INTEGRATED SAFEGUARDS DATA SHEET APPRAISAL STAGE

Report No.: ISDSA4212

Date ISDS Prepared/Updated: 12-Aug-2013

Date ISDS Approved/Disclosed: 13-Aug-2013

I. BASIC INFORMATION

1. Basic Project Data

Country:	Peru		Project ID:	P11731	8	
Project Name:	Cusco Regional Development (P117318)					
Task Team	Zoe Elena Trohanis					
Leader:						
Estimated	22-Jul-2013 Estimated 22-Oct-2013					
Appraisal Date:			Board Date	:		
Managing Unit:	LCSI	DU	Lending Instrument:		nent Pr	oject Financing
Sector(s):		national government admir l protection (20%), Genera				
Theme(s):	Natural disaster management (25%), City-wide Infrastructure and Service Delivery (30%), Cultural Heritage (35%), Pollution managemen t and environmental health (10%)					
	Is this project processed under OP 8.50 (Emergency Recovery) or OP No 8.00 (Rapid Response to Crises and Emergencies)?					No
Financing (In U	SD M	(illion)				
Total Project Cos	ost: 52.10 Total Bank Financing: 25.00		5.00			
Total Cofinancing	ig: Financing Gap: 0.00		0.00			
Financing Sou	Financing Source Amoun				Amount	
Borrower	Borrower 27				27.10	
International Bank for Reconstruction and Development 25				25.00		
Total	52.10					
Environmental Category:	A - Full Assessment					
Is this a Repeater project?	Yes					

2. Project Development Objective(s)

To improve the quality of tourism and solid waste management services and increase the resilience of the tourism sector to the impacts of natural disasters in the provinces of Calca, Urubamba, and Cusco.

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3. Project Description

The project consists of four components:

Component 1: Development and Consolidation of Tourism Services (US\$23.1 million, of which US \$9.9 million is Bank-financed). The objective of this component is to improve the quality and coverage of tourism services in the Sacred Valley and surrounding areas. The component will achieve this through, inter alia, (i) consolidating "classic" tourist attractions by expanding and improving infrastructure, providing improved access to sites, internal walkways and signage; (ii) the commercialization and positioning of tourism products and services in the domestic and international markets; and (iii) the development of a pilot Fondo Concursable, providing technical assistance and knowledge to position small and microenterprises in the market.

Component 2: Integrated Solid Waste Management (US\$22.7 million, of which US\$9.8 million is Bank-financed). The objective of this component is to improve local capacity for cleaning public spaces and to efficiently collect, transport and dispose of solid waste in the provinces of Cusco, Calca and Urubamba. The component will achieve this through, inter alia, (i) investments in provincial municipal solid waste services to improve solid waste disposal and composting; (ii) investments in District-level solid waste services to improve collection, recycling, and cleaning of streets and public spaces; (iii) technical assistance and capacity building for improved solid waste services; and (iv) communication on the implementation of project works and promoting adequate waste management practices to communities.

Component 3: Disaster Risk Management and Disaster Preparedness (US\$2.6 million, of which SUS \$1.1 million is Bank-financed). The objective of this component is to increase the resilience of the local population, tourists, and infrastructure in touristic areas with high vulnerability to natural disasters. The component will achieve this through, inter alia, (i) designing and implementing early warning systems for the flooding of the Vilcanota and Patacancha Rivers in the Sacred Valley and Ollantaytambo; (ii) designing and implementing an integrated approach to the reduction of geological and climactic risks in the micro basin of K'itamayu in Pisac; (iii) designing and implementing an integrated approach to mitigate external geodynamic risks in the Ccochoq river basin in Calca; and (iv) development of an updated Disaster Risk Management Plan for the Sacred Valley, including plans for the evacuation of tourists.

Component 4: Institutional Strengthening, Management and Monitoring and Evaluation (US\$9.6 million, of which US\$4.1 million is Bank-financed.) This component will support the capacity building of the principal institutions involved in the operation of tourism activities in the Sacred Valley, and COPESCO, including its Project Coordination Unit (PCU). Activities will include, inter alia, (i) the collection of baseline data for later evaluations and follow up analyses; and (ii) enhanced capacity for project management, project audits, and monitoring and evaluation of project results.

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

The Project is located in the Cusco Region in Peru, specifically in the provinces of Calca, Urubamba, and Cusco. The population within the sphere of the proposed project is approximately 563,202 people, distributed throughout the provinces of Cusco (population 427,580), Calca (population 72,583) and Urubamba (population 63,039). Due to its historic and cultural heritage, the Cusco Region is one of the most visited tourist destinations in South America and is the principal tourist destination in Peru, accommodating 88 percent of the country's international visitors. None of the

three landfills proposed under Component 2 will be implemented in the vicinity of any known archaeological site. However, some of the activities for Components 1 and 3 may take place directly within the limits or in the surrounding areas of archaeological sites such as Ollantaytambo (which was declared National Cultural Patrimony in 2002).

5. Environmental and Social Safeguards Specialists

Jose Vicente Zevallos (LCSSO) Daniel Mira-Salama (LCSEN) Robert H. Montgomery (LCSEN) German Nicolas Freire (LCSSO)

6. Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/ BP 4.01	Yes	The project is classified as Category A under OP/BP 4.01 based upon the one proposed moderate sized landfill in Cusco (part of Component 2) even though this landfill is expected to improve the environmental sustainability of solid waste management in the region. The works associated with Components 1 and 3 involve relatively standard, smaller-scale infrastructure works with potential environmental and social impacts that have been assessed as short-term, not significant, and can readily be prevented or mitigated with standard measures. There are no significant negative indirect or long- term impacts anticipated related to the project. The objective of Component 1 is to improve the quality and coverage of tourism services in the Sacred Valley and surrounding areas. The component will include various subprojects, including: consolidating "classic", already existing and operating tourist attractions by expanding and improving infrastructure providing access to sites, internal walkways and signs. Subcomponent 1.2 will develop small and micro- enterprises through a pilot Competitive Fund for Tourism (Fondo Concursable), facilitating access and use of new technologies and knowledge to position themselves in the market (the design of this subproject is pending and will be finalized during the implementation of the Project). An Environmental and Social Management Framework (ESMF) has been developed for these component activities and works. The main potential environment impacts are likely due to construction works associated with rehabilitation

of existing roads to existing tourism sites, which are not anticipated to cause significant
environmental impacts. Other potential impacts
relate to works that will be done within or near existing archaeological sites. However, there are
strong Peruvian regulatory procedures and
oversight related to any such works, such as the presence of an archaeologist/architect during
works and continuous monitoring and reporting
to the Ministry of Culture. The ESMF also has relevant requirements. The ESMF has been
prepared, publically disclosed (both locally and in
the Infoshop) and consulted locally.
Component 2 will provide the Cusco Region with
an improved solid waste management system, through the improvement of collection routes,
urban containers, collection trucks, and ultimately
the construction of three landfills (in the Provinces of Cusco, Calca, and Urubamba). This
is expected to have important environmental
benefits in the greater Sacred Valley through a reduction in public health risks and
environmental damage caused by inappropriate
handling of solid waste, reduction/elimination of damage caused by existing informal dumpsites,
and the improvement in waste collection,
transportation and proper final disposal. An Environmental and Social Impact Assessment
(ESIA) has been developed for each landfill.
Each ESIA addresses environmental and social
impacts, risks, and benefits, and includes an Environmental and Social Management Plan
(ESMP). The first draft ESIA for the Cusco
landfill was disclosed to the public in December 2012 and has since been updated and redisclosed
in July 2013. The draft ESIAs for Calca and
Urubamba have been completed, consulted and publicly disclosed, both locally and in Infoshop in
July 2013. Environmental and social aspects were
considered as part of the landfill site selection process, including critical or sensitive natural
habitats, forests, proximity to populated areas or
to environmental designated protected areas.
Various potential negative environmental impacts and risks will be prevented or mitigated by the
use of strong technical landfill design and

	operation standards and procedures. Potential construction environmental impacts are considered to be relatively low and easily mitigated with standard mitigation measures. Potential adverse impacts during operation include odors to neighboring communities, visual impacts, truck traffic and increased noise due to waste transportation, contamination of waters caused by leachate, slope erosion due to cuts in the terrain, and security risks such as gas accumulation in the new landfills. In terms of existing waste disposal sites, these will be either closed (e.g., Cusco and Calca) or the waste will be relocated to the new facilities (e.g., several small waste sites in the Valley). The closure will only happen once the new landfills are operational. Some potential but relatively minor environmental impacts exist during the closure works, such as the release of waste and worker exposure. There has been a steady and ongoing process to keep stakeholders informed and to receive feedback. Consultations with focus groups about the scope of the project, components and expected impacts have been taking place since early 2011 and are understood as a continuous process. Consultation on the draft ESIAs (and its ESMP) for each landfill were held in July 2013.
	Component 3 aims at reducing risk of natural disasters (floods, landslides, etc.) in the valley, both from a management perspective (e.g., with early warning systems, capacity building and others) and by performing works (e.g., stream bank stabilization, stabilization of lagoons located upstream of populated sites, etc.). An ESMF has been developed for these component activities and works, and has been consolidated with the ESMF for Component 1. The main potential environment impacts are likely due to construction works that may occur in stream/river banks, which are relatively minor in size and nature, and are not anticipated to cause significant environmental impacts. The draft ESMF has been prepared, consulted and disclosed, both locally and in the Infoshop.

	Component 1 objective is to provide quality tourism services and increase the positive economic and social impacts of these services in the Sacred Valley and surrounding areas. The component will include various sub-projects (that are pending to be fully determined and designed): consolidating "classic", already existing and operating tourist attractions by expanding and improving infrastructure providing access to sites, internal walkways and signs; and developing small and micro-enterprises through a pilot Fondo Concursable, facilitating access and use of new technologies and knowledge to position themselves in the market. An Environmental and Social Management Framework (ESMF) has been developed for these potential component activities and works. The main potential environment impacts are likely due to construction works associated with rehabilitation of existing roads to existing tourism sites, which if performed, are not anticipated to cause significant environmental impacts. Other potential impacts relate to works will be done within or near existing archaeological sites. However, there are strong Peruvian regulatory procedures and oversight related to any such works, such as the presence of an archaeologist/ architect during works and continuous monitoring and reporting to the authority (the Ministry of Culture). The ESMF also has relevant requirements. The draft ESMF has been prepared and is pending public disclosure and consultation. Component 2 will provide the Cusco Region with an improved solid waste management system, through the improvement in collection routes, urban containers, collection trucks, and ultimately the construction of 3 landfills (Cusco, Calca, Urubamba). This is expected to have important environmental benefits in the greater Sacred valley, through a reduction in public health risks and environmental damage caused by
	environmental benefits in the greater Sacred valley, through a reduction in public health risks and environmental damage caused by inappropriate handling of solid waste, reduction/ elimination of damages caused by existing informal dumpsites, and improvement in waste
	collection, transportation and proper final

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	disposal. An Environmental and Social Impact
	Assessment (ESIA) has been developed for each
	landfill. Each ESIA addresses environmental and
	social impacts, risks, and benefits, and includes
	an Environmental and Social Management Plan
	(ESMP). The Draft ESIA for the Cusco landfill
	was disclosed to the public on December 2012.
	The draft ESIAs for Calca and Urubamba have
	been completed but are presently undergoing an a
	final update to reflect some final design details.
	Environmental and social aspects were
	considered as part of the landfill site selection
	process, including no site location in critical or
	sensitive natural habitats, forests, proximity to
	populated areas or to environmental designated
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	protected areas. Various potential negative
	environmental impacts and risks will be
	prevented or mitigated by the use of strong
	technical landfill design and operation standards
	and procedures. Potential construction
	environmental impacts are considered to be
	relatively minimal, and easily mitigated with
	standard mitigation measures. Potential adverse
	impacts during operation include odors to
	neighboring communities, visual impacts, truck
	traffic and increased noise due to waste
	transportation, contamination of waters caused by
	leachate, slope erosion due to cuts in the terrain,
	and security risks such as gas accumulation in the
	new landfills. In terms of existing waste disposal
	sites, these will be either closed (e.g., Cusco and
	Calca) or the waste will be relocated to the new
	facilities (e.g., several small waste sites in the
	Valley). The closure will only happen once the
	new landfills are operational. Some potential but
	relatively minor environmental impacts exist
	during the closure works such as release of waste
	and worker exposure. There has been a steady
	process to keep stakeholders informed and to
	receive feedback. Consultations with focus
	groups about the scope of the project,
	components and expected impacts have been
	taking place since early 2011 and are understood
	as a continuous process. Consultation on the draft
	ESIAs (and its ESMP) for each landfill is
	currently being scheduled by the implementing
	agency in consultation with stakeholders.

		Component 3 aims at reducing risk of natural disasters (floods, landslides, etc.) in the valley, both from a management perspective (e.g., with early warning systems, capacity building and others) and by performing some works (e.g., stream bank stabilization, stabilization of lagoons located upstream of populated sites etc.) that are to be determined. An Environmental and Social Management Framework (ESMF) has been developed for these potential component activities and works, and has been consolidated with the ESMF for component 1. The main potential environment impacts are likely due to construction works that may occur in stream/river banks, which are relatively minor in size and
		nature, and are not anticipated to cause significant environmental impacts. The draft ESMF for Components 1 and 3 has been consulted and was disclosed on August 1, 2013 in country and sent to the Infoshop on August 6, 2013. The Cusco, Urubamba and Calca EIAs were disclosed in country on July 31, 2013 and sent to Infoshop on August 6, 2013.
Natural Habitats OP/BP 4.04	Yes	The project will not involve the significant conversion of natural habitats or critical natural habitats. However, subprojects under Components 1 are not fully defined, thus the policy is triggered and necessary environmental assessment management requirements are included in the ESMF for Components 1 and 3.
Forests OP/BP 4.36	No	This policy should not be triggered since the project will not affect forests, forest-dependent communities nor will it involve changes in the management of forests.
Pest Management OP 4.09	No	The project does not involve the purchase or use of significant quantities of pesticides. However, the project may involve the relatively minor use of pesticides during the operation of the landfills to control vectors (rodents, insects). This issue will be managed under OP 4.01 by having the relevant ESMPs include applicable good practices and procedures for pesticide use and storage, and prohibit use of pesticides excluded under OP 4.09.

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Physical Cultural Resources OP/ BP 4.11	Yes	The project does not anticipate any significant negative impacts on physical cultural resources. None of the three landfills proposed under Component 2 will be implemented in the vicinity of any known archaeological site. However, several of the activities for Components 1 and 3 might take place directly within or near the limits of archaeological sites such as Ollantaytambo, which was declared National Cultural Patrimony in 2002. While not directly adversely affecting World Heritage Sites, the project will take place in a highly sensitive social and cultural heritage context and thus the policy is triggered. The ESIAs for Component 2 landfills have not identified the likelihood of encountering physical cultural resources. Any environmental analysis associated with Components 1 and 3 subprojects will specifically include consideration of physical cultural resources. All project ESMPs and related construction contracts will include procedures and requirements related to chance find management. In addition, every activity carried out within an archaeological site, by Peruvian law, will require the constant presence of an archaeologist/architect designed by the Ministry of Culture.
Indigenous Peoples OP/BP 4.10	Yes	A Social Assessment has been carried out to evaluate the potential effects of the three project components on Indigenous Peoples. It was published locally on August 5, 2013 and sent to the Infoshop on August 6, 2013. Two of the landfills (Calca and Urubamba) will affect communities of Indigenous Peoples. The Calca landfill will require the acquisition of community land and the Urubamba landfill will be built adjacent to community land. Draft Indigenous Peoples Plans have been prepared for these subprojects and are in the process of being consulted with affected communities. The consultation process is being carried out via discussions with groups of affected community members using a target that at least 40% of participants are women. No physical displacement will occur as a result of the construction of the Calca and Urubamba

landfills.
The land required for the Calca landfill belongs to the community of Vista Alegre Yanahuaylla with 46 indigenous families. The area needed for the landfill (4 hectares) represent 0.48% of the land that belongs to the community (837.18 ha). There are no dwellings located near the project area. The closest dwelling is located approximately at 800 meters from the landfill site. The EIAS did not anticipate significant adverse impacts on this community. Impacts identified in the EIAS include visual impacts, temporary impacts during construction (dust, noise, etc.), increased traffic during construction and operation, and contamination of land and water (in the event that the landfill is not managed properly).
The community of Parcco (60 families) is adjacent to the Calca site. The EIAS did not anticipate significant adverse impacts on this community.
The Urubamba landfill will be built in an area adjacent to the community of Paca Huaynaccolca (40 families). There are no dwellings located near the project area. The EIA did not anticipate significant adverse impacts on this community. Impacts identified in the EIAS include visual impacts, temporary impacts during construction (dust, noise, etc.), increased traffic during construction and operation, and contamination of land and water (in the event that the landfill is not managed properly).
The Indigenous Peoples Plans identify various civil works and activities that will benefit the communities mentioned above. These benefits were requested by the affected communities.
The interventions planned in the Sacred Valley as part of Component 1 and Component 3 may affect communities of Indigenous Peoples. An Indigenous Peoples Planning Framework has been prepared to address potential adverse impacts on these communities and to maximize project benefits for them. The IPPF has been

		shared with indigenous groups for comment and was published locally on July 27, 2013 locally and sent to the Infoshop on August 6, 2013.
Involuntary Resettlement OP/BP 4.12	Yes	One of the three landfills (Urubamba) will be built on municipal land. The other two (Cusco and Calca) will require land acquisition. The land for the Cusco landfill will be acquired from an individual and the land for the Calca landfill will be acquired from an indigenous community. Abbreviated Resettlement Plans have been prepared for the landfills of Cusco and Calca. They were disclosed in country for Cusco on July 31, 2013 and for Calca on August 5, 2013. Both were sent to Infoshop on August 6, 2013.
		The interventions planned in the Sacred Valley as part of Component 1 and Component 3 may require land acquisition. A Resettlement Policy Framework has been prepared to guide the preparation of resettlement plans during project implementation. The RPF was disclosed in country on August 5, 2013 and sent to Infoshop on August 6, 2013.
		The solid waste component will cause economic displacement among informal waste collectors. A Social Inclusion Plan has been prepared to address this impact, which was disclosed locally on July 31, 2013 and in Infoshop on Aug. 6, 2013.
Safety of Dams OP/BP 4.37	Yes	While the project does not support the construction or rehabilitation of dams, as part of Component 3, there may be disaster risk management works in two stream/river basins that have existing relatively small reservoirs located in their headwaters. The EMF for Component 3 includes specific measures to assess any relevant existing reservoir and to take appropriate actions, as deemed warranted, consistent with OP 4.37.
Projects on International Waterways OP/BP 7.50	No	This policy should not be triggered as the project will not finance activities involving the use or potential pollution of international waterways.

Projects in Disputed Areas OP/BP	No	This policy should not be triggered as the
7.60		project will not finance activities in disputed
		areas as defined in the policy.

II. Key Safeguard Policy Issues and Their Management

A. Summary of Key Safeguard Issues

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

N/A

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

The potential positive long-term impacts include: improving the quality and coverage of tourism services and thus increasing the economic and social positive impacts in the Sacred Valley and surrounding areas; improving local capacity to efficiently collect, transport and dispose of solid waste, thus reducing environmental health impacts and promoting sustainable development; the appropriate closing and clean-up of existing informal dumpsites, thus removing potential focus of infections and environmental degradation; and helping protect the local population, tourists, and infrastructure in touristic areas with high vulnerability to natural disasters. There are no significant negative indirect or long-term impacts anticipated related to the project.

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

An alternative analysis was performed related to the waste management component, specifically in terms of assessing different waste management technologies to apply to waste disposal in this region. Alternative waste disposal options included several local landfills, a regional landfill, and other combinations, including transfer stations. An alternative site selection analysis was performed for each of the landfills and included various technical, environmental and social factors. The alternative analysis included stakeholder input.

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.

Related to Component 1 and 3, an ESMF has been developed. The ESMF includes an Indigenous Peoples Planning Framework and a Resettlement Policy Framework.

Related to Component 2, an ESIA has been carried out for each of the three landfills, and each includes an Environmental and Social Management Plan. The ESIA for the Calca and Urubamba landfills also include an Indigenous Peoples Plan, while the ESIA for the Cusco and Calca landfills include an Abbreviated Resettlement Plan.

The relevant construction contracts for works in Components 1 and 3 require compliance with the ESMF, including environmental and social mitigation and monitoring measures (e.g., ESMP) developed under the ESMF for each subproject and any Indigenous Peoples Plan (IPP) or Resettlement Action Plan (RAP) prepared during project implementation. The construction contracts will also comply with applicable Peruvian regulatory requirements including those related to cultural heritage. The project Operational Manual will include relevant environmental and social aspects, including compliance with project specific safeguard instruments (ESMF, ESIAs/ESMPs, social management plans (IPP and RAP), inclusion of environmental and social conditions in project contracts, use of independent supervisors for project construction contracts,

and supervision and reporting responsibilities of COPESCO.

COPESCO has a solid experience with project implementation, has previous experience working with World Bank financing, and has been leading the preparation of the Project, including the associated environmental and social safeguards documents, consultations and processes. COPESCO has gathered sufficient institutional capacity to cope with safeguard issues, and has established an experienced project coordination unit with both environmental and social experts knowledgeable of Peru's and Bank's requirements; COPESCO has also agreed to strengthen its environmental and social team to ensure adequate capacity during project implementation.

The Component 2 landfill for Cusco may be contracted as design-build-operate, and will have an independent supervision contract which will include environmental and social aspects. The execution of works in Components 1 and 3 will be contracted to construction companies and supervision of the construction contractor activities will be contracted to independent supervision consultants, whom, in addition to technical supervision, will be required to provide environmental and social supervision.

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

The preparation of the proposed project has been a long process, dating back to early 2011. During this time, the Cusco Regional Government, through COPESCO, has led a number of public participation/consultation activities aimed at explaining the project's scope, objective, main anticipated impacts and mitigation measures. Conversations and workshops have taken place directly through COPESCO or through the consulting firms in charge of preparing designs, and environmental and social studies. Technical working groups were also created, which have been informed of updates on project preparation and have provided their feedback accordingly. Currently, the communities in Calca and Urubamba support the project and have reached agreements with COPESCO. Most of the communities in Cusco also support the project and have expressed concerns related to potential leachates that could pollute their waters, but have also reached initial agreements with the Cusco Regional Government in support of the project.

As part of the process of project preparation, the development of the ESIAs for the three landfills (Component 2) was done seeking early input from stakeholders to help define potential issues and alternatives. The draft ESMF for Components 1 and 3, as well as the ESIAs for the Cusco, Calca and Urubamba landfills, have all been disclosed and consulted. The three ESIAs were consulted with various local communities (e.g., Huancabamba (Cusco), Yanahuaylla (Calca), Paca Huaynacolqa (Urubamba)), during June and July 2013. Additionally, during July 2013, consultations were held with municipality personnel, representative governmental and civil society institutions, and other rural communities. The principal comments from the consultations included: not to repeat the history of the current management of waste in landfills (i.e., relatively poor management), concerns about the potential risks of water pollution and health risks for persons living near the new landfills, operation/effectiveness of landfill geomembranes as a barrier to protect/prevent contamination, employment opportunities in the construction and operational phases of the project, suggestions for expanding descriptive information about fauna, flora, social aspects, and application of other benefits to surrounding communities.

B. Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other

Date of receipt by the Bank	30-Dec-2012			
Date of submission to InfoShop	03-Jan-2013			
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	07-Aug-2013			
"In country" Disclosure				
Peru	20-Dec-2012			
Comments: ESIA for Cusco Lanfill				
Resettlement Action Plan/Framework/Policy Process				
Date of receipt by the Bank	29-Jul-2013			
Date of submission to InfoShop	06-Aug-2013			
"In country" Disclosure				
Peru	31-Jul-2013			
Comments: Cusco RAP				
Indigenous Peoples Development Plan/Framework				
Date of receipt by the Bank	26-Jul-2013			
Date of submission to InfoShop	06-Aug-2013			
"In country" Disclosure				
Peru	27-Jul-2013			
Comments: IPPF				
If the project triggers the Pest Management and/or Physical	Cultural Resources policies, the			

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:

The IPPs are under preparation and will be disclosed locally and in the Infoshop upon completion of consultations with affected communities, prior to the completion of appraisal.

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 [×]	No []	NA []
If yes, then did the Regional Environment Unit or Sector Manager (SM) review and approve the EA report?	Yes [×]	No []	NA []
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	Yes [×]	No []	NA []
OP/BP 4.04 - Natural Habitats				
Would the project result in any significant conversion or degradation of critical natural habitats?	Yes []	No []	NA [×]
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 []	No []	NA [×]
OP/BP 4.11 - Physical Cultural Resources				

Does the EA include adequate measures related to cultural property?	Yes [×]	No []	NA []
Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?	Yes [×]	No []	NA []
OP/BP 4.10 - Indigenous Peoples			
Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?	Yes [×]	No []	NA []
If yes, then did the Regional unit responsible for safeguards or Sector Manager review the plan?	Yes [×]	No []	NA []
If the whole project is designed to benefit IP, has the design been reviewed and approved by the Regional Social Development Unit or Sector Manager?	Yes []	No []	NA [×]
OP/BP 4.12 - Involuntary Resettlement			
Has a resettlement plan/abbreviated plan/policy framework/ process framework (as appropriate) been prepared?	Yes [×]	No []	NA []
If yes, then did the Regional unit responsible for safeguards or Sector Manager review the plan?	Yes [×]	No []	NA []
OP/BP 4.37 - Safety of Dams			
Have dam safety plans been prepared?	Yes []	No []	NA [\times]
Have the TORs as well as composition for the independent Panel of Experts (POE) been reviewed and approved by the Bank?	Yes []	No []	NA [×]
Has an Emergency Preparedness Plan (EPP) been prepared and arrangements been made for public awareness and training?	Yes []	No []	NA [×]
The World Bank Policy on Disclosure of Information			
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	Yes []	No [×]	NA []
Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?	Yes [×]	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 []
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 []

III. APPROVALS

Task Team Leader:	Zoe Elena Trohanis		
Approved By			
Regional Safeguards Advisor:	Name: Glenn S. Morgan (RSA)	Date: 12-Aug-2013	
Sector Manager:	Name: Wambui G. Gichuri (SM)	Date: 13-Aug-2013	