



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

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BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Africa	AFRICA	P167788	
Project Name	Africa Environmental Health and Pollution Management Program		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Environment, Natural Resources & the Blue Economy	Investment Project Financing	2/17/2020	4/23/2020
Borrower(s)	Implementing Agency(ies)		
	The National Environmental Management Council (NEMC), Environmental Protection Agency (EPA), National Environmental Management Authority (Ministry of Environment and Forestry), Zambia Environmental Management Agency, Direction de l'Environnement et des Etablissements Classés - DEEC		

Public Disclosure

Proposed Development Objective(s)

To reduce exposure to mercury and uPOPs pollution and strengthen the institutional capacity to manage and regulate mercury use in artisanal small-scale gold mining (ASGM) and e-waste in selected countries in Africa

Financing (in USD Million)	Amount
Total Project Cost	37.89

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]

Regional coordination and cooperation in addressing chemicals-related issues, under relevant multilateral environmental agreements, and interventions that cross-national borders have the potential to stimulate better solutions to address the gaps and challenges of chemicals and waste management. The geographic coverage of EHPMP includes the five participating countries: Zambia, Ghana, Kenya, Senegal and Tanzania. The Program’s focus is on policy and strategy formulation and implementation; knowledge and experience sharing; institutional and human capacity building; research on chemicals and hazardous waste management; and coordination and collaboration, determines the technical assistance nature of the Program. The Program supports demonstration projects for low-cost technologies reducing and eliminating human health hazards from chemicals in ASGM and recycling of e-waste. Program activities are grouped under three main components which will be implemented at national level adapted to the national conditions.

Component 1: Institutional strengthening, capacity building and knowledge sharing

The component aims to enhance the capabilities of participating countries to obtain and share the information needed for their national decision-making, in particular, the sound management of chemicals. It will create a framework for exchange of information to support related national, regional and international policy development and activities related to reducing environmental health risks from poor management of chemicals in ASGM and waste recycling sectors. Poor coordination between sectors and ministries can also be an obstacle for effective monitoring, surveillance and enforcement on chemicals and waste management, which results in their becoming a significant risk to environmental health. The component aims to help eliminate the barriers to information exchange and enhance the communication among national and regional stakeholders. The capacity building interventions will be further detailed based on country-specific institutional diagnosis, stakeholder engagement, and best international practices in pollution prevention, monitoring, enforcement and compliance:

1.1. Tanzania: The component will support strengthening of the institutions related to environmental monitoring in the artisanal gold mining sector, where there is significant use of mercury. It will focus on authorities regulating mercury trade (environmental regulators, mining policy makers). These may include the Ministry of Mines (including Zonal Mines Offices, Resident Mines Offices, Inspections office), the National Environmental Management Council (NEMC), and customs/border control tax offices, artisanal gold miners, and mining communities. Activities will support the State Mining Corporation (STAMICO) to put in place systems for regulating the mercury trade, in line with the country commitment to implement the Minamata Convention. This component will also support development of guidelines and monitoring systems, procurement of monitoring equipment, laboratories (list all major items that will be procured). The component will promote enhanced transparency along the whole value chain, which will offer greater opportunity for miners to have direct access to the market and strengthen their negotiating skills for better prices, leading to greater economic and social stability.

1.2. Zambia: This component will strengthen the institutional and legislative framework for managing risks from POP releases. It will promote an area-based approach for sustainable waste management in line with Government’s National Solid Waste Management Strategy (NSWMS) by supporting the development of national guidelines. It will support training for strengthening the capacity of municipalities for collection, transportation and disposal waste; will

Public Disclosure



facilitate partnerships with private sector for recovery and recycling of waste, leading to reduced UPOPs releases. Training will target entities and regulators aiming that POPs containing mining waste is treated separately. This component will also support measures for improving the effectiveness of monitoring systems and for building awareness on sound management of waste and its impact on human health and the environment. In addition, the component will engage stakeholders and facilitate coordination and participation in the regional learning on the chemicals management agenda.

1.3. Ghana: The activities in Ghana focus on artisanal gold mining (AGM) and e-waste.

AGM: The component will support activities for strengthening of institutional systems and capacity building for the Environmental Protection Agency (EPA) and the Minerals Commission (MC) for managing the AGM sector, through training at the national and local levels. It will support the development of guidelines and monitoring systems for the management of mercury usage and waste in ASGM. In addition, the component will support workshops and other fora to engage national level stakeholders for coordination and participation in the regional learning and knowledge sharing activities on chemicals management. This component will also include assistance to facilitate the formalization of artisanal and small-scale gold mining sector; studies for baseline assessment of the quantities of mercury used and the practices employed in artisanal and small-scale gold mining and processing within the country. The component will assist in the development of a strategy promoting reduction of emissions and exposure to mercury in artisanal and small-scale gold mining and processing, including application of mercury-free methods. The strategy will propose measures for managing trade and preventing diversion of mercury and mercury compounds from both foreign and domestic sources to use in artisanal and small-scale gold mining and processing. Preparation of the strategy will involve stakeholders in the implementation of a national action plan through continued dialogue and engagement. The component will support preparation of a public health strategy to prevent exposure of artisanal and small-scale gold miners and their communities to mercury.

e-Waste: This component will support capacity building activities which include (a) benchmarking of key EPA staff to acquire best practices on waste management and ensure appropriate skills transfer; (b) Awareness raising/sensitization workshops on e-waste management along with stakeholders in the value chain country-wide; (c) support to waste management unit in EPA; and (d) streamlining Customs coding with appropriate training of the Customs Officers and borders inspectorate to curtail entry of illicit e-waste in the first place. It will support strengthening of E-waste Management Regulations and Guidelines and development of systems for monitoring and enforcement, relevant to waste management with a focus on e-waste. The component will also review existing documentation and undertake a country-wise situation analysis on waste, including an inventory of major toxic pollutants; assessment of environmental health implications of harmful chemicals and waste and options for risk management; and an economic sector analysis. The component will ensure both national level stakeholders' coordination and participation in the regional learning and knowledge sharing activities on the harmful chemicals agenda.

1.4. Kenya: The component will support capacity building of NEMA staff on best practices on waste management and Environmentally Sound Technologies for reduction of releases of POP's e-waste management practices and ensure appropriate skills and knowledge transfer. NEMA will also receive project support for development of the national e-waste inventory of products and IT vendors and training on sustainable product life cycle practices. The component will support the Ministry of environment, NEMA and customs officers in implementation and enforcement of e-waste management regulations and laws including at the port of entry. Activities will include streamlining customs codes



with appropriate training of customs and borders inspectorate to curtail entry of e-waste dumping as provided in the Basel Convention on Transboundary movement of hazardous waste and other waste. The component will support a country-wise situation analysis on waste, including an inventory of major toxic pollutants emanating from the sector; assessment of environmental health implications of harmful chemicals and waste and options for risk management; and economic analysis of the waste management sector for the national economy. The component will ensure both national level stakeholders' coordination and participation in the regional learning and knowledge sharing activities on the harmful chemicals agenda.

1.5. Senegal: The component will support measures for institutional enhancement to improve the performance of solid waste management in large cities including designing results-based financing mechanisms such as innovative financing through public-private joint ventures for waste management services and enhanced cost efficiency. The component will provide support for institutional capacity for monitoring and enforcement. The capacity building assistance will target stakeholders from the Ministry of Environment and Sustainable Development, National Commission for Chemicals Management, Ministry of Industry, Ministry of Planning, selected municipal authorities and private companies as well as other departments involved. Civil society and NGOs would be involved in delivery of training, awareness and education and communication programs. The component also aims to improve the process of redefinition and clarified roles and responsibilities and associated administrative rules and directives to improve overall waste management sector performance and develop a sectoral database for SWM and user feedback management system.

Component 2: Support to policy dialogue and regulatory enhancements

This component is designed to provide support to participating countries for policy development in sound management of chemicals recognizing that most African countries lack sound policies and effective management tools to control the use of chemicals and reduce human health risk. The component will support policies focusing on measures for strengthening current financial incentives; regulations regarding management of hot spots near sensitive habitat; safety and contamination of public resources; institutional capacity for pollution prevention and control; health and environmental assessments, monitoring and reporting. While many of these are national level activities, the component will support harmonization of national approaches for addressing illegal transboundary movements of chemicals (mercury) and e-waste. Country specific activities include:

2.1. Tanzania: This component will support the development of a strategy for promoting reduction of harmful emissions and releases of, and exposure to mercury in artisanal and small-scale gold mining and processing, including application of mercury-free methods. One of the activities under the component will include devising regulatory solutions for managing the trade illegal diversions of mercury and mercury compounds. Development and improvement of the regulatory framework will be in a participatory manner which will increase the receptibility of enforcement measures by stakeholders from the mining, health, Customs and Environment departments and the ASGM associations and communities. The component will explore developing a public health strategy on the exposure of artisanal and small-scale gold miners and their communities to mercury; and provide more localized training of artisanal miners and stakeholders.

2.2. Zambia: This component will support the Government's efforts in strengthening the current environmental policies and regulations and capacity to monitor; screen and evaluate health and environmental risks associated with POPs and hazardous chemicals through the development of guidelines. This component will support Government's



efforts in strengthening the current environmental policies and regulations and capacity to monitor; screen and evaluate health and environmental risks associated with POPs and hazardous waste. The component will support the development of a strategy for reduction of emissions and releases of, and exposure to, harmful chemicals and hazardous waste. As a background for the strategy the component will finance studies for gathering of health data, training for health-care workers and awareness-raising through health facilities.

2.3. Ghana: The component activities in Ghana focus on artisanal gold mining (AGM) and e-waste:

AGM - The component will support the EPA in strengthening the policy requirements targeted at the ASGM sector. This will include support for amending the Mining Act to include provisions for small-scale miners to prepare Environment Plans for rehabilitating mines after closure with prior environmental and social due diligence. The component will support enhancement of monitoring and evaluation (M&E) framework to ensure the achievement of the project outcomes in accordance with WB and GEF requirements.

e-Waste - This component will support Government's efforts in strengthening the current environmental policies and regulations and capacity to monitor; screen and evaluate health and environmental risks associated with e-waste. The component will assist the development of strategy for promoting the reduction of emissions and releases of, and exposure to, harmful chemicals and hazardous waste. The strategy will be backed by studies and gathering of health data, training for health-care workers and awareness-raising through health facilities.

2.4. Kenya: The component activities will support development of e-waste management regulation with provisions for national and local level implementation. This regulation will be key for strengthening current waste management policies. Training will be provided to enhance agencies' capacity to monitor the flow of e-waste throughout its life cycle. The component will assist the national government in development of a strategy for promoting the reduction of emissions and releases of, and exposure to, harmful chemicals and hazardous waste. The strategy will cover a number of themes, including: (a) mechanisms to prevent human exposure, particularly most vulnerable such as children and women, to harmful chemicals; (b) modalities for dissemination of information to stakeholders and affected communities; (c) assessment of requirements for healthcare staff to screen and evaluate health and environmental risks associated with e-waste; and (d) development of a national framework for monitoring and evaluation of e-waste and safe management.

2.5. Senegal: The component will help augment the effectiveness of activities financed under an ongoing Bank funded project Senegal Municipal Solid Waste Management Project (P161477) which focus on improved solid waste management services in selected cities in Senegal. The component will specifically, finance technical assistance for assessment and update of the existing regulations and guidelines needed to fill the legal gap for a sound management of municipal solid waste and hazardous waste. The component will support the a) development of the National plan for treatment and disposal of special waste (biomedical, e-waste, C&D and industrial waste); and b) a value chain and market analysis for recyclable wastes.

Component 3: Demonstrating application of technological tools and economic approaches

The component will finance specific demonstration projects for cleaner technology in areas contaminated by chemical waste. These investments will be based on a standard set of (social, environment and economic) criteria, without impacting the livelihood and employment opportunities and tailored to country specific implementation conditions.



Recognizing that the risks of exposure, scope of regulations, institutional approaches and enforcement may vary among countries, country specific initiatives are outlined for the participating countries as follows below:

3.1. Tanzania: The component will support the drive of the Government of Tanzania to formalize the ASGM sector. Specific activities which be designed to create incentives for artisanal miners to access relevant knowledge, financing and institutional support in line with Government's obligations under the Minamata Convention. Technical assistance under the program will help improve working condition for local mining community by providing better equipment. The measures aim to facilitate the collaboration with Small Enterprise Development Corporation (SEDCO) or local manufacturers, to manufacture/replicate low cost centralized mercury management equipment allowing miners to move away from individual retorts. Such environmental improvements will act as demonstration pilots for the primary license holders who are mandated to rehabilitate their mines based on the Mine closure policy in the Mining Act. The demonstration investments will be linked with Industrial Competitiveness for Jobs Project (P160164) and will aim to enhance the Government's policy towards appropriate land usage for pastoral and agricultural activities and strengthen community level monitoring, through involvement of communities in land use shifts.

3.2. Zambia: The component support will focus on improving the waste value chain and measures that will reduce UPOPs releases from solid waste by strongly limiting the quantities of waste subject to uncontrolled burning: invest into improving the management of waste collection; transportation; treatment and disposal and improved recycling of waste. The current dumpsite at Kabwe will be upgraded into a sanitary landfill (through IDA financing), and feasibility study of short- and long-term BAT/BEP actions will be supported to determine the volumes and types of waste and the economic viability for private sector collaboration. This will be carried out by improving the segregation between hazardous contaminated wastes from the other non-hazardous waste streams. The component will support training for the existing rag-pickers. Ragpickers will benefits from occupational health and safety training and equipment supported by the component. Support will be provided to explore ways to reduce the impact of chemical pollution emanating from unregulated landfills in economic and socially acceptable manner and support the development of communication tools to raise awareness about the health costs and benefits of pollution management, including community outreach to increase public understanding and visibility of the scale and environmental health impacts.

3.3. Ghana: The component activities in Ghana focus on artisanal gold mining (AGM) and e-waste:

AGM. Support under this component is linked to Component 1. It aims to demonstrate the environmental improvement of 2-3 pilot abandoned mines, based on cost-effective and environmentally sound technologies. The component will also enhance Government's policy towards shifting to appropriate land use for agricultural activities. This component will also support the improvement of environmental and social work conditions to promote mercury abatement techniques.

e-Waste - This component will support the initiation of a pilot project related to Agbobloshie on implementation of integrated and environmentally sound management approach to improve collection, transportation, and safe disposal/recycling of e-waste, following Article 6 of the Stockholm Convention on wastes, and relevant guidance. This will include investment in infrastructure and technologies by looking at the entire e-waste management cycle from collection, transportation, setting up of collection centres or transfer stations and sorting stations and treatment (recycling) facility. It includes formalizing recycling systems, providing protective equipment for the collectors and



recyclers, training and capacity building and developing protocols and methodologies for assessment of environmental health risks associated with e-waste.

3.4. Kenya: This component will support a pilot project in a selected county in Kenya in support of the Kenya Urban Support Program on implementation of integrated waste management approach to reduce releases of POPs from e-waste through improving source reduction/reuse, collection, transportation, and disposal/recycling. The pilot project will be identified based on review of priorities and institutional capacity (including private sector) for the selected location. Such pilot project may target either (a) Strengthening of the financing system for e-waste recycling and disposal; or (b) Infrastructure investments for selected elements of the e-waste management cycle from generation, to collection, transportation, establishing collection centres or transfer stations. Based on the technologies and approaches identified for the pilot, the component will provide support for capacity building for all relevant stakeholders in the county (including government, CSOs, and private sector), and identify opportunities for leveraging and eventually mainstreaming the existing good practices.

Another set of activities financed by this component will support development and piloting a take back scheme with IT manufacturing industry, government ministries, for example Ministry of Education on computer-for-schools programme.

3.5. Senegal: This component will focus on improving the waste value chain and measures that will reduce UPOPs releases from solid waste by introducing new technologies and behavioral change methods for waste minimization and disposal. A demonstration project will invest in improving the management of waste cycle and improved recycling in a pilot site. A waste management unit will be strengthened in the identified municipalities to coordinate waste management efforts. This component will also look into the ways to reduce the impact of chemical pollution emanating from unregulated landfills and support the development of communication tools to raise awareness about the health costs and benefits of pollution management.

D. Environmental and Social Overview

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

The project's Component 3 - Demonstrating application of technological tools and economic approaches - will finance local demonstration projects for cleaner technology with a focus on mercury-free artisanal and small-scale gold mining and safe handling and utilization of electronic and hazardous waste. These investments will be based on a standard set of (social, environment and economic) criteria, tailored to country specific implementation conditions and selected to avoid or minimize impacts on livelihoods and employment opportunities. The demonstrative investments (pilots) will introduce cleaner technologies and methodologies to phase-out mercury use in Artisanal and Small-scale mining and reduce emissions of unintentional POPs in waste management. The pilots will be selected and designed based on priority environmental health risks and cost effectiveness of interventions.

These pilots will be directly connected to ongoing Bank operations in each participating country:

- Ghana - Artisanal and Small-scale Mining Formalization (P168002)
- Tanzania – Resilient Natural Resource Management for Tourism and Growth Project (P150523)
- Kenya - Urban Support Program - (P156777)



- Zambia – Mining and Environmental Remediation and Improvement Project (P154683)
- Senegal – Municipal Solid Waste Management Project (P161477)

The pilot selection process will be guided by the environmental and social screening to determine the level of risk and the nature and extent of the environmental assessment needed for the project. The screening will consider the location, sensitivity, and scale of the pilot; ease of use, availability and replicability of technologies; the nature and magnitude of the potential environmental and social risks and impacts, and the capacity and commitment of the implementing agency to manage the environmental and social risks and impacts in a manner consistent with the ESSs. The proposed pilots with the following characteristics will not be considered for support under this Program:

- Requiring land acquisition, loss of access to natural resources or involuntary physical and/or economic displacement of households including those without legally recognizable rights to the land;
- Not having a legally established landowner willing to voluntarily allow the siting of the demonstration pilot on their land in line with the requirements of ESS5 on voluntary land donation or be government-owned land (without resulting in displacement);
- Utilize land traditionally owned or under customary use or occupation or have collective attachment to indigenous and vulnerable people as defined in ESS7;
- Located close to areas important for biodiversity, riparian zone, area with high risk of erosion, or high ground water table.
- Located in a degraded area presenting a substantial risk of exposure to hazardous materials;
- Located on sites where forced or child labor is a risk;
- Presenting a risk of damage, loss of access to or be located in close proximity to cultural heritage;
- Lack of necessary permits and licenses required to implement the pilot.

D. 2. Borrower's Institutional Capacity

Each national government will support the activities through designated implementing agency(ies).

The regional coordination project (ASA) will provide the overall guidance and oversight for the individual projects. The regional coordination project will establish the coordination framework for the Program and will enable a sustained communication with and among Program stakeholders through stakeholder consultations at the national and regional levels to support all components. A Program Steering Committee (PSC) with representation from key partners and stakeholders will be established as an advisory mechanism to maximize projects' synergies and support the design of activities and implementation of the overall Program. The PSC will have a secretariat with representatives of all participating countries. High-level meeting will be organized on a semi-annual basis for coordination of policies and implementation of program measures towards meeting countries' commitments under MBAs. The main role of the PSC is to provide a coordination forum, serve as a monitoring platform across projects and Program activities. The PSC will ensure technical alignment and synergy between the Program's components to allow cross-fertilization. The following organizations will be the main implementing agencies for the program interventions:

- TZ: National Environmental Management Council (NEMC).
- GH: Environmental Protection Agency (EPA) and the Accra Metropolitan Assembly.
- KE: National Management Agency (NEMA) and the Ministry of Environment and Forests.
- ZM: Zambia Environmental Management Agency in collaboration with the Ministry of Local Government through target Municipal Councils.
- SN: Direction de l'Environnement et des Etablissements Classés - DEEC.



Each of these agencies has established a national PCU, which will be responsible, among other activities, for preparation of the ESA and other ESF-related documents, and monitoring and reporting. The PCU comprises the Project Coordinator; Environmental and Social Safeguards Specialist; Communication Specialist; M&E and Reporting Specialist; and fiduciary specialists.

Capacity building for the implementing agencies supported by the project will incorporate not only ESF specific skills-building for E&S specialists, but also include awareness-raising and sensitization of the whole PCU team in addition to technical training. The following aspects are envisioned to be covered by the project capacity building efforts:

- Environmental and social standards of the World Bank;
- Applicable laws and regulations;
- Benefits of mercury abatement and e-waste management;
- Site selection methodology;
- Best available technologies and selection;
- Use of the technology for recycling and gold extraction;
- Environmental and social management plan;
- Responsibilities of all stakeholders involved;
- ESMP implementation progress report, environmental supervision progress report;
- Occupational health and safety.

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

A. Environmental and Social Risk Classification (ESRC)

Substantial

Environmental Risk Rating

Substantial

The environmental risk classification for the Project is Substantial under the World Bank ESF, based on sector-level risks associated with the management of hazardous waste in e-waste and the use of mercury in artisanal gold mining. However, the project activities include selected demonstration pilots with Moderate risk profile, according to Bank classification, where the majority of the impacts are likely to be site-specific, limited in number, and can be mitigated with measures that are readily identifiable. Demonstration pilots with higher risk profiles will be eliminated from consideration based on the project screening mechanism (provided in ESMF). The selected pilot activities will be designed to demonstrate a use of new technologies to phase-out mercury use in ASGM and reduce uPOP emissions associated with waste management.

The selected implementing agencies have good baseline knowledge and capacity to manage the environmental risks under the proposed pilot interventions, as these agencies have experience implementing World Bank projects, including projects listed in Section D.1. above. However, these institutions will require project support to build additional capacity for contract management during pilot implementation and for managing social and environmental risks and impacts beyond aspects that were generally included in the previous set of environmental and social policies.

Social Risk Rating

Moderate



The Project has been rated as moderate for social taking into account the institutional capacity to manage social risks across the five countries, the nature of potential impacts in the various countries and the fact that activities will be linked to existing World Bank projects which are addressing social risks.

The institutional capacity for managing social risks in the five countries is variable and there is currently limited experience in implementing social elements of the new Environmental and Social Framework. However, the national environmental authorities all have previous experience in implementing World Bank Projects (including supporting the existing bank operations the pilot projects will be linked to). Despite this much of their knowledge is focussed on identifying and managing environmental impacts as opposed to the broader consideration of social issues required under the ESF. To mitigate this dedicated effort will be provided for technical assistance to the implementing agencies with the expanded scope of social and environmental risk coverage under ESF.

Activities undertaken as part of Component 3 will be implemented in areas that have been prioritized due to existing social, environmental and economic factors. These locations are also associated with existing World Bank operations. As such, this project does not envisage any physical or economic displacement or land acquisition due to the nature of proposed project activities. However, this will be verified prior to project implementation. Similarly, while Indigenous People/ Sub-Saharan African Historically Underserved Traditional Local Communities are found in some of the countries where the project is being implemented the pilots are not located in their traditional lands. Labor and working condition risks may occur across all project components associated with the various types of project workers as such industries may not employ all workers in line with national regulations and the requirements of ESS2.

The clients will need to implement the Stakeholder Engagement Plans which identify all relevant stakeholders and ensure meaningful consultation with project affected people and other interested parties. This engagement will need to cover all components of the Project and for the pilot projects emphasis should be placed on engagement with artisanal gold miners and those who make their livelihoods from waste dumps whom may have concerns regarding the proposed program impacts on their livelihoods.

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 key potential environmental issues associated with Component 3 activities, which can be readily avoided or managed/mitigated, are related to (i) hazardous waste management (including disposal) during preparation of pilot sites, (ii) occupational health and safety of workers, (iii) restriction of land use, and (iv) potential impacts to community health and safety. The project has prepared a project-wide Environmental and Social Management Framework (ESMF), which covers activities in all five countries and provides a screening mechanism to eliminate demonstration pilots with high or substantial E&S risks and includes guidance for preparation of sub-project specific ESAs (ESIAs or ESMPs) based on the ESS1 requirements and WBG EHS Guidelines. The ESMF also includes country-level Grievance Mechanisms with guidance on collecting and managing grievances from the project-affected people.



The ESMF was consulted upon in each country, reviewed by the Bank and will be ready for disclosure in-country and the Bank website before project appraisal.

From the assessment of client capacity carried out during preparation, it was concluded that implementing agencies' policies and procedures need to be enhanced to comply with ESS1 requirements. During implementation, the project will provide technical assistance to national Project Coordination Units (PCUs) to ensure the environmental and social specialists are on staff and the PCU is equipped to address project E&S risks as per ESF requirements. This is reflected in the project ESCP.

During implementation, once the pilots are selected, where there are existing ESIA's (covering the ongoing Bank-funded projects linked with each of the pilots), such ESIA's will be reviewed to assess their coverage of the proposed pilot interventions. The Project Area of Influence of each pilot will be clearly defined during the scoping stage of the assessment.

Each pilot-specific ESIA/ESMP, will include clearly defined mitigation measures for construction and operational phases, roles and responsibilities, time plans, costs and implementation producers for each mitigation measures recommended.

The Bank team will review the TOR for the pilot-specific ESIA's to verify that (a) it includes references to World Bank's Environmental, Health and Safety (EHS) Guidelines and (b) in accordance with ESS 1 paragraphs 28 (b) (ii) & (iii) and 29, the TOR: (1) identifies stakeholders affected by the project that may be disadvantaged or vulnerable; and (2) requires an assessment of project risks and impacts, and identification of differentiated mitigation measures, as they pertain to the disadvantaged or vulnerable stakeholders that are identified.

Where contractors will be required for demonstrative activity implementation, each contract will include a condition to implement and comply with the ESMP, including preparing Construction-ESMP.

Based on screening, the project may be required to prepare a supplemental Occupational Health and Safety Plan or Waste Management Plan in addition to the main ESA reports. The Bank team will review and approve this documentation prior to finalizing the design for the pilot activities.

ESS10 Stakeholder Engagement and Information Disclosure

Inclusive country-level SEPs proportional to the nature and scale of the project and associated risks and impacts have been prepared for each country. This will contribute to enhanced project acceptance and stakeholder participation in the design and implementation of the project, thus contributing to the attainment of sustainable outcomes.

The client will seek stakeholder feedback on the Stakeholder Engagement Plan and overall Project. The SEPs present the approach to 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 borrower will engage in meaningful consultations with all stakeholders throughout the project life cycle, paying attention to the inclusion of vulnerable and disadvantaged groups (including the elderly, persons with disabilities,



female-headed households and orphans and vulnerable children). Stakeholders include artisanal and small-scale miners and surrounding communities, waste pickers, informal sector electronic waste processors, local authorities, NGOs supporting ASGM and e-waste management projects in the participating countries, state-level agencies in charge of environmental and natural resource management, mining sector and urban waste management sector.

The implementing agencies 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. As part of the environmental and social assessment the borrower will maintain, and disclose, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

Based on ESMF guidance, the clients will also establish and maintain a Grievance Redress Mechanism (GRM) through which all stakeholders can raise concerns and complaints. In some cases, existing GRMs established as part of the co-financing project will be utilized to avoid confusion. Regardless, stakeholders will be made aware of the existence of the GRM and its functionality.

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 demonstration projects' footprint is relatively discrete and does not entail a significant amount of labor. Most of the projects will not require the construction of physical infrastructure and will rather involve the application of alternative practices and new technologies at an already existing site. Any labor required for the implementation of the pilot will be locally hired, with the exception of skilled workers who cannot be found in the project location. No labor camps are anticipated for any of the pilot projects and no influx of workforce is anticipated based on the proposed demonstration project structure. As such the risk of GBV and SEA within the workforce is expected to be minimal but will be addressed through training and sensitization and including requirements for GBV prevention and response in bidding documents.

OHS: To ensure health and safety of workers during the construction and operational phases of the project, each of the implementing agencies will develop and implement a Health, Safety and Environmental (HSE) plan in line with World Bank Group Environment, Health and Safety (EHS) Guidelines (for construction activities) and Guidelines for Hazardous Waste Management. The plan 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.

Contract Clauses: The ESMF developed for the Project includes Draft Environmental and Social Clauses for contractors which include the need to establish codes of conduct, worker grievance redress mechanisms and ensure that workers are hired in line with the requirements of national labor laws and ESS2.



ESS3 Resource Efficiency and Pollution Prevention and Management

There is a potential for selected pilot sites to have historical pollution, this may include an abandoned small-scale mine with prior use of mercury for gold mining or an existing e-waste management recovery site. For each pilot, the implementing agency will establish a process to identify the responsible party, and in parallel undertake a screening on whether the existing level of pollution could pose a significant risk to human health or the environment, and if such risk is identified undertake a health and safety risk assessment of the existing pollution.

Based on the demonstrative nature of pilot projects on use of cleaner and safer technologies and reduction of the health risks and exposure to hazardous chemicals for the project beneficiaries, the pilots with characteristics such as (a) potential to constitute a significant source of emissions in an already degraded area, (b) proximity to areas of importance to biodiversity; (c) the potential for cumulative impacts with uncertain and/or irreversible consequences; and (c) impacts of climate change, will not be considered under the program. The pilot projects will be designed to demonstrate scalable technologies to reduce emissions of uPOPs in waste management, directly contributing to the commitments under Stockholm and Minamata Conventions.

The pilots will be designed (a) in case of ASGM activities in Ghana and Tanzania to demonstrate internationally recognized and accepted mercury-free methods available for gold mining, and (b) in case of e-waste and municipal waste management activities to minimize the generation of waste, and material reuse, recycle and recovery of waste in a manner that is safe for human health and the environment. For all pilot designs, any remaining waste will be treated or disposed of it in a safe manner that includes the appropriate control of emissions and residues resulting from the handling and processing of the waste material. The treatment and disposal process will comply with national legislation and Minamata, Basel and Stockholm Conventions on storage, transportation and disposal of hazardous wastes. No transboundary waste movements is anticipated. In case relevant national legislation is insufficient, the implementing agencies will adopt Best Available Techniques (BAT) and Best Environmental Practices (BEP) for its environmentally sound and safe management and disposal.

ESS4 Community Health and Safety

The proposed pilot projects are not anticipated to have a substantial risk to community health and safety. Based on the scale of the pilots, there will be no influx of workers and followers into a project area. The site ESIA's will incorporate relevant clauses for ensuring community health and safety are required. The ESIA's/ESMP's will include relevant mitigation measures needed to manage risks to community health and safety including GBV and SEA.

As part of the pilot design, a security perimeter will be established around the site to minimize the risks of injury or accidental exposure to hazardous materials for communities, especially children. The nature of the projects is anticipated to reduce soil, water, air pollution and reduce the risk of community exposure to hazardous substances.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The demonstration projects will be designed to avoid any site with potential for involuntary resettlement, economic displacement or restriction of access. Land ownership and use will be confirmed prior to starting any project activities to ensure there is no physical or economic displacement including informal land users.



ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The demonstration projects will be located in modified landscapes, already used for small-scale mining or e-waste disposal activities. If the selected ASGM pilot (for Ghana or Tanzania) will be identified to be located in a sensitive or critical area, selection criteria provided in the ESMF will be applied to exclude pilots located close to areas important for biodiversity. In addition, if necessary, specific measures will be included in site-specific ESIA/ESMP to avoid biodiversity impacts or minimize them.

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

While there are groups covered by ESS7 in Tanzania, Kenya, and Zambia, proposed pilot projects will not be located in these geographical areas.

ESS8 Cultural Heritage

The pilot projects are not going to involve earthworks, however, should there be any construction contracts identified, they will include a “Chance Find” clause which will require contractors to stop construction in the event that cultural property sites are encountered during construction.

ESS9 Financial Intermediaries

No Financial Intermediaries are participating in this program implementation. The ESS9 is not relevant in this case.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

No

The project activities are not anticipated to affect international waterways.

OP 7.60 Projects in Disputed Areas

No

No project activities are located in a disputed area, thus the policy is not triggered.

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

DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED	TIMELINE
ESS 1 Assessment and Management of Environmental and Social Risks and Impacts	
Disclosure of the ESMF	01/2020
Recruitment of Environmental and Social Specialists in country-level PCUs	07/2020

Public Disclosure



Public Disclosure

Prepare and submit regular monitoring reports on the E&S performance of the Project, including any E&S documentation prepared or to be prepared and implemented under the ESCP, in form and substance acceptable to the Association (Quarterly)	
Promptly notify any incident or accident related or having an impact on the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken to address it, and include information provided by any contractor and supervising entity, as appropriate. (Within 24 hours)	
Obtain and thereafter comply with any permits, consents and authorizations that are required for the Project from relevant national authorities. (Upon confirmation of the site selection).	
ESS 10 Stakeholder Engagement and Information Disclosure	
Prepare, disclose and implement the Stakeholder Engagement Plan (SEP), including the project grievance mechanism. (By project effectiveness)	
Establish, maintain and operate a grievance mechanism (GM) to ensure reception, logging and timely response to any complaints made about the Project, as described in the SEP. (By project effectiveness, throughout the project implementation).	
ESS 2 Labor and Working Conditions	
Develop and implement Labor Management Procedures to address labor risks (By project approval and throughout implementation).	
ESS 3 Resource Efficiency and Pollution Prevention and Management	
Apply ESMF screening procedures to confirm the proposed subproject does not have characteristics from the negative list. (Upon site identification)	
Ensure TORs for project ESIAs/ESMPs include measures for prevention of pollution and specific hazardous waste management provisions. (Upon site identification)	
ESS 4 Community Health and Safety	
Require project staff sign Codes of Conduct and receive basic training on expected behavior and consequences for breach of the code including GBV and SEA. GBV risks under the project are not anticipated. (Upon commencement of works)	
In LMP, include provision for a Code of Conduct governing all security personnel hired to protect this Project. (Upon pilot design completion)	
ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	
ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	



ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

ESS 8 Cultural Heritage

ESS 9 Financial Intermediaries

B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework?

No

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

The Borrower’s framework will not be considered.

IV. CONTACT POINTS

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Borrower/Client/Recipient

Implementing Agency(ies)

Implementing Agency: The National Environmental Management Council (NEMC)

Implementing Agency: Environmental Protection Agency (EPA)

Implementing Agency: National Environmental Management Authority (Ministry of Environment and Forestry)

Implementing Agency: Zambia Environmental Management Agency

Implementing Agency: Direction de l’Environnement et des Etablissements Classés - DEEC

V. FOR MORE INFORMATION CONTACT



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VI. APPROVAL

Task Team Leader(s):	Ruxandra Maria Floroiu, Abdelaziz Lagnaoui
Practice Manager (ENR/Social)	Aly Zulficar Rahim Cleared on 12-Dec-2019 at 19:36:33 EST