



Appraisal Environmental and Social Review Summary Appraisal Stage (ESRS Appraisal Stage)

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BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)		
Tunisia	MIDDLE EAST AND NORTH AFRICA	P179010			
Project Name	Tunisia Emergency Food Security Response Project				
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date		
Agriculture and Food	Investment Project Financing	6/8/2022	6/27/2022		
Borrower(s)	Implementing Agency(ies)				
Ministry of Economy	Office des Céréales				

Proposed Development Objective

Ensure in the short-term the supply of (i) agricultural inputs for farmers to secure the next cropping season and for continued dairy production and (ii) wheat for uninterrupted access to bread for poor and vulnerable households; and to strengthen Tunisia's resilience to food crises by laying the ground for reforms of the grain value chain.

Financing (in USD Million)	Amoun
Total Project Cost	130.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

Yes

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The Project will support activities aimed at protecting producers and consumers from global market disruption in the short term, while enhancing the resilience of the grain supply system to price, supply and climate shocks in the medium term. In the short term, GoT's objective is to support domestic production through the availability and accessibility of agricultural inputs and to ensure the availability and accessibility of food, in particular to vulnerable households. At the same time, GoT wants to use this crisis as an opportunity to strengthen the resilience of its grain supply chain to market and climate shocks by providing the right incentives to grain producers to stimulate domestic production, while reducing the burden on public finances and better targeting food subsidies (including reducing



waste and improving nutrition). The project will consist of three components providing a balance between short-term urgent responses, through support to producers (Component 1), short-term wheat purchases (Component 2) and medium-term measures (Component 3) to improve the whole grain supply chain organization and adjust the associated public support program. It is part of a coordinated package of funding with other partners (to secure grain purchase and support producers) and will develop synergies with other donor interventions (reform preparation, storage facility improvement, etc.).

D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The proposed Project is a response to the economic impact of the Ukrainian conflict to maintain food security, and covers the entire country of Tunisia and its population. The project will benefit both stakeholders in the GoT, stakeholders in the transport sector, the agro-business industry, small farmers and local consumers, including poor and vulnerable households. Through the purchase of soft wheat supported by the Project, all Tunisian families will benefit from continued access to affordable cereal products (bread, semolina, pasta), particularly poor and vulnerable households whose diet relies for a large part on those products which usually represent a large share of their household expenses. The proposed project will ensure the consistent availability of wheat needs in Tunisia for three months to bridge the gap until Tunisia's credit worthiness improves when GoT reaches an agreement with the IMF. More specifically, the project will support activities aimed at protecting consumers and producers from international commodity price hikes induced by the war in Ukraine in the short term, by supporting domestic production through the availability and accessibility of agricultural inputs in view of enhancing the resilience of the grain supply system to price, supply and climate shocks in the medium term.

The environmental and social (E&S) risk boundaries of the project are limited to: procurement, storage activities at the ports in Tunisia of the wheat and barley purchased, and facilitating the gradual phasing-out of food subsidies and transitioning towards cash transfer for poor households. For components 1 and 2, the E&S risks are limited to the procurement and offloading in government Silo's at designated ports. The storage (operation) at the port/s after offloading from vessels is considered an associated activity that is directly and significant for the project, carried out contemporaneously with the project, and necessary for the project to be viable. The transportation to silos and other storage facilities around the country are not considered associated activities/facilities to the project. This is because referenced downstream activities fall short of the requirements to be classified as associated activities/facilities. Specifically, the referenced downstream activities under component 1 (i.e. transportation to silos in Tunisia, milling, distributing flour, baking and distributing bread and other baked products) are not considered associated with the project because they will follow the existing operating arrangements and processes which existed prior the project without any need for constructing, expanding or conducting any additional activities, will be maintained after the project closure, and these activities would have been conducted even if the project did not exist. These downstream activities will follow existing market arrangements and processes set forth by the GoT and OC. Contracts for the purchase of wheat and barley are "cost and freight (CFR)", the shipping vendor oversees shipping arrangement while OC has its own insurance for shipping but does not have any control over it. The distribution of wheat, barley, wheat seeds are outside of project boundaries (they are not "associated activities" because they would have been conducted even if the project did not exist and their distribution by GoT will continue after the project's closure), but the the purchase and processing of seeds falls inside project boundaries. Existing Public-Private Sector arrangements set forth by the GoT and the market as described in project Component 1 (see below), will be used to ensure fair



distribution of wheat and barley, maintain market stability and avoid social exclusion and elite capture. In component 3, the support to the effort of gradually transitioning food subsidy towards a cash transfer mechanism, may induce social exclusion risks, this activity is within the boundary of the project, and the risk of potential social exclusion and elite capture shall be part of the overall effort to gradually transitioning food subsidy to cash transfer. The proposed project will consist of three components providing a balance between short-term urgent responses, through support to producers (Component 1) and purchase of grains (Component 2), and medium-term measures (Component 3) to improve the whole grain value chain organization and revise the associated public support program.

Component 1 – Emergency support to farmers (US\$60 million), aims at cushioning the impact of international commodity price hike on production costs and ensuring stable domestic production during the next cropping season. The objective is to support the domestic grain production of the forthcoming cropping season (September 2022 to June 2023) and prevent a further increase of grain import needs next year. The project will finance the temporary import of barley and access to improved, climate-resilient seeds for small wheat producers to secure the next planting season in October 2022. It will also finance the purchase of the local wheat seeds and their processing (cleaning, sorting, certification) by seeds companies. The processing of durum wheat seeds may require the use of fumigation and pesticides with potential adverse impacts and risks if poorly handled on the population and the environment.

Component 2 - Emergency procurement of wheat for food security (US\$60 million), aims at securing wheat supply to the domestic market to avoid disruption to food security in the short term. It will finance the purchase of an estimated quantity of 120,000 tons of wheat to secure orders and contracts in a context where market conditions and price evolution are difficult to anticipate. The Project will use the existing Government's wheat purchase mechanism through Office des Céréales (OC). OC is the state-owned company which holds a monopoly on grain domestic trade and imports (durum and soft wheat, and barley). The existing distribution mechanism of the wheat will be used.

Component 3 – Improving resilience to food security shocks and adaptation to climate change (US\$10 million), aims at addressing distortions and structural weaknesses in the grain value chain. The approach will in three-fold: (i) prepare a plan to modernize OC, including reassessing its current pivotal role in the value chain linked to its monopoly for grain procurement domestically and internationally, and for distribution to the agro-processing industry; (ii) analyze the food subsidy and facilitate its gradual phasing-out and transitioning towards a cash transfer mechanism; and (iii) propose a new framework of incentives to support domestic wheat production and foster adaptation to climate change. With the support of the World Bank in the last decade, Tunisia has set up a solid cash transfer program known as Amen (Arabic for Safety - established 2019) for the poor and vulnerable, the PIU is expected to work in close collaboration with the Amen Program to minimize social exclusion risk in the transition from food to cash transfer. D. 2. Borrower's Institutional Capacity

Project coordination oversight will be with the Prime Minister's Office. A Project Steering Committee will be established with participation of key Ministries (Economy, Finance, Trade, Industry and Agriculture) and the Office des Céréales (OC). This Steering Committee will ensure the oversight of grain purchase and the preparation of the grain subsector reform agenda. The Office des Céréales (OC) will implement all project activities. Under components 1 and 2, OC will be in charge of grain purchase both for food consumption and animal feed. OC is a public entity under the responsibility of MARHP and has well established grain procurement procedures that meet Bank requirements with some slight adjustments described in section IV.B of the PAD. Under component 3, OC will carry out studies, capacity building activities and other TA activities under the guidance and instruction of the Steering Committee. Design and implementation of TA activities will be done in close coordination and consultation with other concerned Ministries (Economy, Finance, Trade, Industry). A dedicated Project Implementation Unit (PIU) will be established in OC's



General Directorate with short-term consultants to directly manage and monitor Project activities, and to ensure close oversight of fiduciary and ESF requirements. The Office des Céréales has no E&S specialists and has no prior experience in working with Bank projects. Therefore, an E&S focal point/consultant will be assigned/recruited prior to project effectiveness to ensure that the project complies with the Bank's environmental and social requirements. The Office des Cereales's limited capacity in application of the World Bank ESF is a risk factor which is expected to be mitigated through the World Bank team's capacity building measures to the E&S assigned focal point throughout the project duration as needed.

Environmental Risk Rating is Substantial because: (i) there are adverse impacts and risks; (ii) low capacity of the

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Substantial

Substantial

Environmental Risk Rating

implementing agency/PIU; (iii) project is not as complex as high risk operations and will not be located on sensitive sites; (iv) medium to low probability of serious effects to human health and/or the environment; (v) impacts are mostly temporary, predictable and or reversible; and (vi) routine safety precautions are expected to be sufficient to manage the potential environmental risk that may result from the project. The key environmental, occupational health and safety, risks and impacts associated with the project activities are related to the handling and storage of wheat and barley in the silos at the receiving ports of Tunisia under Component 1, and during the purchase of durum wheat seeds by OC, and the processing of the seeds under component 2. The project activities will result in air emissions (gaseous pesticide residuals, emissions from back-up generators), organic dust, noise, solid, liquid and hazardous wastes and use of pesticides. The project entails the processing and certification of durum wheat seeds through existing contractual arrangements between the Institut National de la Recherche Agronomique de Tunisie (INRAT - Tunisia National Agriculture Research Institute]) and selected farmers. This project will also finance the supply of 40,000 tons of quality wheat seeds to secure the next planting season. The Institut National de la Recherche Agronomique de Tunisie (INRAT - Tunisia National Agriculture Research Institute) has developed different varieties suitable for specific agro-ecological zones with enhanced climate-smart traits, notably water- and heat-stress resistance. These varieties will be multiplied by specialized producers/farmers network that are given basic seeds to multiply under the supervision of two farmer cooperatives and two private companies (SOSEM and TUNIFERT). The whole grain seed multiplication and distribution system is overseen by MAWRF's technical services to ensure both quality and equity. This network of farmers are identified by INRAT based on their experience, technical capacity, equipment, qualification of staff, availability of fields etc. To mitigate the impact of current high prices on seed and grain producers, and to maintain access to certified seeds for the upcoming planting season, the Project will help OC purchase the grain seeds multiplied by seed producers during the 2021/2022 cropping season, finance their cleaning, sorting and packaging (preparation of certified seeds), certification at the start of the 2022/2023 season. The downstream activities, which are outside the project scope (I.e. transportation, milling, distributing flour, baking and distributing bread and other baked products) after offloading the vessels will follow the government existing arrangements, processes and protocols. The project will involve primary suppliers of wheat and barley, in which their involvement is considered essential for the project to achieve its objective. TA activities under components 2 and 3 E&S potential risks and impact will be addressed in compliance with OESRC Technical Advisory note of May 2019. In addition, the borrower will prepare and adopt a strategic Regional Environmental and Social Assessment that shall; examine environmental and social risks and impacts, and issues, associated with the findings and recommendations



of the TA, evaluate and compare the impacts against those of alternative options; assess legal and institutional aspects relevant to the risks, impacts and issues; and recommend broad measures to strengthen environmental and social management in the sector. This Regional ESA shall pay particular attention to potential cumulative risks and impacts of multiple activities. This shall take the form of a TA's outputs rather than an ESF instrument per se. The ESA will be cleared prior finalization of the TA's report.

Social Risk Rating

Substantial

The social risk rating is substantial. The overall project impacts are expected to be positive. Project will benefit both stakeholders in the GOT, stakeholders in the transport sector, the agro-business industry, small farmers and consumers, including poor and/or vulnerable groups. The social risks associated with the project activities are: (i) predictable and of temporary nature; (ii) site specific; (iii) of low probability of serious effects to social exclusion; (iv) the project is not expected to fund activities with high potential for harming people. The processing of the procured seeds will follow existing Public-Private sector arrangements set forth by the GoT. The risks associated with the proposed project activities could include use of child labor, forced labor, sexual harassment, discrimination as well as operational, health and safety risks involved in wheat and barley offloading, loading, and storing of grains (wheat, barley) and the processing of seeds. The support to the effort of gradually transitioning food subsidy towards a cash transfer mechanism, may induce social exclusion risks and elite capture, this activity is within the boundary of the project, and the risk of potential social exclusion and elite capture shall be part of the overall effort to gradually transitioning food subsidy to cash transfer. In addition, a social impact assessment, consultations with vulnerable groups will be carried out in in conjonction with the design of the food subsidy compensation mechanism. Land acquisition and resettlement is not anticipated under this project, and the project is not financing civil works. Potential negative social downstream impacts may include physical and economic displacement, impacts on vulnerable groups and ethnic minorities, labor influx, social exclusion, weak stakeholder engagement or feedback mechanisms in relevance to the proposed future investments.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

This standard is relevant.

The unloading and loading of wheat and barley from the vessels at the port and their transport to storage facilities will have environmental and social risks and impacts, including minor dust emission from the suctions of grains from the vessels, Occupational Health and Safety (OHS) risks on workers related to fumigation and use of pesticides, the dynamic risk from moving objects, and COVID-19 transmission risks during the unloading process and the transport to storage facilities. There will be labor-related risks among project contractors, primary suppliers as well as project management staff. These risks, apart from OHS, could be related to SEA/SH, child labor, forced labor, and discrimination. The borrower will adopt the WBG General EHS Guidelines and the WBG EHS guidelines for crop production as reference of good international industry practices (GIIP).



The PIU will prepare a labor management procedure (LMP) in line with relevant laws of Tunisia and World Bank ESS2. Labor requirements for contractors and primary suppliers will also be included in the bidding documents and their contracts. The Project has been prepared under emergency preparation, where it was agreed to defer the LMP which will be prepared, consulted on, reviewed, and cleared by the Bank and disclosed by project effectiveness date and before the start of relevant project activities.

The PIU will prepare an Environmental and Social Management Framework (ESMF) to address the risks and impacts associated with storage and transportation and other activities (transportation; waste management, fire safety at silos, emergency preparedness etc.) and an Occupational Health and Safety Plan (OHSP) which will include standard measures to be adopted to prevent inadequate exposure to dust emissions, and other occupational health and safety risks. The ESMF and OHSP will be prepared by the PIU and cleared by the Bank. The OHSP will be included in the framework agreement between the PIU and eligible importers and will cascade to the contract between the importers and unloading contractors at the port The preparation of the ESMF and OHSP will be incorporated in the ESCP.

The SEP and ESCP have been prepared by the client, and will be cleared and disclosed by appraisal.

The PIU will also prepare, adopt disclose and implement an ESMP for the processing and certification of durum wheat seeds. This ESMP will include (i) a risk assessment to determine the use of the certified wheat durum seeds and (ii) the pest management plan.

The PIU will also undertake E&S audits of the Government Silos at designated ports, in addition to checks of their environmental approvals/permits.

An Environmental and Social Specialist/focal point will be hired or assigned to support the implementation of the environmental and social (E&S) requirements of the project, including OHS and the grievance mechanism.

With reference to the 2019 OESRC Advisory Note on Technical Assistance (TA) and the Environmental and Social Framework, components 2 and 3 of this project fall into the scope of a TA with reference to the following categories: type 1 (supporting the preparation of future investment projects), type 2 (supporting the formulation of policies, programs, plans, strategies, or legal frameworks), and type 3 (strengthening borrower capacity). Specifically, the project will: i) finance a detailed assessment of OC's storage facilities and other logistical infrastructure (port, rail); ii) help prepare a rehabilitation, construction and modernization plan with associated costs that could be proposed to donors, such as EBRD and AFD, who have expressed interest in investing in grain storage expansion in Tunisia, including through OC and private operators; assist the GoT in phasing out of food subsidies, the Project will help GoT to revisit the existing public support program to strengthen the resilience of domestic grain production to shocks and climate change. Under the TA, this project will not finance the the implemendation of the recommendations for the report of the TA. Relevant E&S studies will be undertaken by the PIU acceptable to the Bank and in accordance with the principles of the ESF. To this end the borrower will prepare and adopt a strategic Regional Environmental and Social Assessment that shall examine environmental and social risks and impacts, and issues, associated with the findings and recommendations of the TA . The regional ESA report will be cleared before finalizing the findings and recommendations of the TA's report.



ESS10 Stakeholder Engagement and Information Disclosure

This standard is relevant. Project activities are expected to positively rather than negatively affect Tunisians. It will provide income generating opportunities for stakeholders directly involved in project planning and implementation, and food security to beneficiary stakeholders. Stakeholders that are likely to benefit from income generating opportunities include but are not limited to: staff of the GOT, transport sector business, the agro-business industry, small farmers and the restaurant industry. The benefits of food security will positively affect all consumers in Tunisia, nationals and foreigners, including poor and/or vulnerable groups. Vulnerable and disadvantaged groups include women groups, female-headed households, people with disabilities, the elderly, various minority groups, the extremely poor, and the illiterate. Project stakeholders to be potentially negatively affected include, include but are not limited to: labor and drivers, and particularly those without health and social insurance, people living near the silos and farmers working under stress to deliver generous harvests of wheat and barley.

The Office des Cereales (OC), has carried out an identification of stakeholders and prepared a stakeholder engagement plan (SEP). The SEP identified the project affected parties, other interested parties and vulnerable groups. The reports on the discussions and the results of the consultations carried out with some of those stakeholders on May 20, 2022. Those stakeholders include: L' Office des Cereales who is directly benefitting from the financial support of the project, the Port Authority, the association of Millers and mills' owners, relevant government institutions such as the Ministry of Finance, Ministry of Agriculture, Office des Cereales, Direction de Financement et de l'Organisation de Professionnelles, Bureau de la Coopération Internationale, Bureau Général de l'Office de l'Elevage et du Pâturage, Bureau Général de la production agricole, Bureau Général de l'Agence de la Vulgarisation et de la Formation Agricole, Syndicats des Agriculteurs de Tunisie, and civil society such as Organisation tunisienne de défense du consommateur. The discussions and the results of the consultations which were documented in minutes, confirmed the necessity of the project.

Stakeholder engagement will continue throughout project implementation. Active efforts will be made to seek stakeholders' feedback on the consistent availability of wheat andbarley. The modes of engagement and the frequency of engagement will be determined by the needs of the project as well as the needs and interests of different stakeholders. Information about the project will be made available to stakeholders through the PIU's website. The PIU will conduct additional consultation with vulnerable and disadvantaged stakeholders and others, before the start of project activities and the SEP will be updated as needed

The SEP includes a project grievance mechanism (GM) in line with the requirements of ESS10. The existing GM of MAWRF will be used andwill be updated and operated to receive, process and address project-related grievances. Information on this GM will be disseminated widely before the commencement of project. The functioning and effectiveness of the GM will be closely monitored during implementation and adjustments will be made where necessary in agreement with the Bank. GM will include an uptake mechanism for SEA/SH related grievances . Further, SEA/SH plans will be developed to address the identified risks as need be.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions



This standard is relevant. Although the project will not involve civil works, the Project activities will involve i) direct workers, who are government staff noting that ESS2 does not apply to such staff (civil servants) especially as there are no risks of child or forced labor (para 17-20) and OHS risks are minimal as they are mostly involved in office work; ii) primary supply workers, who will be involved in the supply of wheat and barley; iii) contracted workers, who are engaged in wheat and barley offloading at the ports and who are contracted by the importers and by the processing of seeds companies. These seeds varieties are being multiplied by specialized producers/farmers identified by INRAT under the supervision of two farmer cooperatives (Société mutuelle centrale des semences and Société Mutuelle Centrale de Semences et Plants Sélectionnés) and two private companies (Société des Semences Méditerranéennesand Tunisie Fertilisation). The government staff assigned to this project will maintain their existing employment arrangements throughout project implementation. To manage the potential risks related to labor involved such as OHS, sexual exploitation and sexual harassment, discrimination, relevant aspects of ESS2 will be applied, including: a) implementing adequate occupational health and safety measures; b) setting up grievance mechanism for the workers; c) provisions which will be included in the selection of primary suppliers to ensure that no child labor and forced labor are engaged. Labor management procedures will be prepared in line with relevant laws of Tunisia and World Bank ESS2. It will be disclosed by the Effective Date. The OHSP will be prepared by the PIU and will be included in the framework agreement between the Office des Cereales and local importers. In addition, contractors will similarly prepare and implement Contractors OHSP.

ESS3 Resource Efficiency and Pollution Prevention and Management

This ESS is relevant. There will be some dust emissions while offloading the grains. Suppressing the dust by spraying water is not an option as this would damage the grains, therefore, the OHSP prepared by the PIU will include measures to ensure minimize exposure risks to such limited dust emissions. To secure grains and seeds, the authorized pesticides will be used therefore, the PIU will be required to ensure proper handling, storage and application of pesticides in the silos consistent with the WBG EHSGs, by preparing a Pest Management Plan for each silo site (receiving ports and inland) that will be World Bank reviewed, cleared, and nationally and World Bank disclosed in accordance with the ESCP requirements. The project is not expected to consume significant quantities of water or energy resources. Monitoring the water and electricity consumption during the operation and maintenance of the silos will provide good records to study any possible resource efficiency measures by comparing the consumptions of the different silos. In addition this is the potential risk resulting from the use of pesticides for the production and storage of seeds. Pest and pesticide mangement plan will be prepared and implemented by the borrower. Mitigation measures associated with any wastes generated during offloading and storage of grains, PPE usage etc will be included in the ESMF.

ESS4 Community Health and Safety

This ESS is relevant. The Borrower will implement World Bank guidelines on COVID 19 safety and other community health and safety standards, as applicable, which will guide all interactions during implementation. This will be part of C-OHSP as mentioned under ESS1. The SEA/SH risk assessment is low. Respective SEA/SH risk mitigation measures will be prepared for low risk as per the World Bank Good Practice Note and incorporated in the C-OHSP as mentioned under ESS1. The PIU will prepare, adopt, disclose and implement an ESMP for the production and processing of the durum wheat seeds that may involve the use of pesticides. This ESMP will therefore include a risk assessment to determine the use of the certified wheat durum seeds. For the purchase of wheat and barley, the required quality



control will be carried out prior to shipment in a manner consistent with GIIP. Upon arrival and storage of the grains in silos, OC will conduct the required due diligence to ensure that the imported wheat and barley will be analyzed to ensure they are meeting food safety standards.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement This ESS is not relevant. The project will not entail land acquisition, restrictions to land use nor resettlement.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

This ESS is relevant. The project activities are not expected to have any significant impacts on biodiversity, natural habitats or living natural resources. The suppliers of wheat are grain trading companies which are selected usually by brokers, who shop for the most advantageous offers, in terms of price and logistics, for meeting the wheat and barley specifications needed. The suppliers usually store the wheat and barley at different locations around the world, and sometimes buy from loaded ships in the middle of the sea and mobilize the shipment to Tunisia based on most convenient logistic arrangements. Although selling companies are not directly cultivating the wheat and barley, the supply chain of wheat and barley may indicate that the source of wheat/barleyis from areas where there is a risk of significant conversion or significant degradation of natural or critical habitats. Although this risk is low, for wheat and barley cultivation, OC shall check if the cereals to be purchased originate from areas where there is a risk of significant conversion or significant degradation of natural or critical habitats and that, if this is the case, an evaluation of the systems and verification practices used by the primary suppliers will be conducted.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities This ESS is not relevant.

ESS8 Cultural Heritage This ESS is not relevant.

ESS9 Financial Intermediaries

This ESS is not revelant.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

No

No



B.3. Reliance on Borrower's policy, legal and institutional framework, relevant to the Project risks and impacts

Areas where "Use of Borrower Framework" is being considered:

Borrower's Framework is not being considered.

IV. CONTACT POINTS

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VI. APPROVAL					

Task Team Leader(s):	Olivier Durand
Practice Manager (ENR/Social)	Lia Carol Sieghart Cleared on 09-Jun-2022 at 09:56:38 GMT-04:00
Safeguards Advisor ESSA	Gael Gregoire (SAESSA) Concurred on 09-Jun-2022 at 13:54:14 GMT-04:00

No