



# Project Information Document (PID)

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Concept Stage | Date Prepared/Updated: 03-Feb-2021 | Report No: PIDC30805

**BASIC INFORMATION****A. Basic Project Data**

Country India	Project ID P175728	Parent Project ID (if any)	Project Name Gujarat Resilient Cities Project (P175728)
Region SOUTH ASIA	Estimated Appraisal Date Oct 11, 2021	Estimated Board Date Jan 14, 2022	Practice Area (Lead) Urban, Resilience and Land
Financing Instrument Investment Project Financing	Borrower(s) Urban Development and Urban Housing Department	Implementing Agency Ahmedabad Municipal Corporation	

**Proposed Development Objective(s)**

To develop resilient and sustainable urban service delivery and financial systems in Ahmedabad

**PROJECT FINANCING DATA (US\$, Millions)****SUMMARY**

<b>Total Project Cost</b>	400.00
<b>Total Financing</b>	400.00
<b>of which IBRD/IDA</b>	280.00
<b>Financing Gap</b>	0.00

**DETAILS****World Bank Group Financing**

International Bank for Reconstruction and Development (IBRD)	280.00
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**Non-World Bank Group Financing**

Counterpart Funding	120.00
Borrowing Agency	120.00

Environmental and Social Risk Classification

Concept Review Decision



Substantial

Track II-The review did authorize the preparation to continue

## B. Introduction and Context

### Country Context

- 1. India's Gross Domestic Product (GDP) growth has slowed in the past three years, and the COVID-19 outbreak is expected to have a significant impact.** Growth has moderated from an average of 7.4 percent during FY16-FY19 to an estimated 4.2 percent in FY20. The growth deceleration was due mostly to unresolved domestic issues (impaired balance sheets in the banking and corporate sectors), which were compounded by stress in the non-banking segment of the financial sector, and a marked decline in consumption on the back of weak rural income growth. Against this backdrop, the outbreak of COVID-19 and the public health responses adopted to counter it have significantly altered the growth trajectory of the economy, which is now expected to contract sharply in FY21. On the fiscal side, the general government deficit is expected to widen significantly in FY21, owing to weak activity and revenues as well as higher spending needs. However, the current account balance is expected to improve in FY21, reflecting mostly a sizeable contraction in imports and a large decline in oil prices. Given this, India's foreign exchange reserves are expected to remain comfortable.
- 2. Although India has made remarkable progress in reducing absolute poverty, the Covid-19 outbreak has reversed the course of poverty reduction.** Between 2011 and 2017, India's poverty rate is estimated to have declined from 22.5 percent to values ranging from 8.1 to 11.3 percent. Recent projections of GDP per capita growth rate indicate that as result of the pandemic, poverty rates in 2020 have likely reverted to estimated levels in 2016. The extent of vulnerability is reflected in labor market indicators from high frequency surveys. Data from the Centre for Monitoring Indian Economy (CMIE) shows urban households are facing greater vulnerabilities: between September-December 2019 and May-August 2020, the proportion of people working in urban and rural areas has fallen by 4.2 and 3.8 percentage points respectively. Approximately, 11 and 7 percent of urban and rural individuals, identifying themselves to be employed in the recent period, have performed zero hours of work in the past week. Short-term employment outlook is contingent on whether these temporarily unemployed workers can fully re-enter the labour force. Overall, the pandemic is estimated to have raised urban poverty, creating a set of new poor that are likely to be engaged in non-farm sector and receive at least secondary or tertiary education.
- 3. India's economic growth is accompanied by rapid urbanization, with cities offering a pathway to rapid poverty alleviation and the achievement of upper middle-income status.** India has experienced rapid urbanization over the last four decades – urban population increased from 26 percent in 1991 to 34 percent in 2020 and is expected to increase at a faster rate in coming decades. By 2030, 70 percent of new employment is expected to be generated in cities and the number of urban households in the middle class is likely to more than quadruple. Urbanization has placed cities as the main engines of economic opportunities and shared prosperity for the country, but also posing enormous challenges for making Indian cities livable, resilient, productive, and competitive. This structural transformation defines one of India's core development challenges, which is to provide housing, urban services, employment opportunities, and a good quality of life for urban dwellers. Addressing these challenges requires concerted efforts at national and sub-national (state and local) levels with a focus on strengthening the decentralized urban management and service delivery frameworks in line with 74<sup>th</sup> Constitutional Amendment Act (CAA). Despite ongoing efforts at the Central, state and local levels, the decentralization reform agenda for implementation of the 74<sup>th</sup> CAA remains unfinished. In general, the pace of decentralization and the development of robust urban management, governance, financing and service delivery systems has been uneven and slow.



## Sectoral and Institutional Context

4. **Gujarat is one of the most urbanized states in India with a total population of approx. 71 million, of which approx. 34 million (~48 percent) lives in urban areas.** The state has experienced a high rate of urbanization for about four decades with its urban population increasing from 34 percent in 1991 to ~48 percent in 2020. Going forward, the urbanization level in the state is anticipated to increase to 55 percent by 2036 – a ~11.4 million urban population addition over the period 2021-36. Economically, Gujarat is one of the most progressive and prosperous states, accounting for ~7.7 percent of India's GDP. The state has had an average annual GDP growth rate of 12.87 percent between 2015-21 that outpaced India's national GDP growth. Gujarat's per capita income has grown at a rate of 8.4 percent over the period 2011-18 against India's growth rate of 5.5 percent. Its ranking among Indian states in terms of per capita income has risen from 9th in 2011 to 3rd in 2018, with per capita income (in term of constant 2011 prices) of US\$2,074 in 2018 that is ~66 percent higher than the national average of US\$1,182. Gross state domestic product (GSDP) of Gujarat increased at 13 percent compound annual growth rate (CAGR) between FY12-20, to \$243.45 billion. As per the state government committee report on economic revival measures post COVID19 pandemic, the Gujarat Government clearly identifies ongoing rapid urbanization as a key driver for state's economic growth in coming decades. This growth will be primarily driven by economic activities linked to industries and manufacturing sectors such as petrochemicals, pharmaceuticals, automotive manufacturing, cement, textiles and diamond polishing. The state has prioritized infrastructure investments and urban reforms for accelerated growth and development in the four largest cities - Ahmedabad, Surat, Vadodara, and Rajkot, which cover more than 50 percent of the total urban population of the state. The goal is to develop good quality infrastructure in these major economic centers and position them competitively for attracting foreign trade and investments in the state.

5. **Ahmedabad has the potential to become a globally competitive city, if its urbanization can be leveraged to its full potential.** Ahmedabad is the largest city in the state, with an estimated current (2020) population of 7.3 mn. The population has grown at an annual rate of 3 percent in the last three decades<sup>1</sup>, doubling every 12 years. Ahmedabad is projected to become the first mega city (i.e population more than 10 mn) in Gujarat between 2025-30. The city area has spatially expanded from 161 sq km in 1989 to 505 sq.km in 2020, in a concentric growth pattern centered around Sabarmati River, with a density around 14,450 people/sq.km. The city has played a crucial role in Gujarat's economic growth and has witnessed a double-digit real GDP growth (10.1 percent) over the 2010-16 period. It is the largest inland industrial center in India as well as the second largest Industrial center in Western India. McKinsey (2012) projected Ahmedabad to be among the top 20 global growth hotspots by 2025, driven by high income consumers and population growth. As per Government of India's Ease of Living Index (2019) covering 111 Indian cities, Ahmedabad ranks 4th in the highest population category (>4 Million), and places second among Indian cities on the institutional and economy indices.

6. **The state of Gujarat has developed a horizontally integrated, autonomous and locally accountable urban governance and institutional framework for its main cities, one of the most innovative and robust urban management institutional arrangements in India.** The Ahmedabad Municipal Corporation (AMC) has a comprehensive institutional mandate that includes core urban planning, management and service delivery functions (water supply, wastewater and drainage; urban roads, transport and mobility; solid waste management (SWM); and social services e.g. public health, education). AMC operates with a high degree of autonomy in fiscal planning & budgeting, resource mobilization and decision-making, wherein the key powers are vested with the Commissioner and/or the locally elected Municipal Council. This ULB-centric institutional framework for urban management and service delivery is further strengthened by two key innovations, which are unique to Gujarat: (i) Ahmedabad has adopted an integrated framework for urban utilities/Special

<sup>1</sup> The 2011 census population was 5.6 Mn



Purpose Vehicles (SPVs), wherein all city-level SPVs/utilities (except metro-rail SPV) involved in urban service delivery are owned fully<sup>2</sup> or partially<sup>3</sup>, managed, and coordinated by AMC. These SPVs have clearly defined institutional mandates and are integrated to ensure coordinated service delivery; and (ii) land-use and spatial planning is carried out jointly by AMC and the Ahmedabad Urban Development Authority<sup>4</sup> (AUDA). Ten-year development plans are prepared and once finalized, the land-use planning, development control regulation, management and investment functions within the AMC's jurisdictional boundaries are delegated from AUDA to AMC.

7. **Ahmedabad's overall financial performance has been better than most large Indian cities in the past. It received an AA credit rating in 2019, but municipal revenue generation remains weak and grant dependence is high.** Over the last five years (FY14-19), AMC's income has ranged from \$602 mn to \$770mn, with a five-year average of \$677 mn. AMC's expenditures have ranged from \$597mn to \$764mn, with a five-year average of \$672 mn. AMC has consistently generated an operating revenue surplus on an annual basis, though the trend is declining significantly in last five fiscal years (FYs). AMC's own sources (including land-based revenues) contribute to 50 percent of recurrent income and 32 percent of capital income, while the remaining fraction of recurrent and capital income is sourced from inter-governmental fiscal transfers supplied by central and state government under various national and state programs. Overall grant support from the state has stagnated - a major source of state government grants (Octroi compensation<sup>5</sup>) has been almost flat in per capita terms since 2009-10 (with an annual growth rate of 1.3 percent).

8. **Ahmedabad has been leading on accessing commercial sources of financing for urban infrastructure development using all the three key instruments – municipal bonds & borrowings, PPPs and land value capture.** (i) Municipal borrowing: Ahmedabad was the first city to raise municipal bonds in 1998 and has since raised municipal bonds with a cumulative value of ~\$70 Million through five separate issuances. (ii) Land Value Capture: AMC has significant experience of implementing LVC instruments including sale of development rights (FSI), betterment levy and land-sale through the town planning model pioneered in Gujarat. Relative to comparable cities within India, the AMC has access to, and experience with a robust suite of land-based financing tools, facilitated by an enabling national and local regulatory environment. (iii) PPP: the city has had a long history of successful PPP implementation in solid waste management sector (collection & transportation, waste processing and dumpsite remediation), affordable housing and implementation of smart city projects such as city card payment services in Ahmedabad. In contrast to failed urban infrastructure PPP projects in other Indian cities, Ahmedabad has demonstrated the institutional capacity required for structuring, implementing and managing PPP projects.

9. **Ahmedabad has relatively good urban infrastructure and network coverage for most of the core urban services.** The city has i) 98 percent water supply network coverage with adequate bulk treatment infrastructure capacity, which supplies ~150-160 lpcd of drinking water to the existing population (national benchmark: 135 lpcd). AMC is currently in the process of piloting 24\*7 water supply system and plans to scale-up to the entire city in a phased manner under national urban mission<sup>6</sup>; ii) 94.5 percent sewerage network coverage, 100 percent access to toilets and adequate wastewater treatment capacity to manage the wastewater being currently generated; iii) urban road network with high

<sup>2</sup>This model has been adopted for urban service delivery and area-based development such as (i) Ahmedabad Janmarg Ltd as 100s AMC-owned SPV for operating Bus-Rapid Transit System (BRTS), (ii) Sabarmati Riverfront Development Corporation Ltd for redevelopment of the riverfront and associated central business district area, (iii) Heritage City Management Trust that is responsible for the management of the historic old city as a UNESCO world heritage site; and (iv) Medical Education Trust that is responsible for the management of three medical facilities and associated colleges.

<sup>3</sup> Ahmedabad Municipal Transport Services (AMTS) and Jalvihar SPV (Smart Cities SPV).

<sup>4</sup> Gujarat Town Planning and Urban Development Act (GTP&UD Act), 1976 provides legal authority to independent city urban development authority (Ahmedabad Urban Development Authority) for overall land-use planning, spatial planning and development control.

<sup>5</sup> Octroi compensation is provided in lieu of the Octroi tax abolished by Government of India 2 decades back. Octroi Tx served as a major revenue source for ULBs before abolishment.

<sup>6</sup> Atal Mission for Rejuvenation and Urban Transformation



percentage of motorable surface roads – 3,051 Kms of urban roads, 90 percent of which are surfaced roads; and iv) adequate infrastructure and systems for collection, transportation, processing/recycling and safe disposal of solid waste as well as remediation of legacy waste dump-sites (100 percent coverage, once ongoing investments are completed).

**10. AMC faces significant gaps and challenges related to capacity utilization, operational efficiency, service performance monitoring and financial sustainability in wastewater management and storm water drainage.**

- a. Wastewater management, recycling and reuse: Key challenges faced by AMC include: (i) low operational efficiency, obsolete technologies and low capacity utilization of existing sewerage treatment capacity; (ii) aging sewerage network systems in poor condition due to deferred maintenance and rehabilitation, leading to frequent leakages and contamination issues; (iii) fragmented infrastructure planning, not in line with the geographical expansion and population increase; (iv) urgent need to establish a sustainable model for reuse of treated waste-water to mitigate fresh water demand and achieve the 70 percent recycling and reuse target by 2025 as per state government’s policy for reuse of treated waste-water; (v) lack of household consumer database and weak monitoring & asset management systems; (vi) weak contract structures with limited controls to monitor and penalize operators for non-performance or non-compliance; and (vii) lack of a coherent, volumetric user-charge framework for cost recovery and financial sustainability of wastewater management services<sup>7</sup>.
- b. Storm Water Drainage: Key challenges faced by AMC are: (i) increasing risk of urban flooding due to inadequate coverage of storm water drainage network and limited capacity to handle peak-flow incidents<sup>8</sup>– city has only 30 percent of the required drainage network currently, in poor condition; (ii) lack of integrated planning, operations and maintenance systems for drainage network; and (iii) lack of water quality surveillance systems in the city to monitor the contamination and water quality. Inadequate and inefficient drainage systems have led to rapid depletion of natural water assets (rivers, lakes, canals, ground water) and are making the water supply, sanitation and drainage system unsustainable.

**11. AMC’s urban health service delivery systems have been overly stretched due to ongoing COVID19 pandemic and need critical support to strengthen pandemic response and build resilience to future health shocks.**

The recently released National Family Health Survey (NFHS)-5<sup>9</sup> reveals that urban areas of Ahmedabad district<sup>10</sup> have shown good progress for key Reproductive, Maternal, Newborn, Child and Adolescent Health (RMNCAH) indicators such as institutional delivery, antenatal visits, family planning etc. as compared to state average, but progress has been slow in other critical indicators such as full immunization. Access and quality of primary healthcare services remain constrained due to inadequate health care centers (Urban Primary Health Centers (UPHCs) and Comprehensive Health Centers (CHCs)) and continued focus on RMNCAH services despite increasing burden of NCDs. Focus on quality of healthcare service delivery remains inadequate. Moreover, health care facilities have not received the accreditations and certifications confirming the quality of services as per national standards. These challenges have been further amplified by the COVID19 pandemic, which has hit the city hard - Ahmedabad city has 20 percent of the total confirmed cases and 50 percent of total deaths in Gujarat. AMC has ramped up testing, contact tracing and medical care facilities (including ICUs) and has been able to bring the crisis under control. However, the pandemic has exposed the gaps and challenges in urban health services and underscore the urgent need to strengthen the urban health service delivery systems in the city and build resilience to any future recurrence or new health shocks.

<sup>7</sup> Currently cost recovery is done through conservancy tax, which is levied as 30% of property tax- it is not charged volumetrically and set at sub-economic levels

<sup>8</sup> More than 20 instances of flooding have been reported in 2018/19 as per SLB data

<sup>9</sup> [http://rchiips.org/nfhs/NFHS-5\\_FCTS/GJ/Ahmedabad.pdf](http://rchiips.org/nfhs/NFHS-5_FCTS/GJ/Ahmedabad.pdf) - released in December 2020.

<sup>10</sup> In absence of city level estimates, district level estimates are being used. Also, since more than 70% population of the Ahmedabad district is urban, these estimates are reflective of progress in the city area.



## Relationship to CPF

12. **The project is consistent with the World Bank Group Country Partnership Strategy FY18-22** discussed by the Board on September 20, 2018 (Report 126667-IN). Pillars I and III of the Systematic Country Diagnostic (SCD) recognize the role of efficient cities as a direct contributor to a resource-efficient growth path for India. The SCD identifies policies and actions to make cities more productive and livable, including reduction of environmental impacts, strengthening of city finances, and strengthening the public sector. Similarly, area I of the CPF on “promoting resource efficient growth” focuses on creating urban footprints that are more green, livable, and productive to create more sustainable cities and improving disaster risk management and resilience to climate change. Further, the project will also support the World Bank Group’s strategic objectives of improving human endowments and removing constraints for more and better jobs. To achieve this, the project will identify concrete opportunities to strengthen public sector institutions delivering services and explore opportunities to leverage private sector participation for financing and technical expertise to strengthen the service delivery systems, with a focus on sustainability, resilience and inclusion. In line with the approach outlines in the CPF, the project will initiate *a multi-phase, multi-sector programmatic state partnership with Gujarat* focused on building resilient cities for sustainable urbanization and enhanced productivity.

### C. Proposed Development Objective(s)

To develop resilient and sustainable urban service delivery and financial systems in Ahmedabad

#### Key Results

13. The key results areas targeted under this project include (i) resilient urban infrastructure and improved service levels for select urban services<sup>11</sup>, (ii) improved financial systems and performance, and (iii) strengthened institutional capacity to better plan, deliver and manager urban services. Accordingly, the key results indicators are as follows:

- (i) Amount of wastewater collected and treated as per new national discharge standards (MLD)
- (ii) Length of the storm water drainage network developed (kms)
- (iii) Number of UPHCs/CHCs developed in line with national certification requirements
- (iv) Improved municipal revenues (year-on-year growth percentage)
- (v) Capital investments undertaken by AMC annually based on long-term Capital Investment Plan (CIP) (percentage of capital works identified from CIP)

### D. Concept Description

The proposed project will comprise three main activities, as described below:

14. **Activity 1 – Strengthening AMC’s financial systems and performance:** This activity will provide technical support to AMC to address key constraints affecting its financial performance and capacity to deliver and sustain good quality services to a rapidly expanding urban population. The focus of this activity will be on strengthening AMC’s systems for long-term capital investment planning, financing and budgeting, generating municipal revenues and leveraging land-based financing.

15. **Activity 2 – Improving urban services in Ahmedabad:** This activity will provide comprehensive support to AMC in improving the quality, efficiency, sustainability and resilience of select urban services - waste-water management services, storm water drainage and urban health services (prioritized in terms of significant infrastructure gaps, poor service levels and negative environmental & social externalities). This activity will be implemented by adopting a comprehensive service delivery approach in selected service sectors.

<sup>11</sup> Select urban services include wastewater management, storm water drainage and urban health services



16. **Activity 3 – Developing institutional systems and capacities:** This activity will focus on strengthening the overall institutional and governance frameworks for urban management, service delivery and financing in Ahmedabad, and develop a platform to leverage AMC’s good practices to provide capacity building support to other emerging cities of Gujarat.

Legal Operational Policies	Triggered?
Projects on International Waterways OP 7.50	No
Projects in Disputed Areas OP 7.60	No

Summary of Screening of Environmental and Social Risks and Impacts

Both the Environmental and Social risks of the project are rated as Substantial. The project will improve the overall health of the inhabitants, environmental improvement, and resilience of Ahmedabad city by improving stormwater drainage, sewerage systems, public health systems (investing in Intensive Care Units (ICUs) and public health labs, additional clinical service providers and field staff, strengthening systems for disease surveillance), providing technical support for municipal revenue mobilization, developing a GIS-based real-estate asset inventory management system, appropriate tariff strategy for core urban services, technical support for land-based financing. The project also aims for longer-term sustainable development of the State and its cities through support to the Gujarat Urban Development Institute through GUDC to develop a lighthouse approach to absorb international best practices, implement them in leading cities and replicate them in the rest of the State.

Risks have been assessed based on (i) type, extent, and magnitude of activities proposed; (ii) possible locations of subprojects (including sewer and drainage networks) in varied locations in AMC area; which are not known today, and some of which will be identified as part of project preparation; (iii) risks and impacts of the project during construction, operation, and maintenance (O&M) of urban infrastructure facilities supported by the project and consultancies; (vi) capacities and experience of AMC, GUDC which will be managing the project/subproject activities; and the need to develop capacities for E&S management; (v) the need to engage with a diverse set of stakeholders at the city, and State levels on environment, health and safety issues.

Civil works include up-gradation of existing STPs and construction of new ones and support infrastructure, canal improvements, rehabilitation of existing networks, expanding sewerage and drainage networks, establishing new health centers, laboratories, and other support facilities (cold chain). Other activities with limited risks and impacts include developing GIS based asset management inventory, support to GUDC/GUDI, and technical support. Any works on international waterways will be ineligible under the project.

Expected environmental impacts due to construction and upgradation of sewerage and drainage networks, treatment plants and improving health systems if facilities are not properly planned, designed, and managed; include (i) impacts on water environment of the water body receiving treated water or near construction / storage areas, (ii) increased possibilities for pedestrian-vehicular conflicts and accidents during laying of networks mainly through congested inner city areas, (iii) noise and vibration due to construction activities disturbing surrounding structures including heritage structures in the vicinity; (iv) noise, light, water, dust, air, land pollution and disturbance to fauna/flora and nearby communities due to construction, activities, usage, O&M activities; (v) occupational and community health and safety (OCHS) risks on workers (including due to non-availability / lack of use of PPEs at construction areas, in laboratories & public health systems) and communities, (vi) public inconvenience due to shifting of utilities, material transport, storage, construction and maintenance of proposed infrastructure, (vii) liquid and solid wastes during network laying, upgradation and construction





of treatment plants and operations, construction and demolition waste which may include existing asbestos, batteries, hazardous wastes and e-wastes which need to be disposed carefully, (viii) sludge, other wastes and effluents/backwash water during O&M stages, (ix) labor camp related pollution and burden on shared resources; (x) disturbances to activity spaces, parks, open spaces, natural habitats in the vicinity of work areas due to storage of materials and parking and movement of laborers, and construction vehicles, (xi) biomedical (incl. Personnel Protective Equipment), solid, hazardous and e-wastes, biosafety, during construction and O&M stages of proposed public health / COVID 19 response facilities, ICUs and laboratories. Proposed activities will involve several interdependent components, and all may not be financed under the project. Hence, the impacts of associated facilities are relevant and will be identified during the design stage.

The social risk rating of the project is classified as Substantial, based on the planned project activities throughout the city. The planned infrastructure development work in densely populated urban areas of Ahmedabad will require land that will need to be permanently acquired or temporarily required for the project. The activities will adversely affect the livelihoods of the urban poor as well as community safety during the construction phase. The AMC will need to conduct an assessment of the land parcel required for setting up the wastewater/ sewerage treatment plants(WWTP/ STP)- their numbers and locations across the city, land availability with the municipal corporation or other government entities (public land) for constructing these utilities, the estimated length of sewerage network proposed to be rehabilitated or expanded through large scale excavation and earthwork across the city and the scale of the population likely to be impacted (temporarily or permanently) due to this network improvement. The other risks include a) influx of non-local labor at the construction sites, especially concentration of labor at the WWTP/ STP sites and their impacts on neighboring communities including gender-based violence (GBV), sexual exploitation and abuse and sexual harassment (SEA/SH), b) economic and physical displacement of non- titleholders (squatters and encroachers who occupy stretches of public land/RoW) even if no land acquisition is involved, c) Upgradation of sewerage networks, especially in the congested city area may involve manual scavenging, which poses severe health risks for the municipal workers, d) septage outflow and disposal of sludge is usually at locations that are adjacent to habitations of the poorest and most marginalized communities, impacting their safety and well-being and e) equitable access to health services.

Most of these potential environmental and social risks can be avoided, mitigated, or minimized through good planning and engineering design. Considering that the impacts are reversible, localized, and temporary, both the environmental and social risks of the project are considered as "substantial". The actual nature and magnitude of impacts and risks will be assessed in the Appraisal stage when there is more clarity on the type, and locations of proposed interventions and capacities to manage these. The relevant ESSs for this project are ESS1, ESS2, ESS3, ESS4, ESS5, ESS6., ESS8 and ESS10.

An initial risk screening during the ESMF preparation will help assess the land requirements of the project, their associated risks, scale and magnitude of impact, and the borrower's ability to manage these land-related impacts. A RPF will also be prepared to address adverse land-related impacts. The risk screening mentioned above will also help in assessing the presence of any associated facilities that may have a bearing on the current investments. Guidance under the ESF (using the criteria for judging associated facilities) will be used to identify such facilities. During the preparation stage, the borrower will conduct an ESA of environmental and social risks and impacts of proposed interventions based on-site and desk-based reviews, and stakeholder consultations (in virtual mode, in case of the COVID 19 restrictions); based on which identify, assess and plan the management of the E&S risks/impacts that are likely to arise. An evaluation of the extent and scope of sub-project activities, locations, E&S risks, and impacts on and capacities of the implementing agency/ies to manage these will be undertaken as part of ESA.

The project's Environmental and Social Commitment Plan (ESCP) will specify the requirement for the Borrower to implement the ESMF, undertake sub-project level impacts assessment, and prepare their mitigation and management plans for implementation during the project cycle. All assessments and their recommended mitigation actions (including completion of resettlement and disbursement of compensation) will need to be completed before the commencement of physical /civil works. For this, the Borrower will need to ensure that all required mitigation and management measures expected to be undertaken by the contractors as part of the ESA appropriately are included in standard bid documents and



implemented.

Apart from Environment and Social Commitment Plan (ESCP), Environment and Social Management Framework (ESMF) and sub-project-specific documents (depending on procedures outlined in ESMF) Environment & Social Impact Assessments (with Environment and Social Management Plans), other documents such as Stakeholder Engagement Plan, Labor Management Plan, Resettlement Policy Framework/Resettlement Action Plans, EHRMPs shall be prepared, cleared by the Bank and disclosed by the Client before project appraisal and/or during the implementation of the project. The Terms of Reference (ToRs) for TAs will incorporate the need to follow ESMF and guidance on considering E&S aspects and best environmental practices comprehensively across the TA. The PIU/s will develop the required capacities to manage environmental aspects to prepare and manage project activities and proposed TAs using the ESMF.

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**APPROVAL**

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Country Director:	Hideki Mori	04-Feb-2021
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