

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

**Appraisal Stage**

**Date Prepared/Updated:**

**I. BASIC INFORMATION**

**A. Basic Project Data**

<b>Country:</b>	Ghana	<b>Project ID:</b>	P171620
		<b>Parent Project ID :</b>	P119063
<b>Project Name:</b>	Additional Financing to Greater Accra Metropolitan Area Sanitation and Water Project (P171620)		
<b>Region:</b>	AFRICA		
<b>Estimated Appraisal Date:</b>	3 August 2020	<b>Estimated Board Date:</b>	22 September 2020
<b>Practice Area (Lead):</b>	Water	<b>Lending Instrument:</b>	Investment Project Financing
<b>Borrower(s)</b>	Ministry of Finance (MoF)		
<b>Implementing Agency</b>	Ministry of Sanitation and Water Resources (MSWR), and Ghana Water Company Limited (GWCL)		
<b>Financing (in USD Million)</b>			
	<b>Financing Source</b>	<b>Amount</b>	
	BORROWER/RECIPIENT	00.00	
	International Development Association (IDA)	125.00	
	Financing Gap	0.00	
	Total Project Cost	125.00	
<b>Environmental Category</b>	A		
<b>Decision</b>			
<b>Other Decision (as needed)</b>			
<b>Is this a Repeater project?</b>	No		
<b>Is this a Transferred project? (Will not be disclosed)</b>	No		

## B. Project Description

- a. ***Component 1 - Provision of Environmental Sanitation Services to priority low income areas of the GAMA and GKMA:*** The component aims to increase access to environmental sanitation services in low-income areas of the GAMA and GKMA, with a strong focus on liquid sanitation (excreta disposal). About 42,000 toilets will be constructed in selected low-income communities of GAMA (12,000) and GKMA (30,000) for a total estimated 300,000 beneficiaries. The AF interventions under this component will benefit from the successful implementation of the corresponding component activities under the parent project. Enhanced community sensitization and mobilization activities will be implemented in the Metropolitan and Municipal Assemblies (MMAs) and eligible low-income households will be provided with 70% support up to a maximum of US\$600 to make the capital costs of their toilets affordable to them, as successfully done under the parent project.

A total of about 150 sanitation facility units will also be provided under this component to selected schools across the MMAs in the GAMA and GKMA which either lack sanitation facilities or have facilities that are in dire shape. The school sanitation facilities will follow the standard design established and implemented under the parent project, this being both MHM considerate and disability friendly and having separate blocks for boys and girls.

These activities will reduce the risk of surface and ground water contamination (due to lack of excreta disposal and treatment) as well as the incidence of water-borne diseases among local populations in case of flooding thereby enhancing the resilience of the targeted communities to this climate change-exacerbated threat.

- b. ***Component 2, Expansion of the water distribution network in the GAMA and GKMA and Improvement in operational efficiency:*** The component aims to improve and expand the water distribution network in GAMA and GKMA to provide piped water to an estimated 300,000 people living in low income communities of the two cities. About 120 km of new pipeline will be laid and 10,000 new connections will be provided to low income households.

This component will also support operational efficiency improvements in GWCL and undertake NRW reduction activities in selected operational areas in GAMA. GWCL has identified Accra East Region (i.e. one of the 3 GWCL Operational Regions in charge of water supply to GAMA) for the NRW interventions. In addition to the support provided to GWCL in implementation of the water supply performance improvement program, the operational efficiency improvement work will include: (i) updating of the network modeling, network zoning and network configuration; and (ii) expanding the bulk metering to new areas and integrating these with the existing SCADA system, as well as provision of domestic meters. Capacity building support will also be provided to the regional, and district staff in the form of training, technical assistance, and equipping them with basic operating tools. A non-revenue water baseline will be established at the beginning of the implementation of the AF. For the first two years, the target for NRW reduction will be 1 percent each year and for the last two years, NRW reduction of 1.5 percent each year. A cumulative reduction in NRW of 5 percent for the four-year duration of the AF is therefore expected to be achieved. This component will also complement the implementation of GWCL's performance improvement

program (PIP) with support from two of the Water GP's global initiatives: (i) the *Utility of the Future* (UOF) initiative, which seeks to support selected utilities from around the world in building a vision of the future of efficient and resilient water supply and sanitation service provision and to support clients in turning this vision into reality; and (ii) the *Field Level Leadership* (FLL) initiative which aims to complement the implementation of GWCL's PIP such that it is inclusive and participatory.

- c. ***Component 3, Planning, improvement and expansion of environmental sanitation services:*** supports the planning, improvement and expansion of sanitation services, including through wastewater and septic sludge management investments, as well as the development of participatory planning for integrated sanitation and drainage interventions in GKMA. The objective of this component is to develop integrated GKMA-wide plans for environmental sanitation and to finance critical elements of the city's sanitation service chain in order to improve wastewater and septic sludge management. Simplified decentralized condominal sewerage systems will be provided for GKMA under the AF, as will the processing of the sludge from the household bio-digesters in order to convert them into useful end-use products, in line with circular economy principles.
- d. ***Component 4, Project Management and Institutional Strengthening:*** is designed to provide institutional strengthening and technical assistance (TA) to municipal, metropolitan and national institutions, to facilitate horizontal learning between the GAMA and GKMA stakeholders through knowledge sharing workshops and production and dissemination of BCC materials, feasibility study and water supply masterplan for GKMA will also be supported under this component, an assessment for possible post COVID-19 recovery support will also be supported, as well as the promotion of private sector initiatives including in the operation and management of sludge processing. A flagship study is being conducted under the parent project to: (i) assess the water supply, sanitation and hygiene (WASH) sector's legal, institutional and financial framework; (ii) identify inefficiencies in GOG's pursuit of its sector goals and policies; and (iii) propose options for sector policy, institutional and regulatory adjustments. Implementation of the recommendations from the study will be supported under this component, as will MSWR's efforts to establish a national Sanitation Authority. The component will also provide support to project management and monitoring.

## **C. Proposed Development Objective(s)**

### **Development Objective(s) (From PP)**

The objective of the project is "to increase access to improved sanitation and improved water supply in the GAMA and GKMA, with emphasis on low income communities and to strengthen the management of environmental sanitation in the GAMA and GKMA."

### **Key Results**

#### **2. *Project Beneficiaries***

The primary beneficiaries from the additional financing project are expected to be 300,000 people (51 percent of them women) residing in Greater Accra Metropolitan Area (GAMA) and Greater Kumasi Metropolitan Area (GKMA). Poor households, which in most cases represent the most vulnerable, will be particularly targeted to benefit from the project.

### 3. *PDO Level Results Indicators*

The following indicators will be used to measure progress towards achieving the PDO:

- i. Number of people provided with access to improved sanitation facilities under the project;
- ii. Number of people provided with access to improved water source under the project
- iii. Direct project beneficiaries, of which female beneficiaries.

#### **D. Borrowers Institutional Capacity for Safeguard Policies**

At the Ministry's level, the Ministry of Environment, Science, Technology and Innovation (MESTI) has the oversight responsibility for policy directions and implementation on environmental issues. However, the Environmental Protection Agency (EPA) of Ghana which is an agency under the MESTI is the designated public body for setting environmental standards and ensuring their full compliance. Though the EPA appears more focused on environmental issues, they are mindful and considerate of social issues particularly those linked to development projects. The EPA is considered one of the experienced safeguard institutions in Africa and is familiar with World Bank safeguard policies. Although, overall, the EPA is better placed to handle safeguard issues, it would still need capacity building in management and compliance monitoring, especially in involuntary resettlement enforcement since it has traditionally focused on environmental safeguards.

Social Development and Social Risk Management mandate resides with multiple ministries, departments and agencies including the EPA which has a responsibility for disclosure, dealing with public complaints that emerge from development projects and ensuring that project proponents carry out stakeholder engagements particularly with the project affected communities. On its part, the Lands Valuation Division is responsible for determining and validating compensation rates related to resettlement.

Risks and impacts likely to emanate from the activities under the Additional Financing are cumulatively substantial. A review of project safeguards implementation performance under the parent project indicates a Safeguards Management System in place that is commensurate to the risk profile and the compliance rating on safeguards is Moderately Satisfactory for the Environmental and Social Safeguards. According to the normal supervision reports, the project activities are being carried out taking into account the disclosed safeguards requirements, adhering to policy principles/procedures, and responsibility for social and environmental screening and due diligence, including proper internal reporting, monitoring and documentation of environmental and social aspects of project risks.

Qualified environmental and social specialists have been recruited, trained and are responsible for environmental and social risk management of the project activities and have demonstrated commitment to incorporating environmental and social issues into overall project implementation. The client plans to strengthen safeguard's capacity through the recruitment of two new social safeguards specialists; one each at the PCU (to replace one who just resigned) and the GWCL. The client currently works with the Environmental Health Officers (EHOs) of the MMAs to ensure safeguard compliance at the MMA level. This arrangement will be maintained but extended to include the EHOs of the new MMAs in GKMA. This arrangement will include working with the Planning Officers and Engineers at the MMAs who will serve as focal safeguard personnel and coordinate the activities of the EHOs.

Ghana has a relatively sophisticated framework of laws and regulations governing labor and working conditions and project documents are published or disclosed at the local, regional and levels and at the Bank's website.

Under the parent project, six staff across the Ministry, GWCL and MMAs have been trained in Land Acquisition and Resettlement and management of grievance. It is also recognized that the 8 new participating MMAs will need additional evidence-based capacity building assistance in assessing and managing environmental and social risks, particularly on safeguards training on issues of labor and working standards. Therefore, this project will develop procedures and guidance for screening, assessing, and managing safeguards risks based on lessons learned from the parent project.

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

The project will be implemented in the Greater Accra Metropolitan Area and Greater Kumasi Metropolitan Area respectively for 25 and 8 Metropolitan and Municipal Assemblies (MMAs).

**F. Environmental and Social Safeguards Specialists on the Team**

Edward Felix Dwumfour (SAWE4)

George Amoasah (SAWE4)

Michael Gboyega Ilesanmi (SAWS1)

Sarah Antwi-Boasiako (SAWS1)

Olufumilayo Ayoola (SAWS1)

**II. IMPLEMENTATION**

1. *Implementation arrangement:* The projects implementation arrangements will follow the existing mechanisms for the ongoing GAMA-SWP Project with slight modifications to extend the project coordination unit to the newly included GKMA. The Project Implementation Manual (PIM) will be updated to provide detail implementation steps and procedures to be followed. The PIM will outline the institutional and implementation arrangements for the project.
2. *Institutional arrangement:* The highest governing body of the project is the Ministry of Sanitation and Water Resources (MSWR). The Water and Sanitation Directorate and the Program Coordination Unit (PCU) within MSWR will directly be responsible for the implementation of the sanitation and institutional development components (Components 1, 3 and 4) of the project while the project office at GWCL will be responsible for the water supply activities (components 2 and 4).

**III. SAFEGUARD POLICIES THAT MIGHT APPLY**

Safeguard Policies	Triggered ?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	The project includes medium to large scale civil works such as the construction of 120km water pipeline; pumping stations; improvement and expansion of sanitation services including through wastewater and septic sludge management investments; construction of simplified, decentralized condominal sewerage systems; and processing of sludge from digesters into useful

		<p>products. Most of these works are of a routine nature and do not have large scale, long lasting environmental impacts, or such impacts which would reach beyond the immediate project area. Most impacts would be restricted to the construction phase and can be readily mitigated with available and well-tested, standard techniques and measures.</p> <p>A key environmental risk is associated with the processing of sludge from digesters into useful products. Failure to diligently enforce environmental compliance at the sludge processing systems can lead to pollution at a significant scale, negatively affecting ground and surface water quality, spreading waterborne diseases, and causing nuisances to the adjacent population by odors and vectors.</p> <p>Another key risk is the uncertainty surrounding the nature, scope and scale of the wastewater and septic sludge management facilities the project will finance. It is important therefore that due diligence will be conducted on sub-projects prior to implementation and incorporate environmental safeguard issues in the design and operational planning including technical, financial and organizational robustness.</p> <p>Currently, the Environmental and Social Management Framework (ESMF) for the parent project has been updated to include baseline data, project description, consultations, etc. at the newly proposed areas under the AF and the instrument has been disclosed in country and at the World Bank's external website respectively on 7<sup>th</sup> and 8<sup>th</sup> July, 2020. The ESMF provides clear guidance for the preparation of site-specific ESIA's and ESMPs during project implementation. These specific instruments will guide the implementation of sustainable environmental and social measures with a long-term operational planning perspective.</p>
Natural Habitats OP/BP 4.04	Yes	This is triggered on cautionary basis. During project activity implementation, if need be, the borrower, advised by the Bank, will prepare the required instruments and actions to address any such impacts.
Forests OP/BP 4.36	No	The project will not finance the development or use of natural forests or plantations . Given its location, and type of activities, the project will not have impacts on the health and quality of forests or the

		rights and welfare of people and their level of dependence upon or interaction with forests.
Pest Management OP 4.09	No	The project will not raise potential pest management issues or finance the development and/or the procurement of pesticides, pesticide application equipment or the use of pest management practices.
Physical Cultural Resources OP/BP 4.11	No	This is not triggered. However, the disclosed ESMF includes a Chance Find Procedure which will be followed in the unlikely encounter of cultural resources during project implementation.
Indigenous Peoples OP/BP 4.10	No	There are no indigenous peoples in the project area.
Involuntary Resettlement OP/BP 4.12	Yes	<p>Civil works associated with Components 2 and 3 may result in land acquisition, temporary loss of livelihood and/or limited physical resettlement. Given that not all the sub-projects sites are known in sufficient detail before appraisal, the Borrower has updated the Resettlement Policy Framework (RPF) of the parent project for this Additional Financing.</p> <p>The RPF outlines the resettlement process in terms of procedures for preparing and approving Resettlement Action Plans (RAPs), institutional arrangements, likely categories of affected people, eligibility criteria and categories, compensation rates, methods of valuing affected assets, community participation and information dissemination, Grievance Redress Mechanism and effective monitoring and evaluation. These arrangements are to ensure that there is a systematic process (as against an ad hoc one) for the different stages of implementation of a framework that assures participation of affected persons, involvement of relevant institutions and stakeholders, adherence to both World Bank and Government procedures and requirements.</p> <p>It is expected that during project implementation, project interventions will avoid where possible adverse impacts on people, land and other economic resources and livelihoods. In situations where this cannot be avoided, the borrower will, based upon the principles and objectives spelt out in the updated Resettlement Policy Framework (RPF), prepare site specific Resettlement Action Plans (RAPs) to address the needs of persons who will be affected by loss of economic activities, land acquisition and/or relocation. The preparation of</p>

		<p>these safeguard documents will be inclusive and participatory, promoting community ownership and social accountability.</p> <p>Resettlement Actions Plans (RAPs) will be prepared for each of the remaining/other specific work packages, as needed, following the guidelines set out in the RPF. The RAPs will be consulted upon, reviewed and cleared by the Bank and disclosed publicly in country and on the Bank's external website.</p> <p>The MSWR and participating MMA will be expected to finance resettlement costs, and civil works will not commence on any specific sub-project until Project Affected Persons (PAPs) are properly compensated in accordance with the RAPs.</p>
Safety of Dams OP/BP 4.37	No	This policy is not triggered because project activities will not support the construction of new dams and rehabilitation of existing dams or rely on such dams.
Projects on International Waterways OP/BP 7.50	No	The project will not trigger this policy because the rivers in which this project is intervening are not transboundary
Projects in Disputed Areas OP/BP 7.60	No	This policy is not triggered because the project area is not in dispute.

#### 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 parent project has recorded normal implementation challenges which the task team usually addresses as it arises. The following are the achievements recorded in the implementation of the safeguards instruments that have been cleared and disclosed: 3 ESIA's, 30 ESMP's, 14 RAP's; a total of 6164 Project affected persons (PAP's) have so far been compensated as required, with a total compensation package of GHc 2,366,828.03 ; while additional 5,488 PAP's have benefitted in asset reinstatement activities; about 2190 grievances were recorded and resolved across participating Metropolitan and Municipal Assemblies (MMAs) and communities.

However, the key environmental and social risk management concerns of the ongoing project that might be relevant to the GAMA-AF include: (i) possible soil and water contamination, air contamination, loss of vegetation, dust and noise nuisance, vibration, traffic congestion due to the planned construction and rehabilitation activities, poor management of sludge; odor, proliferation of disease-borne insect vectors, and (ii) potential adverse social impacts that might result from the need for land acquisition and/or the loss of access to economic assets and livelihoods due to planned rehabilitation and investment activities as well as GBV related issues. The client has updated the ESMF and RPF and these outline steps which



will be followed in preparing site specific safeguards instruments (ESIA, ESMP, RAP) when the locations of the sub-project activities e.g laying of 120km pipeline, construction of household and institutional latrines, construction and operationalisation of faecal sludge processing facility etc, are determined during implementation, including mechanism for anticipating, recording GBV related risks and escalating, when necessary.

In summary, there are no long-term impacts anticipated. The environmental and social impacts are expected to be site-specific and can be managed to an accepted level.

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

Potential long term impacts are largely positive such as improved water and sanitation in communities will reduce poverty, lead to expansion of economic activities and opening up of the respective local economies; reduce the severity and impact of malnutrition; improve in health, promote dignity and boost safety particularly among women and girls and increase school attendance particularly for girls.

There are no potential indirect and/or long-term adverse environmental and social impacts expected in the project area. Detailed information will be derived from the ESMF and subsequent ESIA/ESMPs and RPF/RAPs.

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

Each site intervention planned for implementation will follow strict screening protocol under the RPF for possible triggering of OP 4.12 (Involuntary Resettlement) and ESMF for environmental and social assessment and management. Civil works for expansion and rehabilitation of water distribution networks in selected GAMA and GKMA neighborhoods and improvement and expansion of sanitation services, including through wastewater and septic sludge management investments could result in land acquisition or the displacement of families or businesses on a temporary or permanent basis. Works such as drainage canals could also result in loss of access to land and assets even when such assets are not affected by the civil works. Screening will be done early in the planning process by trained MMA and PCU staff in consultation with engineers and others who carry out the site design. Alternatives will be considered to minimize the amount of displacement and the justification for the alternative selected will be set out in the RAP. Consultations with affected people and the participation of affected people and possible host communities are mandatory and the concerns and aspirations of community members shall be taken into consideration in the planning and implementation process.

Each site approved for support by the project can be eligible for financing only when an appropriate safeguard instrument e.g. ESIA, ESMP and RAP (if required) satisfactory to the Bank have been completed and disclosed.

On the household sanitation front, the project is championing mass scale adoption of an innovative and affordable toilet system which does not require huge space to establish but it is very effective and descent. The toilet system which uses bio-digester technology requires minimum water to flush and does not require desludging for approximately 10 or more years depending on usage. The least space requirement for this technology makes it a good fit for most clustered communities in the proposed areas. The resulting minimum effluent from bio-digester latrines at their operational stage will contribute to reducing pressure on existing sludge treatment facilities in the MMAs. This presents a comparable advantage over the traditional septic system which is expensive both in construction and operation besides it relatively large space requirement for construction.

Also, the proposed sludge processing facility to convert fecal matter into useful products e.g. compost

for agriculture, if well managed, will serve as an innovation which will contribute to resource efficiency and ‘zero waste’ generation. This is a deviation from the current practice where excreta is discharged directly to the environment after going through minimum treatment or sometimes without treatment.

**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.**

The Client has demonstrated its commitment to mitigating adverse social and environmental impacts in the implementation of the project. There are adequate instruments prepared (ESMF and RPF) to ensure compliance with World Bank safeguards policies. These instruments have been consulted upon, reviewed and cleared by the Bank, disclosed and will be implemented by the client. Land acquisition for project works or to accommodate resettled families would continue to trigger the policy even when people are not displaced. Screening will be done early in the planning process by trained MMA PMU staff in consultation with engineers and others who carry out the site design. Alternatives will continue to be considered to minimize the amount of displacement and the justification for the alternative selected will be set out in the RAP. Consultations with affected people and the participation of affected people and possible host communities are mandatory and the concerns and aspirations of community members have been taken into consideration in the planning process during the parent project, and this trend will continue during the implementation of the current AF.

Each site approved for support by the project will be eligible for financing only when an appropriate safeguard instrument e.g. ESMP and RAP (if required) satisfactory to the Bank has been completed and disclosed. During the Parent project, 3 ESIA's, 30 ESMPs and 14 Resettlement Plans have been developed for the sites approved in a manner that is satisfactory to the Bank and also consistent with the ESMF and RPF that were prepared and disclosed on December 24, 2012 prior to Board Presentation of GAMA. The implementation of the ESMPs and RAPs during the parent project were rated moderately satisfactory but the aim is to bring the implementation of both instruments to a satisfactory rating during the AF project.

The borrower plans to improve and strengthen safeguard compliance by involving Environmental Health Officers of the MMAs under the coordination and supervision of the MMA's Planning Officers and Engineers. The revised ESMF which has been disclosed details a capacity building program on safeguards for the MMAs.

**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 include beneficiaries and local communities in the project's areas, local NGOs working in the project area, the respective participating metropolitan assemblies, participating Ministries, Departments and Agencies (MDAs), Ghana Water Company and the Government of Ghana. As part of the preparation of the ESMF and RPF, the Borrower's project team has conducted numerous site visits to identify the potential environmental and social impacts of the project, and consultations were held with several stakeholders across the country. Consultations that began during the project preparation will continue throughout the design and implementation stages for all works under the project in accordance with Laws of Ghana, ESMF and RPF requirements.

***B. Disclosure Requirements (N.B. The sections below appear only if corresponding safeguard policy is triggered)***

<b>Environmental Assessment/Audit/Management Plan/Other</b>	
Date of receipt by the Bank	
Date of submission for disclosure	

For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	
"In country" Disclosure	
Ghana	
<i>Comments:</i>	
<b>Resettlement Action Plan/Framework/Policy Process</b>	
Date of receipt by the Bank	July 8 2020
Date of submission for disclosure	July 8, 2020
"In country" Disclosure	
Ghana	July 7, 2020
<i>Comments: The ESMF and RPF have been disclosed in the project website and the local newspaper.</i>	
<b>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.</b>	
<b>If in-country disclosure of any of the above documents is not expected, please explain why::</b>	

**C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting) (N.B. The sections below appear only if corresponding safeguard policy is triggered)**

<b>OP/BP/GP 4.01 - Environment Assessment</b>						
Does the project require a stand-alone EA (including EMP) report?	Yes	<input type="checkbox"/>	No	<input checked="" 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 type="checkbox"/>	NA	<input type="checkbox"/>
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	NA	<input type="checkbox"/>
<b>OP/BP 4.12 - Involuntary Resettlement</b>						
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"/>
Is physical displacement/relocation expected?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	TBD	<input type="checkbox"/>
Is economic displacement expected? (loss of assets or access to assets that leads to loss of income sources or other means of livelihoods)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	TBD	<input type="checkbox"/>
<b>The World Bank Policy on Disclosure of Information</b>						

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"/>
<b>All Safeguard Policies</b>						
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"/>

## VII. Approval

Task Team Leader(s):	Yitbarek Tessema Mammo	
<i>Approved By:</i>		
Safeguards Advisor:	Name: Nathalie Munsberg	Date:
Practice Manager:	Name: Maria Angelica Sotomayor	Date:
Country Director:	Name: Pierre Laporte	Date: