Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 10/21/2019 | Report No: ESRSC00840
**BASIC INFORMATION**

### A. Basic Project Data

<table>
<thead>
<tr>
<th>Field</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Country</td>
<td>Nigeria</td>
</tr>
<tr>
<td>Region</td>
<td>AFRICA</td>
</tr>
<tr>
<td>Project ID</td>
<td>P170664</td>
</tr>
<tr>
<td>Project Name</td>
<td>Ten Million Adolescent Girls Project</td>
</tr>
<tr>
<td>Practice Area (Lead)</td>
<td>Education</td>
</tr>
<tr>
<td>Financing Instrument</td>
<td>Investment Project Financing</td>
</tr>
<tr>
<td>Estimated Appraisal Date</td>
<td>1/20/2020</td>
</tr>
<tr>
<td>Estimated Board Date</td>
<td>5/18/2020</td>
</tr>
<tr>
<td>Borrower(s)</td>
<td>Federal Ministry of Finance</td>
</tr>
<tr>
<td>Implementing Agency(ies)</td>
<td>Ministry of Education</td>
</tr>
</tbody>
</table>

**Proposed Development Objective(s)**

To Improve access and transition of quality secondary education and participation in market-relevant skills training

**Financing (in USD Million) Amount**

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Project Cost</td>
<td>500.00</td>
</tr>
</tbody>
</table>

### 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]

To empower adolescent girls by addressing demand and supply constrains in education and economic participation

### D. Environmental and Social Overview

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

It is broadly known that the project activities will likely take place in Northern States of Nigeria where the lowest girls secondary school attendance and other indicators are most dire. The project will be implemented across different States with uneven institutional capacity and weak legislation enforcement. This may pose social and environmental risks in terms of the ability to comply with the requirements of the ESF.
Conflict/fragility challenges: Some parts of these States are considered fragile and are periodically affected by conflict/violence. The nine-year conflict in North-East Nigeria has created a deepening humanitarian crisis. Notably in the North-East of Nigeria, kidnapping associated with school girls remains a concern.

Behavioral campaigns to change social norms: A key aspect of the project is covered under Sub-component 1b where behavioral campaigns will seek to change social norms on girls’ access to, and completion of, education. Social risks may include further isolation or violence towards the school girls and others in support of the norms. In this sense, stakeholder engagement should thoroughly assess the ideal language, appropriate targeting and as such adopt adaptive/ differentiated campaigns that ensure there are no: (a) possibilities of exacerbating existing exclusion/tensions; (b) stigmatization or violence against girls, female teachers, parents or others within the community that either attend schools or wish to encourage girls education. Hence, managing safe and robust discussions with parties that are unsupportive of the social norms being promoted will be critical.

Gender and School Based Violence: Other issues being addressed within the project design are largely linked to GBV, SEA and School-Based Violence (e.g. bullying, corporal punishment etc.). Young marriages are culturally sensitive and associated with stigmas and taboos and discussion on these issues within the country is limited even amongst women. Since the focus of the project is on adolescent girls and given the probable proximity of the contractor, teachers and female students in schools, it is critical to put in place measures to protect school children and teachers from potential sexual exploitation and abuse by contractors and workers. During construction, it will be advisable to use local builders as opposed external contractors, as this will partially mitigate these risks of sexual exploitation and abuse both on sites and on the way to school. In addition, the borrower’s Social Assessment will be comprehensive to include assessment related to Gender and GBV risks, project impact on vulnerable and individual groups including persons with disability, labor influx, existing formal and informal grievance systems etc. This will begin early at the preparatory stage to help shape the project design and components and inform relevant plans and processes (Stakeholder Engagement Disclosure Plan, Environmental and Social Management plans, Grievance Redress Mechanism, GBV Mitigation Plan, Disability Inclusion Action Plan etc.).

D. 2. Borrower’s Institutional Capacity

Based on the available information, the State Ministry of Education/Secondary Education Board will be the implementing agency of the operation.

The borrower has acceptable Legal and Institutional Frameworks in the country to ensure compliance on environmental issues. For environmental standards, the Federal Ministry of Environment (FMINV) in Nigeria is responsible for setting policy guidelines on environmental issues and ensuring compliance with national environmental standards. The Environmental Assessment (EA) department is charged with the responsibility of implementing the Nigerian EIA Act No. 86 of 1992. However, when it comes to social issues there is no single point ministry dealing with social impacts and risk management in Nigeria. The provisions of World Bank’s Environmental and Social Framework (ESF) that relate to social aspects such as labor, protection of vulnerable groups, social inclusion, community health & safety, land and livelihoods are under the purview of different ministries or department and agencies (MDAs). Typically, these MDAs do not have policies and regulatory provisions that address the ESF requirements holistically.
To a large extent however, the capacity at the National level is better understood as compared to the capacity at State level, there is an expectation for more disparity across the States hence, detailed assessments may be required as well as capacity strengthening including clear definition of roles and responsibilities on environmental and social safeguards in the operational manuals.

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

A. Environmental and Social Risk Classification (ESRC) Substantial

Environmental Risk Rating Moderate

The project is rated as moderate because it proposes to support minor civil works (renovation of schools and classrooms) across States in the Northern region of the country. The civil works will include rehabilitation of existing classrooms and facilities including the construction of additional classrooms. These works will pose a moderate threat to the environment. The project potential risks and impacts to the environment, are typical to construction activities and manageable within the confines of the construction sites. Their mitigation will be guided by national and local laws and procedures and the requirements under ESF.

Social Risk Rating Substantial

On assessment of the social risks of this project, the project is classified as substantial for the following reasons:

• As a result of minor civil works involving rehabilitation of existing class rooms and schools, both skilled and unskilled laborers could be brought in for these civil works in the schools. This heightens certain labor related risks involving health and safety of workers, fair wages and working conditions and the protection of female workers.
• During project preparation, potential GBV risks were identified at two levels. The first is the potential Sexual Exploitation and Abuse (SEA) of the local communities and/or students in schools due to the outside contractor workers. The second risk is heightened sexual harassment in the schools due to the availability of female teachers. In this regard, it is suggested that a GBV / SEA risk assessment and draft action plan is developed to address these risks.
• Further risks include school-based violence among students, and between teachers/school management and students. Risks of violence against girls on their way to school is also a crucial risk requiring attention.
• There could be potential issues regarding exclusion of people with disabilities from both the design of the classrooms (impeding physical access) as well as the courses which may not be tailored to the needs of persons with disabilities.

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 proposes to undertake minor infrastructure works for improved learning conditions. The works will include rehabilitation of existing classrooms and facilities such as laboratories; and construction of additional classrooms. The project may include the procurement of laboratory equipment and chemicals; IT equipment. These are likely to require management plans for toxic substances; and e-waste, respectively. The potential environmental
and social risks and impacts from the works will mainly be generic construction works that include, wastes, noise, dust emissions, vegetation clearance, soil erosion, accidents and injuries etc. The severity of these risks and impacts will further be assessed when the construction activities are confirmed.

Relevant social risks of this project include GBV and Sexual Exploitation, School-Based Violence especially towards the most vulnerable or stigmatized, lack of equal opportunities for women and girls as well as persons with disabilities to participate in the project, and social conflicts arising from social norm disagreements or about which communities are eligible for cash and in-kind grants. As a result of minor civil works involving rehabilitation of existing class rooms and schools, both skilled and unskilled laborers could be brought in for these civil works in the schools. This could heighten certain labor related risks involving health and safety of workers, fair wages and working conditions and the protection of female workers. The project offers an opportunity for gender and disability-inclusive basic education. This approach will be mainstreamed into the project, targeting those under risk. This would include gender-appropriate facilities designed for universal access.

As the exact construction sites are not identified at this stage, an Environmental and Social Management Framework (ESMF), Resettlement Policy Framework (RPF), Environmental and Social Commitment Plan (ESCP) and Stakeholder Engagement Plan (SEP) will be prepared prior to appraisal. The ESMF will provide guidance on screening for potential risks and on managing unavoidable environmental and social impacts. The ESMF will also provide guidance on the level of environmental and social assessment and types of instruments needed (i.e. ESIA, ESMP, etc.). An ESCP will outline the client’s commitments to prepare and implement safeguard instruments throughout the lifecycle of the project. During project implementation, ESIA and ESMP will be prepared where and when needed. It is envisaged that the Environmental and Social Management Frameworks (ESMF) will include Labor Management Procedures. A preliminary Stakeholder Engagement Plan (SEP) along with a Grievance Redressal Mechanism will be prepared and disclosed. To address labor related risks, Labor Management Procedures (LMP) will be integrated as a chapter in the ESMF. The LMP will be further updated as required in the Project Implementation Manual. In addition, a GRM specifically for direct and contracted workers will be set up. The GRM will be designed at an early stage and will be established by project effectiveness. Similarly, during project implementation, the SEP will be periodically updated. Construction contractors will be required as a condition of their contracts with the Project, to implement and comply with the ESMP, including Management Procedures and Occupational Health and Safety measures outlined in the ESMP. The ESMF will make use of the general and sector-specific EHSGs for the identified activities in relation to occupational and community health and safety.

Areas where “Use of Borrower Framework” is being considered:
The operation will not use the Borrower’s Framework in the assessment, development and implementation of sub projects. The project will comply with relevant national legal requirements.

ESS10 Stakeholder Engagement and Information Disclosure
A Stakeholder Engagement Plan (SEP) will be prepared by the borrower, consulted upon and disclosed in-country and in the World Bank’s website. They will address specific risks identified by stakeholders such as persons living with special needs.

The SEP is a living document and major revisions to the SEP during implementation will be publicly disclosed. The objective is to establish a systematic approach for stakeholder engagement, maintain a constructive relationship with
them, considering stakeholders’ views, promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle, and ensure that appropriate project information is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner. The project will set up a project-specific Grievance Redress and Feedback Mechanism for people to report concerns or complaints, if they feel unfairly treated or are affected by the project.

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

Potential environmental, social risks and impacts relevant to the project could emerge from contract workers brought in for the rehabilitation of schools and classrooms. The contractor workers will need to meet the requirements for: terms and conditions of employment; non-discrimination and equal opportunity; worker’s organizations; child labor; forced labor; a grievance mechanism; and, occupational health and safety plans. Stakeholders and beneficiaries working in connection with the project full-time or part-time will remain subject to the terms and conditions of their existing public sector employment or agreement, unless there has been an effective legal transfer of their employment or engagement in the project.

The project will include Labor Management Procedures as part of the ESMF and will consider the National requirements, the Environmental Health and Safety Guidelines on Occupational Health and Safety. The contractor will be required to update and comply with these requirements during project implementation and ensure non-discrimination and promote gender sensitivity in the recruitment process of consultants or specialized workers needed during the implementation of identified sub-projects, including sensitization related to the availability of worker’s Grievance Redress Mechanism and to abide by the code of conduct to prevent and address potential harassment, child labor, gender or GBV/SEA issues during the implementation of the activities financed under this project.

The project will also include an Occupational Health and Safety (OHS) procedures or plans. The government will include OHS measures that addresses: (i) potential hazards for workers (materials, activities, substances); (ii) protective and prevention measures, (iii) provision of training; (iv) first aid; and (v) hygiene facilities.

ESS3 Resource Efficiency and Pollution Prevention and Management

During constructions, there will be a need for pollution management from air emissions, including exhaust from vehicles and dust and wastes generated by digging activities. Those most likely to be affected are workers and people living within the proximity of school 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, and residual impacts are expected to be limited in scope and duration.

Noise: During the construction phase, noise might likely be generated from the use of construction machinery and vehicle movements. The relatively short-term and small-scale nature of the works suggest that noise levels will not be excessive or cause long-term nuisances. The construction works will, however, present short-term nuisance to the
public and to owners adjacent to some of the project sites. The Environmental and Social Management Plans to be prepared will include mitigation measures to minimize and manage the noise levels such by applying standard restrictions to hours of site work.

Waste management: Construction activities will generate solid waste which will primarily include excavated soil and construction debris. The waste generated by the construction works will largely be disposed of at approved sites according with the National laws and regulations. The Government will need to define construction disposal sites according to acceptable parameters of ESS3 and to ensure that contractors do not leave hazardous wastes in the villages (paint containers, cement bags, diesel/oil containers, batteries, etc.).

Other risks to be considered include Government consideration of cost saving which can result in the use of low-priced materials without considering resource efficiency, or the safety and well-being of users.

Use of Water: Access to water is a very important success factor for the project as it is needed for the construction of the works. However, in some areas, water is scarce and its use, collection, storage, access, management and potential pollution as part of the project’s design, will need to be addressed during construction and operation. The borrower will use the ESMF to assess the potential cumulative impacts of water use upon communities and the environment and will identify and implement mitigation measures proportionate to the risks and impacts of project activities.

Use of Energy: The lack of electricity in many rural areas, may result in the need to provide schools with basic energy sources through the deployment of diesel generators as a backup or as the primary source of electrical which will constantly emit CO2 during service life. The project will strive to use solar panels where technically and financially feasible.

The site specific ESMPs to be prepared will include mitigation measures to minimize and manage the risks and impacts associated with resource efficiency and pollution management.

ESS4 Community Health and Safety

By increasing access to secondary schooling, the project will invest in building schools in areas where secondary schools are thinly spread and also build additional classrooms where required. Therefore, there is the potential for impacts to community health and safety which will need to be assessed and mitigated through a site specific ESMP. Presence of workers and potential impacts of GBV/SEA issues on the local communities, teachers and students on site, and en route to schools. The borrower will conduct a GBV risk assessment and develop a costed GBV Action Plan during project implementation. However, the use of local contractors close to the communities may help in limiting these risks. The Borrower will evaluate the risks and impacts of the project on the health and safety of the affected communities during the project life cycle, including those who may be most vulnerable. The ESMF and SA will provide a more complete analysis of potential worker influx, access to schools and GBV risks for teachers and students. The ESMF will make use of the general and sector-specific EHSGs for the identified subprojects in relation to community health and safety.
ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The project is not financing activities that will involve land acquisition, restrictions on land use, or involuntary resettlement. Nonetheless, risks still remain as a result of the possibility of displaced people occupying abandoned schools that are identified for refurbishment. As such, a Resettlement Policy Framework is required.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The proposed project is not expected to involve primary production and/or harvesting of living natural resources. Hence, potential environmental risks and impacts associated with this ESS will be limited.

The ESMF 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. The clearance and loss of areas of vegetation and fauna habitat will be minimal.

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

This Standard is not relevant as there are no Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in the project area.

ESS8 Cultural Heritage

The Environmental and Social Assessment will confirm the existence of tangible or intangible cultural heritage at project sites and the ESMF will include guidance regarding how to manage any negative impacts. Since the project will be financing some civil works, some of excavation, movement of earth and impounding can be expected. These types of activities pose the possibility of encountering both known and unknown physical and cultural resources. Though the possibility is not considered significant, the borrower will avoid impacts on cultural heritage and where such avoidance is not possible, will identify and implement measures to address these impacts in accordance with the mitigation hierarchy. The treatment of PCR including archaeological relics, fossils, human graves, shrines, sacred trees or groves that may be encountered will follow a Chance Finds Procedure that will be elaborated in the Environmental and Social Management Plans.

ESS9 Financial Intermediaries

The Project will not involve the use of financial intermediaries.

B.3 Other Relevant Project Risks

N/A

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

The project will not trigger this policy
OP 7.60 Projects in Disputed Areas

No

This policy is not triggered because project will not be implemented in disputed area

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered?

No

Financing Partners

No financing partners are being considered.

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

**Actions to be completed prior to Bank Board Approval:**

Prior to appraisal the following documents will need to be developed:

i. Environmental and Social Management Framework (ESMF); Labor Management Procedures as an integral part of the ESMF
ii. Resettlement Policy Framework (RPF)
iii. Stakeholder Engagement Plan and Project Grievance Redress Mechanism
iv. Environmental and Social Commitment Plan (ESCP)
v. Updated GBV/SEA risk assessment and draft action plan

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

i. Site specific ESMPs (including labor management Plan requirements) for the individual schools as well as any associated permits and environmental licenses as described in detail in the ESMF.
ii. Updated Stakeholder Engagement Disclosure Plan (SEP).
iii. Occupational Health and Safety (OHS) procedures or plans as part of the LMP.
iv. Development and implementation of a GBV/SEA Action Plan during project implementation.
v. Any project wide frameworks/plans and complementary measures related to contextual risk management.

C. Timing

**Tentative target date for preparing the Appraisal Stage ESRS**

20-Jan-2020

IV. CONTACT POINTS

World Bank

Contact: Aisha Garba Mohammed
Title: Education Spec.
Telephone No: 5359+401
Email: agmohammed@worldbank.org

Borrower/Client/Recipient
Borrower: Federal Ministry of Finance

Implementing Agency: Ministry of Education

V. FOR MORE INFORMATION CONTACT
The World Bank
1818 H Street, NW
Washington, D.C. 20433
Telephone: (202) 473-1000
Web: http://www.worldbank.org/projects

VI. APPROVAL
Task Team Leader(s): Aisha Garba Mohammed
Practice Manager (ENR/Social) Senait Nigiru Assefa Recommended on 01-Oct-2019 at 14:47:38 EDT
Safeguards Advisor ESSA Hanneke Van Tilburg (SAESSA) Cleared on 21-Oct-2019 at 00:23:33 EDT