

Annex [#]. Social and Environmental Screening Template

The completed template, which constitutes the Social and Environmental Screening Report, must be included as an annex to the Project Document. Please refer to the [Social and Environmental Screening Procedure](#) for guidance on how to answer the 6 questions.]

Project Information

Project Information	
1. Project Title	Environmentally sound management and disposal of PCBs - Nigeria
2. Project Number	5720
3. Location (Global/Region/Country)	Nigeria

Part A. Integrating Overarching Principles to Strengthen Social and Environmental Sustainability

QUESTION 1: How Does the Project Integrate the Overarching Principles in order to Strengthen Social and Environmental Sustainability?
<i>Briefly describe in the space below how the Project mainstreams the human-rights based approach</i>

The project proposes a follow-up response to the issue of PCB impact which is faced by Nigeria – in a complement to a first phase of PCB work initiated with support from the GEF. In this regard it supports Nigeria's compliance with its obligations as per Multilateral Environmental Agreements, and most specifically the Stockholm Convention. It also aims to protect human rights insofar as allowing greater access of the population to an environment safe from harmful chemicals, particularly PCBs.

The Universal Declaration of Human Rights proclaimed by the General Assembly, contains a number of articles that are closely linked to the scope of the proposed project. These articles and the manner in which the project will ensure that the human-rights based approach is mainstreamed in the project, are the following:

Article 3. "Everyone has the right to life, liberty and security of person".

The project will remove harmful sources of pollution, both for workers in the impacted sectors as well as in the general population.

Article 19. "Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers".

The project will engage with the relevant stakeholders at every stage of its preparation and implementation, and will contribute to diffusion of key information related to environment in Nigeria.

The project will further strengthen the awareness of operators in the electric sector, including owners of electric transformer workshops, on the risks related to handling and recycling of POPs containing waste, and on the related Best Environmental Practices and Personal Protective Equipment (PPE) to be adopted to minimize the risks.

Article 23 (2) "Everyone has the right to work, to free choice of employment, to just and favorable conditions of work and to protection against unemployment".

The project will reduce the exposure to PCB waste by workers employed by holders of such PCB waste (in particular the Nigeria power companies) and working conditions (in terms of health impact) of facility staff who might come into contact with hazardous wastes. There will also be a positive impact on the general population, especially the communities close to the storage sites of PCBs.

Briefly describe in the space below how the Project is likely to improve gender equality and women's empowerment

It is fully acknowledged that particular attention ought to be given to the connections between gender concerns and chemicals. Namely, women, men and children differ in their physiological susceptibility to the effects of exposure to toxic chemicals. Furthermore, women are particularly influenced by the adverse impact of the hazardous chemicals due to the structure of their reproductive systems. POPs and particularly PCBs are particularly harmful due to their capacity to accumulate in body fats and in breast milk, therefore representing a significant risk for women and infants. Usually, risk-based environmental standards and risk-based corrective actions, following a precautionary approach are designed taking into account the highest risk for the most sensitive and exposed population categories, therefore environmental and toxicological limits already take into account the specific issue of women and infants.

During implementation, the project will address the priority concerns of vulnerable groups including women to assess and strengthen capacity to manage and handle PCBs. The project will ensure female participation in the related activities of training and capacity building. In addition, there will be two overarching interventions – awareness raising and multi-stakeholder's participation – that will contribute to ensuring the successful implementation of gender mainstreaming.

Briefly describe in the space below how the Project mainstreams environmental sustainability

The National Policy framework on PCBs management in Nigeria has been developed with the support of the GEF/WB project "PCB Management Project" and adopted by the Federal Executive Council (FEC) during its meeting of 4th March 2015. However, a regulation on PCB inventory and disposal in Nigerian, with the necessary associated provisions for the industry and potential PCB owners to manage their PCB contained equipment, is still missing.

The project will continue the work undertaken by the WB project. More specifically, the policy developed under the WB project will be used as a basis for drafting the Nigerian regulation on PCB, after the necessary revision and update. The proposed regulation will include PCB definition, obligation for the industrial sector on reporting on PCB contaminated equipment, reciprocal obligation of state administrations and federal administration, rules on analytical methodologies, rules on PCB equipment maintenance and phasing out. The project will also ensure proper communication with relevant stakeholders (Outcome 1.3), by arranging communication events and preparing communication documents aimed at raising awareness on the Stockholm convention, the POPs, and specifically the PCB issue. The access and participation of public and relevant stakeholders in

workshops, media events, and publications related the specific issues of PCBs ensured

In that sense, the project will generally encourage the mainstreaming of environmental sustainability, particularly related to safe management of chemicals, within the national priorities and best practices in Nigeria.

Part B. Identifying and Managing Social and Environmental Risks

QUESTION 2: What are the Potential Social and Environmental Risks? <i>Note: Describe briefly potential social and environmental risks identified in Attachment 1 – Risk Screening Checklist (based on any “Yes” responses).</i>	QUESTION 3: What is the level of significance of the potential social and environmental risks? <i>Note: Respond to Questions 4 and 5 below before proceeding to Question 6</i>			QUESTION 6: What social and environmental assessment and management measures have been conducted and/or are required to address potential risks (for Risks with Moderate and High Significance)?
<i>Risk Description</i>	<i>Impact and Probability (1-5)</i>	<i>Significance (Low, Moderate, High)</i>	<i>Comments</i>	<i>Description of assessment and management measures as reflected in the Project design. If ESIA or SESA is required note that the assessment should consider all potential impacts and risks.</i>
Risk 1: Release of pollutants to the environment due to routine or non-routine circumstances with the potential for adverse local, regional, and/or transboundary impacts, and risk to communities’ health and safety posed by the improper handling of hazardous waste during transport, storage and disposal.	I = 5 P = 2	High	Chlorinated PCBs wastes (concentrated liquid oils, cross-contaminated liquid oils and contaminated soils) will be collected, re-packaged and sent for high-temperature disposal (likely in an EU-based facility). Other less contaminated PCB material could be treated and decontaminated locally. If such wastes are not safely managed, this could cause harmful impacts to human health and environment. However, probability of accident or release to the environment is low and can be well anticipated/mitigated.	An environmental assessment (EA) and environmental management plan (EMP) will be designed in the project document for all expected hazardous waste management operations, including in particular PCBs and any other hazardous waste addressed throughout the project. This will cover the design of PCB equipment draining procedures, needed infrastructure and the sequencing of local works at PCB storage locations. PCB materials will be transported through a tender for processing to certified hazardous waste facilities outside the country, mostly located in the Western Europe. For less contaminated materials, an on-site decontamination will be considered as well. Operationally any future work will be undertaken by qualified, experienced service providers contracted by UNDP using specifications requiring current international standards and with substantive due diligence independent oversight and supervision. All operations, once the project is approved by the GEF, will be undertaken using rigorous, well established and documented international hazardous waste and dangerous goods management practices and procedures and standards, including those set out by

				Basel and SC convention and GEF STAP guidelines, and internationally referenced OHS procedures for on-site workers. No direct social impacts are associated with this operation and public information and consultation of the local communities will be provided for during the project's implementation. Logistic plans, especially for the domestic transportation and transportation to the point of export will be carefully developed and in compliance with international ADR rules, so that any risk to the population, or to the biodiversity – coming from a potential accident during that transportation - during transportation is minimized. Particularly as it relates particularly to Component 3 (“Establishment of PCB collection and treatment center”), it has to be noted that the selection of the site for the collection and treatment center will be based on environmental, logistical and social considerations. In principle, areas located within / in the vicinity of large electrical infrastructures (power distribution stations, power plants) will be considered. The collection and treatment center will have connection to the required utilities (electricity, water) and will be close to the main transportation network (highways and / or railways) to facilitate transportation of the PCB equipment and waste. The proper environmental permitting in compliance with the Nigerian law on the protection of the environment will be carried out. A sound transportation plan, with planned and well arranged “stop” areas along the journey, will ensure that risks due to domestic road transportation of PCBs until their final destination are kept under control. For all components, capacity building and training programmes will ensure the provision of internationally available expertise and advisory support, and specifically to local personnel involved in direct work on project sites, including on handling and transportation. Thus, in terms of sustainability, local workforce will benefit from upgraded skills. As an effort will be made to involve local, certified private companies, the project would potentially create local employment during its implementation and hopefully in the longer run as well.
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Risk 2: Climate risk	I = 1 P = 1	Low	This is related to the potential added GHG emissions due to the implementation of the project.	Minor climate change risks may be associated with the future project largely through fossil fuel consumption associated with its physical implementation including some PCB materials handling and transportation element, and its use of high temperature incineration or other thermal or moderately high energy consumption processes for the treatment and destruction of POPs. However, these are comparably smaller in scale considering the climate impact of these contaminants becoming more widely distributed in the environment and then much large volumes of contaminated material having to be captured and treated.
	QUESTION 4: What is the overall Project risk categorization?			
	Select one (see SESP for guidance)			Comments
	<i>Low Risk</i>	☐		
	<i>Moderate Risk</i>	x	EIA procedures will be prepared, and strong oversight and safety principles will be applied by UNDP Nigeria and the executing partners for the project, during the project implementation process. Regular communication with MPU/Chemicals on key project's milestones such as recruitment of international expertise, step-wise project implementation, and oversight missions are all advised. A thorough tendering process to select qualified sub-contractors with good track record and performance of similar contracts with UNDP or other GEF implementing agencies is strongly recommended. The preparatory phase (PPG) of this project will help determine whether the full project should remain in this "Moderate risk" category or re-qualified as "High risk".	
	<i>High Risk</i>	☐		
	QUESTION 5: Based on the identified risks and risk categorization, what requirements of the SES are relevant?			
	Check all that apply			Comments
	<i>Principle 1: Human Rights</i>	☐		
	<i>Principle 2: Gender Equality and Women's Empowerment</i>	☐		
	<i>1. Biodiversity Conservation and Natural Resource Management</i>	☐		
	<i>2. Climate Change Mitigation and Adaptation</i>	☐		

	3. Community Health, Safety and Working Conditions	X	
	4. Cultural Heritage	☐	
	5. Displacement and Resettlement	☐	
	6. Indigenous Peoples	☐	
	7. Pollution Prevention and Resource Efficiency	X	

Final Sign Off

Signature	Date	Description
QA Assessor Etienne Gonin MPU/Chemicals Istanbul Regional Hub		UNDP staff member responsible for the Project, typically a UNDP Programme Officer. Final signature confirms they have “checked” to ensure that the SESP is adequately conducted.
QA Approver		UNDP senior manager, typically the UNDP Deputy Country Director (DCD), Country Director (CD), Deputy Resident Representative (DRR), or Resident Representative (RR). The QA Approver cannot also be the QA Assessor. Final signature confirms they have “cleared” the SESP prior to submittal to the PAC.
PAC Chair		UNDP chair of the PAC. In some cases PAC Chair may also be the QA Approver. Final signature confirms that the SESP was considered as part of the project appraisal and considered in recommendations of the PAC.

SESP Attachment 1. Social and Environmental Risk Screening Checklist

Checklist Potential Social and Environmental Risks	
Principles 1: Human Rights	Answer (Yes/No)
1. Could the Project lead to adverse impacts on enjoyment of the human rights (civil, political, economic, social or cultural) of the affected population and particularly of marginalized groups?	No
2. Is there a likelihood that the Project would have inequitable or discriminatory adverse impacts on affected populations, particularly people living in poverty or marginalized or excluded individuals or groups? ¹	No
3. Could the Project potentially restrict availability, quality of and access to resources or basic services, in particular to marginalized individuals or groups?	No
4. Is there a likelihood that the Project would exclude any potentially affected stakeholders, in particular marginalized groups, from fully participating in decisions that may affect them?	No
5. Are there measures or mechanisms in place to respond to local community grievances?	No
6. Is there a risk that duty-bearers do not have the capacity to meet their obligations in the Project?	No
7. Is there a risk that rights-holders do not have the capacity to claim their rights?	No
8. Have local communities or individuals, given the opportunity, raised human rights concerns regarding the Project during the stakeholder engagement process?	No
9. Is there a risk that the Project would exacerbate conflicts among and/or the risk of violence to project-affected communities and individuals?	No
Principle 2: Gender Equality and Women's Empowerment	
1. Is there a likelihood that the proposed Project would have adverse impacts on gender equality and/or the situation of women and girls?	No
2. Would the Project potentially reproduce discriminations against women based on gender, especially regarding participation in design and	No

¹ Prohibited grounds of discrimination include race, ethnicity, gender, age, language, disability, sexual orientation, religion, political or other opinion, national or social or geographical origin, property, birth or other status including as an indigenous person or as a member of a minority. References to "women and men" or similar is understood to include women and men, boys and girls, and other groups discriminated against based on their gender identities, such as transgender people and transsexuals.

	implementation or access to opportunities and benefits?	
3.	Have women's groups/leaders raised gender equality concerns regarding the Project during the stakeholder engagement process and has this been included in the overall Project proposal and in the risk assessment?	No
3.	Would the Project potentially limit women's ability to use, develop and protect natural resources, taking into account different roles and positions of women and men in accessing environmental goods and services? <i>For example, activities that could lead to natural resources degradation or depletion in communities who depend on these resources for their livelihoods and well being</i>	No
Principle 3: Environmental Sustainability: Screening questions regarding environmental risks are encompassed by the specific Standard-related questions below		
Standard 1: Biodiversity Conservation and Sustainable Natural Resource Management		
1.1	Would the Project potentially cause adverse impacts to habitats (e.g. modified, natural, and critical habitats) and/or ecosystems and ecosystem services? <i>For example, through habitat loss, conversion or degradation, fragmentation, hydrological changes</i>	No
1.2	Are any Project activities proposed within or adjacent to critical habitats and/or environmentally sensitive areas, including legally protected areas (e.g. nature reserve, national park), areas proposed for protection, or recognized as such by authoritative sources and/or indigenous peoples or local communities?	No
1.3	Does the Project involve changes to the use of lands and resources that may have adverse impacts on habitats, ecosystems, and/or livelihoods? (Note: if restrictions and/or limitations of access to lands would apply, refer to Standard 5)	No
1.4	Would Project activities pose risks to endangered species?	No
1.5	Would the Project pose a risk of introducing invasive alien species?	No
1.6	Does the Project involve harvesting of natural forests, plantation development, or reforestation?	No
1.7	Does the Project involve the production and/or harvesting of fish populations or other aquatic species?	No

1.8	Does the Project involve significant extraction, diversion or containment of surface or ground water? <i>For example, construction of dams, reservoirs, river basin developments, groundwater extraction</i>	No
1.9	Does the Project involve utilization of genetic resources? (e.g. collection and/or harvesting, commercial development)	No
1.10	Would the Project generate potential adverse transboundary or global environmental concerns?	Yes: during the transboundary transportation of the hazardous waste for final disposal, there is such a risk (transportation by sea). One should consider this risk and related precautions during local transportation as well. However, all precautions are taken to minimize this risk, following international standards and regulations.
1.11	Would the Project result in secondary or consequential development activities which could lead to adverse social and environmental effects, or would it generate cumulative impacts with other known existing or planned activities in the area? <i>For example, a new road through forested lands will generate direct environmental and social impacts (e.g. felling of trees, earthworks, potential relocation of inhabitants). The new road may also facilitate encroachment on lands by illegal settlers or generate unplanned commercial development along the route, potentially in sensitive areas. These are indirect, secondary, or induced impacts that need to be considered. Also, if similar developments in the same forested area are planned, then cumulative impacts of multiple activities (even if not part of the same Project) need to be considered.</i>	No
Standard 2: Climate Change Mitigation and Adaptation		
2.1	Will the proposed Project result in significant ² greenhouse gas emissions or may exacerbate climate change?	No (as argued above, it will not be significant GHG emissions).
2.2	Would the potential outcomes of the Project be sensitive or vulnerable to potential impacts of climate change?	No
2.3	Is the proposed Project likely to directly or indirectly increase social and environmental vulnerability to climate change now or in the future (also known as maladaptive practices)? <i>For example, changes to land use planning may encourage further development of floodplains, potentially increasing the population's vulnerability to climate change, specifically flooding</i>	No

² In regards to CO₂, 'significant emissions' corresponds generally to more than 25,000 tons per year (from both direct and indirect sources). [The Guidance Note on Climate Change Mitigation and Adaptation provides additional information on GHG emissions.]

Standard 3: Community Health, Safety and Working Conditions	
3.1 Would elements of Project construction, operation, or decommissioning pose potential safety risks to local communities?	No. All operations will be subject to adhere to strict international requirements on PCB management, and such operations will be carried out by a selected certified and internationally acknowledged hazardous waste handling sub-contractors. Any local EIA assessments will be performed with support of the Government, where required by national law.
3.2 Would the Project pose potential risks to community health and safety due to the transport, storage, and use and/or disposal of hazardous or dangerous materials (e.g. explosives, fuel and other chemicals during construction and operation)?	Yes, risks are involved, see point 1.10 above.
3.3 Does the Project involve large-scale infrastructure development (e.g. dams, roads, buildings)?	No
3.4 Would failure of structural elements of the Project pose risks to communities? (e.g. collapse of buildings or infrastructure)	No
3.5 Would the proposed Project be susceptible to or lead to increased vulnerability to earthquakes, subsidence, landslides, erosion, flooding or extreme climatic conditions?	No
3.6 Would the Project result in potential increased health risks (e.g. from water-borne or other vector-borne diseases or communicable infections such as HIV/AIDS)?	No
3.7 Does the Project pose potential risks and vulnerabilities related to occupational health and safety due to physical, chemical, biological, and radiological hazards during Project construction, operation, or decommissioning?	Partially yes, but all best international practices will be applied to avoid exposure of workers to the impact of PCBs during their handling.
3.8 Does the Project involve support for employment or livelihoods that may fail to comply with national and international labor standards (i.e. principles and standards of ILO fundamental conventions)?	No
3.9 Does the Project engage security personnel that may pose a potential risk to health and safety of communities and/or individuals (e.g. due to a lack of adequate training or accountability)?	No
Standard 4: Cultural Heritage	
4.1 Will the proposed Project result in interventions that would potentially adversely impact sites, structures, or objects with historical, cultural, artistic, traditional or religious values or intangible forms of culture (e.g. knowledge, innovations, practices)? (Note: Projects intended to protect and conserve Cultural Heritage may also have inadvertent adverse impacts)	No
4.2 Does the Project propose utilizing tangible and/or intangible forms of cultural heritage for commercial	No

	or other purposes?	
Standard 5: Displacement and Resettlement		
5.1	Would the Project potentially involve temporary or permanent and full or partial physical displacement?	No
5.2	Would the Project possibly result in economic displacement (e.g. loss of assets or access to resources due to land acquisition or access restrictions – even in the absence of physical relocation)?	No
5.3	Is there a risk that the Project would lead to forced evictions? ³	No
5.4	Would the proposed Project possibly affect land tenure arrangements and/or community based property rights/customary rights to land, territories and/or resources?	No
Standard 6: Indigenous Peoples		
6.1	Are indigenous peoples present in the Project area (including Project area of influence)?	No
6.2	Is it likely that the Project or portions of the Project will be located on lands and territories claimed by indigenous peoples?	No
6.3	Would the proposed Project potentially affect the rights, lands and territories of indigenous peoples (regardless of whether Indigenous Peoples possess the legal titles to such areas)?	No
6.4	Has there been an absence of culturally appropriate consultations carried out with the objective of achieving FPIC on matters that may affect the rights and interests, lands, resources, territories and traditional livelihoods of the indigenous peoples concerned?	No
6.4	Does the proposed Project involve the utilization and/or commercial development of natural resources on lands and territories claimed by indigenous peoples?	No
6.5	Is there a potential for forced eviction or the whole or partial physical or economic displacement of indigenous peoples, including through access restrictions to lands, territories, and resources?	No
6.6	Would the Project adversely affect the development priorities of indigenous peoples as defined by them?	No

³ Forced evictions include acts and/or omissions involving the coerced or involuntary displacement of individuals, groups, or communities from homes and/or lands and common property resources that were occupied or depended upon, thus eliminating the ability of an individual, group, or community to reside or work in a particular dwelling, residence, or location without the provision of, and access to, appropriate forms of legal or other protections.

6.7	Would the Project potentially affect the traditional livelihoods, physical and cultural survival of indigenous peoples?	No
6.8	Would the Project potentially affect the Cultural Heritage of indigenous peoples, including through the commercialization or use of their traditional knowledge and practices?	No
Standard 7: Pollution Prevention and Resource Efficiency		
7.1	Would the Project potentially result in the release of pollutants to the environment due to routine or non-routine circumstances with the potential for adverse local, regional, and/or transboundary impacts?	Yes. Please see explanations under Item 3.2 and 1.10.
7.2	Would the proposed Project potentially result in the generation of waste (both hazardous and non-hazardous)?	Yes. The project is aimed at collection, re-packaging and disposal of PCB wastes in certified high-temperature incineration facilities, or for decontamination. The expected result is the removal of such known waste from the territory of Nigeria for minimization of human health and environmental impacts.
7.3	Will the proposed Project potentially involve the manufacture, trade, release, and/or use of hazardous chemicals and/or materials? Does the Project propose use of chemicals or materials subject to international bans or phase-outs? <i>For example, DDT, PCBs and other chemicals listed in international conventions such as the Stockholm Conventions on Persistent Organic Pollutants or the Montreal Protocol</i>	No, assuming the absence of accidental release during project implementation, which is what the precautionary measures are aiming to avoid.
7.4	Will the proposed Project involve the application of pesticides that may have a negative effect on the environment or human health?	No
7.5	Does the Project include activities that require significant consumption of raw materials, energy, and/or water?	No, except at very specific stage of the project. In case of deployment of PCB decontamination equipment in country, some consumption of energy to power that installation would be expected, but will fall into localized industry scale operation for a temporary period of time needed for renting such decontamination unit. This is not significant over the whole lifetime of the project

	3. <i>Community Health, Safety and Working Conditions</i>	X	
	4. <i>Cultural Heritage</i>	☐	
	5. <i>Displacement and Resettlement</i>	☐	
	6. <i>Indigenous Peoples</i>	☐	
	7. <i>Pollution Prevention and Resource Efficiency</i>	X	

Final Sign Off

<i>Signature</i>	<i>Date</i>	<i>Description</i>
QA Assessor Etienne Gonin MPU/Chemicals Istanbul Regional Hub 	30 July 2015	UNDP staff member responsible for the Project, typically a UNDP Programme Officer. Final signature confirms they have "checked" to ensure that the SESP is adequately conducted.
QA Approver		UNDP senior manager, typically the UNDP Deputy Country Director (DCD), Country Director (CD), Deputy Resident Representative (DRR), or Resident Representative (RR). The QA Approver cannot also be the QA Assessor. Final signature confirms they have "cleared" the SESP prior to submittal to the PAC.
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