

**PROJECT INFORMATION DOCUMENT / INTEGRATED SAFEGUARDS DATA
SHEET (PID / ISDS)**

APPRAISAL STAGE

Report No.: 105985

Date Prepared/Updated: May 5, 2016

I. BASIC INFORMATION

A. Basic Project Data

Country:	Senegal	Project ID:	P158415
		Parent Project ID (if any):	P122841
Project Name:	GEF Sustainable Cities Second Additional Financing to the Stormwater Management and Climate Change Adaptation Project		
Region	Africa		
Estimated Appraisal Date:	18-May-2016	RVP Approval Date:	11-July-2016
Practice Area (Lead):	GSURR	Lending Instrument:	IPF
Sector(s):	Flood protection (94%), Public administration- Water, sanitation and flood protection (6%)		
Theme(s):	Natural disaster management (50%), Other environment (50%)		
Borrower(s)	Government of Senegal		
Implementing Agency	Municipal Development Agency		
Financing (in USD Million)			
	Financing Source	Amount	
	BORROWER/RECIPIENT	16.20	
	International Development Association (IDA)	90.60	
	GEF IAP-SC financing	5.50	
	Total	112.30	
Environmental Category	A - Full Assessment		
Concept Review Decision	Review did authorize the preparation to continue		
Is this a Repeater project?	No		

Is this a Transferred project? (Will not be disclosed)	No
Other Decision (as needed)	

B. Introduction and Context

Country Context

Senegal covers a land area of 197,000 km² and has a very unevenly distributed population of about 12.7 million. The climate is tropical with two seasons: the dry season (October to May) and the rainy season (June to September). Dakar, its capital city, is located at the westernmost tip of the country on the Cap-Vert peninsula.

The country is increasingly urbanized with more than 42% of the population living in cities and notably in the Dakar Metropolitan Area. The region of Dakar covers only 0.3% of the national territory but hosts about 2.7 million (24%) of the national population and concentrate 80% of economic activities. The annual urban population growth rate is estimated at 3%. The city's infrastructure, built to accommodate 300,000 people, is over-stretched. Over 90% of the population in peri-urban Dakar (Pikine and Guédiawaye) lives in areas classified as slums or spontaneous settlements.

Natural disasters such as floods, droughts and storm surges have been increasingly noted and climate change is expected to increase the extremes of weather patterns and natural hazards in the country (e.g. sea-level rise, coastal erosion, etc.). They are exposing both the urban and rural poor to stress and poverty. The vulnerability of Senegal to natural disasters and climate change related changes is linked to its 700 km coastline largely open to the Atlantic Ocean, its latitudinal position which is in a transition zone between the Sahelian climate and the Guinean climate which causes significant rainfall variations within the country, and the existence of two major river systems which results in potentially high groundwater levels during the rainy season. The country ranks 9th in the world for with the largest share of its urban population living in low elevation coastal zones (Dakar, Saint Louis, Thies, Matam, Kaolack, Diourbel, Kolda, Kaffrine and Tambacounda). This physical vulnerability is exacerbated by a low economic development with GDP per capita of US\$1,900 in 2010, limited capacity to create permanent and more sustainable jobs, low agriculture production, inadequate resource allocation for urban and social services, and a general land-use planning failure.

Sectoral and Institutional Context

Recurrent stormwater flooding is the most serious natural hazard Senegal has been facing over the last three decades. From 1980 to 2008, floods have affected an estimated 400,000 to 600,000 people a year and caused significant damage on infrastructure, public equipment and private property along with economic losses. In 2009, heavy rainfall once again caused serious flooding in Senegal, particularly in Dakar but also in the rest of the country. According to Government figures about 360,000 people were directly affected. A Post Disaster Needs Assessment (PDNA) assessed the cost of the 2009 flooding in Senegal at US\$104 million, including almost US\$56 million for damages and US\$48 million for losses. The peri-urban areas of Dakar were the most affected, with the cost of flooding estimated at US\$82 million.

Urban floods are recurrent in Dakar, and are caused not only by heavy rains but by unplanned urbanization, the lack and/or obstruction of drainage systems and rising groundwater according to the PDNA. In 2009,

the rainfalls that caused the floods were above average, but not exceptional. Most of the flood prone areas were urbanized during the drought period and a recent study financed by GFDRR (Preparing to Manage Natural Hazards and Climate Change Risks in Dakar, Senegal) highlighted that almost 40% of new population in the peri-urban Dakar has settled in areas with significant hazard potential especially inland flooding. Because of the absence and/or lack of maintenance of the drainage system, and the obstruction of natural drains by urbanization, the water can no longer be evacuated. The level of groundwater rises because it can no longer be used for water supply, aggravating the vulnerability.

With regards to the issue of urban planning, numerous planning, technical and regulatory instruments (“Code de l’urbanisme”, Strategic Urban Plan, Urban Master Plans, Local Detailed Urban Plans and Construction Plans) have been put in place, but none of them has succeeded in improving the planning and management of these rapidly growing urban centers.

Selection of Senegal as a Sustainable Cities Program Pilot. In early 2015, the Government of Senegal signaled its desire to participate in the GEF’s new Sustainable Cities Program (SCP) as a pilot country, given its interest in integrating climate resilience into its national urban management strategy. The GEF agreed to include Senegal in the program and proposed two grants to be administered separately by the World Bank and the United Nations Industrial Development Organization (UNIDO), with the Bank focusing on integrating climate risks in urban planning and management and UNIDO on promoting renewable energy, integrated waste management and sustainable industrial parks. The GEF provided a project preparation grant in May, 2015. It was agreed that the new grant would be a good fit for scaling up activities in the urban management component of the Stormwater Management and Climate Change Adaptation Project (PROGEP).

PROGEP experiences and lessons-learned are intended to contribute to the ongoing development of sustainable and resilient cities as the lack of good urban planning and management has been recognized as a main reason recurrent flooding in Senegal. This new AF will support a scaling up and introduction of activities in the two project pilot sites – Diamniadio and Saint-Louis – as a pilot “sustainable cities” sub component to support addressing challenges linked to (i) an emerging high priority urban pole (Diamniadio case) and; (ii) an old coastal city that is exceptionally vulnerable to climate change and variations and needs urgent resilience measure (Saint-louis case). Sustainable development of cities is being an urgent need and priority in line with the Government broad urban poles development program for accelerating economic growth and reducing poverty.

Proposed scope. The existing PROGEP supports reduction of flood risks through improved urban management, drainage works, and community engagement in flood control activities. The new AF will scale up the project’s urban management capacity building component focusing on developing integrated climate resilience solutions for two cities under the GEF Sustainable Cities Program. The AF will finance three main areas:

- ✓ *Sustainable Cities Initiative.* Building capacity for integration of climate resilience in urban development planning, management, and financial mobilization for investments for two pilot cities, Diamandialo and St-Louis;
- ✓ *Knowledge Sharing Platform.* Generation of lessons learned to build capacity at the national and feed into a knowledge exchange for the GEF’s global Sustainable Cities Program.
- ✓ *Program Management.* Contribution to overall costs of program management, monitoring and evaluation.

This “sustainable cities” GEF additional financing to the PROGEP is expected to contribute to the

sustainable cities GEF program for Senegal which include ongoing initiatives such as the Dakar resilient city program funded by Rockefeller foundation. The current AF could support some detailed studies identified under this resilient program for Dakar depending on the city demand and prioritizing. Dakar city's civil servants will also benefit from the current AF capacity building and training funded activities to help the city reinforce its capacity to implement its resilient program on ongoing design.

Further, the proposed activities are on the priority list of the Government Strategies and Plans such as the "Plan Sénégal Emergent" (PSE) of the President's Agenda which includes urban pole development and resilience as one of the key priorities of the Government.

The proposed AF will have strong linkages with the new Decentralization Support Program currently under preparation and intended to support the Government of Senegal in implementation of its Decentralization reforms and to improve access to basic and inter-municipal services and infrastructure in targeted cities across the country. Lessons-learned from the original and the proposed AF, will feed into this new operation in terms of building resilient infrastructure, better managing urban growth, and prioritizing infrastructure selection for the short and long runs.

Relationship to CAS/CPS/CPF

The proposed AF is embedded in the Government's "Plan Sénégal Emergent" (PSE), a component of the President's Agenda which includes urban pole development, climate resilience and green governance as key priorities. It is also aligned with the Bank's current Country Partnership Strategy, includes "building resilience" through disaster risk management. The project further underpins the Bank's work in supporting Governments decentralization reforms, particularly with regards to helping municipalities integrate climate resilience into urban planning and infrastructure development.

C. Proposed Development Objective

Proposed Development Objective

The original project PDO remains unchanged, i.e. to reduce flood risks in peri-urban areas of Dakar and improve capacity to plan and implement sustainable city management practices, including climate resilience, in selected urban areas.

Key Results

The main expected outcome of the new activity is "integration of resilience planning tools in municipal decision making in two target cities" as evidenced by new urban strategies and plans for integrating climate resilience. This will lead to improved planning in urban areas and evidence-based decision-making, building on improved information systems for monitoring of vulnerabilities, knowledge exchange about good practices in sustainable urban development, as well as strengthening of national urban policy framework to promote sustainable cities including climate resilience.

D. Project Description

The original project was approved on May 10, 2012 and received a first Additional Financing of US\$35 million (IDA) on May 27, 2015. In May 2015, the GEF agreed to include Senegal in the Integrated Approach –Sustainable cities global pilot program with a US\$5.5 million allocation. It was agreed that the new grant would be a good fit for scaling up activities in the urban management component of PROGEP.

The original project has four components: (a) Integration of climate risks in urban planning and management (US\$ 3.7 million); (b) Drainage investments and management US\$88.2 million); (c) Community engagement in urban flood-risk reduction and adaptation to climate change US\$4.6 million); and (d) Project coordination, management, monitoring and evaluation (US\$10.3 million).

The structure of the original project components remains unchanged. There are no additional drainage civil works and no expected changes to the triggered safeguards policies. Only the Component D for project management and monitoring additional cost and the sub-component A3 on “*Piloting Sustainable Cities through Climate Resilience Measures*” will be scaled up with new sustainable cities activities in the two selected pilot urban areas: Diamniadio (an emerging high priority urban pole, 30 km from Dakar downtown) and Saint-Louis (and old city located along the coast at the mouth of the Senegal River; exceptionally vulnerable to climate change and variations) and to support urban policy strengthening in climate resilience.

The AF will include the preparation of Detailed Urban Plans (PUD) which integrate a risk and climate vulnerability lens. Detailed Urban Plans have safeguards risks which need to be assessed through a social and environmental assessment document. The project has experience both in preparing PUDs integrating climate resilience and risks aspects and related safeguards documents since the Pikine and Guediawaye’s PUD preparation is just being finalized including the safeguards measures. The Project Implementation Unit (PIU) will have to prepare these linked social and environmental assessment documents for all the PUDs to be prepared under this AF in relationship with the Environment Department which is one of the project technical implementation agency.

The GEF Integrated Approach Program – Sustainable Cities is expected to provide US\$5.5 million as additional financing to both the sub-component A3 (piloting Sustainable cities practices: US\$5.225 million) and D (Project management: US\$ 0.275 million).

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

The project will cover the peri-urban areas of Dakar (mainly the District of Pikine and Guediawaye), and the emerging urban poles of Diamniadio and Saint-Louis. These project areas are all located in the Senegal coastal zone which is currently being eroded and threatened by sea level rise induced climate change. They are also some natural ponds scattered over the peri-urban areas in the catchments where the drainage will be constructed, but no important humid ecosystem.

F. Environmental and Social Safeguards Specialists on the Team

Abdoul Ganyi Bachabi Alidou, Environmental Specialist (GENDR)
Yacouba Konate, Social Development Specialist (GSU01)

II. IMPLEMENTATION

The monitoring and evaluation systems will remain unchanged; however, UNIDO will be added as an additional member of the project technical committee to facilitate coordination and exchange between the SCI components to be implemented respectively by the PROGEP and UNIDO.

The Steering Committee (SC) will retain the overall responsibility of overseeing implementation, ensuring policy support and providing strategic direction taking into account national relevant strategies and programs, and related ongoing projects.

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	The original project has been categorized A due to the potential adverse environmental and social impacts of the civil works under existing component B1. No new drainage infrastructure is planned under the AF. The Environmental and Social Management Framework (ESMF) and the Resettlement Policy Frameworks (RPF) of the parent project have been updated to include the project new geographic scope under the previously approved AF, and re-disclosed. The Environmental and Social Impact Assessment (ESIA), Environmental Management Plan (EMP) and/or Resettlement Action Plan (RAP) have been also prepared under the parent project, consulted upon, disclosed and executed accordingly.
Natural Habitats OP/BP 4.04	No	The project activities would not result in any conversion or degradation of critical natural habitats. Further, there will be no biodiversity loss through conversion of natural habitats in the peri-urban catchments that will host the drainage infrastructures.
Forests OP/BP 4.36	No	The project will not finance activities related to forest exploitation, harvesting, direct or indirect forest degradation, and increase access to forest. Instead, community initiatives to replant mangrove trees may be support in Saint-Louis.
Pest Management OP 4.09	No	The project will not finance acquisition transport, distribution, storage or use of pesticides or similar chemicals that could threaten environmental and human health.
Physical Cultural Resources OP/BP 4.11	Yes	This policy is triggered because of the digging up that will occur during the civil works under the parent project. The ESMF states that if cultural resources are found during civil work a “chance find procedure” will apply in accordance with national regulation and OP/BP 4.11.
Indigenous Peoples OP/BP 4.10	No	There are no indigenous people in the project intervention areas.

Involuntary Resettlement OP/BP 4.12	Yes	The policy is triggered as there is the likelihood that infrastructural investments under the parent project might lead to resettlement of households; in particular to those living where the drainage channels will be built. There is also the possibility of restriction of access to sources of livelihood during civil works. The RPF has been updated and re-disclosed. A RAP will be prepared, consulted upon, disclosed and executed prior the commencement of works, when case arises during the project implementation.
Safety of Dams OP/BP 4.37	No	The project will not finance dam works or activities associated to existing dam.
Projects on International Waterways OP/BP 7.50	No	The project will not finance activities that will interfere with international watercourses; either in terms of water withdraw or discharge of pollutants.
Projects in Disputed Areas OP/BP 7.60	No	The project intervention areas are not under dispute.

The Technical Committee (TC) will continue providing technical support to the activities implementing entities through reviewing of studies, participation in regular monitoring of the activities and information sharing including for the project “sustainable cities” sub-component.

The Municipal Development Agency (ADM/MDA) will also remain the project coordinating entity holding the overall fiduciary responsibility for the project including the AF: procurement and financial management, as well as safeguard compliance monitoring and coordination. MDA will ensure technical assistance, monitoring and evaluation of the SCI activities in collaboration with the others technical structures involved in the project implementation. ADM/MDA also has as mandate to implement civil works under sub-component B1 on the basis of agreements entered with the beneficiary communes, while the National Office for Sanitation (ONAS) is responsible for implementing Sub-component B2 on drainage network operation and maintenance.

IV. Key Safeguard Policy Issues and Their Management

A. Summary of Key Safeguard Issues

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

The proposed project is designed to have beneficial impacts on the population in terms of reduced vulnerability to flooding and improved livelihoods conditions. The project is categorized A because of the potential adverse environmental and social impacts of the civil works related to the construction of the drainage infrastructures under the parent project in particular, in areas where they were non-existent. Three safeguard policies are triggered: Environmental Assessment (OP/BP 4.01); Physical Cultural Resources (OP/BP 4.11) and Involuntary Resettlement (OB/BP 4.12).

The drainage investments under the parent project will take into account the existing settlements and be designed/selected in order to minimize the resettlement of residents, mainly those living where the drainage channel will be built. During civil works, they might be loss of land or restriction of access to sources of livelihood. The environmental impact associated with the construction and operation of the stormwater drainage system and the pilot projects is expected to be moderate because the existing environment is already largely degraded.

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2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:
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No potential indirect or long term or cumulative impacts are foreseen during project implementation.

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.
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The overall implementation of the safeguard measures was rated satisfactory by the Bank implementation support missions in December 2016 because almost all the due diligences have been completed such as: (i) regular screening of activities; (ii) elaboration, processing and execution of specific safeguard instruments (ESIA, RAP) of the construction of the emergency and phases 1 and 2 infrastructures, and the selection of community investment project (CIP); (iii) periodic environmental and social safeguard monitoring reports sent out to the Bank; (iv) a documentation of the safeguard track records including the evidence of all the compensations (land, loss of revenue, rehabilitation of houses) that happen in the course the ongoing project.

The Environmental and Social Management Framework (ESMF) and Resettlement Policy Framework (RPF) have been updated and disclosed in country at the Bank Infoshop on January 28, 2015. As under the original project, they will be used for implementation purposes; in particular these frameworks will fully apply to investments under component B and micro-project planned under component C and A (sub-component A3). In addition the awareness raising and communication strategy developed under component C will be implemented with the participation of all actors including local communities and will also be designed in order to facilitate the resettlement process.

The Municipal Development Agency (MDA), the Directorate of Environment and Classified Installations (the Senegal EIA enforcement institution also involved with the implementation of the new sub-component A3.3), the participating enterprises and supervising consultants have been given well defined roles in the different instruments to ensure that environmental and social safeguards guidelines including occupational, health and safety guidelines. The MDA will also ensure that all bidding documents and contracts have the environmental and social management clauses to ensure the enterprises and supervising consultants adhere to sustainable environment, social, health, and safety guidelines during civil works.

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

The key stakeholders are the Ministries (and their relevant agencies/departments) in charge of urban development, habitat, hydraulics, drainage and sanitation; environment and protection of nature; and local development and decentralization; the participating municipalities and communes (Pikine, Guediawaye, Diamniadio, Saint-Louis ...), participating communities, NGOs and other relevant institutions.

All the relevant bodies have been informed of the Project. Concerns of the communities and some details of consultations have been provided as Annexes to the ESIA, ESMF and RPF. Most of the people have been affected by floods for many years, and they welcome the project. The key concerns raised during the consultation process include the lack of involvement of the population in project activities, the risk of clogging of drainage channel by solid wastes, weak O&M that could affect the performance of the system, resettlement without compensation, and delay in project implementation. All these concerns have been addressed in project design mainly through a strong participatory preparation process, the construction of closed channels in densely populated areas, and support for a sustainable O&M system. Resettlement procedures will comply with OP 4.12.

One of the key principles of this project from the outset was to foster participation of all relevant stakeholders. This approach will be sustained throughout project implementation. The environmental and social assessment studies, namely the ESMF and RPF, were also carried out according to the same principle, using a broad-based public consultation approach, involving the above stakeholder groups. The objective was to raise awareness of project activities and impacts and foster ownership on their part.

B. Disclosure Requirements

Environmental Assessment /Audit/Management Plan/Other	
Date of receipt by the Bank	26-Jan-2015
Date of submission to InfoShop	28-Jan-2015
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	15-Apr-2015
"In country" Disclosure	
Senegal	26- Jan -2015
<i>Comments:</i>	

Resettlement Action /Policy Process	
Date of receipt by the Bank	26-Jan-2015
Date of submission to InfoShop	28-Jan-2015
"In country" Disclosure	
Senegal	26- Jan -2015
<i>Comments:</i>	
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:	

C. Compliance Monitoring Indicators at the Corporate Level

OP/BP/GP 4.01 - Environment Assessment			
Does the project require a stand-alone EA (including EMP) report?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
OP/BP 4.04 - Natural Habitats			
Would the project result in any significant conversion or degradation of critical natural habitats?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
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?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
OP 4.09 - Pest Management			
Does the EA adequately address the pest management issues?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
Is a separate PMP required?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
If yes, has the PMP been reviewed and approved by a safeguards specialist or PM? Are PMP requirements included in project design? If yes, does the project team include a Pest Management Specialist?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
OP/BP 4.11 - Physical Cultural Resources			

Does the EA include adequate measures related to cultural property?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

OP/BP 4.12 - Involuntary Resettlement			
Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
The World Bank Policy on Disclosure of Information			
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
All Safeguard Policies			
Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
Have costs related to safeguard policy measures been included in the project cost?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

V. Contact point

World Bank

Contact: Isabelle Celine Kane

Title: Disaster Risk Management Specialist

Borrower/Client/Recipient

Name: Republic of Senegal

Contact: Ministry of Economy and Finance
Title: Minister of Economy and Finance

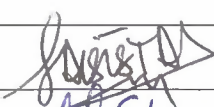
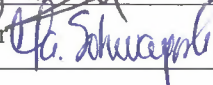
Implementing Agencies

Name: Municipal Development Agency
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VI. For more information contact:

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VII. Approval

Task Team Leader(s):	Isabelle Celine Kane	
<i>Approved By:</i>		
Safeguards Advisor:	Maman-Sani Issa 	Date: May 23, 2016
Practice Manager:	Maria Angelica Sotomayor 	Date: May 24, 2016
Country Director:	Louise J. Cord	Date:

¹ Reminder: The Bank's Disclosure Policy requires that safeguard-related documents be disclosed before appraisal (i) at the InfoShop and (ii) in country, at publicly accessible locations and in a form and language that are accessible to potentially affected persons.