



# Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

Appraisal Stage | Date Prepared/Updated: 22-Apr-2020 | Report No: PIDISDSA28417



**BASIC INFORMATION**

**A. Basic Project Data**

Country Nigeria	Project ID P173104	Project Name Additional Financing for MCRP	Parent Project ID (if any) P157891
Parent Project Name Multi-Sectoral Crisis Recovery Project for North Eastern Nigeria	Region AFRICA	Estimated Appraisal Date 22-Apr-2020	Estimated Board Date 26-May-2020
Practice Area (Lead) Urban, Resilience and Land	Financing Instrument Investment Project Financing	Borrower(s) Federal Ministry of Finance	Implementing Agency State Governments of Borno, Adamawa and Yobe, North East Development Commission (NEDC)

Proposed Development Objective(s) Parent

The objectives of the Project are to: (a) support the Government of Nigeria towards rehabilitating and improving critical service delivery infrastructure, improve the livelihood opportunities of conflict and displacement-affected communities, and strengthen social cohesion in the North East Participating States of Borno, Yobe and Adamawa; and (b) in the event of an Eligible Crisis or Emergency, to provide immediate and effective response to said Eligible Crisis or Emergency

Proposed Development Objective(s) Additional Financing

To improve access to basic services and livelihood opportunities for the crisis-affected communities of Adamawa, Borno, and Yobe States, and enhance coordination among these States and other Lake Chad countries

Components

- Peace Building and Strengthening Social Cohesion and Livelihoods
- Infrastructure Rehabilitation and Service Delivery Restoration & Improvement
- Technical Assistance and Program Management Support
- Contingent Emergency Response

**PROJECT FINANCING DATA (US\$, Millions)**

**SUMMARY**

<b>Total Project Cost</b>	176.00
<b>Total Financing</b>	176.00



of which IBRD/IDA	176.00
Financing Gap	0.00

**DETAILS**

**World Bank Group Financing**

International Development Association (IDA)	176.00
IDA Credit	176.00

Environmental Assessment Category

B-Partial Assessment

Decision

The review did authorize the team to appraise and negotiate

Other Decision (as needed)

**B. Introduction and Context**

Country Context

**The complex challenges in the North-East (NE) and the broader Lake Chad region are among the most pressing issues facing the Federal and NE State administrations in Nigeria.**

***Recent resurgence in conflict exacerbates the humanitarian crisis***

- Following the election of President Buhari in 2015, the Nigerian Government took steps to address the insurgency in the NE, with support from neighboring countries and the African Union through the Multinational Joint Task Force (MNJTF).** They appointed new military leadership, created a Theatre Headquarters in Maiduguri and increased resources committed to NE activities. Significant territory formerly controlled by Boko Haram (BH) was reclaimed and relative peace restored, allowing for the return of at least 1.6 million internally displaced people (IDPs) to their homes or nearby, more than 750,000 of these in Adamawa State and over 650,000 in Borno. Large-scale international humanitarian aid averted famine in 2017.
- However, security in the NE has deteriorated sharply since 2018. Attacks have increased in Borno State, as well as nearby areas of Adamawa and Yobe (together the ‘BAY’ states).** Islamic State West Africa Province (ISWAP), which split from BH in 2016, has developed into the more potent threat, employing more sophisticated military tactics and dominating swathes of northern Borno around its strongholds on Lake Chad. Major attacks, including those on Baga, Monguno and Rann in December 2018 and January 2019, have triggered renewed large-scale displacement of people. Meanwhile, BH continues attacks on the population in south-east Borno and northern Adamawa, absorbing military attention and preventing a stronger response further north.



3. **Around 7.1 million of the BAY states' total population of 13.4 million need humanitarian assistance in 2019, according to the 2019-21 Nigeria Humanitarian Response Strategy<sup>i</sup> which seeks to reach 6.2 million people.** Around 1.7 million face food insecurity (CH3-5). Some two million people are internally displaced across the BAY states, a net increase of more than 100,000 since December 2018. Around 230,000 Nigerian refugees are in neighboring Cameroon, Chad and Niger. Within Nigeria, around one million people are now estimated to live in areas, mainly in the far north of Borno, that are inaccessible to humanitarian actors. Approximately 60 percent of the total number of IDPs live in host communities, while 20 percent reside in camps.
4. **The conflict has intensified the historical social, economic and development disadvantages of the NE.** The NE poverty rate was the second highest in the country in 2013, after only the North-West, at nearly 48 percent against 33 percent nationally<sup>ii</sup>. The NE literacy rate in 2013 stood at just 22 percent for women and 40 percent for men. The NE has long suffered from poor access to health care and sanitation services, with under-five mortality of 160 per 1,000 live births, against 90 in South-West, the best performing region. The proportion of children age 12-23 months received all basic vaccinations was only 14 percent in the NE, compared with 52 percent for South-South.

***Government and partners have responded strongly, but unmet needs remain considerable***

5. **The 2016 Recovery and Peace Building Assessment (RPBA) for NE Nigeria<sup>iii</sup> estimated the economic impact of the crisis at nearly US\$9 bn across the six affected states: Borno, Yobe, Adamawa, Taraba, Gombe and Bauchi.** It put recovery and peacebuilding needs at US\$6.7 bn, covering three strategic areas of intervention: US\$150.5 m for peacebuilding, stability, and social cohesion; US\$6.0 bn for rebuilding infrastructure and restoring social services; and US\$473.5 m for economic recovery. The RPBA was prepared by the Federal Government, led by the Vice President's Office, and the governments of the six affected states, with support from the European Union, the United Nations and the World Bank.
6. **In June 2016, the Federal Government released the Buhari Plan as the blueprint for humanitarian relief and socioeconomic stabilization of the NE, as well as durable solutions for displaced persons.** The Buhari Plan incorporated the RPBA's assessment of needs and established the scope and framework for targeted interventions, as well as defining the national vision and objectives for long-term stability and economic redevelopment of the region. The Plan is built around 10 pillars, comprising safety and security, good governance, infrastructure, agriculture, health, education, entrepreneurship, women and youth empowerment, regional planning and strategic growth, environment, border security and international trade development, and solid minerals.
7. **Major programs are underway, but the considerable needs identified by the RPBA are far from being met, and much of the Buhari Plan remains to be implemented.** NE recovery and peacebuilding efforts supported by the African Development Bank, the European Union, Germany, the United Kingdom, the United Nations system, the United States, the World Bank and other international partners total around US\$1.6 bn. However, reliable data on total government or partner expenditures in the NE and overall implementation progress is not available. For the broader region, donors pledged US\$ 2.13 bn for humanitarian and recovery activities for 2018 and beyond at the High-Level Conference on the Lake Chad Region in September 2018,<sup>iv</sup> of which US\$985.5 m was for humanitarian activities. For NE Nigeria, the Humanitarian Response Plan seeks US\$ 848 million, while the 2019-2020 Nigeria Regional Refugee Response Plan<sup>v</sup> aims to raise a further \$135 million for 2019.



8. **In support of the RPBA and the Buhari Plan, the World Bank has approved US\$775 million in IDA financing for the six NE States since 2016, the largest commitment among international development partners.** The program addresses urgent needs, restores basic services and livelihoods and rebuilds infrastructure. It has included additional financing for six existing projects for health, education, social protection and agriculture/food security, as well as a US\$200 million Multi-Sectoral Crisis Recovery Project (MCRP) for North-East Nigeria.
9. **The MCRP has been effective since February 16, 2018 and has recently undergone its Mid-Term Review (MTR) in November 2019.** Despite a 10-month gap from Board-approval to effectiveness, the Project has picked up significant pace over the last 18 months and its current implementation progress has been satisfactory, based on its financial progress and the current status of results achievement on the ground. The likelihood of achievement of the Project Development Objective (PDO) of the intended project outcomes and results is now rated as high. As at the Mid-Term, total project disbursements from the World Bank to the Government of Nigeria were at USD 95 million (of the USD200 million IDA Credit), representing 46% of the total project allocation amount.

#### ***Rational for Additional Financing***

10. **The Federal Government of Nigeria has requested that the country be included in the regional program supported by the proposed IDA Lake Chad Region Recovery and Development Project (PROLAC, P161706).** PROLAC (\$170 million) has been in preparation since FY18 for three of the four countries that border the Lake: Cameroon, Chad and Niger, slated for FY20 Board consideration. The participation of Nigeria, the fourth country, is important for the PROLAC program to have complete regional coverage, and because Nigeria is the largest country by far and the epicenter of the Boko Haram conflict, the impacts and drivers of which PROLAC seeks to address.
11. **PROLAC's proposed development objective is to contribute to the recovery of the Lake Chad Region through supporting regional coordination and crisis monitoring, connectivity and agricultural livelihoods in selected provinces of the participating countries.** It includes three main components: Component 1: Regional and National Coordination Platform and Local Capacity Building (\$20 m) - This aims to reinforce regional dialogue and data collection and dissemination, institutional capacity building and knowledge sharing, including a Lake Chad Data and Knowledge Platform. Component 2: Restoring Rural Mobility and Connectivity (\$75 m) aims to improve access of communities to markets, especially regional markets, and to provide beneficiaries with an opportunity for short-term employment, through civil works for rehabilitation of rural roads of regional importance. Component 3: Agriculture Investments and Value-Chain Development (\$60m) will promote public productive investments, value-chain development, citizen engagement and community participation activities in project areas.

#### ***Situation of Urgent Need of Assistance***

12. **An 'Additional Financing for Restructuring' is proposed for MCRP in the amount of \$176 million, with the main purposes:** (a) addressing the huge unmet needs of the three most affected states of Borno, Yobe and Adamawa (the originally estimated needs for NE recovery and stabilization were to the tune of US\$6 billion, of which only about 1/3rds are estimated to have been financed through



various government and development partner programs, and which will require the redesign of, and the addition of supplementary activities within, the existing project components ; (b) the MCRP implementation model has proven successful in putting the State Governments firmly in the leadership and implementation role for recovery and peace building, thus helping restore state-citizen trust, the erosion of which was a key structural driver of crisis; (c) the additional financing will serve the objective of bringing Nigeria into the Lake Chad regional program, which will also entail bringing in new components on agricultural value chain, rural access and regional connectivity. Given the consistency and complementarity of MCRP and PROLAC objectives and activities, and the need to bring Nigeria into the regional program quickly, the Country Management Unit and task teams consider that an Additional financing operation for MCRP, prepared in parallel with the finalization of PROLAC and presented to the Board as a single package with PROLAC, is the best mechanism for doing this. In the main PROLAC project, adjustments will be made to the regional elements, to promote the full inclusion of Nigeria. In addition to a regional focus, adapting MCRP to bring it into the program supported by PROLAC, will bring a more strategic focus on agricultural livelihoods and value chains and economic recovery, a natural evolution for MCRP.

- 13. The restructuring will also be used to lay the groundwork for adapting MCRP to become an integrated central platform for the channeling of broader World Bank assistance to Borno, Adamawa and Yobe, the three states most affected by the Boko Haram crisis.** Five additional financing operations, which were part of the Bank's 2016-2017 \$775 million Boko Haram response package along with MCRP, are set to close before the end of FY20. The restructuring will be used to further develop MCRP's multi-sectoral approach, to allow it to absorb activities, and potentially unspent IDA funding from these five operations, which cover health and education service delivery, agriculture and food security, social protection and community development. This approach is also in line with the need for spatial sector consolidation of Bank projects towards increased impact and implementation arrangements streamlining.

#### Sectoral and Institutional Context

- 14. As foreseen in the MCRP PAD, the Presidential Committee for the Northeast Initiative (PCNI) has been replaced as federal apex institution for recovery in the northeast of Nigeria by the Northeast Development Commission (NEDC).** As part of this, the NEDC has taken over from the PCNI as the main Federal counterpart for MCRP with responsibility for overall coordination. The NEDC is anchored in the newly created Ministry of Humanitarian Affairs, Disaster Management and Social Development, while PCNI had come under the Office of the Vice President. The NEDC is a statutory body (unlike the PCNI, which was mandated through a time-bound Presidential executive order) and is responsible for the oversight and coordination of all humanitarian, recovery and development work in the six states of northeast Nigeria. In addition to the coordination of multilateral development bank programs, at the federal level it is expected to lead program coordination among federal government MDAs and development partners, and vertical coordination between regional, federal and state level institutions and planning processes.

**Each of the BAY States has developed different coordination arrangements.** In Borno, the Ministry of Reconstruction, Rehabilitation and Resettlement (MRRR) has overall responsibility for recovery planning and coordination. In addition, a statutory coordination agency has been created, under the auspices of the MRRR; Adamawa has created its own MRRR and a multilateral coordination office has



been formed within the State Government Secretariat. Meanwhile, Yobe has recently set up a state level Ministry of Humanitarian Affairs and Disaster Management.

### **C. Proposed Development Objective(s)**

#### Original PDO

The objectives of the Project are to: (a) support the Government of Nigeria towards rehabilitating and improving critical service delivery infrastructure, improve the livelihood opportunities of conflict and displacement-affected communities, and strengthen social cohesion in the North East Participating States of Borno, Yobe and Adamawa; and (b) in the event of an Eligible Crisis or Emergency, to provide immediate and effective response to said Eligible Crisis or Emergency

#### Current PDO

To improve access to basic services and livelihood opportunities for the crisis-affected communities of Adamawa, Borno, and Yobe States, and enhance coordination among these States and other Lake Chad countries.

Changes to the PDO are made to reflect the project's regional dimension and removal of the aim to "strengthen social cohesion". Selected targets have also been revised upwards, to accommodate some over-shooting to-date, with costs in some areas having proved lower than estimated originally. Additional sectoral indicators have been absorbed from the sectoral programs (AF operations) phasing out, while the indicators related to regional coordination are the same as the one under PROLAC.

#### Key Results

##### **Achievement of the intended PDO will continue to be monitored by the following indicators:**

- Number of direct project beneficiaries (percentage of which are women)
- Percentage of direct project beneficiaries who are female
- Number of beneficiaries that have improved livelihood opportunities with project support (o/w female)
- Number of beneficiaries with additional or improved access to service delivery infrastructure

##### **New PDO-level indicators include:**

- Increase in yield among farmers benefiting from agricultural benefits (percentage increase from baseline)
- Number of peace groups that promote collective action
- Number of government officials adopting new skills of peace building, conflict sensitivity and crisis recovery management
- Number of school children benefiting from rehabilitated and re-equipped schools (o/w IDP children)
- Number of women benefiting from improved health facilities
- Joint statement and action plan agreed during an annual coordination meeting with participation of the four countries (two measurements: yes or no – measure every year; and from year two: % of agreed actions implemented)



## D. Project Description

1. **Strategic Shifts:** From a broader strategic perspective, the AF is a natural evolution of MCRP from a program focused on urgent needs, early recovery interventions and reconstruction, to one that looks toward long-term recovery and development of livelihoods and the economy. Going forward, the expanded MCRP will have (a) a stronger focus on basic services, with the addition of health and education service provision activities; (b) greater emphasis on livelihoods and employment generation; (c) a new lens for transport support on enhancing connectivity, on the Lake Chad region, as well as locally, linking farms to markets and people to sources of employment; (d) continued strong support for peacebuilding and the strengthening of social cohesion; and (e) the fostering of regional stabilization as a main priority.

- **Component 1:**

- The component name will be changed to: **Peace building and strengthening social cohesion and livelihoods**, to reflect a stronger emphasis on – and a more strategic approach to - supporting livelihoods, as well as a move from an emphasis on shorter term stability to longer term development
- Consistent with this, a more strategic approach to support for livelihoods, including agricultural ones. For agricultural, this will involve moving on from MCRP’s current emphasis on distribution of seeds, small ruminants and basic tools to subsistence farmers, to a broader range of support with greater emphasis on sustainability.
- A deepening of community engagement on planning, prioritization and oversight, through stronger community structures, potentially absorbing some of those created through the Community and Social Development (CSDP, P157898) and FADAMA (P131075) projects.
- Inclusion of labor-intensive works (cash for work) activities, to be funded by community grants.

- **Component 2:**

- Complementary to the direct livelihoods support under Component 1, the inclusion of new activities for the restoration and strengthening of infrastructure and services related to agriculture, livestock and fisheries, including support for key stages of priority value chains and the development of Agricultural Clusters.
- The inclusion of new activities for enhancing rural access/mobility and markets
- Consolidation on Citizen’s engagements, Community Participation and Ownership Structures established by the Community and Social Development Project (CSDP - P157898)
- Addition of activities to strengthen service provision for health and education, absorbing activities underway through the Nigeria States Health Investment Project (NSHIP -P120798) and State Education Program Investment Project (SEPIP – P122124), possibly including grants to school management committees and incentive payments to teachers - or introducing alternative mechanisms for improving service delivery that are closer to the original design of MCRP and achieve the same objectives of activities now under NSHIP and SEPIP.
- Improving Operations and Maintenance (O&M) for existing and planned infrastructure subprojects under MCRP and the MCRP AF to enhance the sustainability of investments, such as for the water, sanitation and hygiene (WASH) and transport sector, by introducing a system of performance-based grants or central resource pools in each state for O&M.

2. **Cross-cutting priorities of climate change adaptation and mitigation and labor-intensive public works:** Where appropriate, project activities under both Component 1 & 2 will, from both a design and resource





allocation perspective aim to increase climate sensitivity. Labor-intensive public works (LIPW/cash for work (CfW) will be used as a means of both delivering project outputs and creating local employment (with an emphasis on women and youth), through dedicated programs under Component 1 and as an approach that can be included in the design – and particularly in the maintenance strategies – for the larger infrastructure works included in Component Two.

3. **Component 3: Technical assistance and programme management support** that focuses on the strengthening of institutional capacities for the coordination of recovery programming in the NE, and of MCRP implementation capacities.

**Proposed Changes:**

- Build capacity of Nigeria NE actors (including State governments, academia and teachers and students from research institutes other relevant stakeholders) to engage regionally through coordination, knowledge management, collaboration with the Lake Chad Basin Commission knowledge platform being supported under PROLAC.
- Host thematic dialogues with academic and research institutions on the Lake Chad Region.

**E. Implementation**

*Institutional and Implementation Arrangements*

4. Implementation of Components 1 and 2 remains broadly as described in the MCRP PAD. That is, Component 1 is implemented directly by the State PCUs through service delivery contractors with technical oversight from relevant MDAs, while Component 2 is implemented by state MDAs with PCU oversight. However, the North East Development Commission (NEDC) has provided a jointly agreed proposal on implementation arrangements with States, that maximizes flexibility that may need to be made across the States. The proposal provides a roadmap for the gradual transfer, harmonization and ultimate integration of existing institutional capacities into the implementation arrangements of the MCRP-AF. Further refining of the plan will be reflected in the Project Implementation Manual (PIM). Relevant capacities of the existing PCUs of the soon closing additional financing projects will be either merged or otherwise connected to the MCRP implementation arrangements.

**F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)**

Borno, Adamawa, Yobe

**G. Environmental and Social Safeguards Specialists on the Team**

Amos Abu, Environmental Specialist  
Michael Gboyega Ilesanmi, Social Specialist



**SAFEGUARD POLICIES THAT MIGHT APPLY**

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	
Performance Standards for Private Sector Activities OP/BP 4.03	No	
Natural Habitats OP/BP 4.04	Yes	
Forests OP/BP 4.36	No	
Pest Management OP 4.09	No	
Physical Cultural Resources OP/BP 4.11	Yes	
Indigenous Peoples OP/BP 4.10	No	
Involuntary Resettlement OP/BP 4.12	Yes	
Safety of Dams OP/BP 4.37	No	
Projects on International Waterways OP/BP 7.50	No	
Projects in Disputed Areas OP/BP 7.60	No	

**KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT**

**A. Summary of Key Safeguard Issues**

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

The parent project has recorded some implementation challenges and the task team has worked with the client to usually addresses as they arise. The following are the achievements recorded in the implementation of the safeguards instruments that have been cleared and disclosed: 1ESIA, 15 ESMPs have so far been prepared under the parent project and are at different stages of implementation. Also about 114 grievances have so far been recorded and satisfactorily resolved across participating states under the parent project.

Environmental and Social Safeguards Policies were strictly adhered to as at mid-term of the parent project. Safeguard Action plan was prepared and disclosed prior to implementation. The investment plan was screened and site-specific safeguards instruments were prepared, cleared and disclosed through the appropriate channels. A number of trainings were conducted to improve the capacity of ESSU (environmental and social safeguards units) of the PCUs. Several supervision missions were conducted to ensure implementation of the cleared and disclosed safeguards instruments.

It is clarified by the task team that there are no new institutional arrangements per se, as per the transition plan proposed by the government for the “integration” of parts of existing staff resources and assets of NSHIP, SEPIP, CSDP



and FADAMA into the MCRP institutional arrangements. The existing PCUs/PIUs of these projects will cease to exist and only relevant staff will be transferred to boost the capacity of MCRP. In addition, the reference projects were implemented in geographical zones that included that of MCRP and the envisaged risks of MCRP AF, are materially consistent with the risk ratings of the original projects (NSHIP, SEPIP, CSDP and FADAMA). Further, the letter and spirit of the proposed integration is that existing activities of these projects will be adjusted, molded and assimilated into the design and implementation arrangements of the MCRP, rather than their continuation in the present form, and hence such transition and eventual integration will be organic in nature and scope, rather than a simultaneous continuation of the existing projects parallel to MCRP. Where new activities are added on MCRP on account of such integration, these activities will be fine-tuned to fall within the objectives and implementation modus operandi of the MCRP, and such that these activities would be screened to ensure that they are of similar environmental and social risk. The task team does agree that such new activities should continue to be governed by the safeguards instruments of their parent projects.

In the above vein, it is submitted that new policies are not expected to be triggered on account of the integration of these projects into the MCRP, as the activities if redesigned will fall within the safeguards instruments of the MCRP, or if continued in their original form, will fall within the safeguards instruments of the parent projects. A clause could be included in the Financing Agreement to ensure that the continuation of the use of safeguards instruments of the parent projects for MCRP is given legal effect. To this end, the task team will remove any references in the Project Paper to triggering of new Safeguards policies.

However, the key environmental and social risk management concerns of the ongoing project that might be relevant to the MCRP-AF include: (i) possible soil, water and air contamination, loss of vegetation, and noise nuisance, vibration, traffic congestion due to the planned construction and rehabilitation activities, possible exposure to health care wastes, potential injuries from accidents, incidents and near misses, poor management of sludge; and (ii) potential adverse social impacts that might result from the need for land acquisition and/or the loss of access to economic assets and livelihoods due to planned rehabilitation and investment activities as well as GBV risks. As part of the project preparation, the team has updated the Safeguards Action Plan for the Project. Immediately after Board Approval, the client will prepare ESMF and RPF which will outline steps to be followed in preparing site specific safeguards instruments (ESIA, ESMP, RAP) when the locations of the project activities are determined during implementation, including mechanism for GBV prevention and response when necessary.

In summary, there are no long-term impacts anticipated. The environmental and social impacts are expected to be site-specific and can be managed to an acceptable level.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area: Activities being planned under this project will have limited social and environmental impacts. In principle, MCRP does not envision to fund large-scale new infrastructure development projects (e.g. dams or power stations), but rather small to medium size rural infrastructural rehabilitation and reconstruction works in localized sites across the BAY areas. Much of the Project will focus on medium size rehabilitation and re-construction projects of schools, health centers, public buildings, water sources, roads and bridges. The anticipated scale of potential adverse environmental or social impacts on human populations are site-specific, few if any of them are irreversible and in most cases, mitigation measures could be designed to address the impacts.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts. The MCRP, in view of the fact that it is responding to an emergency situation, will not in principle fund large-scale new infrastructure development projects that could potentially have long-term and irreversible impacts. Instead, the



proposed project focuses on small to medium size rehabilitation and re-construction projects that can be easily managed at the community level. A flexible and programmatic approach is being taken and will adapt to the evolving context and environment on the ground.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.

Specifically, the project will be processed through IPF Policy paragraph 12 (a) that allows for the deferral of the preparation of social and environmental assessment documents till implementation. Immediately after Board Approval, the client will prepare ESMF and RPF which will outline steps to be followed in preparing site specific safeguards instruments (ESIA, ESMP, PMP, RAP) when the locations of the project activities are determined during implementation. The instruments would be consulted upon and publicly disclosed. The Project, including the ESAP have satisfactory calendar, budget and clear institutional responsibilities for the implementation of measures related to safeguard policies. In addition, costs related to safeguard policy measures are being included in the project cost tables.

Each site approved for support by the project will be eligible for financing only when an Environmental and Social Management Plan (ESMP) and RAP (if required) satisfactory to the Bank have been completed and disclosed. Under the parent project, the client has so far prepared and disclosed 1ESIA, 15 ESMPs have so far been prepared under the parent project and are at different stages of implementation

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.

The key stakeholders include beneficiaries and local communities in the project's areas, local NGOs working in the project area, the respective State Governments of Borno Adamawa and Yobe (BAY), and participating Ministries, Departments and Agencies (MDAs).

Environmental and Social Safeguards preparation, review and approval procedure to be followed under this project shall be consistent with the requirements from the Federal Ministry of Environment of Nigeria as specified in the Environmental Assessment Act (Decree No. 86 of 1992, hereinafter the EIA Act), the World Bank's OP 4.01. Compliance with this procedure will constitute part of the evaluation methodology for proposed subprojects prior to approval for MCRP support. The steps in the process are project screening, environmental and social assessment and instrument preparation, EIA review and approval, and oversight of implementation. Stakeholder consultation is an integral part of the preparation process, and public disclosure and comment are necessary prior to the decision to accept or reject a proposed subproject on the basis of environmental and social information. The procedure for consultations on subprojects should conform to OP 4.01 and the EIA Act. OP 4.01 requires consultation with stakeholders. For MCRP, safeguards work on subprojects entails an initial consultation of affected populations and interested NGOs as well as relevant agencies of federal, state and local governments, to inform them about the proposed activity and solicit recommendations, questions and concerns to be addressed in environmental and social assessment. Once drafts of safeguards documents are completed by the client, they must be cleared by the Bank and disclosed. Both Nigeria and the Bank require public disclosure of the safeguard instruments (ESIAs, ESMPs, PMPs, RAPs and Audits-as the case may be). The Bank's requirements are the most detailed and, to comply with them, safeguards documents for MCRP subprojects will be disclosed, at public locations in the area affected by the project as well as in appropriate State and Federal agencies, and on the Bank's external website. Following a time period adequate for the review of those documents, which for MCRP is defined as 30 calendar days for Category B. It is a policy of the Bank that consultations and disclosure should be in form and language accessible to the stakeholders, and that consultation



should continue throughout project implementation. This consultation that has started during project preparation will be continued during implementation. In addition, the MCRP has a robust Grievance Redress Mechanism (GRM) that enables project beneficiaries to log in complaints and receive swift and fair resolution in real time.

Under the parent project, consultations have been held with stakeholders at different levels: (a) As part of environmental and social screening for sub projects; and (b) During the preparation of site-specific safeguards instruments. So far 16 safeguards instruments 1ESIA and 15 ESMPs have been prepared and disclosed by the project.

## **B. Disclosure Requirements (N.B. The sections below appear only if corresponding safeguard policy is triggered)**

### **Environmental Assessment/Audit/Management Plan/Other**

The review of this Safeguards has been Deferred.

#### Comments

The proposed project activities include the rehabilitation of existing infrastructure which could result in adverse environmental and social impacts thereby triggering OP/BP 4.01. However, considering the limited scale and magnitude of rehabilitation and improvement works as well as the confinement of activities to existing footprints, the proposed operation is classified as category 'B'. At this point in time, the locations of the activities that will be financed by the project is not known in sufficient details. Site specific safeguards instruments such as ESIA's, stand-alone ESMPs, RAPs and Audits (when necessary) will be prepared, consulted upon and disclosed by the proponents prior to the commencement of civil works, and the relevant measures including E&S clauses clearly incorporated in contracts.

### **Resettlement Action Plan/Framework/Policy Process**

The review of this Safeguards has been Deferred.

#### Comments

The need for involuntary resettlement or land acquisition in specific subproject areas will only be known during project implementation, when site-specific plans are available. Therefore, subprojects will be screened for applicability of the resettlement policy and in case any activity or subproject involves land acquisition, a Resettlement Action Plan (RAP) or Abbreviated Resettlement Action Plan (ARAP) will be prepared in compliance with the Bank policy and Nigerian laws prior to actual implementation of the activity or subproject. Several issues will increase the complexity of land acquisition. For example, the lack of reliable land record systems, and the inability of people losing land to either document ownership or be physically present to make their claims for eligibility. Such situations can increase due to the situation of forced displacement in the North East as well as the weakened local authorities who can mediate in land ownership conflicts Site- specific Resettlement Plans will, therefore, include procedures for identifying eligible project-affected people, calculating and delivering compensation, and mechanisms for land dispute grievance redress.



**C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting) (N.B. The sections below appear only if corresponding safeguard policy is triggered)**

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**APPROVAL**

Task Team Leader(s):	Ayaz Parvez Mary Morrison
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**Approved By**

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Practice Manager/Manager:	Sylvie Debomy	22-Apr-2020
Country Director:	Kathleen A. Whimp	23-Apr-2020

<sup>1</sup> UNOCHA, 2019-2021 Nigeria Humanitarian Response Strategy.  
[https://reliefweb.int/sites/reliefweb.int/files/resources/28012019\\_ocha\\_nigeria\\_humanitarian\\_response\\_strategy.pdf](https://reliefweb.int/sites/reliefweb.int/files/resources/28012019_ocha_nigeria_humanitarian_response_strategy.pdf)



<sup>ii</sup> 2016 General Household Survey (GHS).

<sup>iii</sup> See <http://documents.worldbank.org/curated/en/542971497576633512/Synthesis-report>.

<sup>iv</sup> Including 17 Member States, the European Commission, the UN Central Emergency Response Fund, the UN Peacebuilding Fund, the African Development Bank, and World Bank < <https://lakechadberlin.de/>>

<sup>v</sup> <https://data2.unhcr.org/en/documents/download/67364>