

**INTEGRATED SAFEGUARDS DATA SHEET
APPRAISAL STAGE**

Report No.: ISDSA16673

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I. BASIC INFORMATION

1. Basic Project Data

Country:	China	Project ID:	P149528
Project Name:	CH-Second Gansu Cultural and Natural Heritage Protection and Development Project (P149528)		
Task Team Leader(s):	Ji You, Guido Licciardi		
Estimated Appraisal Date:	28-Mar-2016	Estimated Board Date:	26-May-2016
Managing Unit:	GSU08	Lending Instrument:	Investment Project Financing
Sector(s):	Public administration- Other social services (50%), Urban Transport (30%), General water, sanitation and flood protection sector (20 %)		
Theme(s):	Cultural Heritage (60%), Other urban development (40%)		
Is this project processed under OP 8.50 (Emergency Recovery) or OP 8.00 (Rapid Response to Crises and Emergencies)?			No
Financing (In USD Million)			
Total Project Cost:	160.76	Total Bank Financing:	100.00
Financing Gap:	0.00		
Financing Source			Amount
Borrower			60.76
International Bank for Reconstruction and Development			100.00
Total			160.76
Environmental Category:	A - Full Assessment		
Is this a Repeater project?	Yes		

2. Project Development Objective(s)

To conserve cultural and natural heritage, enhance tourism services and improve community services in selected project sites in Gansu Province.

3. Project Description

The Longdongnan Regional Strategic Planning Study for the Cultural and Natural Heritage Conservation and Sustainable Tourism Development (Longdongnan Regional Study) provided the basis to screen sites for inclusion in the project. The selected sites have a complete set of planning tools to expedite implementation, including heritage conservation and development plans at both county and site levels, as well as tourism development plans at both county and site levels. Of the sites identified based on the above, sites with higher development potential, including attractiveness for private sector investments, job creation, and income generation for local communities, were prioritized.

Six sites have been selected for inclusion in the project as bellow;

Kongtong District:	Kongtong Mountain Cluster of Historic Buildings,	5A
Jinchuan County:	Hundred Mile Grottoes Corridor Conservation,	4A
Zhuanglang County:	Yunya Temple Cultural Heritage and Scenic Area,	4A
Tanchang County:	Guan'egou Ethnic Cultural and Natural Heritage Conservation,	4A
Kangxian County:	Yangba Natural Heritage Conservation,	4A
Hezheng County:	Hua'er Traditional Music Conservation and Inheritance Program	4A

The three project components described below would blend investments in sites and communities with capacity building.

Component 1: Heritage Conservation and Tourism Services Improvement (Component cost US \$117.72 million, IBRD share US\$73.77 million). This component will support Carrying out of site conservation and protection activities, construction, upgrading and/or rehabilitation of basic infrastructure and services facilities in Project Sites, consisting of, inter alia::

- i.) Protection and conservation of cultural and natural heritage and cultural relics, including the carrying out of studies on Project-related activities and the design of cultural heritage preservation programs;
- ii.) Construction, rehabilitation and/or upgrading of tourist roads, footpaths, pedestrian bridges, and scenic lookouts, including associated equipment;
- iii.) Provision and upgrading of services including water supply, drainage, wastewater collection and disposal, solid waste collection, power, and tourist signage, including associated equipment;
- iv.) Construction and/or rehabilitation of selected scenic areas's administration facilities, museums, heritage and service centers, and parking space associated thereto;
- v.) Implementation of mitigation measures and works for natural heritage aimed at landslides, floods, and other natural hazards; including associated equipment.
- vi.) Development of a tourism information system and website for each of the Project Sites, which is fully integrated with the province-wide Gansu E-Tourism system.

Component 2: Community Basic Services Delivery (Component cost US\$28.69 million, IBRD share US\$17.98 million). This component will support construction, upgrading and/or rehabilitation of basic infrastructure, and provision of basic services to the communities in the Project Sites, consisting of, inter alia: (a) improvement of pavement for village access roads; (b) provision of water supply, wastewater collection and disposal; (c) solid waste collection and sanitation improvements; (d) street lighting; (e) construction of a wastewater collection network in Kongtong Scenic Area; (f) construction of a wastewater treatment plan along with a water collection network in Hua'er Songmingyan Scenic Area; and (g) construction of village classrooms for teaching and practicing local intangible cultural heritage.

Component 3: Capacity Building, Institutional Strengthening, and Project Management Support (Component cost US\$8.00 million, IBRD share US\$8.00 million). This component consists of:

- i.) Provision of training to selected Project-related staff, scenic area administrators and operators, as appropriate, on cultural relic protection, natural heritage protection, intangible cultural heritage preservation, scenic area management, tourism development strategies, and tourism products and market development.
- ii.) Provision of: (a) training to residents of local communities in the Project Sites on topics related to, inter alia, the start-up or expansion of locally-owned and tourism-related small businesses, business skills for participation in tourism, and protection of intangible cultural practices; and (b) technical assistance to local communities for incubating community-level small business associations and cooperatives.
- iii.) Provision of Project management support and technical assistance on, inter alia: (a) design review; (b) project management, monitoring and supervision; (c) construction supervision; (d) independent monitoring of the implementation of environmental and social safeguards; and (e) project reporting.
- iv.) Carrying out of studies on heritage preservation and the culture of local ethnic minorities, as well as on the overall management of scenic sites (including asset management).

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

The project is scattered in several areas in east, southeast and central area of Gansu Province, middle west of China. The biggest concentration is in Pingliang Prefecture, eastern part of the province on loess plateau in cold temperate zone with semi-wet climate and annual precipitation of 420-600mm. Two project counties are in Longnan Prefecture, southeast of Gansu, at the foot of Qingling mountain with wet warm temperate climate and annual precipitation of 580-750 mm. The remainder is located in central Gansu on loess plateau with semi-arid to arid climate and annual average precipitation down to around 200mm. The project area is relatively poor and has more than 20 ethnic minority groups.

5. Environmental and Social Safeguards Specialists

Meixiang Zhou (GSU02)

Xin Ren (GEN02)

6. Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	<p>Activities proposed include conservation of cultural relics, rehabilitation of existing roads/paths, and construction of new roads/foot paths, tourism and sanitation facilities in natural reserves, national scenic/geological parks or local drinking water protection area. Given the cultural, historical and natural significance and sensitivity of the sites involved, activities and limited capacity at local level, a category A was assigned.</p> <p>One Environmental Assessment (EA) report has been prepared to consolidate all subprojects?? domestic EAs. An Environmental and Social Management Plan (ESMP) was developed which includes general mitigation measures and site-specific measures as well as monitoring</p>

		for each subproject, taking into account the WB's Environmental, Health and Safety (EHS) Guidelines applicable to the project.
Natural Habitats OP/BP 4.04	Yes	Project activities include small scale civil work such as foot paths in peripheral zones of natural reserves of national/provincial level or national scenic/geological parks or provincial drinking water protection areas for the nearby county towns. According to the WB policies, the OP 4.04 is triggered. Relevant mitigation measures and monitoring requirement have been included in the ESMP.
Forests OP/BP 4.36	No	Not applicable
Pest Management OP 4.09	No	Not applicable
Physical Cultural Resources OP/BP 4.11	Yes	Activities proposed include conservation of provincial and county level physical cultural resources as defined by this OP. More details can be seen under II A below. A cultural resource management plan has been developed and included in the ESMP.
Indigenous Peoples OP/BP 4.10	Yes	The Bank OP 4.10 policy is triggered. The project will support Tanchang county for ethnic cultural heritage protection and Hezheng county for traditional music conservation and inheritance. There are various ethnic minority groups such as Tibetan, Dongxiang and Hui minorities in 1566 households with 6901 people in 7 villages of these project counties. A social assessment has been conducted and confirmed the presence of these ethnic minorities which meet the requirements for the Bank OP 4.10 IP term only in the identified seven villages amongst all the 30 project villages. A free prior informed consultation was done with ethnic minorities in all the 7 project villages, social risks and impacts were assessed, an ethnic minority development plan has been prepared to mitigate social risks and promote positive social impacts and benefits for ethnic minority people. Various activities and community-based organizations have been included in the EMDP for intangible cultural heritage protection and economic opportunities for these ethnic people and their communities. According to the SA findings, there will be no other ethnic minorities to be triggered in the project areas, so there is no need for an IPPF.
Involuntary Resettlement OP/BP 4.12	Yes	By project appraisal, through optimization of design and selection of location, the project civil works will be constructed on existing land in scenic areas which are already state owned land or ready-for-use collective land for village level infrastructure. However, some of the

		specific locations of land to be used for the project may be adjusted during project implementation, such as new paths and small bridges, small scale of local cultural exhibition centre, and tourism facilities. A resettlement policy framework thus has been prepared to address potential emerging land demands during project implementation. The RPF sets measures and procedures to be followed so as to mitigate negative impacts of involuntary resettlement.
Safety of Dams OP/BP 4.37	No	The proposed project investment will not involve or link to dams defiled in OP/BP 4.37.
Projects on International Waterways OP/BP 7.50	No	Not applicable
Projects in Disputed Areas OP/BP 7.60	No	Not applicable

II. Key Safeguard Policy Issues and Their Management

A. Summary of Key Safeguard Issues

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

Environment

The project will bring overall positive impacts on the environment through the conservation of cultural relics and traditional houses, the upgrading and paving of access roads, building of sewage treatment facilities, and landscaping. Current impacts of local residents and tourists on the environment will be mitigated through the provision of key environmental services such as sewage interception and treatment, solid waste collection and disposal, and power supply. Tourist impact on the sites will be controlled through the provision of fencing, pathways and signage.

However, there is risk of damage to physical cultural heritage from repair, reconstruction and inadequate protection of chance-finds during construction. Inappropriate restoration that does not match the original architecture style and color can be a threat too. Similarly, renovation of traditional buildings with inferior materials or without expert guidance may result in the irreversible loss of valuable heritage. This risk will be mitigated through close involvement of the cultural relic bureaus at each level in the design review and approval, and through pre-qualification of contractors for conservation works as well as strict site supervision following the ESMP.

The adverse environmental impacts at each site from project works are not significant due to the small scale, as shown by experience of the First Gansu project on cultural heritage, and can be readily mitigated or managed. Impacts during construction mainly include damage to cultural resources by improper repair, noise and dust, wastewater discharge, vegetation loss, and off site impacts from borrow and disposal pits on water and soil erosion. Major impacts during operation include air pollution and noise from traffic on new roads, sewage and solid wastes from tourist facilities and home stay, and social and environmental impacts induced by influx of tourists once the project completes.

Social issues

The project will have significant positive impacts through improvement of cultural heritage protection, local accessibility and support to tourism and community development. Specific positive impacts include improved road accessibility and safety, better tourism services and supporting facilities, as well as new opportunities of employment and income for local people to involve in project construction during implementation and tourism service provision in the long term. There were totally 707,000 people living in poverty by Chinese official poverty line in 2014 in the 6 project counties and district, with a poverty incidence of 22%. This accounts for about 16.8% of whole Gansu provincial poor people which was 4,170,000 in 2014. The project will make big contributions to local poverty reduction with better facilities, services and income resources for local people in project areas. Negative impacts include risks associated with intervention in 7 ethnic minority villages out of the total 30 project villages, dust and noise pollution, temporary and partial roads blockage, and traffic jams during project construction.

There are 6901 Tibetan, Hui and Dongxiang minority people present in 1566 households in 7 villages of Tanchang and Hezheng Counties. There are Tibetan minority people in Luren, Xinping and Yuezangfu villages of Guan??e??gou subproject of Tanchang County. In these village, Tibetan people account for 73 to 100% of the total villagers respectively. In another 4 villages in Songming subproject area of Hezheng County, there are concentrated presence of Dongxiang and Hui ethnic people in project communities, they account for 33 to 86% of total villagers in Dashanzhuang, Cheba, Bianpo and Ketuo villages. These ethnic minority groups all meet the definition of the Bank IP term.

In addition, the project will construct some civil works. Although by appraisal the civil works will be all constructed on existing land with no need for additional land acquisition or resettlement. Nevertheless future land acquisition and resettlement which can??t be determined by project appraisal might emerge given possible adjustment of location selected for the civil works during project implementation.

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

Environment

While the project is expected to bring overall positive long-term environmental and social benefits, there are some potential long-term and indirect impacts mainly due to tourism development. Disposal of garbage and manure collected from the tourism area, over influx of tourists that exceed carrying capacity and environmental facilities of scenic areas might have long term impacts on the environment and various protected areas such as natural reserves, drinking water protection zone and geological formation in geo parks. These may threaten the natural beauty or cultural heritage of the site, and the surrounding environment. However, at each site under various protected areas, zoning and their enforcement have been in place for years to control induced development.

Social

- (1) The change to identified location of civil works during project implementation potentially may cause additional land demanding for involuntary resettlement.
- (2) Influx of migrant workers during the project construction period and increasing influx of tourists may have some impact on local social security, cultural shocks to ethnic minorities, and even epidemic disease expansion.
- (3) With the development of the scenic spot attracting more and more tourists, the influx of the

external culture and tourism consumers may increase the price of local goods and business moral standards. The issues of value and moral degradation may arise.

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

The EA process has played a key role in optimizing the project scope and design. Several activities originally proposed were within the control zone of cultural relics, buffer zone of provincial nature reserves and certain zone of national geo parks/wetland (e.g. in Kang County) where the types of activities proposed are not allowed by applicable national regulations. These proposals were either dropped, relocated or adjusted to ensure legal compliance domestically. For acceptable activities proposed, various alternatives, including a 'no project' scenario, have been identified and compared during the EA process in order to avoid or minimize potential adverse environmental and social impacts. Different sites for several subprojects were compared from environmental point of view. Different types of latrine available were compared, namely, conventional dry latrine, standard flush toilet, and so called eco-toilet using foam to collect wastes, with recommendations made based on local situation, cost and environmental consideration. Major available technologies for small scale on-site sewage treatment were analyzed and compared too. The recommended options are those environmentally sounder, more economically viable and more adapted to local conditions.

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.

Environment

Following the requirements of Bank's safeguard policies and relevant domestic regulations, the Environmental Assessment (EA) was prepared by a certified EA firm with recent experience in other Bank projects. Based on the EA, an Environmental and Social Management Plan (ESMP) has been developed, taking into account the applicable WB's Environmental, Health and Safety (EHS) Guidelines. General mitigation measures were developed into Environmental Code of Practice (ECOP) to deal with civil work impacts common to all subprojects. Site-specific measures were devised to mitigate potential impacts on various protected areas (natural reserves, geo-park, drinking water protection areas etc) identified in the EA process. In addition, the ESMP includes Physical Cultural Resources (PCR) Management Plan, learning from experiences from recent WB projects in China on PCR protection. A social impacts management plan is also included, taken mitigation measures from the social assessment report.

The provincial PMO is the same one for Gansu Cultural Heritage and Tourism Development Project- Phase I, just completed in 2015. It has adequate experience with the WB safeguard. However, most of the project counties/sites are new to the WB project and their PMOs have little knowledge about the WB safeguard policies and requirements. The Bank team provided training on safeguard and will continue capacity building in safeguard preparation and implementation throughout the project cycle. An environmental training plan was designed as part of the ESMP to guide training of all parties involved in the project (PMOs, contractors, supervisors etc) to enhance their capacity to address potential impacts and environmental issues during the implementation.

Social

To comply with the Bank IP policy requirement, social assessment has been conducted. As part of the SA, free, prior and informed consultations were done with ethnic minority people in the 7 ethnic minority villages. Based on the SA, an ethnic minority development plan has been prepared by a professional consulting team under the coordination of the PMO and deemed satisfactory to the Bank requirements. The EMDP includes measures to ensure that project activities shall be

fairly offered to all the 7 ethnic communities in a culturally appropriate way and promote benefits and participation of ethnic minority people (both men and women) in the project. Priorities will be given to these ethnic and vulnerable people in project villages in terms of jobs, livelihood development or restoration and other economic opportunities resulting from the project, in particular, ethnic intangible cultural heritage protection and promotion via development of local performing arts and tourism-oriented souvenirs. Also the project will support a number of awareness raising and skills training, hands-on advisory services for local intangible cultural heritage protection and promotion, foster community-based organizations, and promote tourism-related services and local products development for the ethnic communities.

Implementation of the EMDP will be monitored by the PMOs, the Bank task team and external independent consultants. For the rest 23 project villages, a social action plan has also been prepared. and incorporated in the ESMP, FSR and reflected in the project procurement plan with specific activities and budgets. These instruments are to mitigate negative social impacts and risks, and to promote local people's economic opportunities and cultural heritage protection, community-based organizations and tourism service-driven livelihoods.

A resettlement policy framework (RPF) has been prepared to address future possible land acquisition and resettlement although all the known locations for the project civil works are on existing ready-for-use land and do not need additional acquisition. The RPF describes the overall legal framework, planning principles, procedures, compensation and rehabilitation approach, consultation and participation requirements, grievance redress mechanisms, organization and monitoring arrangements.

The Provincial PMO has rich experience in preparing and implementing World Bank financed projects. They have and will continue to provide training and guidance for county/district level of PMOs. The PMO has also agreed to hire an external social consulting team for technical support in dealing with social aspects of the project. Each PMO has delegated a staff to take charge of social safeguards management. The PMOs have prepared a SA with a social action plan, EMDP and RPF.

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

Environment

For this project, the key stakeholders include local communities who live in and around the project sites. Public disclosure and consultation has been conducted two rounds during EA preparation as per the Bank requirement for category A project. The first round was conducted during November 2015 in all project counties and cities as well as at provincial level with project information and a briefing on potential impacts disclosed at official websites of local government/PMOs and notice boards of affected communities. The second round was during January- February of 2016 with the full draft EA/ESMP being disclosed at official websites with announcement in local newspaper, TV and notice boards of local communities concerned in all project localities. Public consultation that follow suit was carried out using a combination of questionnaire survey, expert consultation, workshops and public meetings. Public consultations have focused more on affected people instead of local officials. Their concerns and suggestions have been incorporated into the EA and the development of the ESMP. The details on public consultations is available in the EA report. The English version of EA/ESMP was first sent to the Bank Infoshop on 25 January 2016 and re-disclosed later when the EA/ESMP was updated and revised.

Social

A social assessment report, ESMP, EMDP and RPF were prepared after intensive consultation with local stakeholders in the project areas. These social instruments are planned to disclose locally in PMO's government website on Jan 20, 2016 and made accessible to general public and disclosed in the Bank InfoShop on January 24 and the ESMP on January 25, 2016.

Grievance Redress. A mechanism has been established for grievance redress. Grievances can be filed both orally and in writing. Starting at village and neighborhood committee level, the grievances can be elevated to county/district, city level if they are not satisfied with the resolution at the lower level. The affected people could also file their cases in court if they are not happy with the resolution by the project authority. All grievances and their resolution will be recorded. This mechanism has been disclosed to the local population.

B. Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other	
Date of receipt by the Bank	18-Jan-2016
Date of submission to InfoShop	25-Jan-2016
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	05-May-2016
"In country" Disclosure	
China	20-Jan-2016
<i>Comments:</i>	
Resettlement Action Plan/Framework/Policy Process	
Date of receipt by the Bank	08-Jan-2016
Date of submission to InfoShop	24-Jan-2016
"In country" Disclosure	
China	20-Jan-2016
<i>Comments:</i>	
Indigenous Peoples Development Plan/Framework	
Date of receipt by the Bank	09-Jan-2016
Date of submission to InfoShop	24-Jan-2016
"In country" Disclosure	
China	20-Jan-2016
<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 checked="" 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 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/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 4.10 - Indigenous Peoples	
Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?	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"/>]
If the whole project is designed to benefit IP, has the design been reviewed and approved by the Regional Social Development Unit or Practice Manager?	Yes [<input type="checkbox"/>] No [<input type="checkbox"/>] NA [<input checked="" 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"/>]
Is physical displacement/relocation expected? Provided estimated number of people to be affected	Yes [<input type="checkbox"/>] No [<input type="checkbox"/>] TBD [<input checked="" 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) Provided estimated number of people to be affected	Yes [<input type="checkbox"/>] No [<input type="checkbox"/>] TBD [<input checked="" 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"/>]

III. APPROVALS

Task Team Leader(s):	Name: Ji You, Guido Licciardi	
<i>Approved By</i>		
Safeguards Advisor:	Name: Peter Leonard (SA)	Date: 25-Mar-2016
Practice Manager/ Manager:	Name: Abhas Kumar Jha (PMGR)	Date: 25-Mar-2016