



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 10/12/2021 | Report No: ESRSC02343



BASIC INFORMATION

A. Basic Project Data

| | | | |
|---|--|--------------------------|----------------------------|
| Country | Region | Project ID | Parent Project ID (if any) |
| Western Africa | AFRICA WEST | P176932 | |
| Project Name | Western Africa Regional Digital Integration Program | | |
| Practice Area (Lead) | Financing Instrument | Estimated Appraisal Date | Estimated Board Date |
| Digital Development | Investment Project Financing | 4/4/2022 | 7/22/2022 |
| Borrower(s) | Implementing Agency(ies) | | |
| Economic Community of Western Africa States | MINISTÈRE DES POSTES, TÉLÉCOMMUNICATIONS ET DE L'ECONOMIE NUMÉRIQUE, Ministère de la Transformation numérique de l'Innovation et de la Modernisation de l'Administration, Ministry of Information & Communication Infrastructure - MOICI | | |

Public Disclosure

Proposed Development Objective

The Program Development Objective (PDO) is to increase access to broadband and digital services through the development and integration of digital markets in the Western Africa region.

| Financing (in USD Million) | Amount |
|----------------------------|---------------|
| Total Project Cost | 143.00 |

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 development objective of the proposed project is to increase access to broadband and digital services through the development and integration of digital markets in the Western Africa region. The proposed project would aim to advance regional integration of digital markets through the simultaneous integration of the connectivity, data, and online market across the region. Advancement in each distinct market layer is expected to create a virtuous cycle as each segment builds on another, reinforcing the development, expansion and integration of the region’s digital market. WARDIP would consist of a menu of activities from which participating countries and entities could choose under the following components.

Component 1: Connectivity Market Development and Integration. This component would support reforms to reduce barriers to the provision of cross-border telecoms services through open markets as well as broadband connectivity infrastructure deployment. Broadband infrastructure, such as fiber optic and mobile networks, as well as broadband services, benefit greatly from scale, as the cost of capital investment and operating costs can be spread across more users through infrastructure sharing based on open access. Economies of scale from a regionally integrated market could also attract more private investment. Increased competition would enable wholesale, and subsequently, retail connectivity services prices to fall in the region. More affordable prices would in turn help expand access and boost demand for related services, generating increased data traffic and online activity critical to the business case for further network investment in capacity upgrades and expansion to new areas. Doing so can help address deficits for landlocked countries or close to urban-rural divide, which is a key lever for job creation and advancing inclusive economic growth. Lower cost and more accessible connectivity would also pave the way for more innovative services and digital businesses that rely on higher bandwidth capacity, further reinforcing this positive cycle. In line with regional goals, this component could potentially include support to national objectives which would be critical to set the path for integration

Component 2: Data Market Development and Integration. This component aims to enable the secure exchange, storage and processing of data across borders to support regional deployment and access to data-driven services, innovation and infrastructure, including reducing regional restrictions on the free flow of data and increasing investments into data infrastructure. Hence improving legal and regulatory environment for cybersecurity, data protection and privacy is key. A more integrated data market in Western Africa could boost innovation and enhance data analytics, resulting in significant economic and social benefits and efficacy gains across virtually all sectors. The creation of a larger data market would also generate substantial cost savings by creating economies of scale that make investment in regional data centers that support online services, including cloud hosting, more financially viable. In line with regional goals, this component could potentially include support to national objectives which would be critical to set the path for integration.

Component 3: Online Market Development and Integration. This component aims to support the development and integration of the online market, which would enhance the enabling environment for the cross-border delivery and access of digital goods or services. This component would support governments, firms and citizens in participating countries to access and deliver private services online, as well as to make online purchases seamlessly from anywhere in the region. Digital commerce, which is a key enabler for online market development, would be increased by supporting legal framework enhancement, ramping authority capacity to protect consumers (data protection and privacy) and enforce regulations, vendor- and technology- neutrality, training sellers and online buyers, and easing its entrance to SMEs, especially by developing social commerce skills and facilitating digital marketing outputs to take



advantage of the high usage of social networks. Digital skills are key to boost technologies adoption, digital innovation and entrepreneurship, which would be supported under this component by targeting strategic regional priority economic sectors, such as agriculture and tourism. As a result, citizens and businesses would gain larger access to a wider range of digitally enabled services, in line with regional goals.

Component 4: Project Management. This component would provide technical assistance and capacity support for project preparation and implementation. It will finance the operating costs of the Project Implementation Units (PIUs) for each participating country as well as a PIU embedded in the participating regional body. Support will be provided to ensure the establishment of adequate social and environmental safeguards capacity, as well as fiduciary and monitoring and evaluation (M&E), for the implementation of activities. Due to potential high safeguards risks associated with the project, particular attention will be provided to ensure adequate development of technical studies and capacity building of relevant institutions and coordination measures. Project preparation would also include a set of technical studies to ensure PCM approach is taken as well as the necessary environment and social safeguards studies and assessment around climate co-benefits.

The proposed project would adopt a two-track approach so to provide appropriate support for the varying needs of the individual countries and sub-regions on different rungs of the digital adoption ladder. It is proposed that the project incorporates both regional IDA credit and grant financing to meet the needs of the different recipients in the region (primarily country beneficiaries), as well as, IDA grant financing to relevant regional organizations, to support legal and regulatory harmonization efforts among member countries. It is also proposed to support this project through a series of projects (SOP) to allow countries and regional bodies to join as and when they are ready (subject to the availability of IDA funds). To date the governments of The Gambia, Guinea and Mauritania have each requested to join the proposed SOP1; expanding on this interest across Western Africa is likely given some of the interconnected needs of countries in the region and ECOWAS encouraging engagement and cooperation in Western Africa towards the development of a digital economy.

The proposed Western Africa Regional Digital Integration Program (WARDIP) is aligned with various regional strategies of the World Bank Group (WBG). The project aligns to the objectives of the following WBG strategies:

- The World Bank’s Western and Central Africa Region Priorities (2021-2025): WARDIP aligns with several of the Strategy’s priorities. The first objective is to improve effective and inclusive service delivery, including through digital solutions. The second goal relates to filling infrastructure gaps, including digital connectivity and the third priority is to empower women through enhancing their human capital and facilitating their access to markets.
- Africa Regional Integration and Cooperation Strategy Update (FY21–23): Pillar 1 of the Africa Regional Integration and Cooperation Strategy Update, ‘Building Regional Connectivity’, supports the integration of digital markets including broadband infrastructure connectivity and financial payment platforms, in line with what WARDIP would aim to achieve.
- AfCFTA Support to Negotiations and Implementation (P172232): The Technical Assistance supports the AUC and AfCFTA member states to conclude the pending negotiations of the AfCFTA protocols on trade in goods, trade in services and investment by providing analytical inputs and technical assistance, and to start preparing the administration of the AfCFTA treaty both at regional and national level by enabling the establishment of protocols and procedures based on best international practices.
- Digital Economy for Africa Initiative (DE4A) : WARDIP would support the WBG Digital Economy for Africa (DE4A) initiative which aims to contribute to the operationalization of the African Union (AU) Digital Transformation Strategy and is aligned with the findings and recommendations of several World Bank analytical / technical assistance



reports focused on digital economy, digital technologies and financial services. The AU strategy sets out a bold vision that calls for every African individual, business, and government to be digitally enabled by 2030, to drive the digital transformation of Africa and ensure its full participation in the global digital economy.

In addition, at the country level, the proposed WARDIP supports the objectives of the CPFs in the three participating countries (The Gambia, Guinea, and Mauritania) for the SOP 1. All the CPFs include objectives focused on strengthening regional integration, improving the overall infrastructure to stimulate private investments and access to markets, and increase human capital.

- The Gambia, Draft CPF FY22-26. Focus Area 2: Enable Inclusive and Resilient Private Sector Driven Job Creation/ Objective 2.4. Catalyze development of an inclusive Digital Economy
- Republic of Guinea, CPF FY18-23. Pillar 3: Create Agricultural productivity and economic growth / Objective 8: Improve Business environment and Objective 9: Maximize access to job opportunities, especially young people
- Mauritania, CPF FY18-23, Focus Area 1: Promote Economic Transition for Diversified and Resilient Growth / Objective 1.3: Promote the development of productive cities and adjacent territories in the context of decentralization; and Focus Area 3: Strengthen Economic Governance and Private Sector-Led Growth / Objective 3.2 Improve private sector participation in economic activities

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 is a multiphases project, of which the development objectives of SOP1, are to increase access to broadband and digital services in each of the territory of The Gambia, Guinea and Mauritania and to support the ECOWAS Commission and participating countries in the development and integration of digital markets in the Western Africa region.

While most of the activities in the project will focus on technical assistance, Regional Submarine Infrastructure are also planned, involving coastal areas in all three countries, as well as the establishment of a data center (with potential physical works) and the cybersecurity center (CSIIRT). The exact locations of the physical investments remain unknown and will be decided with the authorities based on the identified priorities.

The coastal zone of The Gambia consists of 70 km open ocean coast and 200 km sheltered coast. Only about 20 km of the open coastline is significantly developed, and this includes Banjul (the capital city), Bakau and Cape St. Mary, Fajara and the Tourism Development Area (TDA). Tourism is the most important economic sector in the coastal zone and contributes about 10% of the government revenue. Fisheries and agriculture are also important coastal industries. As for most coastal states, the Gambian coastal zone is very sensitive to three key drivers related to climate change and human impacts: sea level rise, coastal erosion, and storm surges. Coastal erosion is regarded as one of the most apparent indicators posing serious global threats to coastal landscapes and communities in the 21st century. The coastal zone of The Gambia, a zone of economic, environmental and social importance, is at risk of erosion because of its Low Elevation Coastal Zone (LECZ). A good management of coastal zones is also important for the sustainability of Marine protected areas (MPA) such as: the Niimi National Park, and the Bao Bolon Wetland Reserve; and the conservation of the rich fauna and flora they have within multiple ecosystems.

The coastal zone of Guinea belongs to the Lower Guinea region, one of four eco-climatic regions of the country. Guinea has a tropical climate with a rainy season lasting 5-7 months (April to October) and a dry season for the rest of



the year. The coast is approximately 300km long and its primary ecosystem is mangrove forests, which extend up to 49km inland in proximity of large river estuaries. Subsistence agriculture is the predominant economic activity on the coastal region. The poverty rate in rural areas in the country exceeds 65%, according to World Bank's estimates. Women represent a high percentage of Guinea's population. 4 MPA among which the Réserve Naturelle Gérée Des Iles Tristao, the Sanctuaire De Faune Des Iles De Loos, were established with among others, the objective to contribute to the protection and conservation of the biological and socio-cultural diversity in financial and technical sustainability that improves the living conditions of the populations through a participatory management of stakeholders.

In Mauritania, the coastal zone varies between high energy beaches in the north to mangrove environment at the Senegal River mouth. The sandy islands of the Banc d'Arguin are a significant habitat for migrating birds. The coastline is interrupted by infrastructure such as the Nouakchott port. In the north, the bay of Nouadhibou forms a natural harbor for the city's free-zone economy. Parts of Nouakchott are under sea-level, vulnerable to floods, and protected from the Atlantic Ocean by just a string of dunes and adds to the new development challenges of the countries. Physical activities that will involve infrastructure construction to support the digital development and access by communities, might will have impacts on the environment and community due to their nature and scale. The environmental and social assessments will examine the potential risks and impacts associated with these activities.

D. 2. Borrower's Institutional Capacity

At the country level, the program will be implemented under the fiduciary responsibilities of the delegated project implementation ministry/agency in participant countries. At a national level, the Ministry of Information and Communication Infrastructure (MOICI) in The Gambia, the Ministry of Posts, Telecommunications and Digital Economy (MPTEN) in Guinea, and the Ministry of Digital Transformation, Innovation, and Government Modernization (MTNIMA) in Mauritania, will play a key role in technical oversight of the project.

Furthermore, based on each participant country's specific needs a steering committee could be established to provide guidance and oversight of the work of the PIU and the institutional teams, and to lead coordination with the government and any other relevant entities.

At a regional level, responsibilities for coordination and monitoring of cross-cutting legal, policy and regulatory areas such as regional digital markets regulation, cybersecurity, data use, and privacy, would potentially be assigned to the regional body (ECOWAS) which would then collaborate with additional development partners active within the region and on given topic areas covered.

In regard with environmental and social risks and impacts management, project's participating countries have different levels of capacity depending on their experience in implementing World Bank projects.

Each country has at least one environmental agency in place, which is mainly in charge of clearing environmental and social studies, as well as the monitoring of environmental and social measures' implementation by projects.

The main national agencies responsible for the management of the environment and natural resources are : (i) in the Gambia:, the National Environmental Agency under the Ministry of Environment, Climate Change and Natural Resources; , (ii) in Mauritania : the Directorate of Assessment and Environmental Control under the authority of the Ministry of Environment and Sustainable Development;; (iii) in Guinea. The Ministry of the Environment through the Guinean Bureau of Audit and Environmental Compliance (BGACE). However, the implementing agency for Guinea will be Tthe Ministere des Postes, Telecommunications et Economie Numerique (MPTEN). All the three agencies have experience with Bank financed project, mainly those applying the World Bank Operational Policies on environmental and social safeguards. The MPTEN in Guinea for example has executed a Bank Financed 's technical assistance project - Policy Dialogue and donor collaboration for national backbone development (P132822). None of the three agencies



has has experience implementing projects under the Environmental and Social Framework (ESF). Given the widening scope of the ESF and the lack of familiarity of clients with it, the Bank team will make sure that adequate capacity building and trainings are organized and delivered to the client in all participating countries. Apart from the technical capacity, human and logistical resources within the Ministries of Environment remain limited in general. BGACE in Guinea recently recruited new staff who will need training to strengthen to build capacity in this institution. The project will take advantage of the recently approved Technical Assistance project: Guinea Natural Resources, Mining and Environmental Management Project (P168613), which aims to build the capacity of the Ministry of Environment, including BGACE on environmental due diligence, in addition to training sessions that will be provided by the World Bank team to allow clients to fully comply with ESF requirements.

Capacity building activities will include: the preparation and implementation of environmental and social instruments in compliance with the requirements of relevant Environmental and Social Standards WBG’s (ESSs). More specifically, the project will seek assistance from consultants and firms to develop E&S safeguards instruments

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

A. Environmental and Social Risk Classification (ESRC)

Substantial

Environmental Risk Rating

Substantial

The environmental risk rating is estimated to be Substantial at concept this stage, based on the nature and scale of the project activities mainly under component 1 (construction of digital infrastructures particularly construction of the submarine cable, establishment of a data center and the cybersecurity center (CSIRT), and the capacity of PIU in each participating country to align with the ESSs requirements. No irreversible environmental risks and impacts are anticipated at this stage. Key environmental concerns identified at concept stage are related to: (i) impacts on water quality, (ii) risks related to marine’s and other coastal biodiversity disturbance during construction and operation; (iii) disposal of construction wastes and ewaste management ; (iv) occupational health and safety of workers, including contamination risks to COVID-19 (v) Labor and working conditions; and (vi) nuisances related to air and noise emissions. However, majority of the risks and impacts likely to be generated from the project activities are expected to be site-specific, temporary, and manageable to an accepted level by applying good construction industry best practices. This assessment may be revised in the appraisal stage Environmental and Social Review Summary (ESRS), once additional technical details regarding project financed activities are known.

Social Risk Rating

Moderate

The proposed social risk classification is moderate at this stage. Once the extent of the components activities is known this classification may be revised in the appraisal ESRS. The potential noise impacts and temporary infrastructure needed for the underwater cabling may have more than moderate impacts depending on the assessment of the livelihood activities. The project aims to support the development of cross-border connectivity, data flows and online services across the region and will result in significant benefits to digital and social inclusion. Social impact associated with program activities will generally result from Component 1 activities related to the laying of the submarine cable, establishment of a data center and of the cybersecurity center. Potential risks include (i) land acquisition and temporary disruption of economic activity or livelihood activities, (ii) laying submarine cables may affect livelihoods of fishermen, (iii) loss of access to fishing ground due to construction of the landing station, (iv) impacts on people’s livelihood. The project will be implemented in urban areas, including coastal areas, and



there could be impacts on people's livelihoods, labor related social challenges associated with the presence of workers from outside communities, including the risk of sexual exploitation and abuse or harassment. The social risk rating will be revisited during project appraisal when more information is made available.

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:

This Standard is relevant. The proposed project is expected to have overall positive impacts. Adverse environmental and social impacts expected to result from project' activities will need to be well assessed and managed during project's preparation and implementation. Potential adverse social and environmental risks and impacts will come mainly from activities under component 1. However, most of them will be site specific within the targeted areas, and in most cases mitigation measures can be readily designed. The potential environmental risks and impacts identified at concept stage will result from construction works of infrastructures and data centers, cables installation, and associated handling and storage of construction material. These activities may entail risks related to : (i) waste production, (ii) occupational health and safety issues related to civil works, including risks related to COVID-19; (iii) labor and working conditions; (iv) exclusion of vulnerable groups from project benefits , and community health and safety, (v) nuisances related to excessive noise and dust levels, (vi) marine coastal biodiversity disturbance. There are likely to be adverse social impacts such as damage to assets, possibility of influx of labor,, i. Depending on the scale of the rehabilitation/construction works, there could be clearing during site preparation and construction that could lead to loss of vegetation and associated fauna, soil disturbance and erosion. However, these potential environmental and social risks and impacts are predictable, expected to be temporary, low in magnitude, and site-specific.

The scope and sites of public works are not yet defined nor identified, therefore, a framework approach will be adopted: in each participating country, an Environmental and Social Management Framework (ESMF), including a Social Assessment which will also analyze SEA/SH risks, will be prepared to provide guidance on the appropriate instruments to be prepared during project implementation, such as Environmental and Social Impact Assessments/Environmental and Social Management Plans (ESIAs/ESMPs), and where necessary Resettlement Plans (RPs), in line with the Resettlement Policy Framework (RPF).

In addition, the ESMF will incorporate relevant parts of WHO guidelines establishing good international industry practice for COVID-19 response, as well as the World Bank Group Environmental, Health and Safety guidelines, and an assessment on risks on marine biodiversity. The ESMF will make use of the general and sector-specific EHSs for the identified subprojects in relation to occupational and community health and safety. The ESMF will also contain a preliminary assessment of the possible biodiversity impacts of the submarine cables.

Each participating country will prepare an Environmental and Social Commitment Plan (ESCP) , with the support of the Bank team, to set out the substantive measures and actions that will be required for the project to meet environmental and social requirements. These measures shall be implemented within the specified timeframes and the status of implementation will be reviewed as part of project monitoring and reporting.

The ESMFs and RPFs will be prepared consulted upon, disclosed in each participating country and on the World Bank external website prior to project Appraisal.



Construction contractors will be required, as a condition of their contracts with the Project, to implement and comply with Contractor ESMP consistent with ESS1 requirements, including the requirement to develop a waste management plan. Construction contracts will include relevant provision on procedures for handling “chance finds” during implementation of project activities. GBV relevant mitigation measures will be reflected in the bidding documents. The Borrower will monitor the environmental and social performance in accordance with the legal agreement and manage any requirements based on social assessments.

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

The project will not use the Borrowers' environmental and social frameworks in assessments or development and implementation of investments. However, it will comply with all relevant national environmental and social legal requirements.

ESS10 Stakeholder Engagement and Information Disclosure

Each of the participating countries will prepare and implement a Stakeholder Engagement Plan (SEP) commensurate with the nature and scale of the project and the associated risks and impacts in each country. The SEP should be made public and updated in the light of stakeholder feedback. The primary stakeholders include: the Ministère des Postes,

Télécommunications et Economie Numérique (MPTEN) of Guinea, Ministère de la Transformation numérique de l'Innovation et de la Modernisation de l'Administration (MTNIMA) of Mauritania, Ministry of Information & Communication Infrastructure (MOICI) of The Gambia. Other stakeholders will include the mobile communication operators, civil society organization involved in representing vulnerable groups, people living with disability, women and vulnerable groups.

Stakeholder engagement is a critical tool for social and environmental risk management, project sustainability and success. All SEPs will be disclosed as early as possible and prior to Appraisal. The Borrowers will seek stakeholder feedback and opportunities for proposed future engagement, ensuring that all consultations are inclusive and accessible (both in format and location) and through channels that are suitable in the local context. The borrowers will engage in meaningful consultations with all stakeholders throughout the project life cycle, paying attention to the inclusion of all groups, enabling them to be engaged in planning and decision-making to ensure that the constructed infrastructure opens opportunities equally to men, women and youth, and considers the special needs of the disabled and other vulnerable groups.

Each SEP will also include a grievance mechanism (GM) to receive and address all complaints that could likely arise as a result of project activities, receive feedback from stakeholders and beneficiaries in a transparent and timely manner.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

Public Disclosure



ESS2 Labor and Working Conditions

This standard is relevant. The project will involve direct and contracted workers. Direct workers include full and part-time workers assigned to the PIUs and consultants hired based on project needs, such as PIU staff, primary supply workers and, potentially, contracted workers and civil servants. The contracted workers include the contractors and sub-contractors hired for the anticipated civil works. Based on the program's pre-identified activities, Borrowers will develop Labor Management Procedures (LMP) prior to project's Appraisal and will include : working conditions and grievance mechanism (GM) for all categories of project's workers including within the supply chains and the roles and responsibilities of contractors and PIUs in managing the requirements of ESS2, non-discrimination and equal opportunity, worker's organizations, occupational, health and safety measures, the prohibition of child and forced labor, and a Code of Conduct (CoC). The CoC will require that each project worker take SEA/SH training to guide their conduct towards local communities, children, and women. Possibility of labor influx will be assessed and confirmed during project preparation.

The terms and conditions of the contracts for any workers involved will be consistent with respective national labor laws to ensure that working conditions are acceptable (terms and conditions of employment, nondiscrimination and equality of opportunity, workers' organizations).

The project will ensure adequate and appropriate measures are put in place for Contracted workers including Occupational Health and Safety Plan and Environmental (OHS) measures as part of the ESMF and specific instruments (ESIAs/ESMPs) in line with the World Bank Group EHS Guidelines and the Industry Specific EHS Guidelines for Telecommunications and to ensure health and safety conditions of workers during construction activities and response measures in line with WHO guidelines on COVID19.

The Implementing Agencies will ensure that the bidding and contract documents include clauses that ensure compliance with the requirements of this ESS together with appropriate non-compliance remedies. The LMP will include procedures on incident investigation and reporting, recording, and reporting of non-conformance, emergency preparedness and response procedures and continuous training and awareness to workers on OHS.

The Borrowers shall ensure that the ESS2 requirements are incorporated into: (a) the contracts with Contractors and any entity (including the Owner's Engineer) supervising the Project's civil works; and (b) the contracts between the Contractor and any Contractors' subcontractors. Civil works contracts will incorporate social and environmental mitigation measures based on the WBG EHS Guidelines and other referenced plans (SEP, RAP, etc.), as well as specific language referring to setting priorities for hiring local unskilled labor. The codes of conduct will include, at a minimum, the following: prohibited behavior, list of sanctions, minimum standards for the PIU to follow, reporting requirements and complaints mechanism.

ESS3 Resource Efficiency and Pollution Prevention and Management

This standard is relevant to the project. It is anticipated that during the project implementation limited air emissions be generated due to transport vehicles, and fugitive dust generated by digging activities. Those most likely to be affected are workers and people living within the proximity of construction/rehabilitation sites. The implementation of mitigation measures such as dust suppression and vehicle maintenance will be applied to minimize the impact of air emissions during construction/rehabilitation, and residual impacts are expected to be limited in scope and duration. Noise might likely be generated from the use of construction machinery and vehicle movements. The



relatively short-term nature of the works suggest that noise levels will not be excessive or cause long-term nuisance. Installation of submarine cable activity might induce impact on water and biodiversity.

The ESMF and specific ESIA/ESMP will carefully assess pollution eventualities of water and include mitigation measures to minimize and manage all sources of pollution on water, as well as the noise levels such by applying standard restrictions to hours of site work.

Water use: ESIA will include assessment water need based on the technical study, and propose measures, to the extent technically and financially feasible, that avoid or minimize water usage so that the project's water use does not have significant adverse impacts on communities, other users and the environment, as per this ESSs requirements. In addition, the ESIA will outline measures, to the extent technically and economically feasible, to ensure the resilience of the investments by safeguarding submarine cable from storm surges or from human activities.

Wastes management: Construction/rehabilitation activities will generate solid and liquid wastes which will primarily include excavated soil and other types of solid and liquid wastes, such as construction material residues, wood, and scrap metal, used oil. Wastes generated by the construction works will largely be disposed at approved sites in line with the national laws and regulations. In case of hazardous wastes, participating countries will comply with existing requirements for management (including storage, transportation, and disposal) of hazardous wastes, including national laws and international good practice. Contractors will be required, as part of the C-ESMP to provide wastes management plans or procedures.

ESS4 Community Health and Safety

This standard is relevant. During the construction phase, the Borrowers will put in place plans to mitigate the risks associated with construction activities to direct beneficiaries and neighbors. Key risks relate to construction works or any other activities that might have impacts on community health and safety, such as dust, noise and vibration, exposure to hazardous materials and possible health risks associated with inappropriate storage/use of chemicals; health risks linked to inappropriate disposal of solid and human waste; risks to fishermen; risks associated with property theft especially at night when construction equipment is stored. The risks of SEAH associated with construction work will be mitigated by codes of conduct and other measures described above, in the sections on ESS2. Other risks relate to potential temporary obstruction of access to fishing grounds due to the construction of the landing stations, and potential issues related to possibility of labor influx. These and other issues will be reflected in the ESMF, which will provide guidance on the development of measures to address aspects associated with construction activities at the subproject level (e.g. traffic management plans) to be included in eventual project ESMPs and in the contractor's bidding documents. The site-specific ESIA/ESMPs will also include COVID-19 transmission mitigation measures in line with the national and World Health Organization (WHO) guidance. It will also include a clear incident-reporting and response procedures. The project's communities will be informed of the grievance mechanism (GM) and provided information on how to register complaints and address safely and ethically and document complaints and allegations (including those involving SEAH) during the project implementation. During the operation phase, the ESMF will include guidelines for the development of site-specific Emergency Response and Preparedness Plans to face unexpected situations such as pandemic diseases, which will include general emergency response and preparedness planning and training procedures, as well as operations-phase facility maintenance requirements.



ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

This standard is relevant. Some project activities such as: (i) the construction of the submarine cable (ii) the establishment of a data center and (iii) the establishment of the cybersecurity center, could likely to induce land acquisition and temporary disruption of economic activity or livelihood activities.

As at this stage it is not possible to estimate the number of project's affected persons since the location of the program physical investments and detailed technical designs of the infrastructure will not be known during program preparation, a Resettlement Policy Framework (RPF) will be prepared by each participating country, prior to appraisal, to address any impact on assets and affected persons' livelihoods. The RPF will provide guidance on the preparation of any site-specific Resettlement Action Plans (RAPs) during program implementation, in accordance with the requirements of ESS5 whenever a subproject requires land acquisition, restrictions of land use or involuntary resettlement. The RPF will also set out eligibility criteria for affected persons, procedures and standards for compensation, and arrangements for consultations, budgets, and monitoring, including how a project-level grievance mechanism will address involuntary resettlement-related grievances. The RPF will be reviewed, consulted upon, and disclosed in-country and on the World Bank website prior to project appraisal.

In addition, as precise submarine cable burying locations will not be known during project preparation and Marine Protected Areas (MPAs) such as the National Park of Banc d'Arguin (PNBA) in Mauritania, may be affected by project interventions. At this time it is not known how these areas will be impacted or if access to them by communities will be only temporary. If the impacts merit it a Process Framework (PF) will be prepared. Assessment of the risks and impacts should be completed by appraisal.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

This standard is relevant. The project will endeavor to use mainly submarine cables. Borrowers will make sure that the operation avoid ecologically sensitive ecosystems on coastal zone, especially in occurrence of the presence of a MPA. The ESMF will assess possible biodiversity impacts of submarine cables, and propose mitigation measures be taken in site specific documents (ESIA/ESMP) to ensure that project activities do not harm or alter natural habitat or areas of high biodiversity values. Equally, any onshoring of cable should not undermine the integrity of coastal resources such as mangroves, grasslands or other habitats where landing stations may be placed. Efforts will be made to avoid adverse impacts to local biodiversity and living natural resources through application of the mitigation hierarchy and optimizing project technical designs, with specific measures to be outlined in the ESIA. The ESMF will contain a screening mechanism to avoid any sensitive areas and provide guidance to sub-project ESMPs. Every effort will be made to avoid adverse impacts on local and marine biodiversity and living natural resources through the application of a mitigation hierarchy and by optimizing the project's technical designs in this regard to the extent feasible, with specific measures to be outlined in the ESIA.

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

This Standard is not currently relevant as there are no Indigenous Peoples/Sub-Saharan Historically Underserved Traditional Local Communities in the project area that fulfill the four characteristics indicated under ESS7.

ESS8 Cultural Heritage



The presence of culturally significant sites associated with the project cannot be determined at this stage of project. During construction, it is possible that both known and unknown physical and cultural resources may be uncovered. Though the possibility is not considered significant in the project area, the ESMF will describe the probability of Cultural heritage in the project area and provide guidance on chance finds , including underwater heritage. The ESIA will include assessment of any cultural heritage - including archaeological relics, fossils, human graves, shrines, sacred trees or groves - in the project area. Any sites identified will be avoided and if avoidance is not possible, the ESMP will identify measures required to address these impacts in accordance with the mitigation hierarchy. The ESMF will include “Chance Find” Procedures to be included in construction contracts as a “Chance Find” clause which will require contractors to stop construction if cultural heritage, in any form, are encountered during construction and contact the appropriate service of the Ministry of Culture of each country.

ESS9 Financial Intermediaries

This ESS is not judged relevant at concept stage. The relevance will be confirmed once additional information is are provided during project preparation.

B.3 Other Relevant Project Risks

Due to the fact that fishery and agriculture are the most common activities on coastal zone, a particular attention should be put on not inducing negative impacts on those who live from these activities.

C. Legal Operational Policies that Apply

| | |
|--|-----|
| OP 7.50 Projects on International Waterways | TBD |
| 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

Common Approach is not being considered under this project.

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

Actions to be completed prior to Bank Board Approval:

Each participating country will prepare, consult upon, and publish in the countries and on the Bank external website, prior to appraisal:

- the Stakeholder Engagement Plan (SEP) and Grievance Mechanism (GM)

Public Disclosure



- the Environment and Social Management Framework (ESMF) with SEA/SH Mitigation and Response Action Plan as an annex to the ESMF

- the Resettlement Policy Framework (RPF)

- the Environmental and Social Commitment Plan (ESCP)

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

Each participating country will develop its own ESCP, which should include:

- the preparation and implementation of Site-Specific ESMP and ESIA under the ESMF for public works;

- the application of labor management procedures (including Occupational Health and Safety measures and an SES/H action plan),

- The preparation and implementation of Labor Management Procedure (LMP)

- implementation of a resettlement framework and preparation and implementation site specific resettlement action plans when needed

- Recruitment of E&S staff

- Implementation of SEP and GM

- SEA/SH Prevention and Response Action Plan (and mapping of services) will be prepared prior to project activities and implemented throughout project lifecycle as part of the ESMP.

- In addition, ESF capacity-building will be prioritized.

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

16-Mar-2022

IV. CONTACT POINTS

World Bank

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Public Disclosure



Borrower/Client/Recipient

Borrower: Economic Community of Western Africa States

Implementing Agency(ies)

Implementing Agency: MINISTÈRE DES POSTES, TÉLÉCOMMUNICATIONS ET DE L'ECONOMIE NUMÉRIQUE

Implementing Agency: Ministère de la Transformation numérique de l'Innovation et de la Modernisation de l'Administration

Implementing Agency: Ministry of Information & Communication Infrastructure - MOICI

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

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|-------------------------------|--|
| Task Team Leader(s): | Rocio Sanchez Viguera, Rafael Pardo Ostos |
| Practice Manager (ENR/Social) | Maria Sarraf Recommended on 11-Oct-2021 at 08:18:21 GMT-04:00 |
| Safeguards Advisor ESSA | Nathalie S. Munzberg (SAESSA) Cleared on 12-Oct-2021 at 13:22:52 GMT-04:00 |