

**INTEGRATED SAFEGUARDS DATASHEET
APPRAISAL STAGE**

I. Basic Information

Date prepared/updated: 02/02/2011

Report No.: AC5776

1. Basic Project Data

Country: South Asia	Project ID: P121210	
Project Name: Strengthening Reg Cooperation for Wildlife Protection in Asia		
Task Team Leader: Sumith Pilapitiya		
Estimated Appraisal Date: January 28, 2011	Estimated Board Date: March 22, 2011	
Managing Unit: SASDI	Lending Instrument: Adaptable Program Loan	
Sector: General agriculture, fishing and forestry sector (70%);General public administration sector (30%)		
Theme: Biodiversity (80%);Environmental policies and institutions (10%);Other trade and integration (10%)		
IBRD Amount (US\$m.):	0.00	
IDA Amount (US\$m.):	39.00	
GEF Amount (US\$m.):	0.00	
PCF Amount (US\$m.):	0.00	
Other financing amounts by source:		
<u>BORROWER/RECIPIENT</u>		0.00
		0.00
Environmental Category: B - Partial Assessment		
Simplified Processing	Simple <input type="checkbox"/>	Repeater <input type="checkbox"/>
Is this project processed under OP 8.50 (Emergency Recovery) or OP 8.00 (Rapid Response to Crises and Emergencies)	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Project Objectives

The project aims to assist the participating governments to build or enhance shared capacity, institutions, knowledge and incentives to jointly tackle illegal wildlife trade and other select regional conservation threats to habitats in cross border areas. The project will focus on a selected set of country-specific initiatives that are crucial to meeting the regional strategic goals.

3. Project Description

The project is envisaged around three themes: (i) capacity building and cooperation for addressing the illegal trans-boundary wildlife trade, (ii) promoting wildlife conservation in South Asia; and (iii) project coordination and communication/outreach. Two countries, Bangladesh and Nepal are participating in the first APL. In response to a formal request from Bhutan, preparation of the second APL would commence shortly. The boost in resources allocated by the Government of India for PA management and wildlife protection has energized the collaboration among South Asian countries around

conservation. India may participate in the project in the future and, if it does, there would be no investments in PAs and other wildlife habitats of India.

A multi-phase adaptable program loan (APL) is proposed as the lending instrument for the project so that support is made available on the basis of country readiness. This broader regional approach will provide confidence in a long-term commitment and engagement by the Bank to ensuring a higher profile and stronger identification with the program by all involved countries.

Component 1: Capacity building and cooperation for addressing the illegal trans-boundary wildlife trade (Total US\$14.304 million, including contingencies, of which: Bangladesh US\$13.304 million and Nepal US\$ 1.0 million)

Component 1 aims to bring about regional harmonization and collaboration in combating wildlife crime through strengthened legislative and regulatory frameworks, well equipped specialized agencies and systems, as well as relevant training and awareness programs for staff across the range of agencies that contribute to the enforcement of wildlife laws and regulations. It is anticipated that the activities collectively would generate well coordinated frameworks, systems, technology, infrastructure and expertise at compatible or near compatible levels across the countries participating in the project.

Sub-component 1.1 Institutional strengthening in wildlife conservation and illegal wildlife trade control would support: (i) technical advisory/assistance (TA) services to establish, upgrade or strengthen the different units under Bangladesh's Wildlife Circle and Wildlife Center to undertake training, research, education and awareness and monitoring and evaluation (M&E); (ii) TA services to establish Bangladesh's Wildlife Crime Control Unit (WCCU) and Nepal's Wildlife Crime Control Bureau (WCCB) responsible for forensics, quarantine, legal support and assisting in the discharge of country responsibilities as signatories to CITES; (iii) TA services for the development of analytical and operational protocols to meet CITES requirements; (iv) provision of operational support and training for field-level rapid response cells; (v) TA services for the review and revision of Nepal's legislative framework and strengthening of relevant institutions; and (vi) operational support for the establishment of the Secretariat for Nepal's National Tiger Conservation Committee within the Ministry of Forests and Soil Conservation.

Bangladesh is in the midst of revising the country's Wildlife Conservation Act that would grant more powers to the Wildlife Circle (WC) within the Bangladesh Forest Department (FD) and create a better enabling environment for wildlife management. The project would support technical and management consultancies to enable BFD to effectively discharge its enhanced mandate under the new Act. The consultancies would evaluate BFD's roles and responsibilities under the new Act and assist BFD in developing an effective institutional structure and in building capacity to carry out its mandate. Nepal, on the other hand, has a long history of wildlife conservation as demonstrated by the enactment of various policies, legislation and regulations. However,

weak institutional capacity and inadequate financial resources have resulted in lapses in enforcement of regulations and poor PA management.

Sub-component 1.2 Staff capacity building and training toward regional collaboration would support: (i) training and re-orientation for the benefit of support staff, including regional knowledge sharing; (ii) establishment or strengthening of the Wildlife Center; and (iii) training to the staff of the Wildlife Center in M&E techniques.

The development of Sub-component 1.2 benefited from TRAFFIC's recommendations (See Annex 8). As part of TRAFFIC's mission to deliver innovative and practical conservation solutions, it develops and organizes training and other capacity-building initiatives for officials involved in the regulation of wildlife trade. As recommended by TRAFFIC, the project would highlight new ways for enhancing the ability of agencies within Bangladesh and Nepal to combat illegal wildlife trade and strengthen conservation.

Component 2: Promoting wildlife conservation in South Asia (Total US\$22.70 million, including contingencies, of which: Bangladesh US\$20.925 million and Nepal US\$1.775 million)

Sub-component 2.1: Virtual Regional Center for Excellence (VRCE) for wildlife conservation seeks to fill crucial knowledge and information gaps in addressing the many regional threats to conservation. It entails the creation of the VRCE that would include a network of scientists and practitioners in wildlife conservation whose mission would be to expand the scope and quality of research in wildlife conservation needed to develop a common response against illegal wildlife trade in and outside the region and to address other regional conservation issues to be agreed by the participating countries. Specifically, this sub-component would support the provision of TA services and equipment for VRCE's establishment and operations.

VRCE would provide the first (and only) coordinated, institutional response for research and knowledge dissemination on wildlife conservation in South Asia. The exclusive focus will be on either promoting a conservation-related regional public good or addressing a regional public bad. Given the existence of national institutions with expertise in this area already, it is critical for VRCE to bring value-added and not duplicate existing efforts. By playing the role of coordinator and facilitator of knowledge and expertise, VRCE could become a vehicle for promoting dialogue and good practices as well as disseminating knowledge. Because the center will be virtual and will have no central physical facility, it will rely heavily on state-of-the-art information and telecommunication technology (ICT) to conduct its business and to attain its objectives. A Regional Operational Steering Committee (ROSC) # described in Section IV.A # would assist in the development of VRCE's overall program and objectives.

VRCE would build on existing regional and global environmental initiatives and benefit from established experience, mechanisms and protocols. It would draw on strategic partnerships with renowned wildlife conservation institutions in the region and

elsewhere. It would develop an active knowledge dissemination program that would include: (i) publication of research and pilot project results; (ii) sponsorship of workshops, lectures and seminars; (iii) special seminars aimed at decision makers in the participating governments (legislators, administrators and policy makers); (iv) training modules and teaching materials for wildlife managers; and (v) development of protocols for informing policy and wildlife managers in the field.

Sub-component 2.2: PA, Forest Reserve (FR) and National Forest (NF) management with regional conservation benefits. The client countries recognize that conservation of wildlife resources, in general, and of charismatic flagship species, in particular, would not succeed without prudent investments in PAs, FRs and NFs aimed at ensuring a haven for wildlife. Hence, this sub-component would support the establishment and operation of two competitive funding windows for the management of PAs, FRs and NFs with regional conservation benefits and for innovative pilot projects in wildlife conservation. Sub-component 2.2 would focus on investments that result in regional conservation benefits.

Window 1 of Sub-component 2.2 would support the following typical activities: rehabilitation and development of water resources in PAs and FRs; control of invasive species; rehabilitation of existing roads; improvements in existing park infrastructure; species monitoring and recovery programs; preparation and implementation of endangered species recovery plans; implementation of real-time field based monitoring systems; development of landscape scale imaging platforms and strengthening enforcement. Window 2 would support innovative research projects in wildlife conservation, pilot programs in conservation of endangered species, piloting of human wildlife coexistence models and incentive schemes, such as payments for environmental services for those affected by the conflict; development of ecotourism plans with regional conservation benefits; or implementation of priority activities under such plans.

The project will support activities under both windows in Bangladesh. However, Window 1 will not be implemented in Nepal. The Government of Nepal will allocate funds amounting to US\$6 million over five years from its national budget to support activities on conservation, protection and management of PAs and NFs for long-term, regional conservation benefits. The Government's support and the specific activities will be carried out separately and will not be part of the proposed project. Window 2, however will be implemented in Nepal.

A competitive, demand-driven approach to reward innovation and efficiency of the managers of the PAs, FRs and NFs would be applied in selecting the activities that would receive support under Windows 1 and 2. A transparent review and approval process for both windows will be developed and implemented. The eligibility criteria (including a negative list of activities) will be specified in the operational manuals that will be finalized prior to disbursement for Windows 1 and 2.

Lessons from ADB and other donor-funded wildlife projects in South Asia demonstrate that partnerships between public conservation agencies with NGOs (such as WWF,

IUCN, etc.) and local communities are integral to the success of pilot models but the sustainability of the initiatives relies on the leadership of the public conservation agencies. To that end, the project would promote partnerships between NGOs or local communities and the managers of PAs, FRs and NFs but the submission of Window 2 proposals will be led by the conservation agencies. Access to Window 2 funds may be secured indirectly by NGOs and communities through their partnerships with the conservation agencies in preparing and carrying out activities as part of projects supported by Window 2.

Since the precise PA, FR and NF sites as well as conservation landscapes would be identified during the preparation of the funding proposals, more focused consultations with those communities that may be affected by the proposed investments as well as site-specific environmental and social assessments would be undertaken when Component 2.2 is underway. However, both countries prepared respective environmental and social management frameworks consisting of assessments of generic environmental and social issues that may arise during implementation and of mitigation measures as well as guidance for future site-specific environmental and social assessments # have been prepared (see VI.E).

Component 3: Project coordination and communications (Total US\$4.996 million, including contingencies, of which: Bangladesh US\$4.771 million and Nepal US\$0.225 million)

Component 3 would provide services, TA and incremental costs for project staff as well as operating costs for the management and coordination of the project. Sub-component 3.1 would support project coordination arrangements for national and regional activities.

Sub-component 3.2: Communications. The project will adopt a multi-pronged approach to communications in order to meet regional and local challenges. The project would set up separate communications units within the PIU/PMUs that will implement coordinated strategies for regional and national communication. A wide range of consultations with various stakeholder groups will be conducted at the national and local levels. It is expected that rolling consultations will continue throughout the project cycle. To ensure that all stakeholders have a clear understanding about this project, mass communication tools will be used to simplify and explain the basic concept and principles. The tools will include multimedia audio/video products, dramas in local languages, brochures, and website(s). These products will be tailored to meet local conditions and languages. The communications sub-component # that is being developed and implemented in collaboration with the World Bank's external relations specialists # will harmonize with GTI in view of the latter's broader geographic mandate to engage in demand side management.

Sub-component 3.3 would represent the Government of Bangladesh's commitment to cover the salaries and overheads of existing government staff and the cost of land purchases to build wildlife recovery and rehabilitation centers.

4. Project Location and salient physical characteristics relevant to the safeguard analysis

Currently two countries, namely, Bangladesh and Nepal are participating in this program. Project interventions are designed to benefit the countries throughout their territories, although emphasis would be on site-specific activities in areas with cross border conservation benefits. At this stage, the exact location of interventions in PAs, FRs and NFs have not been determined. To be eligible for funding, PAs, FRs and NFs should have interconnected habitats and ecosystems with neighboring countries.

5. Environmental and Social Safeguards Specialists

Mr Daniel R. Gross (LCSEN)

Ms Darshani De Silva (SASDI)

6. Safeguard Policies Triggered	Yes	No
Environmental Assessment (OP/BP 4.01)	X	
Natural Habitats (OP/BP 4.04)	X	
Forests (OP/BP 4.36)		X
Pest Management (OP 4.09)		X
Physical Cultural Resources (OP/BP 4.11)		X
Indigenous Peoples (OP/BP 4.10)	X	
Involuntary Resettlement (OP/BP 4.12)	X	
Safety of Dams (OP/BP 4.37)		X
Projects on International Waterways (OP/BP 7.50)		X
Projects in Disputed Areas (OP/BP 7.60)		X

II. 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 environmental and social impacts of the proposed project are expected to be positive since the project focuses on tackling illegal wildlife trade and other select regional conservation threats to critical wildlife habitats in cross border areas. Therefore, it is not envisaged that there will be any significant or irreversible environmental or social impacts under the project. Since some of the project interventions will be undertaken in natural habitats and forests, OP 4.04 is triggered. No involuntary resettlement and land acquisition will take place under the proposed project. Although no involuntary resettlement or land acquisition would take place due to project activities, there could be impacts on community livelihoods as a result of better enforcement of regulations in PAs, FRs and NFs, landscape-based conservation planning and the human wildlife conflict management through human-elephant and human-tiger coexistence interventions which could affect land use patterns. Thus, OP 4.12 is triggered. In order to safeguard lifestyles and livelihoods of Indigenous Peoples living around PAs and national forests, and to ensure that the project does not have any adverse impacts on indigenous communities OP 4.10 is also triggered. Of the three components of the project, Components 1 and 2 could have potential environmental and social impacts.

Component 1 of the project will support institutional capacity building and cooperation for addressing the trans-boundary illegal wildlife trade in Bangladesh and Nepal, hence no adverse environmental impacts are envisaged, except short-term impacts due to the construction or renovation of a few buildings such as Wildlife Center and wildlife recovery and rehabilitation centers in Bangladesh and WCCB and for field-level rapid response cells in Nepal. Most of these facilities will not be located within PAs, FRs or NFs. Therefore it is unlikely that such construction will have irreversible impacts. Likely social impacts will mainly relate to less access to PAs because of stronger enforcement and access to potential project benefits in terms of opportunities for employment and skills enhancement within communities as well as among staff participating agencies, particularly with regard to training opportunities.

Component 2.1 will include investments in conservation in protected areas and national forests as well as addressing the human wildlife conflict through co-existence models and development of ecotourism opportunities. The investments other than the VRCE will be funded through two specialized funding windows. VRCE as the name implies would provide a platform for wildlife conservation scientists and practitioners to respond to illegal wildlife trade through expanded scope and quality of research in wildlife conservation and therefore, will not have any negative environmental or social impacts, but will enhance positive impacts over the long-term. The project's Regional Operational Steering Committee will ensure governance of VRCE and the rotational directorship among participating countries will assure ownership and representation.

The activities proposed under Component 2.2 will eventually have significant conservation benefits. It is anticipated that some activities that are likely to be proposed will involve small civil works and possible, temporary, negative environmental impacts during the implementation phase. Due to the demand-driven nature of this component where proposals will be submitted from PA, FR and NF managers to implement crucial aspects of the conservation activities with regional benefits, it is not possible to pre-identify specific activities that will be included in the proposals until the proposals are submitted to Window 1. However, based on experience with PA, FR and NF management in Bangladesh and Nepal as well as other South Asian countries, activities typically undertaken in management of PAs, FRs and NFs can be determined.

Some likely activities to be proposed for funding under Window 1 within PAs, FRs and NFs may include rehabilitation and development of water resources, habitat management, such as control of invasive species, preparation and implementation of endangered species recovery plans, implementation of real time field based monitoring systems, development of landscape scale land use imaging platforms, rehabilitation of existing roads, improvements in existing park infrastructure, species monitoring and recovery programs, protection of inviolate (strict protection) areas for species conservation; strengthening law enforcement, etc. The environmental impacts of such interventions could include temporary disturbance to habitats and wildlife populations of conservation importance in the surrounding areas due to construction. The project operational manual will include a comprehensive set of precautions to be taken by contractors during any

civil works undertaken with project resources. These precautions dealing with borrow pits, disposal areas, disposal of lubricants, location of construction camps and worker housing, etc. will also be written into a construction manual attached to each contract for civil works as an obligation. There will be no worker camps within PAs, FRs and NFs. As the project sites are ecologically sensitive zones, extreme caution must be taken with proper disposal of any waste generated during work and restoration of the sites to their natural state.

Innovative pilot projects that will be funded under Window 2 may include a broad range of activities needed to address the human wildlife conflict and develop and implement coexistence models and development of eco tourism. Human-wildlife conflict, particularly involving elephants and tigers has emerged as one of the most critical socio-economic, political and conservation challenges. No adverse environmental issues are expected under this component, as the only civil works likely to be undertaken would be to erect electric fences at the boundaries of villages and permanent (non-shifting) agriculture for protection from wildlife. Tiger-human conflict (THC) is a serious concern in both countries given the increasing trend of buffer zone communities affected by THC. Community participation in implementing the pilot projects is critical for long-term success. This would involve raising the awareness of communities on the importance of tiger conservation, training on techniques of handling stray tiger intrusions to villages without harming the tiger, establishment of an effective communication system between the community and the response teams from Bangladesh WC and Nepal Department of National Parks and Wildlife Conservation (DONPWC), exploring the possibility of training select community members in basic immobilization techniques and containment until the tiger response teams arrive, training for the response teams on safe tranquilizing and capture methods, etc. These are not expected to involve activities that have adverse environmental impacts.

Human-elephant conflict (HEC) is another serious problem. HEC is escalating in both countries with serious repercussions for both humans and elephants. Current approaches have done little to address the problems effectively. Translocations and elephant drives used as a HEC management tool in many countries have proven to be a costly failure to both humans and elephants. They have largely failed because the approach neglects the root causes of the problem. Most PAs are already at or even beyond carrying capacity and hold the maximum number of elephants they can support. Additionally, PAs are generally primary or mature forests and they provide sub-optimal habitat for edge species, such as elephants. There is, therefore, a need to find a new approach to management of HEC by finding mechanisms capable of transforming wild elephants from economic liabilities and the foes of local farmers to wild, living, communal and economic assets. Ecotourism is one promising approach.

Typical activities funded under this window are: (i) identification of wildlife corridors and making connectivity linkages for the long term survival of flagship species such as elephants. This may involve the construction of electric fences for isolating these corridors from developed and human inhabited areas; (ii) restoration of degraded ecosystems within the corridors; and (iii) restoration of existing degraded or abandoned

water bodies; and (iv) electric fencing at ecological boundaries and human settlements to prevent elephant incursions. Since these interventions will enhance the environmental and ecosystem quality of the wildlife corridors and prevent elephants from destroying crops and property, adverse or irreversible environmental impacts are not anticipated. Limited, localized environmental impacts are likely during the restoration and rehabilitation of existing water bodies and erection of electric fencing.

The potential social impacts of activities that may take place are likely to be on livelihood patterns of community members as the pilots on human-elephant conflict may attempt to change land use practices of local communities. Whereas, in managing tiger human conflict, the likely issues that may arise are due to safety of community members selected to participate in immobilization and containment during tiger attacks. In addition, there will be positive impacts where the project will revisit the existing compensation schemes for those affected by human-wildlife conflicts with proposals for revisions or modifications, as well as incentive mechanisms such as crop substitutions and payments for environmental services.

The second area that will be supported under Window 2 is ecotourism development that would support the formulation of ecotourism plans with demonstrated regional environmental and conservation benefits, and implementation of priority activities under ecotourism plans with ensuing regional benefits for conservation. It is likely that activities such as improvements to tourism facilities, e.g., visitor centers, visitor toilets and resting areas, picnic sites, camp sites, nature trails, wildlife hides, watch towers and facilities for non-motorized boats, canoes and kayaks for wildlife viewing, etc. The typical negative impacts to be associated with such interventions include changes to land form, decrease in aesthetic value, disturbance to animal life and habitats, etc. But since these are small scale interventions, significant and/or irreversible adverse environmental impacts are unlikely. The project would support studies and possibly pilots aimed at ensuring that the economic benefits from ecotourism accrue not only to investors but also to local people and to local governments.

The project will ensure once the locations of intervention are identified, site specific environmental and social impacts assessments including status and possible impacts of IPs if present are carried out prior to finalization of site-specific activities.

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

Enhancing ecotourism opportunities under the project could result in unplanned tourism development taking place in the peripheries of protected areas and national forests. This could result in the loss of conservation value in the landscapes that contain the PA, FR and NF networks. Therefore, proper planning and regulation of development of areas peripheral to PAs, FRs and NFs are crucial in order to ensure that these areas are managed within their carrying capacities and stress to wildlife is minimal. The perceived economic liability of wildlife conservation to the national economies will be reduced through development of responsible ecotourism, thus providing an incentive to the

leadership of the countries to ensure that the PA, FR and NF networks are conserved in the long term.

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

Thus far, countries have sought to tackle the illegal trade unilaterally, with uncoordinated investments in enforcement, while the problem is regional in nature. As noted earlier, valued wild resources are poached in one country, stored in another and transported through another to the final destinations. The trade is practiced by moving to the most porous locations with the lowest level of enforcement. Coordination and unification of enforcement efforts is thus essential to increase the costs to poachers and reduce the volume of trade. The regional approach proposed in this program therefore seems crucial to effectively address the controlling illegal wildlife trade. Drawing upon the example of the ASEAN-WEN, this project will seek to promote synergies and harmonize enforcement efforts. However, there are very few best practices and lessons that are available so far in this context. Recognizing the complexities involved, an important aspect of this project is to create the synergies and structures that are needed to promote learning, and adaptive management approaches that permit improvements to be incorporated.

Project design has also benefited from the growing body of empirical evidence on the medium-term performance of integrated conservation and development projects (ICDPs). While ICDPs seemed to offer the tantalizing prospect of promoting conservation and rural development simultaneously and often without any need for explicit investments in habitat or wildlife protection, the emerging literature suggests that success in achieving the dual goals of development and sustainability has often been elusive. ICDPs have been more successful in providing rural employment than in producing any discernable conservation benefits. Indeed, ICDPs tend to add new income-generating activities rather than eliminate or substitute activities that are not conducive to conservation. In recognition of the limitations, the project looks to alternative approaches and research on approaches that blend regulations with direct incentives for conservation. The project would promote innovation in regional conservation approaches through competitive, demand-driven funding with a transparent process for the submission, review and approval of proposals for wildlife management.

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. An Environmental and Social Management Framework (ESMF) in lieu of project specific Environmental Assessments (EA) and Social Assessments have been prepared as details of specific project locations, sub-project activities and interventions are available until project implementation. The ESMF primarily includes description of the environmental and social policies and legislation that will govern the project interventions, an assessment of generic issues typically associated with anticipated interventions under the project, measures for environmental and social risk mitigation and institutional arrangements for conducting environmental and social assessments, implementation and monitoring, actions to be taken if IPs are present. The World Bank safeguard policies

triggered under this project are: Environmental Assessment (OP/BP 4.01); Natural Habitats (OP/BP 4.04), Involuntary Resettlement (OP/BP 4.12 and Indigenous Peoples (OP/BP 4.10). Therefore, the ESMF was prepared taking the policies that have been triggered into account and will serve as a guide to the level of environmental and social analysis and mitigation required for all interventions supported by the project which will have the potential for adverse environmental and social impacts and thereby ensure compliance with the World Bank environmental and social safeguard policies and the relevant national regulations during implementation.

The type of environmental assessment and planning required will be based on the findings of the environmental checklist to be completed for each physical intervention. As a category B project with no significant adverse environmental impacts, all physical activities financed under the project in general, including Components 1 and 2, will be required to prepare Environmental Management Plans (EMP) for each site or activity. No sub-projects will be approved from any of the two windows of the Component 2 without a satisfactory EMP being submitted with the detailed proposal which will be reviewed and cleared by the Bank prior to fund disbursements. With regard to Component 1, no funds will be disbursed for any physical activity (other than training) without EMPs being reviewed and cleared by the Bank.

The social checklist that will also need to be completed for each site identified will also provide an indication on the need to conduct detailed socio-economic and IP assessments. All activities that may have the potential for social impacts are required to be developed after consultations with the affected community. Consultations are pre-requisite for designing any activity supported under Sub-component 2.2, Window 2. In order to ensure social safeguard requirements are adequately assessed, the ESMF includes an assessment of generic issues that are expected in view of anticipated interventions under the project, including a Resettlement Policy Process Framework in case of land use restrictions and livelihood impacts occur and guidelines for the development of an Indigenous Peoples Plan (IPP) to be used in the event that project activities may take place in areas where indigenous people are located, measures for social risk mitigation and institutional arrangements for conducting social impact assessments (SIAs), implementation and monitoring. The project will not fund any activity if a prior social impact assessment has not been completed if found necessary under the social checklist.

Bangladesh and Nepal environmental clearance processes are fully operational and experience and knowledge on EIA has been built in the institutions that are involved in the project. The existing knowledge within the implementing agencies to conduct and review EMPs under the project is deemed adequate. However, an area that could do better with improved performance, EMP monitoring which tends to be the weakest link in the EA cycles of both countries. The project would place strong emphasis on post EMP clearance monitoring and identify technical assistance to strengthen this aspect within the implementing agencies.

The primary responsibility of coordinating work related to social safeguards will rest with Project Implementation Unit/Project Management Unit (PIU/PMU) in the two

countries. However, while environmental management capacity is adequate, the capacity to manage social safeguards requirements is comparatively weak, especially in the Bangladesh PIU. Social sector capacity exists in the National Trust for Nature Conservation (NTNC) who will serve as the PMU in Nepal. Both the PIU in Bangladesh and the PMU in Nepal will assign dedicated social development officers to work with the environmental officers to take the responsibility of ESMF implementation. These officers will make sure that SIAs are prepared for all relevant project sites/activities and that suitable mechanisms are mobilized to ensure their implementation.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people. Project preparation is done in mainly in consultation with custodians of wildlife conservation, however in Nepal the Government appointed project preparation team included a representative from the World Wildlife Fund (WWF) and from the National Trust for Nature Conservation (NTNC). In Bangladesh the project design was completed in consultation with IUCN and the Wildlife Trust of Bangladesh. Consultations were held with the conservation NGO community in both Bangladesh and Nepal. Since the specific locations of the field interventions are still unknown, more focused group discussions with communities likely to be affected by have not been held in order not to raise expectations in advance of concrete plans for intervention. Such consultations in the absence of knowledge of the protected areas and national forests where the site specific activities will take place, as well as not having specific knowledge of proposed activities could result in raising expectations of communities that project benefits may accrue and be counterproductive in the longer term. Therefore, site specific community consultations will take place when the sub-project proposals are being prepared. However, the project has made provision for site-level consultations with stakeholders prior to finalization of proposals for funding through the funding windows. The final proposal design and details in the intervention will be made public at the specific sites prior to approval by the Proposal Review Committee. The ESMF was disclosed to the public in both countries on November 8, 2010. The final ESMF was submitted to IDA for clearance on November 3, 2010. It will be available at the Infoshop as soon as it is cleared by the Bank.

The disclosure dates provided in Section B. reflects the dates of Bangladesh disclosure which were done last. Nepal submitted the safeguards documents to the Bank on November 3, 2010 and disclosed it on November 8, 2010.

B. Disclosure Requirements Date

Environmental Assessment/Audit/Management Plan/Other:

Was the document disclosed prior to appraisal?	Yes
Date of receipt by the Bank	11/07/2010
Date of "in-country" disclosure	11/08/2010
Date of submission to InfoShop	01/28/2011
For category A projects, date of distributing the Executive	

Summary of the EA to the Executive Directors

Resettlement Action Plan/Framework/Policy Process:

Was the document disclosed prior to appraisal?	Yes
Date of receipt by the Bank	11/07/2010
Date of "in-country" disclosure	11/08/2010
Date of submission to InfoShop	02/03/2011

Indigenous Peoples Plan/Planning Framework:

Was the document disclosed prior to appraisal?	Yes
Date of receipt by the Bank	11/07/2010
Date of "in-country" disclosure	11/08/2010
Date of submission to InfoShop	02/03/2011

Pest Management Plan:

Was the document disclosed prior to appraisal?	
Date of receipt by the Bank	
Date of "in-country" disclosure	
Date of submission to InfoShop	

*** If the project triggers the Pest Management and/or Physical Cultural Resources, 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 above documents is not expected, please explain why:

Resettlement Action Framework and Indigenous Peoples Framework are included within the overall Environmental and Social Management Framework.

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 Sector Manager (SM) review and approve the EA report?	Yes
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	Yes

OP/BP 4.04 - Natural Habitats

Would the project result in any significant conversion or degradation of critical natural habitats?	No
If the project would result in significant conversion or degradation of other (non-critical) natural habitats, does the project include mitigation measures acceptable to the Bank?	N/A

OP/BP 4.10 - Indigenous Peoples

Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?	Yes
If yes, then did the Regional unit responsible for safeguards or Sector Manager review the plan?	Yes
If the whole project is designed to benefit IP, has the design been reviewed	Yes

and approved by the Regional Social Development Unit or Sector Manager?

OP/BP 4.12 - Involuntary Resettlement

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

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

The World Bank Policy on Disclosure of Information

Have relevant safeguard policies documents been sent to the World Bank's Infoshop? 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

D. Approvals

<i>Signed and submitted by:</i>	<i>Name</i>	<i>Date</i>
Task Team Leader:	Mr Sumith Pilapitiya	11/07/2010
Environmental Specialist:	Ms Darshani De Silva	11/07/2010
Social Development Specialist	Mr Daniel R. Gross	11/07/2010
Additional Environmental and/or Social Development Specialist(s):		
<i>Approved by:</i>		
Regional Safeguards Coordinator:	Mr Sanjay Srivastava	11/07/2010
Comments: Approved subject to incorporation of changes suggested to the ESMF for the ROC meeting		
Sector Manager:	Mr Herbert Acquay	11/24/2010
Comments: Approved		