Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 01/22/2020 | Report No: ESRSC01047
### BASIC INFORMATION

#### A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Western Africa</td>
<td>AFRICA</td>
<td>P169594</td>
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</table>

**Project Name**  
West Africa Unique Identification for Regional Integration and Inclusion - Phase 2

**Practice Area (Lead)**  
Social Protection & Jobs

**Financing Instrument**  
Investment Project Financing

**Estimated Appraisal Date**  
1/31/2020

**Estimated Board Date**  
4/22/2020

**Borrower(s)**  
Togolese Republic, Republic of Niger, Republic of Benin, Burkina Faso

**Implementing Agency(ies)**  
Ministry of Finance, Ministère du Développement de l’Économie Numérique et des Postes (MDENP), Agence Nationale d’Identification des Personnes (ANIP), Ministère des Postes, de l’Économie Numérique et des Innovations Technologiques

**Proposed Development Objective(s)**

Project Development Objectives (PDO): For phase 2 of the Project: Increase the number of persons in the Republic of Niger, Republic of Benin, the Republic of Burkina Faso, and the Togolese Republic who have government-recognized proof of unique identity that facilitates their access to services.

**Financing (in USD Million)**

<table>
<thead>
<tr>
<th>Amount</th>
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<tbody>
<tr>
<td>Total Project Cost</td>
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#### B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No
C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]
The WURI MPA Program will aim to provide government-recognized IDs for the fID system (i.e., fIDs) to all individuals in participating countries, irrespective of legal status. Progress is anticipated in the number of enrolled women, as well as in the number of previously-unrecognized individuals (that is, those not formerly having a government-recognized ID), which is expected to substantially overlap with the vulnerable population. Another result will be to link key services, such as social safety net programs, to the fID systems. Progress towards the PrDO will be measured through the following program-level outcome indicators:

i. Legal Robustness: Development of foundational ID (fID) system enabling legal and institutional framework (including relevant data protection and privacy laws and a mandated ID agency and data protection agency), in keeping with regional standards and international good practices;

ii. Technical Robustness: Development of fID system which generates UNIs, in keeping with international good practices;

iii. Inclusion & Coverage: Number of direct project beneficiaries who have received a UNI (of which women); and

iv. Access to Services: Number of national or regional functional public and private services linked to the fID system.

The MPA will employ a multi-borrower approach and will include at least two phases, each of which will run for at least 6 years from FY18 through FY28, with any country allowed to progressively join the Program once the first set of countries have been approved for financing (see Figure 2). The three key components of the Program—(i) strengthening the legal and institutional environment; (ii) establishing robust and inclusive fID systems; and (iii) facilitating access to services through fIDs—will be replicated by countries participating in subsequent phases. Phase 1 of the Program will include Côte d’Ivoire, Guinea and the ECOWAS Commission. Phase 2 of the Program will include Benin, Burkina Faso, Niger, and Togo.

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]
Phase II of the project will cover four countries - Benin, Burkina Faso, Togo and Niger. Project activities will be conducted at national scale.

D. 2. Borrower’s Institutional Capacity
Institutional responsibilities for project implementation will be defined during project preparation, and it is expected that each country will have its own PIU. Borrowers do have substantial experience with preparing and implementing safeguards instruments. So, the overall capacity is acceptable.

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

A. Environmental and Social Risk Classification (ESRC) Substantial

Environmental Risk Rating Low
No civil works or other activity that might impact negatively the environmental components are part of the project.

Social Risk Rating Substantial
The proposed project activities entail some significant risks and impacts, which fall largely into two categories. First, there is significant potential that the mass registration of the population will not reach certain vulnerable groups thus exacerbating their social exclusion and marginality. Second, data collected as part of the registration could be used for discriminatory purposes, or give rise to data theft and other privacy violations. Social Assessments will be prepared in each country to assess these risks and propose mitigation measures. Substantial and continuous measures will need to be put in place during project preparation and implementation.

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 project is likely to entail significant risks, particularly on the social side, and requires thorough assessments and mitigation plans for the four countries. ToR for the social assessments will be adapted from Phase I of the project, where social assessments are being carried out in Guinea and Côte d'Ivoire. Given the national and programmatic scope of project activities the assessments should be conducted using methodologies for SESAs/PSIAs.

*Areas where “Use of Borrower Framework” is being considered:*
This operation will not use the Borrower’s E&S Framework in the assessment, development and implementation of investments. However, it will comply with relevant national legal and regulatory requirements.

ESS10 Stakeholder Engagement and Information Disclosure

Stakeholder identification and analysis for participation in the consultations will include due consideration of representativeness and inclusion of vulnerable groups. Groups to be consulted in every country shall include: women, youth, elderly, persons with disabilities and refugees, forcibly displaced and stateless persons. Additional key groups will be identified based on the particular country context (e.g., minority ethnic/nationality groups, geographically isolated communities) with the help of experts. The use of independent third-party specialists might be needed to support an inclusive engagement process.

Pilot methodologies for the consultations will include a series of roundtables, field-based research and open, national consultation meetings with civil society, beneficiaries and other stakeholders to solicit feedback on project design and implementation. These will form the basis of an active and ongoing feedback loop under the operation. This multi-methods approach to consultations will ensure operations in each country reach civil society more broadly, and especially vulnerable groups who cannot actively and meaningfully participate in national consultations due to distance, safety or access issues—the “last mile” groups (including, based on country context, e.g., refugees and the forcibly displaced; border communities; stateless persons; the elderly; gender minorities; persons with disabilities and their caregivers; minority ethnic/nationality groups). Methodologies will range from individual and regional meetings or roundtables to focus groups to participant-observer research, depending on the context in each country and the best way to contact hard to reach groups. Information will be disclosed in relevant local languages in a culturally appropriate and accessible manner, taking into account the differentiated needs of vulnerable groups.
These proposed stakeholder engagement activities will be summarized and documented in a stakeholder engagement plan, to be developed and disclosed during appraisal. Finally, the project will include a Grievance Redress Mechanism to handle complaints by stakeholders.

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 PIUs will include direct workers. The project activities, particularly the mass registration campaigns, will also require the engagement and deployment of significant amounts of labor, including on a short-term basis. There is a risk that these project workers might be subject to unfavorable contractual arrangements and working conditions. The project will prepare Labor Management Procedures which will set out: terms and conditions of employment; principles regarding non-discrimination and equality of opportunity; guidance on workers’ organizations; policies on child and forced labor; measures for occupational health and safety; and, the establishment of a grievance mechanism for labor disputes. The LMP will include measures for addressing working condition and GBV/SEA risks, such as a Code of Conduct for PIU staff and contractors. These measures will be defined during project preparation.

ESS3 Resource Efficiency and Pollution Prevention and Management

The project does not involve activities raising Resource Efficiency and Pollution Prevention and Management issues.

ESS4 Community Health and Safety

The project will not finance any civil work that could be associated with potential adverse impact on Community Health and Safety.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The project is not likely to entail any land acquisition leading to economic or physical displacement.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

None of activities to be supported by the operation might constitute a threat for biodiversity and/or Living natural resources.

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

There are no known Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in the project area. The social assessments will, however, examine if project activities are being carried out in areas where such groups may be present.
ESS8 Cultural Heritage
It is not anticipated that the project will impact cultural heritage as no physical activity will be supported by the project.

ESS9 Financial Intermediaries
This standard does not apply.

C. Legal Operational Policies that Apply

| OP 7.50 Projects on International Waterways | No |
| OP 7.60 Projects in Disputed Areas | No |

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:
The project will prepare Social Assessments accompanied by Social Management Plans for each of the four countries. In addition, Stakeholder Engagement Plans should be prepared in close coordination with the Social Assessments and Management Plans. The need for additional instruments might be identified during project preparation and prior to appraisal.

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):
The ESCP should include the Borrowers’ commitments to prepare draft Stakeholder Engagement Plans before appraisal. Social Assessments/Social Management Plans will be prepared prior to project implementation.

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS  
22-Jan-2020

IV. CONTACT POINTS

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Borrower/Client/Recipient
Borrower: Togolese Republic  
Borrower: Republic of Niger  
Borrower: Republic of Benin  
Borrower: Burkina Faso

Implementing Agency(ies)
Implementing Agency: Ministry of Finance
Implementing Agency: Ministère du Développement de l’Économie Numérique et des Postes (MDENP)
Implementing Agency: Agence Nationale d’Identification des Personnes (ANIP)
Implementing Agency: Ministère des Postes, de l’Economie Numérique et des Innovations Technologiques

V. FOR MORE INFORMATION CONTACT
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VI. APPROVAL
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Practice Manager (ENR/Social) Aly Zulficar Rahim Recommended on 17-Jan-2020 at 10:09:22 EST
Safeguards Advisor ESSA Nathalie S. Munzberg (SAESSA) Cleared on 22-Jan-2020 at 09:42:12 EST