



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

Appraisal Stage | Date Prepared/Updated: 10-Oct-2017 | Report No: PIDISDSA22083



BASIC INFORMATION

A. Basic Project Data

Country Iraq	Project ID P163108	Project Name Iraq Social Fund for Development	Parent Project ID (if any)
Region MIDDLE EAST AND NORTH AFRICA	Estimated Appraisal Date 02-Oct-2017	Estimated Board Date 30-Nov-2017	Practice Area (Lead) Social Protection & Labor
Financing Instrument Investment Project Financing	Borrower(s) Economic Reform Unit - Prime Minister's Office	Implementing Agency Ministry of Planning	

Proposed Development Objective(s)

The project development objective is to: (i) improve access to basic services and; (ii) to increase short term employment opportunities, in targeted communities.

Components

Financing Community Sub-projects
Supporting Microfinance Systems Strengthening
Capacity Building and Institutional Development

The processing of this project is applying the policy requirements exceptions for situations of urgent need of assistance or capacity constraints that are outlined in OP 10.00, paragraph 12.

Yes

Financing (in USD Million)

Financing Source	Amount
International Bank for Reconstruction and Development	300.00
Total Project Cost	300.00

Environmental Assessment Category

B - Partial Assessment

Decision

The review did authorize the preparation to continue



Other Decision (as needed)

B. Introduction and Context

Iraq has seen its development challenged by decades of conflict and economic deterioration, with the twin crises of declining oil revenues and an ongoing war against ISIS, which in 2014 are estimated to have reversed the gains in poverty reduction between 2007 and 2012, raising the poverty headcount to 22.5 percent and pushing an additional three million people into poverty. More than four million Iraqis have been displaced by the country's various conflicts. While oil prices have recovered to some extent recently and there has been progress in the fight against ISIS with the recent liberation of Mosul, Iraq's multifaceted fragility leaves it vulnerable to shocks in the future.

On the other hand, many parts of Iraq are affected by poor basic social and economic infrastructure and lack of job opportunities, particularly in conflict and liberated areas. Government action to address these challenges is constrained by the little presence of and trust in the State. There is an incipient but determined decentralization reform process, which will eventually devolve the responsibility for the delivery of basic services to Governorates. However, it will take some time before governorates are able to effectively take on this responsibility in a way that makes them accountable to the central government and to citizens. In the meantime, large parts of the country suffer from these challenges which, if left unattended, will generate more conflict and instability.

Equal opportunities to access quality basic services and jobs is the foundation for sustainable inclusive growth, peace, and stability in Iraq, and decentralization can help promote greater accountability and responsiveness. There is evidence that a community-driven social fund-type of program could help address these immediate challenges by delivery of assistance to disadvantaged and conflict-affected communities to help rebuild basic social and economic infrastructure and to create temporary jobs.

Sectoral and Institutional Context

The Government of Iraq (GOI) has embarked on a comprehensive Social Protection reform that introduced significant improvements to the existing system, promoting equity, resilience and opportunities for the Iraqi people. Through the World Bank Iraq Emergency Social Protection Support Program – Phase I (P099295), it has developed and progressed in the implementation of the Social Protection Strategic Roadmap 2015-2019, with the vision of having “a comprehensive social protection system for Iraq covering social safety nets, social insurance, and labor market policies”. Two major achievements were the shift from categorical to poverty targeting in social assistance that improved outreach to the poor; and the issuance of the new integrated Social Insurance Law that is likely to have a positive impact on labor mobility and fiscal rationalization of the pensions fund.

Complementing this work, the GOI requested World Bank support in the design and financing of a Social Fund for Development (SFD) to support locally driven initiatives to improve the living conditions and opportunities of the poor and vulnerable in Iraq. Since early 2017, the World Bank has conducted high level discussions with senior decision makers in Iraq, and provided broad guidance on the conceptual framework based on international good practices relevant to the Iraq context. The agreed-on objective of the SFD program is to contribute to sustainable development of local communities and support and empower them to improve their livelihoods and access to basic services. The SFD would be a platform for mobilizing resources for communities to undertake locally driven initiatives.



In preparation for the proposed project, the GOI established a high-level national team to guide and coordinate the development and institutionalization of the SFD, as well as five technical teams to work on the different aspects of the fund, namely: (i) Governance, Institutional, and Legislation; (ii) Financing and International Cooperation; (iii) Civil Society Organizations and Community Engagement; (iv) Operations and Implementation; and (v) Monitoring and Evaluation. Together with the support of the World Bank, these teams have developed the design of the SFD. It was agreed that the SFD will be established by law as an autonomous institution that does not operate under civil service rules. It is expected that the law will take some time to be issued and the SFD to be established and fully operational.

The project will provide the opportunity to build the capacity of local government and anticipate the sustainability of the project. An Operational Manual (OM) was developed with the support of the World Bank that addresses all operational aspects related to the SFD including community targeting methods, community engagement aspects, and fiduciary and safeguards aspects.

C. Proposed Development Objective(s)

Development Objective(s) (From PAD)

The project development objective is to: (i) improve access to basic services and; (ii) to increase short term employment opportunities, in targeted communities

Key Results

- Households benefitting from improved access to basic services;
- Beneficiaries of short term employment, of which women.

D. Project Description

The proposed project will support the establishment of the Iraq Social Fund for Development (SFD) and provide support to targeted communities to improve access to basic services and employment opportunities. The project will aim to increase participatory planning, management and delivery of public infrastructure services to targeted communities. This will be achieved through: (i) financing for community level subprojects in education, health, water, small-scale economic infrastructure, and access to markets; (ii) enhancing the capacity of micro finance institutions to support micro and small enterprise development; and (iii) provision of technical assistance and capacity building. The project will benefit targeted communities, local government, NGOs, MFIs, the Ministry of Planning (MOP), and the eventual SFD institution.

The SFD will scale-up across all of Iraq over a period of five years starting in January 2018, using a phased approach. The fund will begin with three governorates, and expand to seven in year two, and subsequently to all 18 by year five. The program would support community-level social and economic infrastructure, and micro-finance systems strengthening. Significant capacity building would be embedded in the project for the establishment and management of the SFD and for local government, communities, micro-finance institutions, and related NGOs. The project will include three components as follows:

Component 1 – Financing Community Sub-projects: The objective of this component is to improve access of communities to basic social services. It will finance subprojects at the local level, that consist of basic services



that represent priority investments identified by the community. These will be based on an open menu that typically includes investments that can be realized using labor-intensive techniques and maximizing the use of local materials. The work will start with Muthanna, Salahdiheen, and Dohuk in the first year, and expand to Ninawa, Baghdad, Thi qar, and Qadisiya, in the second year, and then to all 18 governorates by year five.

Component 2 – Supporting Microfinance Systems Strengthening: The objective of this component is to support the establishment of the overall MSE program of SFD through technical assistance and capacity building activities. Support will be provided to the Government of Iraq on: (i) enhancing the ability to manage MFIs that will be engaged under the SFD in the future; (ii) review regulatory environment to allow MFIs to function without market distortions; and (iii) develop a framework for structured financing that would allow for flow of funds from SFD to MFIs in a sustainable manner, while meeting SFD objectives. The component, once implemented would allow for capitalization of the MFI sector based on good practices that would ensure: (i) proper outreach; (ii) sustainability; and (iii) impact.

Component 3 – Capacity Building and Institutional Development: This component will provide overall implementation and project management support for the duration of the project, to the establishment and operation of the SFD. This will include: (a) supporting MOP in managing the SFD functions during the establishment phase and project management activities; (b) providing institutional development for the eventual SFD autonomous institution; (c) building the capacity of local government, community groups and NGOs; and (d) contracting NGOs to undertake social and economic assessment for local communities.

E. Implementation

During the establishment phase of SFD, which is expected to last approximately two years, MOP with its central and local offices will manage the SFD operations. The objective is that once the SFD law is issued and the institution is fully operational, all functions would be transferred from MOP to SFD.

Project Management Office and Teams at MOP

During the establishment phase, and until the SFD law is enacted, MOP will manage implementation of SFD. Overall interim implementation will be guided by a Steering Committee (SC) that will be chaired by the Secretary General (SG) (CoMSec). The SC would include, broadly, membership that mirrors that of the SFD Board of Trustees. These interim arrangements are expected to last approximately two years, depending on the speed by which (i) the law can be enacted by the Council of Representatives; and (ii) the length of time it will take to set up the organizational aspects of the SFD institution. In the interim, a Project Management Office (PMO) will be established at the MOP, under the Directorate General of the Poverty Reduction Strategy, to oversee implementation of SFD. At the level of the governorates, Project Management Teams (PMTs) will be established at the MOP offices located in the governorates.

The PMO will be headed by a Project Manager, and will include the following functions: social development, communications, fiduciary, environment, social, monitoring, evaluation, and administration. Each PMT will be managed by a Project Manager, and will include a Procurement Specialist, a Community Development Specialist, a M&E Specialist, and an Administrative Assistant, in addition to specialist engineers assigned based on local community subprojects. The PMO and PMT staff would eventually be transferred to the SFD institution once it is established and functional.

In terms of implementation, the modality at the Kurdistan Regional Government (KRG) will slightly differ from that of



the rest of Iraq. The key difference is that the SFD, while managed overall centrally at KRG MOP, will be implemented locally by the local governments in Dohuk, Sulimani, and Erbil. In this regard, the KRG MOP will play the secretariat role for SFD, and will coordinate closely with the governorates who will undertake activities related to implementation, including fiduciary and safeguards requirements. This arrangement is based on prior KRG experience with the Iraq Trust Fund financed Consultative Services Delivery Project, and is expected to further strengthen local government in addressing socio-economic requirements for local communities. The subproject cycle, at the local level, remains unchanged from the rest of Iraq, as are all other aspects of the SFD.

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

The exact locations of the project interventions are still not defined. The sub-projects to be implemented under Component 1 consist of small scale repair, rehabilitation, and additions to existing facilities (e.g. addition of 2-3 classrooms to existing schools, repair/rehab of a health center, as well as paving/rehabilitation of existing roads). The expected scale of the interventions under Component 1 is thus very small. In addition, small scale infrastructure that represents priority investments identified by the community will require minor civil works. These sub-projects will be determined based on a menu that typically includes investments that improve access to basic services, and investments that can be realized using labor-based techniques and maximizing the use of local materials. During the establishment phase (whereby the Ministry of Planning (MOP) with its central and local offices will manage SFD operations-expected to effectively begin in January 2018), will encompass seven governorates, starting with Muthanna, Salahdieen, and Dohuk in the first year, and expanding to Ninawa, Baghdad, Thiqr, and Qadisiya in the second year. The objective of Component 2 is to support the strengthening of microfinance systems; and Component 3 will provide overall implementation and project management support to the establishment and operation of the SFD. No specific physical characteristics are associated with these two components. The common feature for all project interventions, particularly under Component 1, is the strict adherence to pre-existing footprints of buildings, structures and linear infrastructure, which were damaged, destroyed, sabotaged or stolen during combat activities and occupation by the terrorist groups. Most of the interventions are expected to take place in urbanized areas, which are currently characterized by very low environmental baseline conditions, mainly due to acts of war and related deterioration and negligence (such as: rubble and UXO presence, unregulated waste disposal, breakdown of environmental services, and presence of contaminations from oil / fuels and ammunitions). Among the positive impacts of the overall project interventions is that the Government of Iraq will ensure clearance of rubble and UXO to pave the way for project activities.

G. Environmental and Social Safeguards Specialists on the Team

Ehab Mohamed Mohamed Shaalan, Environmental Safeguards Specialist
Amer Abdulwahab Ali Al-Ghorbany, Environmental Safeguards Specialist
Ibrahim Ismail Mohammed Basalamah, Social Safeguards Specialist



SAFEGUARD POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	The project will involve simple infrastructure works including physical / civil works, dealing with rubble removal, clean-up and reconstruction activities. While expected to be implemented in small increments and on existing footprints, these works will require a solid ESMF which will be annexed with screening tools to provide the guiding principles for selecting the appropriate safeguards instruments and sets out the requirements and guidance for preparation of ESMPs. The ESMPs will be site specific and will include specific measures to avoid, minimize and mitigate potential negative impacts routinely associated with construction activities of the foreseen scale. The PMO will be responsible for submitting the TORs for preparing the ESMF by December 17, 2017, and preparing, consulting on and disclosing the ESMF by March 2018. Site-specific ESMPs should be prepared prior to any construction activities. The PMO will be responsible for preparing the ESMF and ESMPs prior to any construction activities. The PMO will rely on external consultants to prepare the required safeguards instruments.
Natural Habitats OP/BP 4.04	No	The project is confined to existing footprints of structures and located in urbanized areas, thus no sensitive or protected habitats will be affected and OP 4.04 is not triggered.
Forests OP/BP 4.36	No	The project is confined to existing footprints of structures, roads, bridges etc., and mainly located in urbanized areas, and no forests are existing within the project boundaries. OP 4.36 is not triggered.
Pest Management OP 4.09	No	No activities will be financed that will require the purchase, storage, handling, or use of pesticides or herbicides. OP 4.09 is not triggered.
Physical Cultural Resources OP/BP 4.11	Yes	Iraq is extremely rich in Physical Cultural Resources (PCR), and the destruction experienced during the conflict is most likely to have affected historical buildings, religious sites such as mosques and shrines, and monuments. Destruction may have been random acts of war, but also targeted acts of



		sectarian violence. Dealing with PCR has been addressed in the SAP. OP 4.11 is thus triggered as a precautionary measure which will include mitigation measures/chance find procedures and will be elaborated on in the ESMF.
Indigenous Peoples OP/BP 4.10	No	The project will not finance any activities that affect indigenous peoples, thus OP 4.10 is not triggered.
Involuntary Resettlement OP/BP 4.12	Yes	As a general principle, all activities are planned to take place on existing footprints. Nevertheless, there is a small possibility that reconstruction works may temporarily affect access to livelihoods or residences, or require temporary use of private land and/or relocation of encroachers/squatters. OP4.12 is thus triggered as a precautionary measure. Since the location of individual subprojects is not known, and if taking of land is needed in the project, an RPF will be prepared which will set out the general principles and procedures for compensation and resettlement requirements and the guidelines for the preparation of RAPs or ARAPs if required. Additionally, during the life of the project, voluntary land donation (VLD) is envisioned as a contribution by the community with no pressure and will only be eligible if a consent form is signed and attached to the subproject. A screening checklist will be adopted and will exclude subprojects that require involuntary taking of land.
Safety of Dams OP/BP 4.37	No	No reconstruction activities involving dams are included in the project. OP 4.37 is not triggered.
Projects on International Waterways OP/BP 7.50	No	No water abstraction or works on transboundary water bodies are within the scope of the project. OP 7.50 is not triggered.
Projects in Disputed Areas OP/BP 7.60	No	While the project will target areas recently liberated from terrorist groups, these areas are not deemed “disputed” in the sense of this policy, as the terrorist groups have no international recognition and would thus not be a claimant with any legitimacy to any liberated territories. OP 7.60 is not triggered.



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:

The proposed project interventions are expected to have major positive social benefits which will contribute to the improvement of the living conditions of the Iraqi people in addition to improvement of the overall environmental status in the liberated lands. However, due to the minor civil works which are expected to take place, potential negative impacts will be associated with subproject activities. Air and dust emissions during excavations or movement of soils as well as noise generation from machinery are anticipated. In addition, solid and liquid waste generation from construction sites will require simple mitigation measures. Among the main concerns would be worker health and safety and worker welfare onsite. The proposed interventions under the project are expected to take place on an existing footprint. Nevertheless, there is a small possibility that reconstruction works may temporarily affect access to livelihoods or residences, or require temporary use of private land and/or relocation of encroachers/squatters. Hence OP4.12 is triggered as a precautionary measure. Additionally, voluntary land donation during the establishment phase of the project is envisioned as an option for any subproject and will be considered as contribution by the community. The anticipated impacts are limited to the specific sites, localized, reversible, and time limited, and can therefore be mitigated with simple measures. With appropriate mitigation measures in place, the impacts will be largely neutralized. None of the anticipated impacts are considered irreversible or of potential large scale.

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

No indirect / long term impacts are expected as a result of project activities. Broader impacts would involve rekindling of the previous levels of economic activities, and the restoration of public and environmental services, which would have a positive impact compared to the current baseline.

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

Since this project will only finance the reconstruction and restoration or pre-existing structures, no relevant project alternatives are considered. Within sub-projects there may be various design options, and the ESMPs to be deployed for every sub-project will promote the environmentally and socially best performing and most sustainable approaches and design options.

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.

As the project is prepared under the provisions of paragraph 12 of OP10 for projects in situations of urgent need for assistance or capacity constraints, the preparation of safeguards instruments is being deferred to implementation. A Safeguards Action Plan (SAP) has been developed by the World Bank which provides guidance on future safeguards implementation arrangements. During the implementation period and prior to the commencement of relevant subproject activities, the PMO will, with assistance from the World Bank, prepare an Environmental and Social Management Framework (ESMF) and Resettlement Policy Framework (RPF). The ESMF will cover all project components in order to assess any safeguard issues of concern and provide guidance on additional safeguard instruments to be prepared, or mitigation measures to be examined during implementation. In addition, the ESMF will provide screening criteria to ensure exclusion of any high risk (Category A type) projects which may have significant adverse environmental or social impacts.



The ESMF will cover the following topics and will cover the entire scope of project activities including components 1, 2 and 3: (i) scope of project activities; (ii) typologies of expected impacts, as well as magnitudes and durations; (iii) types of E&S assessment/management instruments including the range of mitigation measures tailored to the identified sub-project/impact typologies; (iv) methodology for sub-project E&S screening, classification and allocation of specific E&S instruments; (v) review of relevant institutions, key players, roles and responsibilities and administrative processes; (vi) capacity analysis and training requirements; and (vii) update of cost estimates for E&S management measures. Most typologies within the expected scope of subprojects are expected to involve routine, simple civil works pertaining only to existing structures and footprints, where conflict-related damage was incurred. Therefore, ESMPs and checklist ESMPs are suggested as the appropriate safeguards instruments. Freestanding, comprehensive ESIsAs will not be required, as no large-scale Category A projects will be eligible for financing under this project. Beyond land acquisition, the ESMF will also address potential for child/forced labor or issues relating to labor influx if relevant, elite capture, potential for exacerbating social conflict relating to selection of activities to be supported and distribution of benefits.

Similarly, the RPF will provide the general principles and procedures for compensation and resettlement requirements and the guidelines for preparation of RAPs or ARAPs if required. Both the ESMF and RPF will include guidelines to assess and document voluntary land donations. The ESMF and RPF will be reviewed, cleared and disclosed in-country and on the Bank's external website in English, Arabic and Kurdish (as applicable) by March 2018.

Linked to the ESMF (though under management and control of the Iraqi Ministry of Defense and Ministry of Interior) is the risk of ERW (explosive remnants of war), including UXO (unexploded ordnance), AXO (abandoned explosive ordnance) and booby traps in the project areas. Since the project will be implemented in recently liberated areas, and as the liberation often took place with considerable combat activities, the presence of ERW is a certainty. Thus, all project areas will have undergone or will undergo a screening (technical survey) for ERW and will have to be declared safe by the Iraqi Ministry of Defense and Ministry of Interior prior to any works, be it relating to rubble removal, reconstruction of damaged structures, or any works below ground level.

A Project Management Office (PMO) within the Ministry of Planning (MOP) will be established to carry out project activities until the SFD is established. The MOP has adequate knowledge and capability to implement screening eligibility criteria for projects to be financed, however, the criteria currently being used would need to be modified to adhere to World Bank safeguard policies and requirements which will be laid out in the ESMF. Significant gaps currently exist between Iraqi environmental and social requirements, and World Bank safeguard policies as well as the manner in which projects are environmentally classified. The PMO will include qualified environmental and social specialists to ensure the implementation of applicable safeguard policies. Once appointed, these specialists will require extensive training on World Bank safeguard policies as well as eligibility criteria for sub-projects to be financed under the project. During the initial establishment phase of the project, the PMO may be required to rely on external local consultants to support in the preparation of necessary safeguard documents for eligible sub-projects. In addition, close support and review of screening of eligible sub-projects will be required from the World Bank.

The implementation of the ESMPs will largely be the contractors' responsibility whereby the contractor would have to nominate qualified environmental, health and safety consultants and a social development consultant (if needed) in order to ensure compliance with the ESMPs during construction. In addition, the Project Engineer (Consultant) may be required to hire external consultants to work closely with the POM to ensure that the ESMP and RAP/ARAP requirements are adequately implemented.

Furthermore, the PMO will ensure, through its contractual arrangements with contractors, that all ESMP/RAP



requirements are embedded in the construction contracts and will be binding for all contractors. In addition, safeguards monitoring will be carried out by a third party consultant on behalf of the World Bank due to security constraints which will limit World Bank staff from carrying out implementation support missions to many of the project sites.

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

The key stakeholders are: (i) relevant technical and administrative teams from sector line ministries; (ii) administrations of the concerned governorates; (iii) municipalities; iv) Ministry of Health and Environment; and (v) project beneficiaries, and people potentially affected by the project (PAPs).

Given that public consultation is a challenge in an FCV context such as Iraq, an alternative mechanism to consider is individual interviews and/or meetings by adopting limited questionnaires to be carried out in safe places. Separate interviews for women should also be carried out by a female consultant if possible. Meetings/interviews with relevant stakeholders will be carried out during the preparation of the ESMF, RPF and site specific ESMPs and RAPS/ARAPs as needed. The purpose of these meetings is to present the overall objectives of project design, explain to participants its broader benefits at the national level and begin outlining some of the anticipated adverse environmental and social impacts that may result from any subproject activities, and to enable the stakeholders to participate and provide feedback and comments, as well as to ensure that their concerns are taken into account during all phases of the subproject, including the planning phase. Another round of meetings/interviews should be conducted during the preparation of a site-specific subproject where the focus would be on impacts of that subproject.

The findings of the meetings/interviews of the ESMF, RPF and each subproject will be disclosed on the PMO website, relevant line ministries and governorates where the interventions will take place. All subproject affected people should be aware and can provide feedback if needed.

Grievance Redress Mechanism. The PMO shall include a Complaints Handling Unit and be equipped with a computerized system with 4-5 dedicated officers who are responsible for ensuring that complaints and questions are being registered, tracked, investigated and promptly resolved. The unit will coordinate with local subproject field staff and local government officials to ensure prompt follow-up action in response to complaints. The electronic GRM will provide a system for reporting and addressing project-affected people's concerns with regard to environmental and social impacts of the subproject activities.

Complaints and/or questions about the project operations or process, can be directed to a subproject field engineer, community representative, local government official and/or to the PMO where complaints shall be registered for investigation. Multiple access points (telephone, complaint box, website, email, text message, etc.) shall be provided so that PAPs are aware of who to contact about their concerns. The contact information of the focal point should be posted at the local level and in the local language for subproject affected people to file complaints. In addition, copies of complaints shall be recorded in the subproject file and the subproject progress report including the number and type of complaints and the results of their resolution.

B. Disclosure Requirements



The review of this Safeguards has been Deferred.

Comments

As the project is being prepared under OP10.00 paragraph 12, a deferral of preparation of safeguard documents has been requested until the implementation period. To that end, the World Bank has prepared a Safeguards Action Plan (SAP) which will serve as a roadmap for preparing subsequent safeguard instruments. In addition, a Project Operational Manual (POM) is being developed with assistance from the World Bank. The Borrower, with support from the World Bank, will incorporate necessary screening checklists to determine the interventions which are ineligible for financing under the project. In addition, the Borrower, with support from the World Bank, will prepare, at the start of project implementation but before commencement of any sub project activities, an Environmental and Social Management Framework (ESMF) which will provide guidance on: (i) the approach to be taken during project implementation; (ii) appropriate safeguard instruments; and (iii) a framework for mitigating and monitoring impacts. The ESMF will be disclosed in-country and on the World Bank website in English, Arabic, and Kurdish (as applicable) in line with the relevant World Bank disclosure policy and by March 2018.

The review of this Safeguards has been Deferred.

Comments

Due to the small-scale nature of the infrastructure work, the community participatory approach, the SFD POMs focus on avoidance of resettlement impacts. As a general principle, all activities are planned to take place on existing footprints. Nevertheless, there is a slight possibility that reconstruction works may temporarily affect access to livelihoods or residences, or require temporary use of private land and/or relocation of encroachers/squatters. Hence OP4.12 is triggered as a precautionary measure. Since the location of individual subprojects is not known, an RPF will be prepared which will set out the general principles and procedures for compensation and resettlement requirements and the guidelines for the preparation of RAPs or ARAPs if required. Additionally, during the project life cycle, voluntary land donation (VLD) is envisioned as a contribution by the community with no pressure and will only be eligible if a consent form is signed and attached to the subproject. A screening checklist will be adopted and will exclude subprojects that require involuntary land acquisition.

C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting)

OP/BP/GP 4.01 - Environment Assessment

Does the project require a stand-alone EA (including EMP) report?

Yes

If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report?

NA

Are the cost and the accountabilities for the EMP incorporated in the credit/loan?

Yes

OP/BP 4.11 - Physical Cultural Resources

Does the EA include adequate measures related to cultural property?



Yes

Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?

Yes

OP/BP 4.12 - Involuntary Resettlement

Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?

No

If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?

The World Bank Policy on Disclosure of Information

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

NA

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?

NA

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

World Bank

Ghassan N. Alkhoja
Sr Social Protection Specialist



Ramzi Afif Neman
Senior Program Officer

Surat F. Nsour
Sr Social Protection Specialist

Borrower/Client/Recipient

Economic Reform Unit - Prime Minister's Office
Haider Al-Abadi
Prime Minister and Acting Minister of Finance
ministeroffice@gmail.com

Implementing Agencies

Ministry of Planning
Mehdi Al-Allak
Secretary General, Secretariat of the Council of Ministers
mahdim.alalak@pmo.gov.iq

Najla Al Murad
Director General for Poverty Reduction Strategy
najla_am@ymail.com

FOR MORE INFORMATION CONTACT

The World Bank
1818 H Street, NW
Washington, D.C. 20433
Telephone: (202) 473-1000
Web: <http://www.worldbank.org/projects>

APPROVAL

Task Team Leader(s):	Ghassan N. Alkhoja Ramzi Afif Neman Surat F. Nsour
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Approved By

Safeguards Advisor:	Nina Chee	13-Oct-2017
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Practice Manager/Manager:	Hana Brixi	13-Oct-2017
Country Director:	Saroj Kumar Jha	16-Oct-2017
