience. Nashi Groshi also works to nurture the pool of journalists and experts in this sphere and enhance cooperation with activists and initiatives in response to their investigation of corruption cases.

AntAC and Nashi Groshi have successful long-term cooperation in tackling corruption through information and knowledge exchanges between the two organizations. They work together to follow up on the corruption cases investigated by Nashi Groshi with AntAC’s lawyers monitoring and analyzing the work of anti-corruption investigators, prosecutors and ultimately courts. Both organizations have experience in managing and implementing projects of such scale as both CSOs have already been partners within the EU-supported project on enhancing journalistic network and challenging public procurement and have experience of joint implementation of such donor funded projects (Project “Enhancing the role of civil society in public finance oversight”, September 1, 2017 – August 31, 2019).

The capacity to perform safeguards activities of these two institutions at this stage of project development is not known - this will be assessed during the project design and capacity building activities will be supported under the project, as needed.

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

A. Environmental and Social Risk Classification (ESRC) Moderate

Environmental Risk Rating Low

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The project does not envisage any civil works or any impact on physical environment. The project does not involve development/review/update of any primary or secondary legislation on environmental issues. Therefore, the project environmental risk is rated a 'Low'.

Social Risk Rating

Moderate

Overall, the Project does not pose any significant social risks associated with ESS2, ESS5, ESS7. Although the project not envisaged any civil works that might involve risks related to land acquisition and resettlement, other risks such as preparation of an inclusive stakeholder engagement plan, contextual risks, sensitivity of the topic in the society, and probable labor related issues cannot be ruled-out. Given contextual background described above, as well as crucial importance of properly implementing ESS10 to achieve the objectives of the Project, the proposed social risk is rated 'Moderate'.

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 project strategy will consist in deploying resources for supporting integrated and coordinated actions by both civil society groups and state institutions leading the AC agenda. Project activities will engage all three branches of government in project implementation and promote collaborative dialogues to address challenges and solving problems with regards to anti-corruption legislation and its implementation. Likewise, activities will engage both state and civil society stakeholders – including journalists and local civil society and community-based organizations – in capacity building and peer learning at the regional level.

The project will produce independent analyses, including the use of international benchmarks and indicators to assess institutional performance, and to compare it against national and international legal frameworks and monitoring mechanisms. The project will also provide training and mentoring to journalists, CSOs and other relevant stakeholders in monitoring anti-corruption reforms through their meaningful participation in public hearings and other types of events at both the national and local levels. The project will rely on a collaborative social accountability approach aimed at strengthening the capacities for multi-stakeholder collective action and cooperation in Ukraine’s anti-corruption reform. As project aims to generate recommendations on improvements to anti-corruption legal and policy framework (both legislation and implementation) taken up by target government institutions at the local or national levels the proper stakeholder mapping needs to be done and Stakeholder Engagement Plan prepared prior to appraisal. This includes coordinated actions by the both state and civil society stakeholders – including journalists and local civil society and community-based organizations leading anti-corruption agenda.

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

Due to discrepancies between requirements of the WB ESSs and National Environmental and Social Assessment laws and regulations, the project will not use Borrower Framework.

ESS10 Stakeholder Engagement and Information Disclosure

In order to ensure that an inclusive and coordinated approach is taken to stakeholder engagement and project disclosure, Anticorruption Action center (AntAc) will have to prepare Stakeholder Engagement Plan (SEP). The SEP will

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be developed and implemented to ensure that stakeholder engagement is conducted on the basis of timely, relevant, understandable and accessible information. The SEP will also lay out a strategy to identify and map key stakeholders. Under this project there are a number of stakeholder at national and regional level including local councils, CSOs, journalists and activist groups etc. Hence, AntAc will ensure that consultations are inclusive and accessible to all types stakeholders and interested parties. . SEP will have to be disclosed, prior to appraisal and will be updated, as necessary, throughout the project cycle (preparation and/or implementation). A stakeholder grievance redress mechanism (GRM), as part of SEP, will be operationalized for the project to allow for feedback from all interested parties including but not limited to both civil society groups and state institutions leading anticorruption agenda. AntAc will have a focal point handling proper development and implementation of SEP, as well as ensuring that the GRM is functioning.

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

Although it is not clear the extent of workforce including labor requirements for this small grant project, its expected to have Direct Workers (AntAc) and Contracted Workers (consultants hired by the AntAC) involved. AntAc will be responsible to develop project-level Labor Management Procedures (LMPs) applicable to the project. The LMP will identify the main labor requirements including the program management staff of agencies, and risks associated with employing the staff and providing safety and legal assurance for investigative journalists and activists to be supported under the project. The LMPs would describe (i) procedures relevant to each category of workers involved; (ii) overview of key potential labor risks (if any); (iii) overview of Ukraine’s labor legislation; (iv) description of grievance redress mechanism or mechanisms available for all direct workers and contracted workers, including the process for hiring experienced consultants to provide “hands-on” technical assistance and capacity-building programs. LMPs may be amended at any time during project cycle depending on the needs and developments in the project preparation and/or implementation. In addition, LMP will describe legislation pertaining to labor regulations governing specifically for anti-corruption bodies activity given the potential concern about the safety and job security of journalists involved in the implementation of this project. It will also describe the nature of its contractual relationship with recipient executing tasks in the Project (whether it is through contract or sub-granting agreement).

ESS3 Resource Efficiency and Pollution Prevention and Management

The standard is not currently relevant for the project.

ESS4 Community Health and Safety

The standard is not currently relevant for the project.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

As the project will support only capacity building activities, no issues related to land acquisition or restrictions on land use and involuntary resettlement are expected.



ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The standard is not currently relevant for the project.

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

The standard is not relevant for the project.

ESS8 Cultural Heritage

The standard is not currently relevant for the project.

ESS9 Financial Intermediaries

The standard is not relevant for the project.

B.3 Other Relevant Project Risks

Risks specific to operations in Ukraine such as transparency and accountability issues.

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

N/A

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

Actions to be completed prior to Bank Board Approval:

The following documents will need to be prepared disclosed prior appraisal:

1. Draft Stakeholder Engagement Plans (SEPs) outlining the arrangements for engaging with relevant stakeholders;
2. Draft Labor Management Procedures (LMP);
3. Environmental and Social Commitment Plan



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

1. Maintaining E&S capacity throughout the project implementation;
2. GRM Establishment and operationalization;
3. Ensuring adequate implementation and reporting on LMP;
4. Implementation of the SEP.

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

15-Jan-2020

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Anti-Corruption Action Center (AntAC)

Implementing Agency(ies)

Implementing Agency: Anti-Corruption Action Center (AntAC)

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

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