



# Environmental and Social Review Summary

## Concept Stage

### **(ESRS Concept Stage)**

Date Prepared/Updated: 10/26/2018 | Report No: ESRSC00048



**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	IPF		
Borrower(s)	Implementing Agency(ies)		

Proposed Development Objective(s)

Financing (in USD Million)	Amount
<b>Total Project Cost</b>	<b>41.30</b>

**B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?**

**C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]**

**D. Environmental and Social Overview**

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]  
Component 3 - Demonstrating application of technological tools and economic approaches - 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, 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 – Industrial Transformation for Growth Project (P160164) - Kenya - Urban Support Program - (P156777) - Zambia – Mining and Environmental Remediation and Improvement Project (P154683) - Senegal – Municipal Solid Waste Management Project (P161477) The 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; 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: - Proposals with high level of environmental and social risk; and - Proposals requiring land acquisition or involuntary resettlement

**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: The Ministry of Environment and Forests and the National Management Agency (NEMA). • ZM: Zambia Environmental Management Agency in collaboration with the Ministry of Local Government through target Municipal Councils. • SN: Division de l’Environnement et des Etablissements Classés - DEEC. An assessment of the implementing agencies will be carried out during preparation as a basis for further detailing of implementation arrangements in consultations with implementing agencies of the five countries.

Public Disclosure

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

**A. Environmental and Social Risk Classification (ESRC)**

Moderate

**Environmental Risk Rating**

Moderate

The environmental risk classification for the Project is moderate under the World Bank ESF, based on the nature and scale of the demonstration project activities, which include potential impacts from managing hazardous waste, however, majority of the impacts likely to be generated from the project activities are site-specific, limited in number, and can be mitigated with measures that are readily identifiable. These 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 knowledge and capacity to manage the environmental risks under the proposed pilot interventions, however, these institutions will need to build additional capacity for contract management during pilot implementation and for managing social and environmental risks and impacts beyond aspects that are generally included in the OP's.

**Social Risk Rating**

Low

The clients will need to prepare country-level and project-level SEPs which will need to identify all relevant stakeholders. For project-level SEPs, artisanal gold miners will be included, whom may have concerns regarding the proposed program impacts on their livelihoods.

In addition, dedicated effort will be provided for technical assistance to the implementing agencies with the expanded scope of social and environmental risk coverage under ESF.

**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, which can be readily 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. From the preliminary review carried out at this concept stage, it can be concluded that implementing agencies' ESMS and procedures need to be enhanced to comply with ESS1 requirements. The Project will address the gaps through the ESCP, which will be based on the update / preparation and implementation of the ESIA and the associated ESMPs. 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 ESIA/ESMP with clearly defined mitigation measures for construction and operational phases, roles and responsibilities, time plans, costs and implementation producers for each mitigation measures recommended. 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 The findings of the ESIA's will be integrated into relevant plans and processes (SEP, ESMP, GRM etc.). The Bank team will review the TOR for the ESIA's to verify that, in accordance with ESS 1 paragraphs 28 (b) (ii) & (iii) and 29, the TOR: (a) identifies stakeholders affected by the project that may be disadvantaged or vulnerable; and (b) 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.

**Areas where reliance on the Borrower's E&S Framework may be considered:**

The Borrower's framework will not be considered.

Public Disclosure



### **ESS10 Stakeholder Engagement and Information Disclosure**

In consultation with the Bank the clients will prepare and implement an inclusive country-level SEP proportional to the nature and scale of the project and associated risks and impacts. A draft of the SEP will be prepared and disclosed as early as possible and prior to Appraisal. The client will seek stakeholder feedback and opportunities for proposed future engagement, ensuring that all consultations are inclusive and accessible (both in format and location) and through channels that are suitable in the local context. If major changes are made to the SEP, a revised SEP should be publicly disclosed. 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). Preliminary list of stakeholders includes 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.

### **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 construction of physical infrastructure and will rather involve application of alternative practices and new technologies at 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. 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. Capacity Assessment: As a precautionary measure, as part of the planned institutional capacity assessment the client's capacity to manage labor, working conditions and community health and safety will be assessed. Contract Clauses: For project requiring small-scale civil works contracts, such contracts will incorporate ESMP; EHS; SEP, terms and conditions of employment, as well as specific language referencing the prioritization of the hiring of unskilled local labor. GBV: The findings of ESIA and the Bank's GBV Risk Assessment Tool will guide the identification of GBV risks and the subsequent development of mitigation plans. GRM: A locally based project-wide GRM, proportionate to the pilot project will be established by effectiveness.



### **ESS3 Resource Efficiency and Pollution Prevention and Management**

There is a potential for a 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 pilots will be designed to minimize the generation of waste, and reuse, recycle and recover waste in a manner that is safe for human health and the environment. In case of e-waste pilots, the purpose of the project is aiming towards material reuse, recycle and recovery. 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 and Basel Conventions on storage, transportation and disposal of haz. wastes. No transboundary waste movements is anticipated. In case relevant national legislation is insufficient, the implementing agencies will adopt GIIP alternatives for its environmentally sound and safe management and disposal.

### **ESS4 Community Health and Safety**

The proposed pilot projects are not anticipated to have 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 project ESAs will be reviewed and updated, where necessary, to determine whether corresponding the ESMP should include community related clauses. 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 will be established and documented prior to finalizing the selection of the pilot.

### **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.

### **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.

**B.3 Other Relevant Project Risks**

The political and governance risk is substantial, given the complex decision-making process affecting participating countries borrowing from international entities such as the World Bank Group.

**C. Legal Operational Policies that Apply**

**OP 7.50 Projects on International Waterways**

**OP 7.60 Projects in Disputed Areas**

**III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE**

**A. Is a common approach being considered?**

No

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

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

1. Review and update of existing or preparation of ESIA/ESMPs, consultation and disclosure (or redisclosure) of relevant ESIA/ESMPs
2. Preparation, consultation and disclosure of the Stakeholder Engagement Plans (SEPs)
3. Institutional Capacity Assessment

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

1. Implementation of SEPs
2. Development and Implementation of Institutional Capacity Strengthening Plan

Public Disclosure



**C. Timing**

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

19-Nov-2018

**IV. CONTACT POINTS**

**World Bank**

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**Borrower/Client/Recipient**

**Implementing Agency(ies)**

**V. FOR MORE INFORMATION CONTACT**

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**VI. APPROVAL**

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