

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

Appraisal Stage | Date Prepared/Updated: 02-May-2018 | Report No: PIDISDSA24447



BASIC INFORMATION

A. Basic Project Data

Country Angola	Project ID P167201	Project Name Additional Financing - Second Water Institutional Development Project	Parent Project ID (if any) P151224
Parent Project Name Second Water Sector Institutional Development Project	Region AFRICA	Estimated Appraisal Date 17-May-2018	Estimated Board Date 21-Jun-2018
Practice Area (Lead) Water	Financing Instrument Investment Project Financing	Borrower(s) Republic of Angola	Implementing Agency Ministry of Energy and Water

Proposed Development Objective(s) Parent

The Project Development Objective is to strengthen the institutional capacity of selected water sector agencies and increase water service coverage in target cities.

Components

Water Supply Institutional Strengthening and Capacity Development Water Resource Management Rehabilitation and Expansion of Water Supply Production and Distribution Management and Engineering Support Piloting Small-Scale Sanitation Service Delivery in Peri-Urban Areas

PROJECT FINANCING DATA (US\$, Millions)

SUMMARY

Total Project Cost	150.00
Total Financing	150.00
of which IBRD/IDA	150.00
Financing Gap	0.00

DETAILS

World Bank Group Financing



International Bank for Reconstruction and Development (IBRD)	150.00

Environmental Assessment Category

Partial Assessment (B)

Decision

The review did authorize the team to appraise and negotiate

B. Introduction and Context

Country Context

Angola is a resource-rich country, the seventh-largest country in size, the third-largest economy in Sub-Saharan Africa. Angola became independent in 1975 after being colonized by the Portuguese. Independence triggered a 27-year long civil war that killed more than a million people, displaced about 4 million people, and destroyed almost all infrastructure. Angola has a population of about 26 million, and, remarkably for a middle-income country with a per capita income of over US\$3,500, an estimated 28 percent of the population in 2014 still lived below the international poverty line of US\$ 1.90 (PPP 2011), and one in six urban people live in poverty.

Following its civil war, using revenues from oil and gas, the Government of Angola (GoA) invested heavily in infrastructure for energy, transport, and social services. In this time, considerable progress has been made in providing households with access to improved water supply and sanitation. However, Angola was not able to meet its Millennium Development Goal (MDG) targets for water and sanitation, as service expansion did not keep pace with population growth. Greater progress was made in reducing poverty, expanding access to primary education, and gender equality. Under-5 mortality has fallen from 207 (per 1,000 live births) to 83, but malnourishment rates remain high, as 29.2 percent of children under 5 are stunted and 15.6 percent are underweight (as of 2007).

As a resource-rich country, the Angolan economy cycle is dictated by the fluctuations in the price of oil. The drop in oil price that started in late 2014 depressed economic activity, led Angola to register large external imbalances, and more than halved government revenues, leading Angola to record high budget deficits, despite significant cuts on current and capital expenditures. The GoA initially took some hard adjustment measures, but it eventually reverted to a muddle-through policy in the run-up to the 2017 elections. The new administration has embarked on much needed reforms whose objective is to achieve macroeconomic stability, to create an environment conducive to economic growth, economic diversification and job creation, and to address the most pressing social problems. The GoA has shifted to greater exchange rate flexibility, tightened the monetary policy stance and resumed fiscal consolidation. The kwanza devalued near 30 percent to the US dollar in the third quarter of FY18. Inflation slowed to 23.4 percent in February. The government is targeting a fiscal deficit of 3.4 percent in 2018. The fast



adoption of economic reforms to correct macroeconomic imbalances and to improve the business environment has created a positive environment in Angola.

As a result of the drop in oil prices, Government revenues were more than halved from 2013 – 40.2 percent of GDP – to 2017, when it reached 17.7 percent of GDP. Expenditures had to be adjusted accordingly and were cut from 39.9 percent of GDP to 24.4 percent of GDP in the same period. Public investments suffered the largest cut going from 11.4 percent of GDP in 2013 to 3.8 percent of GDP in 2016, only to rebound modestly in 2017 to 6.2 percent of GDP due to elections. The sharp drop in revenues left the GoA with very limited resources of their own to fund public investments. During this period, almost all the public investment undertook was financed by external loans and counterpart funds were very limited. As a result, public investment on water declined from LCU 63.7 billion (0.53 percent of GDP) in 2013 to LCU 55.3 billion (0.33 percent of GDP) in 2016, latest figure available

Sectoral and Institutional Context

In urban areas in Angola, an estimated 82.5 percent of households have access to an improved water source, though only 45 percent have access at their premises and only 33 percent have access when needed (JMP 2015). The water supply coverage and sustainability of water supply service provision continue to be addressed under the first and second Water Sector Institutional Development Projects. Under these projects, the capacity of the Provincial Water and Sanitation Utilities (PWSUs) is being strengthened to increase their ability to provide reliable, cost effective services to all segments of the urban population. Given the progress seen in these areas, the Government is now ready to move forward the sanitation agenda and help ensure that households not only have access to improved latrines/toilets but also have access to the services that provide safe management of human waste.

Most urban households, 89.4 percent, now have access to an improved toilet/latrine – although among the poorest wealth quintile only 63.9 percent of households have access (JMP 2015, 2011). However, about 30 percent of these facilities are shared with neighboring households, and most of these facilities are attached to a pit or septic tank that has not been properly maintained. A small number of urban households, in the urban centers of Angolan cities, are connected to sewer networks (constructed during the colonial period), but even though these networks are located in the wealthier part of the city, they have not been maintained over the past decades and waste is released to local rivers untreated. Additionally, the pits and tanks, on which most households rely, require emptying, as they fill up over time, and further, in low-lying areas, these pits/tanks may overflow during rainy periods. Without an entity responsible for operating and maintaining a system to safely empty these pits and to take the waste to a treatment site, households are left to live in environments that may be heavily contaminated with fecal waste. Overall, in urban areas this means that most human waste receives minimal to no treatment before being released into the environment.

Low levels of access to sanitation lead to a higher disease burden due to waterborne illnesses. For example, Angola has been facing a cholera outbreak since December 2017. Further, diarrhea is the leading cause of death in Angola (Global Burden of Disease Study 2016). In 2016 alone, an estimated 9,121 deaths were attributable to diarrhea caused by poor sanitation, and 4,723 of those deaths were in children under 5. An additional 6,467 deaths were attributable to diarrheal illness caused by lack of access to



handwashing facilities.

The challenges of urban sanitation will continue to rise as Angola continues to urbanize and as water supply access continues to increase – both under WSIDP2 and other GoA projects. Urbanization rates have declined since 2004, but remain high at 5.1 percent per year. As urban populations rise, sanitation service delivery will need to increase, not only to provide toilets/latrines, but also to ensure that the waste generated at the household level receives an appropriate level of treatment before being released into the environment.

C. Proposed Development Objective(s)

Original PDO

The Project Development Objective is to strengthen the institutional capacity of selected water sector agencies and increase water service coverage in target cities.

Current PDO

The PDO will remain unchanged as the proposed additional component will continue to support the strengthening of institutional capacity of the same selected water sector agencies

Key Results

Approval of guidelines for participatory urban sanitation master planning Sanitation Master Plans for 9 Provincial Capitals 35,000 people provided with safely managed sanitation service delivery under the project National strategy for scaling up piloted approach to urban sanitation

D. Project Description

The project will approach sanitation as a service to be delivered, and as such, will include activities to support national and provincial institutions in carrying out their mandates for sanitation service delivery, policy implementation and regulation as well as pilot activities to increase access (through infrastructure improvements). In line with this approach, technical solutions will consider the full sanitation service chain – i.e., household containment, collection, conveyance, treatment and safe disposal. For this purpose, the project will use the Citywide Inclusive Sanitation approach (further detailed in the project paper). Two sub-components are proposed in this AF.

Sub-Component 5a: Citywide Inclusive Sanitation Planning and Institutional Development (IBRD financing US\$ 2 million). This sub-component will support the national and provincial agencies in planning for the necessary institutional, policy and regulatory changes that will be required in order to carry out their mandates for sanitation, through: (a) the provision of technical assistance to The National Directorate of Water (DNA), and the Regulatory Agency (IRSEA); (b) Development of the proposed approach and guidelines for the preparation of the Participatory Sanitation Master Plans; (c) the provision of technical assistance to the Provincial Water and Sanitation Utility of the benefited Province; (d) the provision of TA to undertake a study exploring the possible role of private sector service providers for urban sanitation service provision; (e) support to develop behavior change/information education campaigns in the pilot communities to educate households on the importance of proper sanitation and hygiene behaviors; and (f) the development of a national strategy



for scaling up the approach to urban sanitation. The parent project will finance the actual TA activities and the updating of sanitation master plans, for each of the nine cities, which will consider a range of technical solution for providing services to the whole city (as compared to the existing plans that focus on sewered sanitation only in the central part of the city.

Sub-Component 5b: Piloting of Delivery of Small-Scale Sanitation Services in Peri-Urban Areas (IBRD financing US\$ 53 million). Under this sub-component, infrastructure improvements will be implemented in select peri-urban areas to provide the PWSU(s), who are responsible for both water supply and sanitation, with an opportunity to pilot onsite sanitation service delivery. The piloting will take place in one or more of the nine provincial capitals (additional information on each city is provided in Annex 1). The specific city (or cities) will be chosen through a competitive process, based on completion of the updated sanitation master plans, PWSU readiness and performance, and PWSU and provincial government support.

E. Implementation

Institutional and Implementation Arrangements

Institutional and implementation arrangements will replicate the arrangements agreed under WSIDP I, and WSIDP II, building upon the capacity built in the existing implementing unit at MINEA. Project management will be overseen by MINEA. Project implementation will rely on a dedicated FCMU for the World Bank/AFD project (FCMU-WB), which will report to the MINEA Project Director, and will be mainly staffed by local and international consultants. The FCMU-WB will manage all WSIDP II and WSIDPII-AF activities, including procurement, financial management and accounting for project funds, as well as coordination with other agencies and institutes involved in the project

Project beneficiary agencies at the national level (IRSEA, and DNA) will be responsible for establishing the agencies' priorities regarding the provision of sanitation services; and for supporting the FCMU-WB throughout the procurement process related to each agency. Institutional support to the benefited/chosen PWSU, as well as all infrastructure investments under *Sub- Component 5b* in the selected city, will be closely coordinated by the respective PWSUs, the corresponding provincial government, and DNA. Beneficiary agencies shall provide periodic reports to the FCMU-WB on the progress of activities supported by the project for their respective components.

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

The project investments will be in a subset of the nine provincial capitals: Kuito-Cunje, Huambo, Lubango, Namibe, N'dalatando-Villa De Lucala, Malange, Uige, Dundo, and Luena (all included under WSIDP2). Given the nature, scale and scope of the infrastructure investments planned, the potential adverse environmental and social impacts of the project are expected to be moderate, reversible and temporary. The civil works will be carried out either on land already owed by GoA or along existing roads right-of-way. The Bank safeguards team carried out field assessments in some of the municipalities and concluded that there are no protected areas for nature conservation, species or habitats of particular interest that will be directly or indirectly affected. It is expected that most of the potential adverse environmental and social impacts associated with the project investments will be avoided and/or mitigated through provisions that will be



adopted during project preparation and/ the design stage. The proposed WSIDP2 AF is an extension of the ongoing WSIDP2, which is a Category B project. WSIDP2 AF is also a - Infrastructure investments under (c) will be constructed on the existing rights-of-way of roads. During field visits, the project team observed that the road rights-of-way envisaged for the investments are free of encroachment, but detailed information about any required land acquisition and/or impact on livelihoods (such as of street vendors who may eventually use the area) will be available only during the preparation of the detailed engineering designs. Given the technical a flexibility allowed for the installation of water pipelines, it will be possible to avoid land acquisition and also impacts on livelihoods. In case these impacts cannot be avoided, the Government will follow the provisions in the RPF addressing compensation requirements.

G. Environmental and Social Safeguards Specialists on the Team

Kristyna Bishop, Social Safeguards Specialist Benjamin Burckhart, Social Safeguards Specialist Paulo Jorge Temba Sithoe, Environmental Safeguards Specialist Mario Rizzolio, Social Safeguards Specialist

SAFEGUARD POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	Like the parent project, WSIDP II AF was classified Environmental Category B. WSIDP II AF will finance the sanitation utilities and development of sanitation master plans. The nature, scale and scope of the infrastructure investments proposed for the project are similar to those financed under the original project. Specific project investments will finance the construction or rehabilitation of sanitation systems (sewerage networks, household latrines, fecal sludge treatment facilities). Such activities, will largely contribute to positive outcomes, such as reducing the prevalence of unhygienic environmental conditions in urban neighborhoods which cause high rates of child stunting, trigger cholera epidemics and chronic diarrhea outbreaks, and lead to high child mortality, while also generating significant adverse environmental and social impacts that require due



		safeguards consideration. Consequently, OP/BP 4.01 on Environmental Assessment is triggered and the borrower will update the existing Environmental and Social Management Framework (ESMF) to reflect changes in the project nature and scope brought by the AF. any subsequent site-specific safeguard tools, such as the Environmental and Social Screening Checklist (ESSC) and the Environmental and Social Management Plan (ESMP), will be reviewed, as well as the environmental clauses and penalties for non- conformity to the ESMP. The ESMF updating process was subject to public consultation and publicly disclosed prior to appraisal.
Performance Standards for Private Sector Activities OP/BP 4.03	No	There are no applicable Private Sector Activities under the project.
Natural Habitats OP/BP 4.04	No	There are no sensitive or critical natural habitat areas affected by proposed investments.
Forests OP/BP 4.36	No	The project does not involve or affect forests.
Pest Management OP 4.09	No	The proposed project activities do not require the use of pesticides or other inputs that trigger this policy.
Physical Cultural Resources OP/BP 4.11	No	The presence of physical cultural resources has not been identified in the project area. In addition, the project will avoid disturbing or affecting physical cultural resources. Nonetheless, civil works contracts will include "chance finds" procedures as described in the project ESMF.
Indigenous Peoples OP/BP 4.10	No	There are no Indigenous Peoples in the project area.
Involuntary Resettlement OP/BP 4.12	Yes	OP/BP 4.12 is triggered for this project due to the nature of the proposed investments; a Resettlement Policy Framework (RPF) has therefore been prepared that establishes the standards and procedures to follow in the event that individual investments have been determined to result in possible impacts on households and/or businesses. The RPF prepared for the WSDIP II was subject to broad public consultation in the nine beneficiary cities and has been disclosed in Angola (09/27/2016 and 10/05/2016) and at the Banks external website (10/05/2016). The RPF is currently being updated to take into consideration the sanitation construction activities under the AF and guide the FCMU in the mitigation of any resettlement impacts that may occur.



		The project has been reviewed for resettlement issues, and procedures for activities that may require land acquisition have been agreed with the GoA. During the detailed planning and design of individual sub-projects, a screening process will determine whether or not a Resettlement Action Plans (RAP) should be prepared due to land acquisition needs, impacts on assets, or impacts on livelihoods. It is expected that engineers will try to utilize unused government land and rights-of-way when designing distribution networks in order to reduce the number of affected households and businesses. For cases where project activities cannot find unused public land for project investments, a RAP will be prepared based on the guidance and standards set forth in the RPF. The RAP will be prepared by the Borrower, reviewed and cleared by the World Bank, and implemented so that affected persons will receive compensation prior to project activities.
Safety of Dams OP/BP 4.37	Yes	The project is supporting TA related to dams and dam safety planning in Angola though no physical works in relation to small or large dams will be undertaken under the project, nor do any project investments rely on the appropriate operation of an existing dam.
Projects on International Waterways OP/BP 7.50	Yes	OP 7.50 International Waterways is triggered by the WSDIP II AF project. However, the exception to the notification requirement was approved by RVP on April 26, 2018, as the activities supported will have minor, if any, impact on international waterways
Projects in Disputed Areas OP/BP 7.60	No	The project is not taking place in disputed areas.

KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

A. Summary of Key Safeguard Issues

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

WSIDP II AF is an extension project from WSIDP II, and as this will finance the sanitation utilities and development of sanitation master plans. Through the AF, a select number of pilot interventions will be constructed in any of the nine cities and specific pilot sites will be chosen based on 1) the master plans and 2) the preparedness of the Provincial Water and Sanitation Utilities (PWSUs) relative to one another. Specific project investments will finance the construction or rehabilitation of sanitation systems (sewerage networks, household latrines, fecal sludge treatment

facilities). Such activities, will largely contribute to positive outcomes, such as reducing the prevalence of unhygienic environmental conditions in urban neighborhoods which cause high rates of child stunting, trigger cholera epidemics and chronic diarrhea outbreaks, and lead to high child mortality, while also generating significant adverse environmental and social impacts that require due safeguards consideration. Consequently, OP/BP 4.01 on Environmental Assessment is triggered and the borrower will update the existing ESMF to set forth guidance and procedures to address likely adverse impacts from the proposed projects investments. The project is classified as Category B in the World Bank's Environmental Assessment categorization. Adequate environmental management measures, procedures and instruments are expected to be able to adequately manage likely impacts resulting from the project (primarily pollution from wastes/residues on soil, eventual oil spills from generator filling, and health and safety risks).

The nature, scale and scope of the infrastructure investments proposed for the AF project are different to those financed under the parent project and the precise location of project activities and their footprints will not be known prior to appraisal. Hence, the Environmental and Social Management Framework (ESMF) will be updated to reflect changes in the project nature and scope. The existing environmental safeguard tools prepared for different subproject under the original project, such as the Environmental and Social Screening Checklist (ESSC) and the Environmental and Social Management Plan (ESMP), will be reviewed, as well as the environmental clauses and penalties for non-conformity to the ESMP. Both ESMF and RPF will be made available for public consultation and disclosed prior to appraisal.

In addition to the activities planned under WSIDP II an Additional Financing is currently under preparation. The AF will support the Sanitation Master plans and Pilot Sanitation Infrastructure in same the cities targeted by WSIDP II. Although the exact location of the interventions is not yet known, the type of technical solutions to be implemented will be chosen considering specific urban context of each area while also avoiding any resettlement impacts. In case such impacts cannot be avoided, the Resettlement Policy Framework (RPF) for WSIDP II is currently being updated by the FCMU and will consider impacts that may occur due to the sanitation construction activities.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:

The civil works and other construction and rehabilitation activities proposed under the AF project are relatively small in scale and the potential adverse environmental and social impacts are expected to be minor, localized, and readily manageable. Indirect and long-term impacts are not expected at this time, barring any major cumulative impacts caused by the larger water sector investments in select target cities that are being implemented in tandem with some of the activities of this project. Such impacts will be further assessed during the preparation of site-specific ESIA/ESMP.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.

Within the master plan for a given city, more than one technical solution for the sanitation utilities may be pursued, as different parts of the city may be best serviced by different types of technologies. Through the AF, a select number of pilot interventions will be constructed. Notwithstanding, the cities and specific pilots will be chosen based on 1) the master plans and 2) the preparedness of the PWSUs relative to one another. Since the specific technologies to be implemented will be selected based on the master plans, at this time it is not possible to know exactly which technologies will be pursued, nor in what geographic locations the interventions will happen. Consequently, the preparation of master plan will also take into consideration technical solutions for sanitation utilities that seek to minimize adverse environmental impacts.

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

The FCMU (the project implementing agency) updated the ESMF and the RPF originally prepared for WSIDP I for



WSIDP II. The ESMF and RPF have been reviewed and cleared by the Bank and publicly disclosed. Both the ESMF and RPF include clear guidelines and measures to mitigate any adverse environmental and social impacts of the project investments, almost all of which are related to construction.

The ESMF existing provides a screening process for establishing the level of environmental management required for each type of project activity. The ESMF and RPF are currently being updated to take into consideration the sanitation construction activities under the AF and guide the FCMU in the mitigation of any adverse impacts that may occur.

Borrower's capacity to implement environmental safeguard policies during WSIDP I has proven to be acceptable. The existing FCMU includes three experienced safeguards specialists who among other donor's funded projects, oversee WB operations. Safeguard procedures in the FCMU are well established and considered to be satisfactory. During WSIDP implementation, the Borrower has prepared, consulted, and disclosed in-country and at the Bank's external website more than 19 safeguards documents, including several ESMPs for different construction sites across the country. The capacity of existing team and procedures along with their ability to manage additional environmental and social risks brought by WSIDP II AF activities was further assessed in the updated ESMF and budgeted accordingly.

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

Project stakeholders include DNA, the PWSUs, provincial and municipal authorities, community leaders and residents where the WSIDP II AF investments will be made.

Both the ESMF and RPF were publicly made available for consultation to key project stakeholders (March 26, 2018). The target audience for the public consultations included provincial and municipal governments, civil society, and local communities in the cities where the bulk of the project activities will be implemented. All project beneficiaries have access to the Portuguese version of the summaries of the ESMF and RPF in their city. The recommendations and discussions were adequately captured and included in the final versions of the ESMF and RPF. These documents will be publicly disclosed in-country prior to appraisal.

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

Environmental Assessment/Audit/Management Plan/Other

"In country" Disclosure		
06-Apr-2018	30-Apr-2018	
Date of receipt by the Bank	Date of submission for disclosure	For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors

Angola 28-Apr-2018

Comments

The ESMF was publicly disclosed on MINEA's website www.pdisa-minea.com

Resettlement Action Plan/Framework/Policy Process



Date of receipt by the Bank	Date of submission for disclosure		
06-Apr-2018	30-Apr-2018		
"In country" Disclosure Angola 28-Apr-2018			
Comments			
The RPF was publicly disclosed on MI	NEA's website www.pdisa-minea.com		
If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.			
If in-country disclosure of any of the a	above documents is not expected, please explain why:		
C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting) (N.B. The sections below appear only if corresponding safeguard policy is triggered)			
OP/BP/GP 4.01 - Environment Assess	ment		
Does the project require a stand-alone EA (including EMP) report? No			
OP/BP 4.12 - Involuntary Resettleme	nt		
Has a resettlement plan/abbreviated Yes	plan/policy framework/process framework (as appropriate) been prepared?		
If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan? Yes			
Is physical displacement/relocation expected?			
No Is economic displacement expected? (means of livelihoods) No	loss of assets or access to assets that leads to loss of income sources or other		
OP/BP 4.37 - Safety of Dams			

Have dam safety plans been prepared?

No

Have the TORs as well as composition for the independent Panel of Experts (POE) been reviewed and approved by the Bank?



No

Has an Emergency Preparedness Plan (EPP) been prepared and arrangements been made for public awareness and training?

NA

OP 7.50 - Projects on International Waterways

Have the other riparians been notified of the project?

No

If the project falls under one of the exceptions to the notification requirement, has this been cleared with the Legal Department, and the memo to the RVP prepared and sent?

Yes

Has the RVP approved such an exception?

Yes

The World Bank Policy on Disclosure of Information

Have relevant safeguard policies documents been sent to the World Bank for disclosure?

Yes

Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?

Yes

All Safeguard Policies

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?

Yes

Have costs related to safeguard policy measures been included in the project cost?

Yes

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?

Yes

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?

Yes

CONTACT POINT

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APPROVAL

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Approved By

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