Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 06/04/2019 | Report No: ESRSA00166
BASIC INFORMATION

A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Africa</td>
<td>AFRICA</td>
<td>P167817</td>
<td></td>
</tr>
</tbody>
</table>

| Project Name                                                                 |
| Regional Disease Surveillance Systems Enhancement (REDISSE) Phase IV            |

<table>
<thead>
<tr>
<th>Practice Area (Lead)</th>
<th>Financing Instrument</th>
<th>Estimated Appraisal Date</th>
<th>Estimated Board Date</th>
</tr>
</thead>
</table>

| Borrower(s)                                                                 |
| Republic of Chad, Republic of Angola, Central African Republic, Democratic Republic of Congo, Republic of Congo |

| Implementing Agency(ies)                                                                 |
| Ministry of Health and Population, Ministry of Health and Population                  |

Proposed Development Objective(s)
The project development objectives are: (i) to strengthen national and regional cross-sectoral capacity for collaborative disease surveillance and epidemic preparedness in the participating countries; and (ii) in the event of an eligible crisis or emergency, to provide immediate and effective response to said eligible crisis or emergency.

Financing (in USD Million)

<table>
<thead>
<tr>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>280.00</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?
Yes

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]
The project will promote the “One Health” (OH) approach, which is a multi-sectoral initiative for the prevention, detection and control of health threats, including epidemics and other major endemics. This approach ensures that human, animal, and environmental health are working collaboratively, considering the fact that stressors in any of these domains impact the others and increase the likelihood of experiencing deadly outbreaks. The approach is
formalized by the one health platform which includes training veterinarians, nurses and hospital workers on infection control measures, investing in Health and animal Information System, surveillance system, simulating cross-border emergency preparedness exercises, purchasing equipment and supplies for laboratories, and supporting the development of multi-sectoral standard operation procedures to combat zoonotic disease outbreaks.

D. Environmental and Social Overview

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

The Project will be implemented across five countries (Angola, Chad, Central African Republic, Democratic Republic of Congo and Republic of Congo), by the ECCAS Secretariat, nationally and locally in both urban and rural areas. The project will contribute to improved disease surveillance and response to epidemics which occur in the region. The project aims to increase human resource development and laboratory capacity regionally, nationally and at the local level in a systematic manner. The exact locations remain unknown but will mainly be determined by the presence of existing laboratory facilities (which can be upgraded), ability to establish appropriate networks (collection, referral and transport) and prevalence of targeted diseases in each of the countries. Training/capacity building will be provided at existing facilities (likely larger towns and cities) in the Region. Civil works are expected to be associated with upgrading existing facilities. The project expects to meet its development outcome through support to PIUs, ECCAS or other public institutions working in disease surveillance and response, as well as hiring contractors to rehabilitate laboratories. At the regional level, implementation will be led by the ECCAS General Secretariat (Health Division in the Department of Socio-Cultural Integration) based in Libreville, Gabon. ECCAS will host the Project Coordination Unit (R-PCU) who will be responsible for regional and cross-border coordination guided by the decisions of the REDISSE Regional Steering Committee. The Regional PCU will also be responsible for procurement and financial management, technical and fiduciary reporting, monitoring and evaluation (M&E) and environmental and social safeguards compliance.

D. 2. Borrower’s Institutional Capacity

At the individual subproject level, in particular the existing laboratories to be rehabilitated, capacity is anticipated to be limited and training and capacity building will be provided at existing facilities (likely larger towns and cities) in the Region. At the national level, implementation will be through a Project Coordinating Unit within the Ministries of Health supported by the ECCAS General Secretariat (Gabon). A national steering committee is proposed in each country. In addition to the implementing agent (ECCAS) there are 5 borrowing countries with varying levels of institutional capacity in managing environmental and social issues. ECCAS and the five countries all have experience in implementing World Bank Projects under the safeguards instruments, but not the new Environmental and Social Framework (ESF). However, given the expanded scope of the ESF and the clients’ lack of familiarity with the new ESF, capacity building and training will be required during the project’s life.

Republic of Angola: The environmental legislation in Angola is quite recent and inspired by the international conventions that Angola participates in. The existing Angolan regulatory framework for impact assessment covers the most relevant principles and best practices, including public consultation and participation, monitoring and licensing procedures.

Central African Republic: The Director General for Environment (DGE) is the main institution in the Ministry of Environment and Sustainable Development (MEDD), responsible for conducting and coordinating the environmental and social assessment process in CAR (validate ESIAs, ESMPs, analysis of field reports, inspection and environmental
For Official Use Only

The World Bank
Regional Disease Surveillance Systems Enhancement (REDISSE) Phase IV (P167817)

Jun 13, 2019
Page 4 of 13

For Official Use Only

For Official Use Only

For Official Use Only

For Official Use Only

For Official Use Only

For Official Use Only

Public Disclosure

In audit). At the provincial level, the DGE works in collaboration with local structures of the MEDD. However, implementing capacity is low, especially as the DGE lacks financial and technical resources. In addition, staff often leave to join other national and international structures.

Democratic Republic of Congo: The Ministry of Environment, and Sustainable Development (MECNDD) governs environmental policies and compliance. The technical agency in charge of environmental monitoring and management within MEDD is the National Agency for the Environment (Agence Congolaise de l’Environnement - ACE). ACE is responsible for safeguards compliance of all projects in the country, but with an emphasis on environmental Category A projects. The ACE is familiar with safeguards/ESF instruments such as the Environmental and Social Management Framework (ESMF), the Resettlement Policy Framework (RPF), and the Indigenous Peoples Policy Framework (IPPF) through the ongoing implementation of recent Bank-financed projects in the health sector. Recently, the Agency established offices in some provinces for a better monitoring of projects in the field. The agency (ACE) is however understaffed and has limited capacity (financial, institutional, technical, facilities etc) and despite several donor-funded capacity-building initiatives, the unit still largely relies on donor funds to carry out its field supervision duties. At the provincial level, government agencies (including those attached to the Ministry of Environment) often do not have the necessary equipment to monitor social and environmental impacts, staff lack training, and management capacity is limited.

Republic of Congo: Environmental issues in the Republic of Congo are managed by the Ministry of Tourism and Environment. The Director Générale de l’Environnement (DGE), under the Ministry of Tourism and Environment is in charge of the elaboration and implementation of environmental policies, as well as providing general guidance on Environmental and Social Impact Assessments (ESIAs) and their validation. However, the borrower capacity, both at the national and municipal level, to adequately implement the safeguard/ESF measures is considered weak. This is due to a lack of experts in environmental and social management. As identified through the Bank’s safeguards portfolio review in in 2017, there is a need for capacity building for the experts in PIUs and key ministries, as well as a close collaboration with the DGE.

Chad: The main institution in charge of environmental and natural resource management is the Ministry of Environment, Water and Fisheries, which includes the Directorate of Environmental Assessment, Pollution and Nuisance Control (DEELCPN). The DEELCPN covers two components, one on environmental assessments and the other on pollution (waste, etc.) and nuisance (noise, etc.). While the environmental system exists, its implementation remains less effective. The country is continuously subject to institutional change. The last change happened in March 2018 with the publication of a new organigram of the Ministry of Environment, Water and Fisheries. The institutional capacity does not allow a strong and rigorous implementation of environmental assessment law and procedures. DEELCPN is not able to ensure adequate monitoring of the EIA recommendations due to the lack of resources both at the central and decentralized levels. There is a need for capacity building targeting both PIU and experts in key ministries as well as close collaboration with the DEELCPN.

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Moderate
Environmental Risk Rating

The environmental Risk Rating is considered to be moderate at this stage, as potential risks and impacts on the environment are not expected to be irreversible. Key environmental concerns are related to potential risks and impacts from the rehabilitation of some laboratories, emergency interventions; and the handling, management, transportation and storage of drugs, chemicals, specimens and vaccine. Some of the Laboratories could be very old, with expired chemical products, while some buildings might need extensive rehabilitation work. Potential impacts can be related to (i) impacts on water quality, (ii) disposal and management of building/construction wastes; (iii) occupational health and safety of workers and (iv) nuisances related to air and noise emissions; and (v) the management and disposal of hazardous materials and wastes.

Social Risk Rating

The Social Risk Rating is considered to be moderate at this stage as the Project does not involve activities with a high potential to harm the population. The likely impacts are expected to be reversible and can be managed with the application of appropriate mitigation measures. Key social concerns relate to (i) labor and working conditions of those engaged in civil works; (ii) community health and safety related to a range of factors including, worker-community interactions (especially given cultural sensitivities on the treatment of victims), potential for Gender Based Violence (GBV) and the movement of chemicals and samples etc to which communities could be exposed in the event of a road traffic accident; and (iii) the need to consider Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (IPs/SSAHUTLCs) who will be project beneficiaries. In addition, there is a need for stakeholder engagement both at the national level associated with the overall program and the benefits and value of the program. Local level consultation will also need to be undertaken on elements of the Project associated with construction and upgrading activities, emergency response requirements and elements of the project related to livestock health.

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:

Assessment and management of environmental and social risks and impacts will be required mainly associated with Component 1 “Surveillance and laboratory capacity to rapidly detect outbreaks”. Potential impacts are expected to be site specific emerging mostly from civil works associated with laboratories rehabilitation, emergency interventions; and the handling, management, transportation and storage of drugs, chemicals, specimens and vaccine. There will need to be measures in place for managing, transporting any expired chemical products, and stocking laboratories with new material and products. Once operational, measures will need to be in place to manage the transportation of samples. Impacts are expected to be adequately managed during project implementation in accordance with the Environmental and Social Management Framework (ESMF). The ESMF will provide guidance on the appropriate required environmental and social risk management documents that need to be prepared, such as Environmental and Social Impact Assessments (ESIAs), or Environmental and Social Management Plans (ESMPs); that will clearly define mitigation and management measures during all phases of the project including roles and responsibilities, schedule, costs and implementation procedures. These plans will include consideration of risks associated with Gender Based Violence (GBV) and an assessment of GBV risks. Climate screening will also be
undertaken. The Bank’s review considered the project’s capacity to manage its environmental and social performance as a challenge. It can therefore be concluded that the project’s environmental and social management system and procedures will need to be complemented/enhanced to comply with ESS1 requirements.

The REDISSE Phase IV Project is being processed as an emergency operation in accordance with paragraph 12 of operating procedure (OP) 10.00. As such the preparation of the required instruments, with the exception of the Stakeholder Engagement Plans (SEP) and Environmental and Social Commitment Plans (ESCP) for each country have been deferred until four (4) month after project effectiveness. The ESCP for each country has therefore included commitments to undertake the required assessments and production of the necessary instruments for each country within the REDISSE IV Project. Mitigation measures for site-specific impacts will be managed through the implementation of required environmental and social risk management documents to be prepared four (4) months after board approval (taking into account the possible presence of Indigenous Peoples in DRC, CAR, ROC and Chad). Requirements for targeted training and support to the environmental and social specialists within the implementing units will also be outlined in the ESCP.

ESS10 Stakeholder Engagement and Information Disclosure

Stakeholder engagement is a critical tool for social and environmental risk management, project sustainability and success. Each of the five countries has prepared Draft Stakeholder Engagement Plans (SEP) proportional to the nature and scale of the project and associated risks and impacts within each country. The draft SEPs will be publicly disclosed and updated in light of any feedback from stakeholders.

The SEPs take into account sharing information on the project activities, incorporating stakeholder feedback into the Project and reporting and disclosure of project documents. In addition, as public health activities are proposed including education and awareness campaigns the needs of different groups, including vulnerable and Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities (IP/SSAHUTLCs) will need to be taken into account in planning such activities.

The client 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(s).

The Borrower will engage in meaningful consultations with all stakeholders throughout the project life cycle paying particular attention to the inclusion of vulnerable groups (including the elderly, persons with disabilities, female headed households and orphans and vulnerable children) and IP/SSAHUTLCs. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.

The draft SEP also present grievance mechanisms that will be in place during project implementation that are appropriate for each of the five countries. Again these mechanisms will be reviewed and updated as needed following disclosure of the SEP.
Disclosure of all the instruments prepared will be undertaken following board approval and comments incorporated as appropriate.

B.2. Specific Risks and Impacts

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

ESS2 Labor and Working Conditions

The majority of those involved will be existing government civil servants (of one of the five countries), employees of ECCAS or other organizations, such as the WHO. As such, employees of the public sector will remain subject to the terms and conditions of their existing sector employment. Additional staff will be hired by ECCAS to support the Project, they will also be subject to normal terms and conditions of ECCAS employees unless their employment is by the Project in which case they will be subject to the full requirements of ESS2. Contractors hired to rehabilitate laboratories (as required) will be subject to the requirements of ESS2 including occupational health and safety and grievance mechanisms. Should this require the employment of (skilled) workers from outside the local area (especially as they may relate to the installation of specialist technical equipment) worker accommodation and influx will need to be managed in line with ESS2 (and ESS4). Likewise, any technical consultants contracted by the Project will also need to adhere to such standards.

To ensure health and safety of workers during the rehabilitation of laboratories during operational phases of the project, Health, Safety and Environmental (HSE) plans in line with good international industry practice (GIIP) and based on job hazard analysis will need to be prepared. During operation, this will include detailed requirements for the transport, handling and disposal of infectious disease specimens, chemicals/reagents and other hazardous materials. The plans will include procedures on incident investigation and reporting, recording and reporting of non-conformances, emergency preparedness and response procedures and continuous training and awareness to workers.

The project will develop and implement written labor management procedures that will set out the way in which project workers will be managed during rehabilitation and operational phases. These will be prepared and disclosed within four (4) months of board approval. As such, many of the indicators have not yet been initiated.

ESS3 Resource Efficiency and Pollution Prevention and Management

During laboratories rehabilitation, pollution to air, water or land might occur. The project will apply efficiency pollution prevention measures in accordance with the mitigation hierarchy. The ESMF and site-specific instruments (ESIAs/ESMPs) will include guidance related to transportation and management or expired chemical products during rehabilitation and implementation. Waste is mainly expected from the laboratories rehabilitation. ESA instruments (ESMF, site specific ESIA/ESMP) will include mitigation measures to manage waste during project implementation including the development of Hazardous Waste Management Plans. A Biomedical waste management plan to manage risks and impacts related to biosafety from testing, management and disposal of blood and other biomedical
wastes will be prepared by each participating country four (4) month after project effectiveness. The project is not anticipated to be a significant user of water or emit significant quantities of greenhouse gases.

ESS4 Community Health and Safety
The project is intended and designed to support efforts to reduce and manage transmission of Road traffic movements, including movement of biological specimens, chemicals (reagents) etc during implementation will be required as part of the project. The risks associated with road traffic movements in the five countries will need to be assessed as part of the environmental and social assessment and appropriate measures developed either as part of a specific traffic management plan or the ESMP. This will need to include appropriate protocols associated with the handling, storage, transportation and disposal of biological samples and consideration of security threats and arrangements. Civil works may result in the presence of workers and/or influx of opportunistic migrants. This has the potential to result in impacts to community health. Gender-based violence (GBV), sexual exploitation and abuse (SEA), and the spread of sexually transmitted and communicable diseases, may occur especially if the communities are rural, remote or small. The project will assess the risk of GBV/SEA and include measures to mitigate the risk as required. Emergency Preparedness and Response Plans will be developed and implemented for the operation of laboratories rehabilitated under the project. Screening criteria in the ESMF will include security risk assessment for identifying consistent with the World Bank Good Practice Note on Assessing and Managing the Risks and Impacts of the Use of Security Personnel. A Security Management Plan will be prepared, as provided in the ESCP, for security arrangements in the Democratic Republic of Congo and any other subproject location where significant security threats are assessed, as provided in the ESCP. No adverse health and safety risks related to provisioning and regulating ecosystem services impacts are anticipated.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
Economic or physical displacement resulting from land acquisition Rehabilitation is not expected in any of the countries as the project will finance the refurbishment of existing laboratories. As part of the ESMF there will be a requirement to screen all sites/facilities to ensure economic or physical displacement does not occur. In those cases where it is necessary appropriate instruments (compensation at replacement cost and/or other assistance, an RPF or RAP will be prepared, consulted upon, cleared by the Bank and disclosed, as reflected in the ESCP.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources
The project is not anticipated to affect or involve activities with impacts on biodiversity or natural resources and this ESS6 is not expected to be relevant. However, potential impacts to habitats will be captured in the ESMF to ensure that impacts are minimized during any emergency response and as a result of any rehabilitation works. In addition, the national and local surveillance system and sanitary information system will include ecological risk factors (wildlife corridor between countries; parks, reserves and classified forests).

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
The presence of IPs/SSAHUTLC will need to be verified during the development of the ESIAs / ESMF or stand alone assessments but there is evidence to suggest the presence of IPs/ SSAHUTLC in most if not all of the five countries covered by the Project.

As the Project is planning to improve disease surveillance and undertake public health awareness campaigns including around veterinary health and livestock, consultation will need to be designed which reflect their needs and ensure they also benefit from the Project.

Indigenous Peoples Planning Framework(s) will be developed to address the risks followed by Indigenous Peoples Plans as required.

ESS8 Cultural Heritage

Impacts to cultural heritage associated with the excavation works are expected to be minimal. However, “chance finds” clauses will be included in all physical work contracts even where the risk is determined to be very low.

ESS9 Financial Intermediaries

This standard is not relevant, as the project is not an FI operation

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways
No
No linkages

OP 7.60 Projects in Disputed Areas
No
No linkages

III. BORROWER’S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

<table>
<thead>
<tr>
<th>DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED</th>
<th>TIMELINE</th>
</tr>
</thead>
<tbody>
<tr>
<td>ESS 1 Assessment and Management of Environmental and Social Risks and Impacts</td>
<td>10/2019</td>
</tr>
<tr>
<td>All Countries: Establishment of an organizational structure for environmental and social risk management including an appropriately qualified Environmental Safeguards Specialist (ESS) and a Gender and Social Safeguards Specialist (GSSS) in each country.</td>
<td>10/2019</td>
</tr>
<tr>
<td>All Countries: The government will conduct the environmental and social assessment of all sub-projects to identify and assess environmental and social risks and effects and appropriate mitigation measures.</td>
<td>10/2019</td>
</tr>
</tbody>
</table>
All Countries: The Government will develop and implement the following risk assessment and management framework and plan tools and instruments:
- Environmental and Social Management Framework (ESMF)
- Indigenous Peoples Planning Framework (IPPF) (in Angola, CAR, DRC, Republic of Congo and, possibly, Chad)
- Healthcare Waste Management Plan (HWMP), and Hazardous waste management plan
- Labor Management Procedures (LMPs)
- Gender-Based Violence Risk Assessment
- (GBV Action Plan)

All Countries: The Government will draft a project implementation manual (or procedures manual) with an Environmental and Social safeguards section including the procurement expert’s role; the role of the ESS and GSSS in preparing the environmental and social safeguards sections to be included in the Terms of Reference (ToR), tender documents and works contracts; the minimum environmental and social clauses to be incorporated into the ToR and contracts, monitoring requirements and timeframes.

**ESS 10 Stakeholder Engagement and Information Disclosure**

All Countries: The Government has prepared a draft version of the Stakeholder Engagement Plan (SEP) including a grievance mechanism. The SEP will be disclosed and updated throughout implementation.

**ESS 2 Labor and Working Conditions**

All Countries: The Government will develop labor management procedures consistent with national legislation and ESS 2, including the recruitment and project job management procedure.

All Countries: The Government will ensure that Project contractors develop and implement an Occupational, Health and Safety (OHS) Plan.

All Countries: The Government will ensure that Project contractors develop and implement an Emergency Preparedness and Response Plan.

**ESS 3 Resource Efficiency and Pollution Prevention and Management**

All Countries: Government will ensure that a Healthcare Waste and Hazardous Materials Management Plan is implemented in every health center /laboratory concerned.

**ESS 4 Community Health and Safety**

All countries: The Government will ensure that Project contractors develop and implement Traffic and Road Safety Plans, especially a traffic plan for construction equipment.
<table>
<thead>
<tr>
<th>ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</th>
<th>All Countries: A Resettlement Policy Framework (RPF) shall be prepared, consulted on, cleared by the Bank, and disclosed in case there is probable land acquisition leading to economic or physical displacement. RAPs will prepared, as and when needed.</th>
<th>12/2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources</td>
<td>All Countries: The ESMF will include measures and actions to manage risks and impacts on biodiversity (including reforestation offsets, location and avoidance of natural habitats; biodiversity restoration).</td>
<td>12/2019</td>
</tr>
<tr>
<td>ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities</td>
<td>All Countries: Government will conduct social screening and assessment to determine if IP/SSAHUTLCs are in project areas. Since sites and works have not been finalized, an Indigenous Peoples Planning Framework (IPPF) will be drafted, where applicable</td>
<td>12/2019</td>
</tr>
<tr>
<td></td>
<td>All Countries: Since the Indigenous Peoples communities and/or individuals have not yet been identified, an Indigenous Peoples Planning Framework (IPPF) will be drafted</td>
<td>12/2019</td>
</tr>
<tr>
<td>ESS 8 Cultural Heritage</td>
<td>All Countries: Develop and implement a Chance Finds Procedure. “Chance finds” clauses will be included in all works contracts, even in cases where such finds are highly unlikely</td>
<td>12/2019</td>
</tr>
<tr>
<td>ESS 9 Financial Intermediaries</td>
<td>Not relevant</td>
<td></td>
</tr>
</tbody>
</table>
IV. CONTACT POINTS

World Bank
Contact: Enias Baganizi  
Title: Senior Health Specialist  
Telephone No: 5377+3045 /  
Email: ebaganizi@worldbank.org

Contact: Andy Chi Tembon  
Title: Senior Health Specialist  
Telephone No: 458-4879  
Email: atembon@worldbank.org

Borrower/Client/Recipient
Borrower: Republic of Chad  
Borrower: Republic of Angola  
Borrower: Central African Republic  
Borrower: Democratic Republic of Congo  
Borrower: Republic of Congo

Implementing Agency(ies)
Implementing Agency: Ministry of Health and Population  
Implementing Agency: Ministry of Health  
Implementing Agency: Ministry of Health and Population

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): Enias Baganizi, Andy Chi Tembon
Safeguards Advisor ESSA null on