Public Disclosure Copy

INTEGRATED SAFEGUARDS DATA SHEET APPRAISAL STAGE

Report No.: ISDSA13104

Date ISDS Prepared/Updated: 08-Feb-2016

Date ISDS Approved/Disclosed: 22-Feb-2016

I. BASIC INFORMATION

1. Basic Project Data

Country:	Benir	1	Project ID:	P147014			
Project Name:	Public Investment Management and Governance Support Project (P147014)						
Task Team	Robert A. Yungu						
Leader(s):							
Estimated	25-Ja	n-2016	Estimated	29-Mar-2016			
Appraisal Date:			Board Date:				
Managing Unit:	GGO	13	Lending	Investment Project Financing			
			Instrument:		No. 201		
Sector(s):	Central government administration (100%)						
Theme(s):	Administrative and civil service reform (60%), Managing for development						
	results (40%)						
		sed under OP 8.50 (Em	•	very) or OF	No		
		to Crises and Emerge	ncies)?				
Financing (In US	Financing (In USD Million)						
Total Project Cost: 30.00		30.00	Total Bank Fir	nancing: 30.00			
Financing Gap:		0.00					
Financing Sour	rce			Amount			
BORROWER/RECIPIENT					0.00		
International Development Association (IDA)					30.00		
Total	Total 30.00						
Environmental	C - N	ot Required	1				
Category:							
Is this a	No						
Repeater							
project?							

2. Project Development Objective(s)

The project development objective is to improve efficiency in public investment management and enhance the performance of selected institutions of accountability in Benin.

3. Project Description

The proposed Project will be financed by an Investment Project Financing (IPF) loan of US\$30.00

million. The modality for project implementation will consist of a blended approach which combines technical assistance, for which disbursements will be based on inputs, with results-based financing, which will be linked to the achievement of agreed-upon performance indicators (Disbursement Linked Indicators - DLIs) and the reimbursement of a portion of eligible expenditures of existing government investment programs.

The approach adopted by the Project seeks to support the Government in directly tackling the technical and governance challenges that presently affect public investment management (PIM), whilst simultaneously providing results-based incentives to specific line ministries to improve their management of discrete investment projects. The technical assistance components have been designed on the basis of comprehensive technical diagnostics conducted by the Government, with the support of development partners. The results-based lending component supports discrete projects within the Government's own public investment programs in the energy, water and justice sectors.

The Project consists of four strategically linked and mutually reinforcing components:

Component 1: Enhancing Efficiency and Effectiveness in the Public Investment Management Expenditure Cycle (US\$ 9 million)

Sub-component 1.1: Strategic Guidance and Appraisal (US\$2.0 million)

The sub-component seeks to improve the coordination and timely preparation of well-appraised projects. Envisaged activities include:

- Elaboration of a PIM manual to serve as a mandatory reference framework for the preparation and implementation of investment projects. The manual will include guidelines for conducting feasibility studies, preparing concept notes and carrying out appraisal, supervision, and contract management. It will also include guidelines and information on the vetting of projects, PIPs, and recurrent expenditures. The manual will ensure that the National Directorate for the Control of Public Procurement (Direction Nationale du Contrôle des Marchés Publics, DNCMP) is mandatorily implicated in the preparation of the budget. The Ministry of Development will ensure that line ministries comply with the PIM manual guidelines by monitoring the processes and procedures used at different stages of project cycle. There will be warnings and actions against ministries or units that fail to meet required PIM standards.
- Technical assistance for the development of basic fiscal rules to be approved by the government (cabinet) as guiding principles in support of the orderly implementation of the PIM principles as this will limit the flow of politically-desirable projects into the PIP and the budget and crowd out the more socially and economic viable ones that make more productive contributions to national development.
- Technical assistance to strengthen the financial and fiscal risk assessment and management role of the Ministry of Finance, especially regarding contingent liabilities for the Government in the case of PPPs and other emerging financial instruments like the refinancing public investment mechanism.
- Technical assistance to the General Directorate of Budget in setting-up of effective sectorial budget monitoring centers in charge of budget dialogue with ministries (sectoral policies, sectoral budgetary framework, budget decisions, budget implementation monitoring). This assistance will

include the i) creation of a budget synthesis function, ii) finalization of a Management Charter clarifying the roles and responsibilities of different actors involved in the performance budgeting approach (program-budget, fungibility of funds, commitment authorizations and payment allocations, selection of performance indicators and evaluation), (iii) the design of a new organizational chart of the General Directorate of Budget and its implementation plan, including the impacts in terms of human resources, iv) support for establishment of sectorial budget costing models that help simulations with agreed sectorial indicators.

- Upgrading of the existing Integrated System for the Analysis and Programming of Investment Programs (Système Intégré d'Analyse et de Programmation des Investissements Publics, SIAPIP) with the Integrated Public Finance Information System, SIGFIP, the Procurement Management Information System (Système Intégré de Gestion des Marchés Publics, SIGMAP), and the Harmonized and Integrated Public Investment Monitoring and Evaluation System (Système Harmonisé et Integré de Suivi et Evaluation des Projets et Programmes d'Investissements, SHISEPIP)1. The set-up of the intranet and extranet will make significantly enhance SIAPIP functionalities.
- Development of a database of projects which have feasibility studies, have been appraised, and are 'ready for execution', which should be made public.
- Workshop and training programs based on the new budget organic law (LOLF) on planning, programming, and investment decision-making.

The execution of the above envisaged activities should lead to a substantive increase in the percent of investment projects appraised in compliance with the PIM appraisal guidelines manual, including cost-benefits analysis and independent review at the Ministry of Planning. It is expected that this percent will rise from 15 in the first year to eventual reach 85 in five years at the end of project.

Sub-component 1.2: Multi-year Budgeting and Project Selection (US\$1.0 million)

The sub-component will strengthen existing project selection mechanisms and budgeting procedures. This will ensure that un-vetted or opportunistic projects are not included in the annual budget. It will assure the advanced preparation of procurement plans (PPMs), annual work plan (PTAs), and credits consumption plan (PCCs) in time for the submission of the budget to Parliament. Active involvement of the DNCMP in the preparation of the budget will be emphasized. Key activities will include:

- Technical assistance on the development of standard costs to improve cost planning and monitoring.
- Technical assistance to help project teams in selected line ministries to prepare PPMs, PTAs, and PCCs to be presented before submission of the Finance Law to the Parliament.
- Technical assistance to help ministries that have significant capital budgets to use the new performance budgeting tools introduced by the new Organic Finance Law (LOLF) e.g. the multi-year expenditure programming documents (DPPD), annual performance report, and multi-year liabilities authorization (autorisation d'engagements pluriannuels, AEP).
- Seminars and training on project ranking and selection based on assessments of economic and social returns a process that is critical for the optimization of finite budget resources

As a result of the execution of the these planned activities, a significant improvement is expected at the end of project in: (i) the percent of projects selected for annual budgeting in line the PIM project selection guideline (i.e. project selected should be part of the PIP and have a complete procurement plan); and (ii) average time taken for release of budgets to credit managers for investment projects selected for the year.

Sub-component 1.3: Project Implementation (US\$2.0 million)

This sub-component aims to improve the timely and effective execution of investment projects. This stage of the PIM cycle also involves developing institutional capacity for project restructuring to respond to lessons-learned and difficulties encountered during project implementation. Procurement, which is the major source of delays and cost overruns in the project implementation stage, will clearly receive most of the technical assistance support under this sub-component. In the same vein, the three sectors targeted by the results-based financing scheme (electricity, water, and justice) will benefit the most from this technical assistance. Envisaged activities include:

- Support for the organization of the mandatory monthly ministerial working group meetings with credit administrators, treasurers, budget officers, and comptrollers of the Ministry of Finance's DPP, Directorate of Financial and Assets Management (DRFM), and Directorate of Financial Control (DCF) to prioritize project funding by the Treasury.
- Support to the DGB, Treasury and Directorate of Budget control for the setting-up of commitment ceilings for budgetary units (i.e. ministerial commitment plans) based on cash flow forecasts and the overall national budget.
- Progressive development of the electronic management of tender processes (e-procurement) as and introduction of a bidder pre-qualification process and a categorization of enterprises. The development of e-procurement will first entail the set-up of a robust internet system and deployment of required equipment. The infrastructure network linking SIGMAP to different procurement contracting units will thus be upgraded.
- Technical assistance to support the creation of a professional cadre of procurement specialists (with diplomas in Management of Public Procurement) within the public administration system and the mandatory inclusion by all contracting authorities (ministries, public institutions, local authorities, and agencies) of at least one procurement specialist from within the cadre
- Capacity building through seminars and training of all key actors involved in the procurement system in planning, execution, and contract management of procurement as well as on project restructuring and closing of under-performing projects.
- Improve the hierarchical system of risk-based controls for public investments along the expenditures chain
- Development of standardized technical specifications for the acquisition of common items to assist the DNCMP in evaluating technical aspects of tender packages.
- Technical assistance for establishing the managing system of financial and non-financial

assets generated by public investments.

Expected results that will result from the above activities include improvement of the: (i) processing time of public procurement; and (ii) execution rate of public procurement commitment plans in selected line ministries.

Sub-component 1.4: Project Evaluation and Audit (US\$1.5 million)

This sub-component will build capacity to evaluate project results against expected objectives, facilitate learning for better design of future projects and ensure compliance with fiduciary procedures. The following activities are proposed:

- Technical assistance for the development and set-up at the Ministry of Development of a dashboard for SHISEPIP (monitoring and evaluation system).
- Seminars and training programs in project evaluation and audit, including the development of risk-based auditing and performance auditing for the national oversight institutions (Auditor General, General Inspectorate of Finance, Ministerial Inspectorates). Risk maps establishment and strategic audit programs will be supported for all priority ministries like Education, Health, Agriculture and infrastructure.
- Technical assistance to improve and rationalize of the institutional and legal frameworks of national internal audit institutions (Office of the Auditor General, General Inspectorate of Finance, and general ministerial inspectorates).
- Support for the preparation and the implementation of selected activities from the Chamber of Accounts modernization plan which will lead to the conversion of the Chamber to a Court of Accounts.
- Support for the organization of quarterly portfolio monitoring meetings led by the Ministry of Development that will include project managers from line ministries.
- Training in the elaboration of quarterly consolidated information on financial, and physical execution of projects.
- Support for the organization of joint quarterly site visits of the General Directorate for Programming and Monitoring of Public Investments (Direction Générale de la Programmation et du Suivi des Investissements Publics DGPSIP) and Project Implementation Units.
- Support for raising awareness of civil society organizations (CSO) including media on investment project implementation outcomes and issues. CSO will be associated with the Government in the monitoring process of public investment projects. Key CSOs that focus on effectiveness and efficiency of public investments will receive appropriate training on PIM monitoring and evaluation and will be called to make their assessment on the performance of government investment program.
- Training and assistance to DNCMP and ARMP in the conduct of procurement post review and audit. This will include technical assistance for organizing the collection of procurement performance statistics in line with the PEFA 2016 framework and support to improve public access to procurement information.

The execution of the above activities shall lead to the increase in the percentage of projects audited and projects formally evaluated.

Sub-component 1.5: Public Private Partnerships (US\$1.5 million)

Activities indicated above for traditional public investments in terms of appraisal, project selection, implementation, and evaluation also apply to PPPs. However, given the specific challenges involved in establishing and managing PPPs, this sub-component will focus on the following activities that are specifically dedicated to PPPs:

- Technical assistance and advisory services to the Government to improve the PPP law by addressing existing inadequacies in the current draft.
- Elaboration of a PPP operational manual which will cover the four standard phases of (i) PPP identification and screening, (ii) business case evaluation, (iii) negotiation and transaction, and (iv) contract management. Specific guidelines will be developed on project viability, marketability, value for money, transaction structure, drafting of PPP agreements, pre-qualify bidding, request for proposals, evaluation and award, project risks management, PPP performance management, and administration of agreements
- Streamlining and strengthening the institutional framework governing PPPs.
- Technical assistance to integrate PPP and PIM from the early stages of the project cycle. Ideally final appraisal of traditional investment projects and PPPs should be done by the same unit.
- Rapid assessment of proposed PPPs for which there are no feasibility studies.
- PPP training programs on project finance, project appraisal, procurement and due diligence, contract management, performance management, negotiations, fiscal risk management, fiscal monitoring and reporting

The execution of these capacity building activities related to PPP should lead at the end of the project to these key results: (i) increase in the number of PPP transactions and (ii) reduction in the number of unsolicited PPP bids. Given the limited budget for this component the project will seek to mobilize additional technical assistance support from sources such as the Public Private Infrastructure Advisory Facility (PPIAF

Sub-component 1.6. Support for Centralized and Consolidated Monitoring and Evaluation of the Government's Investment Program (US\$1.0 million)

The sub-component will support the operationalization of the centralized monitoring and evaluation system recently established by the Government for PPPs and flagship investment projects. In particular, it will support the BOS within the President's office. The United Nations Development Program (UNDP) and United Nations Population Fund (UNFPA) are currently supporting the BOS by providing \$1.7 million over the next three years to help with the design and initial roll-out of an M&E system Under this sub-component, the World Bank will focus on the scale-up and maintenance of the system, to ensure that all projects in the portfolio are adequately monitored and implementation bottlenecks are adequately addressed. Activities will include:

- The development of a computerized dashboard, which will be public, to consolidate data from ministerial information systems on flagship investments and development programs.
- Change Management for development sessions for high level officials.
- Coaching and training of coaches for the roll-out of Rapid Results Initiative (RRIs) processes in the management / monitoring of selected investments.

Some of the key results expected to be achieved as the result of these activities include: (i) a centralized monitoring dashboard; (ii) hiring of a good number of coaches supporting the implementation of RRIs; (iii) annual high level seminars on change management; and (iii) orders enacted annually as a result of high level change management seminars.

Component 2: Strengthening Good Governance and Accountability (US\$3.5 Million)

This component seeks to enhance accountability throughout the PIM expenditure cycle by reinforcing some of the principle government and judicial institutions that are responsible for holding the public administration to account. Specifically, the component will provide technical assistance to: (i) facilitate the installation and strengthening of administrative chambers in pilot First Instance Courts and the three Appeals Courts (this will be done gradually starting with the Cotonou First Instance Court); (ii) support the ANLC in investigating, reporting and referring for sanction, corruption cases involving the public administration, including those related to public investment projects; and (iii) stimulating public participation in improving quality of service delivery.

Sub-component 2.1 Support to the Justice Sector (US\$2.0 million)

The sub-component will focus on strengthening the institutional capacity of the judiciary to effectively adjudicate administrative law cases. It will adopt a two pronged approach by (i) assisting the Government to pilot and strengthen administrative chambers in selected courts, and (ii) to carry out a targeted backlog reduction program for administrative cases. Activities will include:

- The elaboration of a specific strategy for the phased operationalization of the administrative chambers (drawing upon existing analytical work). The first priority will be to operationalize and strengthen the Cotonou First Instance Court which accounts for almost half of the cases filed in the country;
- Implementation of in-service training, study tours and professional development activities relevant to the operationalization of the administrative chambers
- Design and implementation of a backlog reduction program targeting specifically administrative cases
- Revision of ENAM's initial training curriculum and design of modules tailored to developing specific expertise (administrative law, economic crimes);
- Technical assistance to enhance the judicial in-service training program managed by the MJLDH.
- Technical assistance to align the Ministry of Justice's recruitment strategy with the staffing needs of the administrative chambers.
- Technical assistance for data collection including investigation skills and case management in the administrative chambers.
- Technical assistance to review the legislative and regulatory framework for administrative law jurisdictions.

The key result indicators that will be monitored to ensure the effectiveness of these planned activities are (i) the clearance rate of administrative cases, and (ii) a reduced backlog of administrative cases.

Sub-component 2.2 Support to the Anti-Corruption Authority (US\$1.0 million)

The sub-component will contribute to the implementation of the ANLC's strategy and operational plan to improve the coordination, investigation, reporting and referral functions of this newly created institution. Activities will support:

Training of ANLC representatives in complaints handling, investigation techniques, cross-

check information from asset declarations with other databases (property registry, tax declarations, etc.), preventative mechanisms, and online disclosure.

- Technical assistance to (i) improve communication and coordination among stakeholders and institutions involved in the fight against corruption; and (ii) enhance the tracking and public reporting on public officials' compliance with the assets declaration requirements.
- The establishment of a community of practice to support both officials and technicians in promoting knowledge sharing on implementation of anti-corruption legislation and ANLC collaboration with CSOs in monitoring implementation of the anti-corruption legislation.

Some of the key expected results of the carrying out of these activities include the increase in the: (i) percentage of officials in compliance with the assets declaration requirement; and (ii) number of corruption cases submitted by ANLC to the State Prosecutor.

Sub-component 2.3 Stimulating Public Participation in Improving Quality of Service Delivery (US\$ 0.5 million)

This sub-component will support social accountability objectives by promoting active citizenship and providing platforms for citizen participation. The objective is to harness citizen voice to influence outcomes of public services in the participating sectors (Justice, Electricity and Water). Activities will include:

- Implementation of Citizen Score Card (CSC) to foster informed and productive discussion between the sectors and citizens/civil society, with the view to identifying and addressing service delivery bottlenecks in the sectors. The CRC process will identify biding constraints (e.g. institutional, regulatory, capacity, governance etc.) of public services for different categories of beneficiates. The results will include a comparative disposition of service performance and governance issues across sectors, regions, districts, gender, and occupation with particular focus on the poor.
- A Platform for policy dialogue to be managed by a consortium of stakeholders to facilitate public discussion of the CRC findings to promote accountability of sectors. The consortium will facilitate the elaboration and implementation of concrete and attainable commitments to address public service challenges in the sectors. The CRC would be repeated at mid-term and towards the end of the project to assess changes in performance of sector services attributable to the systematic tracking of beneficiary feedback.

The key result expected to be achieved from these activities is improved responsiveness of sectors to citizens through improvement in aggregate citizen report card scores of participating sectors.

Component 3: Results-Based Financing in the Electricity, Water and Justice Sectors (US\$15 million)

Disbursements under component 3 will be based on the performance of selected ministries in effectively managing specific public investments and reaching agreed-upon DLI targets. The component aligns with the Government's commitment to results-based management and provides incentives to the selected line ministries to harness the technical assistance available under components 1 and 2 to achieve specific outcomes. From the 2016-2018 PIP, 6 projects in the Electricity, Water and Justice sectors have been selected for support under this component. Eligible expenditure programs (EEP) will include no-procurable budget line related to salaries and miscellaneous operating expenditures. The project will monitor budget lines to reimburse expenses

on DLIs.

Electricity: From the PIP, the following two programs have been selected for results-based financing: (i) promotion and development of electricity distribution in urban and semi-urban areas, and (ii) rural areas electrification. The Government's contribution to fund these electricity distribution projects through the national budget over the five years (2017-21) is estimated at US\$24.06 million, and the Bank's contribution through RBF will, if the relevant DLIs are achieved, amount to US\$5 million, or 21 percent of the overall budget for these projects during that period of time. Two budget lines (377629276100 and 7608676900) will be used respectively to monitor expenditures of the rural areas electrification and promotion/development of electricity distribution projects.

Water: Two water projects have been selected for results-based financing. These projects are: (i) provision of drinking water derived from surface water sources and (iii) provision of drinking water in rural and semi-rural areas. The Government will be funding about US\$17.2 million in these two projects in the next five years and the Bank's contribution through RBF will, if the relevant DLIs are achieved, amount to US\$5 million.

Justice: The two justice sector projects selected for the justice sector are: (i) Operationalization of Administrative Chambers; and (ii) Judicial Services Modernization. The Government will be funding about US\$10 million in these two projects and the Bank's contribution would amount to US\$5 million dollars if the relevant DLIs are reached.

In summary, over the next four years, the results-based financing component could bring about US \$15 million to complement about US\$ 50 million that the Government would be spending for the implementation of six critical projects in the energy, water, and justice sectors. The Bank's contribution through Component 3, thus, represents 30 percent of the Government own resources, and will be conditional upon the attainment of the DLIs.

Three DLI focus areas have been selected to trigger results-based financing under Component 3. For all three sectors, the capital budget execution rates and project implementation rates will be used to assess performance in the management of selected sectoral investment programs. While the budget execution rate measures efficiency improvements in the coordination and processing of financial flows, the implementation rate ascertains real or physical implementation on the ground. Assuming that the technical assistance provided under Component One has influenced PIM institutional capacity and investment projects in the selected sectors have been well appraised, procurement delays have been shortened, and funding has been made readily available, it would be reasonable to expect higher budget execution and completion rates. For the justice sector, an additional DLI that measures improvements in the judiciary's institutional capacity to adjudicate administrative law cases has been chosen. Assuming that the capacity of the Ministry of Justice to manage its investment projects improves with the technical support provided under Component One and assuming that the steps required to operationalize the administrative jurisdictions are taken through the technical assistance provided under Component Two and through the effective implementation of the Government's investment projects, it is reasonable to expect that the selected courts will be better equipped to manage administrative matters

Component 4: Support for Project Implementation (US\$2.5 million).

Component 4 will support the Project Coordination Unit (PCU) in coordinating and managing the implementation of the Project. Details of the implementation arrangements are outlines in Section III.

C and Annex 3. Activities will include: (i) the development of annual work programs and corresponding procurement plans; (ii) the management of fiduciary and monitoring activities; (iii) the coordination of technical work and the provision of support services to the technical units within the relevant Ministries; (iv) the monitoring of and reporting on the implementation of the project's activities; and (v) hiring of the independent third-party verification firm for DLIs and budget line spending levels. The Project will provide the funding necessary for the acquisition of office equipment and accounting software, as well as for the payment of the activities related to project coordination and monitoring.

4. Project location and salient physical characteristics relevant to the safeguard analysis (if known)

5. Environmental and Social Safeguards Specialists

Abdoul Wahabi Seini (GSU01)

Abdoulaye Gadiere (GEN07)

6. Safeguard Policies	Triggered?	Explanation (Optional)	
Environmental Assessment OP/BP 4.01	No	The project will not undertake any investments that may induce potential environmental adverse impact	
Natural Habitats OP/BP 4.04	No	The project does not involve or affect natural habitats.	
Forests OP/BP 4.36	No	The project does not involve or affect forests.	
Pest Management OP 4.09	No	The project does not involve pest management.	
Physical Cultural Resources OP/BP 4.11	No	The project will not undertake any investments that may impact on Physical Cultural Resources	
Indigenous Peoples OP/ BP 4.10	No	Not relevant for Benin	
Involuntary Resettlement OP/BP 4.12	No	The project does not involve any physical structure or construction, there is no restriction or acquisition of land planned in the projects activities. No new buildings are to be constructed. The project is therefore Cat C and will not trigger the OP 4.12	
Safety of Dams OP/BP 4.37	No	The project will not finance dams nor rely on dams.	
Projects on International Waterways OP/BP 7.50	No	The project is not expected to affect international waterways.	
Projects in Disputed Areas OP/BP 7.60	No	The project will not be located in a Disputed Area.	

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:

Not applicable. The project is essentially about technical assistance and financial incentives for line ministries and selected institutions of accountability to ensure good public investment management and governance.

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

Not applicable.

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

Not applicable.

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.

Not applicable.

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

Not applicable.

B. Disclosure Requirements

If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.

If in-country disclosure of any of the above documents is not expected, please explain why: Not applicable. Project Category C.

C. Compliance Monitoring Indicators at the Corporate Level

The World Bank Policy on Disclosure of Information					
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?]	No []	NA[X]
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?]	No []	NA [×]
All Safeguard Policies					
Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes []	No []	NA [×]
Have costs related to safeguard policy measures been included in the project cost?	Yes []	No []	NA[X]
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	Yes []	No []	NA [×]
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?	Yes []	No []	NA[X]

III. APPROVALS

Task Team Leader(s):	Name: Robert A. Yungu			
Approved By				
Safeguards Advisor:	Name: Johanna van Tilburg (SA)	Date: 18-Feb-2016		
Practice Manager/ Manager:	Name: Guenter Heidenhof (PMGR)	Date: 22-Feb-2016		