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# Project Information Document/ Integrated Safeguards Data Sheet (PID/ISDS)

Concept Stage | Date Prepared/Updated: 05-Sep-2018 | Report No: PIDISDSC24644

**BASIC INFORMATION****A. Basic Project Data**

Country Nigeria	Project ID P167183	Parent Project ID (if any)	Project Name Nigeria Digital Identification for Development Project (P167183)
Region AFRICA	Estimated Appraisal Date Sep 19, 2018	Estimated Board Date Dec 04, 2018	Practice Area (Lead) Transport & Digital Development
Financing Instrument Investment Project Financing	Borrower(s) Federal Ministry of Finance	Implementing Agency National Identity Management Commission	

**Proposed Development Objective(s)**

The Development Objective of the project is to increase the number of persons in Nigeria who have government-recognized proof of unique identity that enables them to access services.

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

<b>Total Project Cost</b>	430.00
<b>Total Financing</b>	430.00
<b>of which IBRD/IDA</b>	115.00
<b>Financing Gap</b>	0.00

**DETAILS****World Bank Group Financing**

International Development Association (IDA)	115.00
IDA Credit	115.00

**Non-World Bank Group Financing**

Other Sources	315.00
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EC: European Investment Bank	215.00
FRANCE: French Agency for Development	100.00

Environmental Assessment Category

B - Partial Assessment

Concept Review Decision

Track II-The review did authorize the preparation to continue

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Other Decision (as needed)

## B. Introduction and Context

### Country Context

- 1. Nigeria’s pressing development challenges require a robust system which allows government and service providers to verify individuals’ identity on demand.** The Economic Recovery and Growth Plan (ERGP), prepared by the FGN in April 2017 highlights the complex development challenges faced by the government in Nigeria. With a population size of 187 million people, Nigeria grapples with poverty, inequality, youth unemployment, and an undiversified economy. Currently, 61% of people live below the poverty line; 22% of labor force are made up of unemployed youth; and 95% of exports are from the oil sector, with manufacturing accounting for less than 1% of the country’s exports. The recent economic downturn is further precipitated by weak infrastructure, challenges in fiscal management, and transparency and accountability – governance challenges which could be alleviated with foundational identification. As the FGN helps people in Nigeria to rise out of poverty and achieve greater prosperity, identification is critical to deliver key services – such as basic financial access, health, education, and social safety nets – and ensure the country’s economic, social and political progress.
- 2. Nigeria’s key foundational identification systems suffer from low coverage across the population.** Of the 187 million living in Africa’s most populous country, only about 30% have had births registered - this figure drops to 19% in rural areas and to 7% within the poorest quintile of the population. Less than 50% of residents have any ID card at all, whilst only 9% of individuals have a national ID number (NIN). Based on the Global Findex Survey results of 2018, 33% of those who do not have ID cite that it is too difficult to obtain, whilst approximately 20% cite a lack of supporting documentation.



## Sectoral and Institutional Context

### 1. *Key Benefits of ID Systems*

3. **Over 1.1 billion people globally, including 502 million in Sub-Saharan Africa (roughly 40% of the population), lack government-recognized proof of identification and consequently face barriers to accessing critical services and exercising political and economic rights.** Robust, inclusive, and responsible foundational identification systems can be transformative for the poorest and most vulnerable by enabling financial inclusion, the empowerment of women and girls, and access to basic healthcare, education, social safety nets, and voting rights. The ability to uniquely identify individuals and reliably authenticate their identity is thus a key enabler to ensuring progress toward achieving the 2030 Agenda for Sustainable Development.

4. **At a systemic level, strong identification systems are essential to countries' economic development, security, governance, and efficient delivery of services** - enabling them to accelerate progress towards a digital economy. Digital identification systems can generate significant benefits across the public and private sectors by increasing accountability (chiefly through the reduction of fraud, leakages, and waste) as well as driving innovation in service delivery (through the use of mobile or digital payments, for instance). Moreover, such systems can generate reliable and continuous data for policymakers to measure development progress.

5. **Evidence from a number of other countries has shown that a foundational approach to ID systems can enable digital government-recognized IDs to be a platform upon which both the public and private sectors can rely for transactions and delivery.** ID systems in countries are often designed and implemented from a narrow, sector-specific perspective. These single-use, functional IDs are costly, administratively inefficient and lead to a fragmented identification landscape with multiple parallel (and duplicative) ID systems; the negative effects of these systems are then disproportionately borne by the poor and marginalized groups who are unable to access basic services due to lack of ID. Experiences from countries such as India and Peru has shown that ID systems based on a unique number with strong links to civil registration (CR), which are interoperable with sectoral systems (e.g., social protection, health, education, financial services, population or travel) and which do not connote legal status can quickly scale to achieve full coverage and provide broad access to services. A unique ID system uses a basic and minimal set of attributes, such as biometrics and demographic data that exclusively describes an individual for UIN assignment. Critically, these ID systems should be underpinned by a robust legal and institutional framework.

### 2. *State of ID Ecosystem in Nigeria*

6. **Nigeria has long known the importance of identification, though it has wrestled with developing a robust ID system.** In 1978, the Department of National Civil Registration (DNCR) was set up within the Federal Ministry of Interior (FMI). DNCR was tasked with issuing national identity cards. The program lasted 18 months. In 2001, DNCR contracted a private partner to enroll people, and issue national identity cards, at a fiscal cost of US\$236.8 million. The program ran for five years, issued national identity cards to 37.3 million people, and was shelved. The system developed was not re-used. In 2007, the government passed a law, the National Identity Management Commission (NIMC) Act, and set up NIMC as the government agency responsible for identification in Nigeria. NIMC continues to operate today.

7. **The National Identity Management Commission (NIMC) currently enrolls persons, deduplicates ID records, and offers online biometric verification services to a limited number of clients.** The NIMC Act No. 23 of 2007, gave NIMC the mandate to establish, own, operate, maintain and manage the National Identity Database in Nigeria, register



persons covered by the Act, assign a Unique National Identification Number (NIN) and issue General Multi-Purpose Cards (GMPC) to those who are citizens of Nigeria as well as others legally residing within the country. The Act also provides the Commission with powers to make regulations connected with its functions. To date, NIMC has generated approximately 31.5 million NINs.

**8. Nigeria hosts a fragmented ID landscape which incurs significant costs to the Federal Government (FGN).**

Currently, over 13 government agencies (including NIMC, NPopC, CBN, INEC, and NCC amongst others) and at least 3 state agencies offer ID services in Nigeria. Many of these capture biometrics and issue ID cards independently without establishing links with other systems, resulting in duplication and waste of resources. For instance, Nigeria registered 70 million voters at a cost of US\$627 million for a one-off biometric, voter registration exercise. Based on an illustrative analysis done in 2015, the FGN is on track to spend US\$4.3 billion on ID across all such programs in Nigeria, of which US\$1.2 billion has already been spent and US\$3.1 billion is in pipeline towards the current fragmented approach. At a cost of \$10 spent per person over 5 years, the spend on identification is significantly over good practice benchmarks which pit the cost of such systems at \$4-7 per person.

**9. The FGN has indicated a strong desire to harmonize the existing identification ecosystem to develop a foundational identification platform which can be leveraged to improve service delivery.** Based on completion of an initial identification ecosystem diagnostic in July 2016, the Vice President convened a workshop of all identification stakeholders in December 2016 which confirmed the need to develop a Strategic Roadmap charting the way forward. The Strategic Roadmap was then prepared with the support of the World Bank Group, and highlighted the need for a minimalist, foundational, and eco-system based approach to identification in the country. The Roadmap was endorsed by the Harmonization Committee at a second Vice Presidential level Workshop attended by over 200+ identification stakeholders on January 31, 2018; the group moved to submit the Roadmap to the Federal Executive Council for final government endorsement in September 2018.

**10. The proposed project will support NIMC and other ecosystem partners to implement the vision of the Strategic Roadmap.** The proposed ecosystem approach will leverage existing capabilities and enrollment facilities of government agencies, partners, and the private sector in Nigeria to rapidly increase coverage of the NIN.

**3. Regional Alignment on ID**

**11. A regional approach to the development of ID systems with the objective of mutual recognition across countries generates significant spillovers and presents a strong value-add.** Such an approach could help to facilitate regional migration, trade, financial flows, and security - accelerating progress towards the creation of a digital single market (DSM) in West Africa. Cross-country learning and shared knowledge would also facilitate improved ID systems, including information about access to more appropriate choices of technology.

**12. Thus, the proposed project is harmonized with a larger regional program of operations (“Multiphase Programmatic Approach”, or MPA) focusing on Identification for Development (ID4D) in the Economic Community of West African States (ECOWAS).** This MPA represents the World Bank’s first regionally focused operation on identification systems, and is based on the substantial global upstream analytical work spearheaded by the ID4D team for reaching the goals set forward in the World Bank’s Africa ID4D Business Plan, including providing access to basic digital identification for 150 million new individuals by the end of IDA 18. Due to its size and complexity, the Nigeria ID4D project will not formally be a part of the regional MPA; nonetheless, it will follow a similar approach and project design in developing country ID systems, whilst also gleaning the benefits of regional integration with other ECOWAS country ID systems as these are implemented under the MPA.



Relationship to CPF

13. The Country Partnership Strategy (CPS) of FY14-FY17, which has been extended to FY19, includes in its Cluster 2 goals the ‘Quality, Effectiveness and Efficiency of Social Services Delivery at State Level for Increased Social Inclusion’ – particularly for health and education outcomes. The CPS envisions a \$150 million World Bank contribution for an ID4D project that would support the development of ‘a foundational identification platform that can be leveraged to improve service delivery’.

C. Proposed Development Objective(s)

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14. The Development Objective of the project is to increase the number of persons in Nigeria who have government-recognized proof of unique identity that enables them to access services.

Key Results (From PCN)

15. The target aims to cover 90% of the population in 5 years.

D. Concept Description

16. The proposed project is structured around 3 main components: (i) Strengthening the legal and institutional framework; (ii) Establishing robust and reliable foundational ID systems; and (iii) Enabling access to services through IDs. This section outlines the broad scope of each component.

**Strengthening the Legal & Regulatory Framework**

Enabling national policy, and legal frameworks, institutional capacity building to support digital, unique, & foundational identification; data protection & privacy; and regional mutual recognition

**Building a Robust Foundational System**  
*Scaling up enrollment in ID*

Includes establishing a central digital identification system and supporting IT systems; enrolling residents and distributing a basic credential; bolstering civil registration systems; strengthening cybersecurity across the ecosystem; conducting a supporting communications campaign and ensuring citizen engagement & grievance redress

**Ensuring Access to Services**

Support linkages with certain key ‘quick win’ public and private services and the foundational ID system, both domestically and internationally, to ensure the identification system enables access and inclusion

17. Component 1 – Strengthening the legal and institutional framework (US\$ 10m). Under this Component, the project will finance the preparation, development and implementation of the legal and regulatory frameworks necessary to



structure trustworthy and abuse-resilient foundational ID systems. This Component will review extant legal and regulatory provisions which underpin the foundational ID system as well as the laws and policies regulating the use of the foundational ID by public and private service providers. This component will also ensure that the legal architecture of the system has appropriate legal barriers to protect against potential abuses of privacy, as well as ensure data security and protection within the foundational ID system as well as the broader ecosystem of enrolment partners and service providers. The legal assessment has already begun, with Bank-executed funds supporting an assessment of the legal and regulatory framework and an international benchmarking exercise. Additional technical support, for example to draft any new legislation, may be financed under the project.

18. **The component will also invest in institutional capacity building.** On the basis of appropriate legal mandates, necessary institutional and governance arrangements and investments will be made to reinforce the capacity of the implementing agency (NIMC) to carry out the project, as well as in the ecosystem of partners as needed. For the other stakeholders in the ecosystem to fully trust NIMC to provide foundational identification, significant institutional reforms will need to be made into NIMCs current capacity, resources, and business processes. This will include ongoing training investments for new and existing users and administrators, both at central and local levels, as well as a revision of its current administrative processes and systems based on a capacity analysis. Effective project management on NIMCs behalf, as well as strong links to the Office of the Vice President will be critical to ensure the success of the implementation of the foundational ID system, as well as mass enrollment, credential issuance and facilitating access to services authenticated through IDs.

19. **Develop an enabling legal and regulatory environment for the digitization and automation of the existing civil registration systems.** This Component will also finance technical assistance for an enabling legal and regulatory environment for development of a digital civil registration system to be integrated into the foundational ID system, including the digitization of existing birth registration processes as a means of laying the foundations for continuous digital enrolment in the foundational ID system.

20. **Provide for mutual recognition for authentication of services internationally.** The Project will also facilitate the development of an approach that will enable cross-border interoperability of the Nigerian foundational ID system. While development of the legal and institutional framework will be guided by international good standards, it will be adapted to both the regional and country-specific contexts.

21. **Component 2 – Establishing robust and reliable foundational ID systems (US\$ 380m).** This Component will support the harmonization of the current identification system to ensure a single foundational source of adult identification in the country which issues, free of cost, a unique ID number (UIN) linked to biometric data for all persons in Nigeria as well as Nigerians living abroad. The system will revise NIMC’s current approach and refocus on gathering only the minimum basic demographic and biometric data fields required to ensure uniqueness and identify the individual, ensuring that the system can both cover Nigeria’s 200 million strong population as well as protect individual privacy by design.

22. **The data for this foundational ID system will be collected by various agencies in an ecosystem approach to identification** (shown in the figure below). This enrolment ecosystem could be based on a pay-per-enrollment design<sup>1</sup>, which is recommended based on scale of the population to be reached in Nigeria, and the demonstrated success of this approach in providing over a billion residents with an Aadhaar number in India in just under 5 years. This has the added advantage of building on previous efforts and existing spend on ID across the FGN, rather than investing in a system

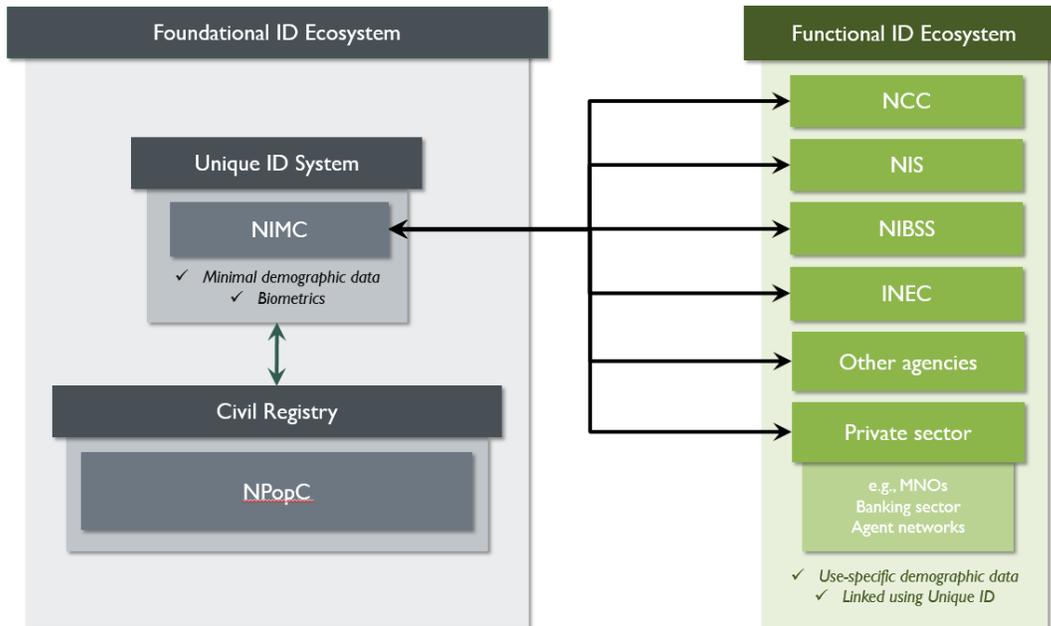
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<sup>1</sup> The financing model will be confirmed prior to project Appraisal, after validation of the on-going Technical Assessment



which perpetuates fragmentation and duplication. Thus, based on an ongoing technical harmonization evaluation to be completed during project preparation, legacy databases may migrate some existing data to form this new foundational database.

*Stakeholder Roles: Mapping the Nigeria ID Ecosystem*



23. **All persons enrolled in the foundational ID system will receive a basic credential at no cost.** In many cases, the UIN alone or this basic credential may be sufficient for individuals to authenticate their identity when accessing a variety of public and private services. The final architecture of the foundational ID system for enrollment, processing and issuance of credentials will be informed by the Strategic Roadmap as well as a careful technical evaluation. For the fraction of the population that may need a more expensive credential (such as a smart card) for travel or other extended services, the cost of such credentials will be borne by the government or passed on to end-users. NIMC will not issue such extended credentials but may play the role of regulator of a network of public and/or private credential issuers. The project will finance the development of a national strategy for issuance of credentials, which will consider which use-cases require what type of credential and will also consider the possibility of making virtual or mobile-phone-based tokens available to certain subsets of the population, in order to maximize access to and efficiency of the ecosystem of credentials.

24. **The foundational ID system will be inclusive by design.** Both the quantity of data collected as well as requirements for validation of data before integration into the UIS will be kept to a bare minimum. In particular, there will be no requirement to present a paper breeder document, such as a birth certificate, at the time of enrolment, since the majority of the population of Nigeria lacks such a document. Whenever possible, the project will bring enrolment to the population – for example, by using mobile and offline-capable enrolment equipment – instead of requiring beneficiaries to travel to an enrolment center. The project will leverage agencies with contact with particularly vulnerable populations (e.g. the rural poor, or IDPs in Northern areas) and develop exception handling mechanisms for individuals who are unable to provide breeder documents (through some form of introducer enrollment) or biometrics (through exceptions for individuals with disabilities).

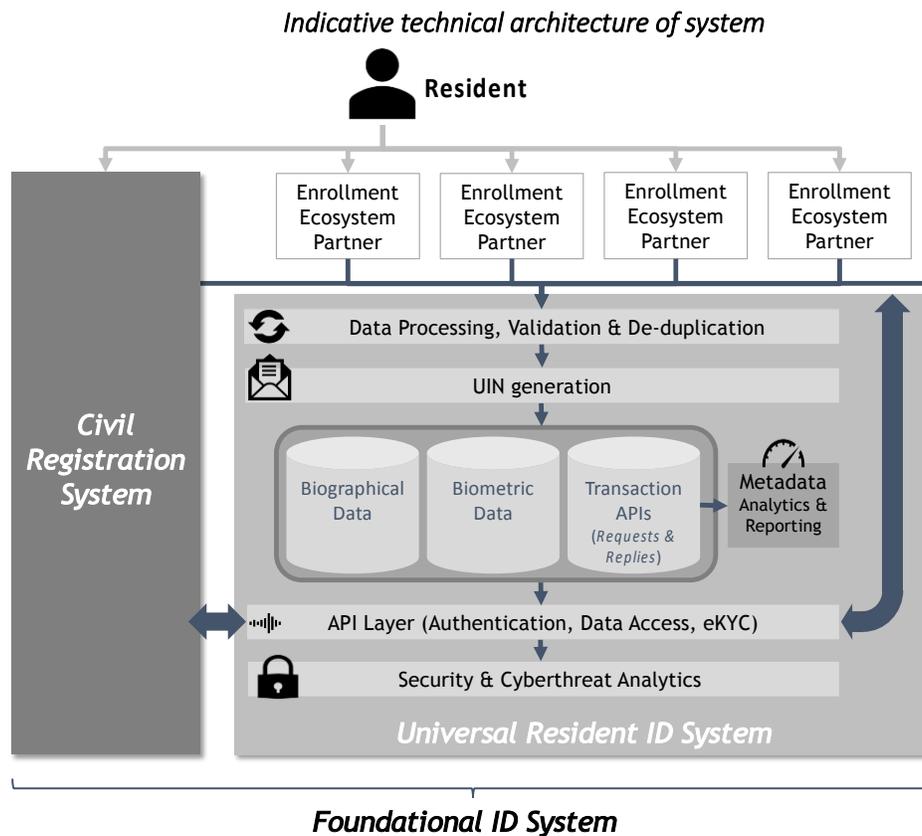
25. **To ensure sustainability, the project will lay the foundations for continuous digital enrolment into the foundational ID system.** In particular, the project will build linkages with the civil registration system to facilitate assignment of UINs



at birth and lay the groundwork for full integration and interoperability between the UIS and a digitized civil registry during a second phase of the project. The project will also invest in the digital enrolment ecosystem in order to ensure that enrolment partners invest in digital infrastructure and enrolment mechanisms that can facilitate ongoing biometric enrolment after project close.

**26. The project will invest in stakeholder outreach, communications, and Citizen Engagement mechanisms.** The project will be supported by a grievance redress mechanism to address issues and complaints in a real-time manner. As part of the project, the Government will develop a stakeholder engagement plan (SEP), to ensure that all stakeholders are informed of the project approach and have an opportunity to contribute to its design. Special attention will be played to State-level stakeholders, including State governments, who are critical to the political economy in Nigeria. Regular communications with the general population will increase understanding of the project and reduce reticence to enrolment. Formal consultations with vulnerable groups will help ensure that the UIS is accessible to and responds to the needs of these populations.

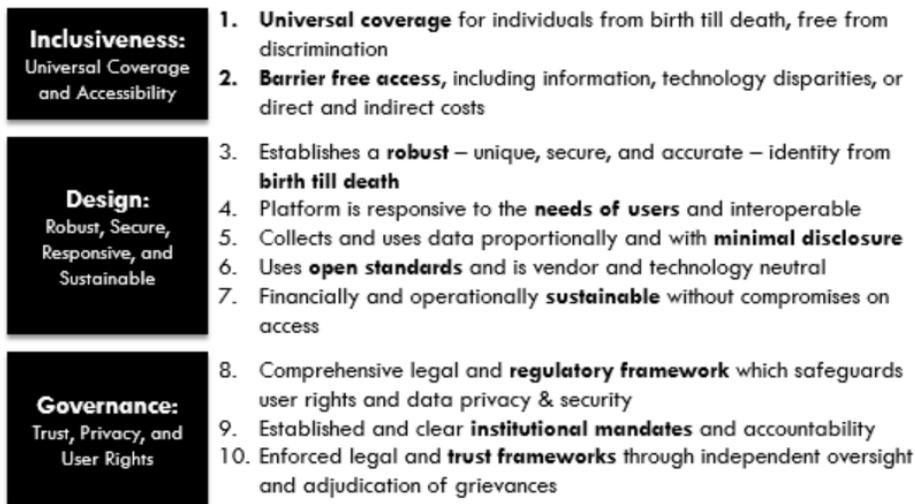
**27. The quality of ID systems depends on a number of design and technical factors and has profound implications for system cost, utility and security.** This includes the organizational design of identity management, the choice of technology used for establishing uniqueness, the authentication infrastructure (i.e., how IDs are used to verify proof of identification at the point of transaction), the form and type of token or credential (i.e., different types of cards or the use of only numbers and biometrics), and security measures put in place for securing databases against disaster and cyberattack. Hardware and software should comply with open standards to reduce costs, avoid vendor lock-in, and provide flexibility for future adaptation. Operational guidance on topics such as technology approaches, costs, system architecture, and linkages with civil registration, will be leveraged from a series of technical studies completed by the Identification for Development (ID4D) Initiative. In addition, a technical assessment of the Nigerian ID ecosystem is currently underway and will present a complete inventory of current information systems and institutional capacity, and recommend design options, including a migration strategy for the potential integration of legacy data into the UIS as well as a strategy for ensuring cybersecurity of the ecosystem. These recommendations will be refined and extended under additional studies financed during project preparation and after effectiveness.



28. Overall, the newly developed ID system will aim to:

- (a) be ***robust***, in that they ensure the uniqueness of the assigned UINs, and have the necessary technical and legal underpinnings to function reliably, and effectively safeguard personal data;
- (b) be ***inclusive***, such that all individuals in any of the participating countries have access to a UIN that will identify them for life and newborns are issued a UIN at birth;
- (c) be ***foundational***, in that they are linked by design and practice to the civil registry and can be used by functional registers for deduplication and authentication purposes;
- (d) provide for ***mutual recognition***, allowing persons to establish their identity across borders; and
- (e) facilitate ***access to services***, for individuals in the public and private sectors by reliably authenticating a person's identity.

29. The system will also adhere to the Shared Principles of Identification Systems, which are endorsed by 23+ international organizations as of February 2018. A summary of these is shown below.



30. **Component 3 – Enabling access to services through IDs (US\$ 40m).** This Component will support integration between selected services in the public and private sector and the foundational ID system to facilitate access to services (both domestically and regionally). To incentivize the uptake of government-recognized IDs as well as ensure their development impact, this Component will identify selected key services that can enable authentication of IDs to facilitate access to services. Potential service sectors under this component include financial inclusion (through KYC for bank accounts and access to credit and insurance); public health and social protection programs (which require ID to verify beneficiaries), education (where a birth certificate is often an admission requirement), or mobile communications (e.g., SIM-card identification). In Nigeria, data from the latest Findex survey indicates that mobile and financial services are key use cases, with 34% and 31% of respectively of ID holders citing using ID to access these services. This Component will thus seek to facilitate features such as eKYC to improve the ease of access to these services through the UIN. In order to protect the privacy of individuals using their UINs for authentication to enable access to services, the UIN could be held privately and an online/mobile service could generate temporary numbers – an ID ‘token’ – for authentication (similar to the Virtual ID for the Aadhaar number in India), while data required for eKYC will only be shared proportionally and with user consent. Finally, foundational ID systems that eventually enable mutual recognition across ECOWAS and internationally could facilitate safe and orderly migration within the region, and promote access to public and private services at national and international levels which use these IDs for their functional applications.

31. **This project draws on lessons learned from other ID projects and the wealth of analytical and global convening work on identification by the World Bank’s ID4D Program, which have been incorporated in the project design.** Key lessons are given below:

- a. **ID systems should aim to provide foundational and minimalist identification to all residents – with proof of ID indicating only that an individual is who s/he says s/he is, rather than try to cater to a specific use (e.g., voting) or to all uses at once.** While developing multiple parallel use-specific ID systems introduces inefficiencies into the government, attempting to develop a foundational ID system with all of the data needed to cater to all sectors often results in a design which requires too much data to enroll, validate, and authenticate – and thus is too complex to successfully roll out universal coverage. Various sectors can then leverage the foundational system for basic ID verification, and augment it with service-specific data as needed. Furthermore, the foundational ID



system financed under this project will be maximally inclusive, with all residents of Nigeria eligible to enroll, regardless of their nationality or legal status.

- b. **Foundational ID systems should endeavor to provide unique identification from birth to death, with strong links to a robust civil registration system.** Unique identification based on biometrics allows for the minimization of fraud and linkages of the basic ID with critical services which require a 1:1 authentication, such as verification for payments which suffer from double dipping (subsidies, G2P payments intended for specific beneficiaries, pensions, and salaries). Linkage with civil registration is critical to ensure that this unique ID is issued from birth.<sup>2</sup>
- c. **The implementation of identification systems is more likely to be successful with high level political will,** which is needed to coordinate cross-ministerial engagement and develop a synthesized national strategy or action plan. This works to prevent the development of a fragmented ecosystem plagued with duplicative or one-off efforts by various individual ministries.
- d. **A robust legal and regulatory framework underpinning an identification system is a critical enabler for success.** Such frameworks provide clear institutional mandates to identify the roles of various stakeholders in fragmented systems, as well as institute laws which protect data (for instance, through use purpose specification) and individual privacy.
- e. **Analysis reveals that the most significant costs of ID systems are associated with the issuance of a sophisticated credential (e.g. a smartcard) as well as the number of full time staff hired (chiefly to enroll populations).** Thus, the design of these programs will, where possible, leverage an ecosystem-based approach to enrolling populations to leverage existing capacity, and develop minimalist foundational databases which issue a unique number based on biometrics. These systems will also provide a basic no-frills credential which can verify identity for access to services.

**Implementation of this project is expected to deliver key learnings to inform future investments in the broader realm of Nigeria’s digital economy.** Implementation of a digital program at scale that captures and verifies foundational ID data for all residents of Nigeria can be immensely informative for operations going forward, which could aim to develop digital platforms in areas such as digital business registries (for taxation or credit) as well as enrollment into various functional digital programs (eHealth or digital cash transfers for example) – particularly in strategies to reach the most vulnerable populations. Developing initial linkages with the birth registration system managed by NPopC will likely bring learnings on the digital investments required to fully modernize the civil registration system. Finally, the test of the ‘enrollment ecosystem’ approach, which involves leveraging various public and private agencies towards one shared objective, will also be extremely informative for future government programs which involve mass mobilization to reach the population, e.g. for immunization or other similar efforts.

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<sup>2</sup> A broad guide which provides an overview of factors which should be considered in building robust and inclusive systems is available in the *Principles of Identification Systems* (World Bank, 2017).



## SAFEGUARDS

### A. Project location and salient physical characteristics relevant to the safeguard analysis (if known)

The actual sites where the proposed project will be implemented are not known at this point of project preparation. To mitigate potential adverse impacts and risks of the proposed project, the Borrower will prepare an Environmental and Social Management Framework (ESMF) prior to appraisal. The ESMF will outline the principles and steps that will be followed during project implementation in the preparation of site specific safeguards instruments when the locations are known.

### B. Borrower’s Institutional Capacity for Safeguard Policies

The Federal Government of Nigeria has extensive experience of delivering World Bank standard safeguard documents and has a good understanding of the Bank’s safeguard policies. There are adequate legal and institutional frameworks in the country to ensure compliance with World Bank safeguards policies triggered by the proposed project. In Nigeria, the Federal Ministry of Environment is responsible for setting policy guidelines on environmental issues and ensuring compliance with national environmental standards. It has different departments with field offices in every region of the country that will carry out statutory oversight function to ensure environmental and social safeguards compliance as required by Nigeria’s EIA Act. However, the sector that is hosting the proposed project is relatively weak when it comes to environmental and social safeguards issues. To mitigate this weak capacity, the Project Management Unit will recruit environmental and social safeguards specialists that will be responsible and accountable for all safeguard issues. He or she will be supported by consultants as needed. Further, the safeguard specialist in the World Bank team will provide additional guidance and capacity building as needed.

### C. Environmental and Social Safeguards Specialists on the Team

Amos Abu, Environmental Safeguards Specialist  
Omezikam Eze Onuoha, Environmental Safeguards Specialist  
Michael Gboyega Ilesanmi, Social Safeguards Specialist  
Edda Mwakaselo Ivan Smith, Social Safeguards Specialist

### D. Policies that might apply

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	The actual sites where the proposed project will be implemented are not known at this point of project preparation. The project will only undertake minor civil works (such as rehabilitation of offices) therefore no adverse impacts are expected. As a precautionary measure, since sites are unknown, the Borrower will prepare an Environmental and Social Management Framework (ESMF) which will be disclosed in country and on the Bank’s external website prior to appraisal.
Performance Standards for Private Sector Activities OP/BP 4.03	No	This policy is not triggered as the project will be implemented by public sector agencies who are wholly



		responsible for assessing and addressing environmental and social risks.
Natural Habitats OP/BP 4.04	No	This policy is not triggered as this project will have no major civil works etc. affecting land, forests, or natural habitats.
Forests OP/BP 4.36	No	This policy is not triggered as this project will have no major civil works etc. affecting land, forests, or natural habitats.
Pest Management OP 4.09	No	This policy is not triggered as this project will have no agriculture or land components.
Physical Cultural Resources OP/BP 4.11	No	No excavation, major civil works, etc. are envisaged therefore this policy is not triggered.
Indigenous Peoples OP/BP 4.10	No	There are no Indigenous People in the project area
Involuntary Resettlement OP/BP 4.12	Yes	The policy is triggered since project components may involve the financing of rehabilitation and upgrading existing ID and civil registration centres, thereby resulting in involuntary land acquisition leading to potential loss of access to assets, means of livelihoods or resources. Given that the detailed description of the investments under these components are yet unknown, the borrower will prepare a Resettlement Policy Framework (RPF) in accordance with the Bank Safeguards policy OP/BP 4.12. The RPF would be prepared and disclosed before appraisal. The RPF will outline the resettlement process in terms of procedures for preparing and approving Resettlement Action Plans (RAPs), institutional arrangements, likely categories of affected people, eligibility criteria and categories, compensation rates, methods of valuing affected assets, community participation and information dissemination, Grievance Redress Mechanism and effective monitoring and evaluation. These arrangements are to ensure that there is a systematic process (as against an ad hoc one) for the different stages of implementation of a framework that assures participation of affected persons, involvement of relevant institutions and stakeholders, adherence to both World Bank and Government procedures and requirements.
Safety of Dams OP/BP 4.37	No	This policy is not triggered as there will be no dam construction.
Projects on International Waterways OP/BP 7.50	No	This policy is not triggered as there will be no work in international waterways.



Projects in Disputed Areas OP/BP 7.60	No	This policy is not triggered as there will be no major civil works in any disputed areas.
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### **E. Safeguard Preparation Plan**

Tentative target date for preparing the Appraisal Stage PID/ISDS

Oct 22, 2018

Time frame for launching and completing the safeguard-related studies that may be needed. The specific studies and their timing should be specified in the Appraisal Stage PID/ISDS

The project is carrying out a Social Assessment to assess the potential social risks related to the ID system as well as relevant mitigation measures, to be delivered by the end of October. The project is also commissioning an ESMF and RPF to be disclosed before appraisal.

### **CONTACT POINT**

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**APPROVAL**

Task Team Leader(s):	Marc Jean Yves Lixi, Foluso Okunmadewa
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**Approved By**

Safeguards Advisor:	Hanneke Van Tilburg	31-Aug-2018
Practice Manager/Manager:	Boutheina Guerhazi	02-Sep-2018
Country Director:	Rachid Benmessaoud	10-Sep-2018

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