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Project Information Document/
Integrated Safeguards Data Sheet (PID/ISDS)

Concept Stage | Date Prepared/Updated: 14-Apr-2017 | Report No: PIDISDSC20432

BASIC INFORMATION

A. Basic Project Data

Country	Project ID	Parent Project ID (if any)	Project Name
Africa	P161329		West Africa Identification for Development (ID4D) Regional Project (P161329)
Region	Estimated Appraisal Date	Estimated Board Date	Practice Area (Lead)
AFRICA	Jan 08, 2018	Apr 09, 2018	Social Protection & Labor
Lending Instrument	Borrower(s)	Implementing Agency	
Investment Project Financing	Republic of Cote d'Ivoire,Republic of Guinea	Office of the Prime Minister (Primature),ECOWAS Commission,Organisation National de l'Identification (ONI)	

Proposed Development Objective(s)

The proposed Project Development Objective is to set the foundation for unique digital identification with mutual recognition and the capacity for authentication in the ECOWAS region.

Financing (in USD Million)

Financing Source	Amount
International Development Association (IDA)	105.00
IDA Grant	5.00
Total Project Cost	**110.00**

Environmental Assessment Category	Concept Review Decision
C-Not Required	Track II-The review did authorize the preparation to continue

B. Introduction and Context

The proposed phased program of operations ("Series of Projects", SOP) focuses on Identification for Development

(ID4D) in the Economic Community of West African States (ECOWAS). This Series of Projects (SOP) would represent the World Bank's first regionally focused operation on identification systems. Building on the substantial global analytical work spearheaded by the ID4D Secretariat, the first phase of the SOP will set out and implement a scalable approach for reaching the goals set forward in the World Bank's Africa ID4D Business Plan. Identifying priorities and gaps in these work programs, as well as based on client demand, the proposed SOP would begin this regional ID4D engagement with an operation focused on identification standards for the ECOWAS sub-region and piloting compatible ID systems in Cote d'Ivoire and Guinea. Additional phases of the SOP would add two countries per year as other ECOWAS countries meet the below criteria outlined in Table 2. The same components would be used in each operation under the SOP, tailored to the maturity of the ID landscape in each country.

Table 1. Phases of Series of Projects on Identification for Development in ECOWAS

Phase	Countries	Proposed FY	Estimated Cost
1	Cote d'Ivoire, Guinea	FY18	US$110m
2	Niger, Burkina Faso	FY19	US$105m
3	Benin, Mali	FY20	US$95m
TOTAL			US$310m

Table 2. Criteria for Engagement in SOP on ID4D in ECOWAS

1. Client's commitment to setting up an inclusive and accessible ID system;
2. Client's completion of an ID assessment to map ID architecture;
3. Client's commitment to adhering to standards for harmonization and mutual recognition within ECOWAS;
4. Client's commitment to building trust in ID systems by protecting privacy and user rights.

Identification is a pre-requisite for inclusion, a goal reflected in target 16.9 of the Sustainable Development Goals (SDGs) to "provide legal identity for all, including birth registration" by 2030. Strong identification systems are also essential to countries' economic development, security, governance, and efficient delivery of services. However, effective identification systems remain elusive in much of the world, notably in developing countries. In Sub-Saharan Africa alone approximately 437 million people (44 percent of the population) are without proof of identity and consequently face significant barriers accessing education, financial services, healthcare, social welfare benefits, and participating in economic development and civic engagement. As such, identification can serve as a key enabler for eradicating poverty and achieving a broad range of development outcomes.

Approaching the development of foundational ID systems regionally with a focus on standards toward the goal of mutual recognition has clear spillover effects and strong value-added. A regional approach could help to drive down costs and facilitate regional migration, trade, and security. A regional digital identity approach would also accelerate the creation of a digital single market (DSM) in ECOWAS. Cross-country learning and shared knowledge would facilitate improved ID systems, including information about access to more/better choices of technology.

1. Country Context

ECOWAS was founded in 1975 with the goal of promoting economic integration across member states. ECOWAS

estimates that, as of 2016, its 15 member states have combined Gross Domestic Product (GDP) of US$735 billion.[1] The total regional population is roughly 335 million people, representing one third of the population across Sub-Saharan Africa. Although poverty varies between countries, two-thirds of member states have national poverty levels above 50 percent; the alleviation of poverty is a priority for ECOWAS and its member states.[2] The ECOWAS Vision 2020 reiterates ECOWAS' overarching mission that regional cooperation and integration will promote economic development in the region and envisions a single integrated market with free movement of people across the region by 2020.[3]

Both migration and remittances within ECOWAS are disproportionally large in comparison to its population and to Sub-Saharan Africa as a whole. The movement of people within the ECOWAS region is seven times that of any other Sub-Saharan African sub-region, and 70 percent of all ECOWAS migrants travel within the sub-region.[4] Cote d'Ivoire is the largest host of ECOWAS migrants, with over 2.3 million, and specifically hosts the largest number of Guineans of any ECOWAS state.[5] Remittances in ECOWAS are roughly US$6 billion annually, nearly half of the total in Sub-Saharan Africa.[6] Cote d'Ivoire alone sends over US$1.6 billion in remittances to other ECOWAS member states. Yet Sub-Saharan Africa has the highest cost associated with sending remittances in the world; the average cost of sending US$200 is 9.5 percent.[7]

Intra-regional trade within ECOWAS is estimated as 10 to 20 percent of total trade for member states, but is considered underreported given the prevalence of informal trade. An ECOWAS study suggests about 15 percent of total trade in the region is conducted informally, largely by women.[8] Research in the Manu River basin, including Guinea, suggests that as many as 60 percent of traders are informal and this figure jumps to 71 percent when considering only female traders.[9]

Forced displacement and statelessness in ECOWAS is particularly acute given the region's history and ongoing fragility. Stateless people – including large numbers of refugees, pastoralists and other nomadic and border populations, and orphans and vulnerable children (OVC) – suffer from political exclusion and inability to access services, among other hardships. Nearly half of the ECOWAS member states were classified as Fragile Situations in FY17[10] and there are approximately 2.7 million internally displaced persons and 300,000 refugees in ECOWAS.[11] However, the inherent difficulty in measuring stateless populations leads to substantial variations in estimations. A 2015 report by UNHCR estimates that there are roughly 750,000 people at risk of statelessness in West Africa, yet a 2016 report by the same body suggests that the stateless population in Cote d'Ivoire alone is 700,000 people.[12]

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[1] The 15 member states are Benin, Burkina Faso, Cape Verde, Cote d'Ivoire, Gambia, Ghana, Guinea, Guinea-Bissau, Liberia, Mali, Niger, Nigeria, Senegal, Sierra Leone, and Togo.
[2] https://unstats.un.org/unsd/publication/ecowas_poverty_profile_e.pdf
[3] http://dummy.ecowas.int/wp-content/uploads/2015/01/ECOWAS-VISION-2020.pdf
[4] http://siteresources.worldbank.org/EXTDECPROSPECTS/Resources/476882-1157133580628/AfricaStudyEntireBook.pdf
[5] https://publications.iom.int/system/files/pdf/ecowas_region.pdf?language=en
[6] World Bank Global Data on Migration & Remittances, 2016 (Development Economics Group)
[7] http://www.worldbank.org/en/news/press-release/2016/04/13/remittances-to-developing-countries-edge-up-slightly-in-2015
[8] https://www.afdb.org/fileadmin/uploads/afdb/Documents/Policy-Documents/RISP%20for%20West%20Africa%20-%20REV%202.pdf;
[9] Building Markets (2015). Impacts of Ebola on Cross-border Trade between Liberia, Sierra Leone, and Guinea.
[10] Cote d'Ivoire, Gambia, Guinea-Bissau, Liberia, Mali, Sierra Leone, and Togo are classified as fragile states.
[11] UNHCR Population Statistics (2015). Populations of concern. https://goo.gl/bsOSuD
[12] http://www.unhcr.org/ecowas2015/Nationality-Migration-and-Statelessness-in-West-Africa-REPORT-EN.pdf and http://www.refworld.org/docid/58594d114.html. The Cote d'Ivoire report notes that this country has the highest population of people effected by statelessness in the sub-region.

2. Sectoral and Institutional Context

Across ECOWAS, the lack of identification has tangible, negative implications on access to services and basic rights. As noted above, roughly 44 percent of the population Sub-Saharan Africa is without identification. ID assessments in ECOWAS member states show that within the sub-region coverage is also poor. The percentage of unregistered populations ranges from around 30 to 50 percent, with coverage of ID cards significantly lower. For example, in Nigeria, the most recent campaign to issue unique identification numbers (UINs) began in 2012 and has covered only 3.5 percent of the population. To the extent that registration, whether a birth certification, national ID card, or otherwise, is required to access services, this create a significant barrier. In Cote d'Ivoire, only 55 percent of the population is registered, yet parents are required to present birth certifications for their children's school enrollment each year. Access to private sector services, notably in finance and telecom, is also hindered by a lack of identification.

Moreover, the regional interoperability of IDs could make a key contribution toward the higher level goals of a single integrated market with free movement of people across the region articulated in the ECOWAS Vision 2020. As a first step in this process, ECOWAS has developed standards for a National Biometric Identity Card (NBIC). ECOWAS envisions that the NBIC can enable free movement of people and digital integration across the sub-region for a future regional digital economy, including through the linkage of public key infrastructure (PKI) which would allow for secure electronic transactions, etc. across member states in an integrated digital single market (DSM) akin to the European Union model. The NBIC builds on long-established ECOWAS Free Movement Protocols.[13]

Although the heads of state of the member countries approved the NBIC technical standards in December 2014, adoption has been limited due to the nature of the standards and limited country capacity for implementation. Senegal is the sole member state to begin implementation (in 2016) and only Burkina Faso, Mali, and Niger have announced plans to follow. Adoption of these standards is impeded by their complexity, including the inclusion of 20 technical specifications, and resulting high cost. At over US$20 per person, it is four times above best practice recommendations of US$5.[14] Streamlining the standards to allow countries to align with their principles without necessarily adhering to the most stringent requirements could facilitate uptake and foster mutual recognition of IDs in the ECOWAS region.

Indeed, the challenge of improving ID systems is widespread across Africa. Legal and regulatory frameworks are weak or outdated and do not provide for privacy or data protection, including cyber security. Governance systems are fragmented, particularly between civil registration and national identification, creating wasteful duplication, while the mixture of paper-based and digital registries prevents sustainable quality record keeping. This encourages expensive, one-off registration campaigns, such as for elections, or household surveys. Estimates suggest that for 2015 elections alone US$1.4 billion was spent across the continent. This included biometric ID cards – typically ranging from US$5-10 and as high as US US$44 in Cote d'Ivoire – that are often only leveraged for this single use. High costs and administrative inefficiencies not only impact government budgets but also have a direct impact on the accessibility of IDs, particularly for poor and marginalized groups.

In Guinea, successive governments have tried to address service-delivery issues by designing ad hoc identification-

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[13] Economic Community of West African States, *Protocol on Free Movement of Persons, Residence, and Establishment,* May 29, 1979, available at: http://www.cfr.org/world/economic-community-west-african-states-ecowas-protocol-free-movement-persons-residence-establishment/p28124

[14] By comparison, India's Aadhar program enrolled over a billion people at a cost of US$2per person. See http://blogs.economictimes.indiatimes.com/et-commentary/uid-is-the-largest-most-cost-effective-foolproof-id-solution/[15] Cote d'Ivoire CPF FY16-19, Objective 3: Improve business regulatory framework and access to finance.

based solutions. Reliable proof of identity is required in order to identify voters for elections, beneficiaries for social welfare programs, civil servants, mobile subscribes for mobile banking, and to deliver official documents such as passports or driver licenses. Identification of citizens and residents falls under several ministries in Guinea who have launched many initiatives in parallel, without coordination or follow-up, that have resulted in duplication, waste of public resources, and no re-usable database. Major elections alone cost more than US$15 million of public money every two or three years. Donors, such as the World Bank, have funded some of these initiatives including a biometric registry of civil servants and the identification of vulnerable communities through social protection projects. In spite of these initiatives, the percentage of the population with a reliable proof of identity remains very low. Only 58 percent of births are registered and only 48 percent of the population has a national ID or voter registration card.

Following a decade of political crisis fueled by inequalities and the notion of "*ivoirité*", Cote d'Ivoire launched a vast program to rebuild the country's civil registry and provide all citizens and residents with reliable proof of identity. To rebuild civil registries destroyed across the country, Cote d'Ivoire put in place "*audiences foraines*", a long process which has highlighted the very low rate of birth registration outside urban areas and the absence of proof of identification for a large part of the population, especially the poor, women and children, and marginalized communities. Without official proof of identity, a citizen or resident cannot access most public services, including education and health. To address these issues, the Government established the "*Office National de l'Identification* (ONI)", an autonomous agency which consolidates all registration and identification services. ONI has developed a comprehensive strategy aimed at providing every citizen and resident with a unique identifier, through a national reliable ID system. However, this ambitious strategy will require technical capacity, high level coordination, and resources that the Government has yet to mobilize.

In addition to Guinea and Cote d'Ivoire, the World Bank is supporting the ID agenda in countries across the ECOWAS region and in Africa more broadly. Guinea and Cote d'Ivoire were selected as the first two countries for the first regional operation based on the criteria in Table 2 above and the sequencing of additional countries under the proposed SOP is based on these same criteria. Stand-alone work on IDs is also supported in Liberia, Nigeria, and Sierra Leone and will be coordinated with this first proposed regional operation focused on ECOWAS. In addition, other regional ID operations are being explored within Africa, notably with the East Africa Community.

3. Relationship to CPF

The proposed regional operation aligns with the existing World Bank Regional Integration Assistance Strategy for Sub-Saharan Africa and its aim of fostering regional integration and strengthening the capacity of regional economic communities. Specifically, it supports the objectives in "Pillar III: Coordinated Interventions to Provide Regional Public Goods." The operation will produce positive regional spillovers from the harmonization of identification standards and policies across ECOWAS countries, and will support capacity building for the ECOWAS Department of Trade, Customs, Free Movement & Tourism and the Department of Telecommunication & Information Technologies.

The proposed operation meets the criteria set forward in the Guidelines for Accessing IDA Regional Program Funding in IDA17. The proposed operation is a SOP, beginning with two countries (including one fragile country) and expanding to four additional countries in future years. There are clear regional spillovers to mutual recognition of IDs, as well as leadership from ECOWAS, evidenced by concrete actions taken on the NBIC, to promote this agenda. As outlined in more detail in the Project Concept section below, collaboration on the ID agenda could help realize regional benefits regarding trade, migration, financial inclusion, and delivery of public and private sector services. Regional benefits are also tied to the fragility of member states, with potential gains to better respond to refugee populations and to coordinate government and donor responses to crises. Lastly, the proposed operation will provide a platform to facilitate high level policy harmonization on ID standards toward the achievement of the overarching ECOWAS Vision

2020.

The design, as outlined below, includes a regional Grant to ECOWAS and meets the standards for the provision of the same. Under the proposed operation, ECOWAS would receive an IDA Regional Grant and readily meets the six criteria for access to IDA grants by regional institution. It is a bona fide regional organization with relevant legal status and authority, as well as fiduciary capacity to receive funding (see institutional assessment). ECOWAS is not eligible to take on an IDA credit and co-financing from other development partners is not readily available for this activity. The costs and benefits of the activity to be financed cannot be allocated to national programs, and the activities entail coordinated interventions to provide a regional public good in the form of mutually recognizable IDs. Finally, the IDA grant to ECOWAS is an integral part of this operation and will support the strategic objectives of IDA on regional integration.

At the country level, the proposed operation supports the objectives of the Guinea Country Partnership Strategy (CPS) FY13-17 and the Cote d'Ivoire Country Partnership Framework (CPF) FY16-19. Both the CPS and CPF include objectives focused on improving service delivery and strengthening regional integration. As noted above, service delivery is facilitated by the availability of a national ID and therefore helps improve delivery, specifically in terms of access to finance[15] and expanding a social protection system[16]. Moreover, the proposed Project is directly aligned with the forthcoming Guinea Systematic Country Diagnostic (SCD) report, which highlights the importance of e-ID.

C. Proposed Development Objective(s)

The proposed Project Development Objective is to set the foundation for unique ID schemes with mutual recognition and the capacity for authentication in the ECOWAS region.

The PDO will be measured by the following key outcome indicators:
- Development of a unique ID numbers with biometrics in keeping with ECOWAS standards and international best practices (Y/N)[17]
- Number of direct project beneficiaries who have received a unique ID number (number), of which female (percentage) [beneficiary indicator]
- Number of functional users (number)[18]
- Percentage of grievances registered related to delivery of project benefits that are addressed (percentage) [beneficiary feedback/citizen engagement indicator]

D. Concept Description

The Project would support achievement of the PDO through three components:
- (1) Strengthening the legal and enabling environment;
- (2) Improving the robustness and reliability of ID systems; and

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[15] Cote d'Ivoire CPF FY16-19, Objective 3: Improve business regulatory framework and access to finance.

[16] See Cote d'Ivoire CPF FY16-19, Objective 6: Expand affordable social protection system, and Guinea CPS FY13-17, "Strategic Area of Engagement 3.1: Improved access to basic services" and "3.3: Established functional SSN system reaching those below the poverty line"

[17] The team is considering the development of a matrix to score key legal and technical aspects of the ID system frameworks will be developed and used to benchmark development. This could be used to inform both this outcome and intermediate indicators.

[18] Functional users will be defined during Project preparation but could include government ministries or agencies and/or private sector users.

(3) Promoting IDs for free movement and service delivery.

Through these inter-related activities, the Project would support the development of a framework for the ECOWAS identification standards, testing them through country-level take-up, to inform broader roll-out and adoption across the ECOWAS region. When national identification systems are designed with cross-border mutual recognition in mind, the benefits and cost savings for trade facilitation, free movement of persons, managed labor schemes, remittances, and border and migration management across the region are significant.

Component 1 - Strengthening the legal and enabling environment
Under this component, the Project would finance regional dialogue to develop agreed legal and technical standards for identification systems. Identification systems can have a transformative effect on regional development, but only in the context of an enabling environment that facilitates mutual recognition of national IDs across borders and ensures an environment of trust between countries and between countries and the population to prevent discrimination and protect the data of individuals. Such a framework would incorporate internationally agreed upon technical standards and best practices in governance, regulation, and institutional arrangements.

Project engagement to develop this framework would begin with support to ECOWAS to facilitate regional integration through the development of policies/standards to support mutual recognition while ensuring safeguards, notably for security and privacy. This would include developing (i) regional technical standards and policies that encourage mutual recognition of identity credentials and (ii) a standardized legal safeguards checklist and guidance note for national ID systems in the ECOWAS region. These standards would be developed with an aim to ensure coverage of refugees, migrants, and stateless persons, to the greatest extent possible. Support to the country counterparts would include technical assistance to develop legal and regulatory frameworks aligned with the regional standards to enable reliable, secure, and mutually recognizable country ID systems. Specific activities could support the development of laws governing: foundational aspects of the country's legal framework; institutional and governance arrangements; data security, privacy, control, flow, and transparency; non-discrimination; and management processes.

Relevant stakeholders such as United Nations agencies, non-governmental organizations, civil society organizations, and beneficiaries would be engaged through consultations, third-party monitoring mechanisms, etc. in the design and implementation of Component 1, particularly with an eye toward safeguarding privacy and non-discrimination.

Component 2 – Improving the robustness and reliability of ID systems
This component would support the creation of foundational ID systems based on issuing UINs linked to biometrics in Cote d'Ivoire and Guinea in accordance with and to inform the ECOWAS regional standards. This work would also require strengthening and digitizing the countries' civil registration and vital statistics (CRVS) systems, notably birth registration. Lessons learned from this experience would create a replicable public good to inform the finalization of the ECOWAS NBIC standards.

The quality of ID systems depends on a number of design and technical factors and has profound implications for system cost, utility, and security. This includes the organizational design of identity management, the choice of technology used for establishing uniqueness, the authentication infrastructure (i.e. how IDs are used to verify at the point of a transaction), the form and type of token or credential (i.e. different types of cards or the use of only numbers and biometrics), and securing databases against disaster and cyber-attack. Hardware and software should comply with open standards in order to reduce costs, avoid vendor lock-in, and provide flexibility for future adaptation.

For the NBIC, ECOWAS dictates use of mandatory standards for mutual recognition that would promote the development of robust national ID systems. These entail a specific approach to data collection and data entry for each person, including the creation of UINs and links to biometric data. Aside from South Africa, countries in Sub-Saharan Africa that have not been able to create UINs that link CRVS and ID records and provide a UIN from birth to its citizens. In both Guinea and Cote d'Ivoire, CRVS is separated from the national ID system.

  a. Sub-component 2(a): Testing the ECOWAS standards in Guinea and Cote d'Ivoire would create a unique opportunity to create and maintain national population databases with a UIN linked to the CRVS. Both countries have invested millions in recent years in creating single purpose biometric voters' registries. Guinea alone spent around US$70 million dollars in the last eight years in voter registration. These exercises have not benefited its paper-based CRVS, nor created a national ID database (or population registry) as a foundation for providing other services (e.g. voting, health, SP, education, trade, taxes, justice, transport etc.). The Project would coordinate with UNICEF-funded pilots in both countries that are automating and digitizing the civil registry process.

  b. Subcomponent 2(b): Application of lessons learned would inform the ECOWAS regional ID standards and provide spillover benefits to other member states working toward their adoption. In-country implementation of ID systems aligned with the ECOWAS standards will provide key feedback to inform potential adjustments to the ECOWAS standards. It would also document the experience of their adoption to help streamline and replicate these processes for other member states. This subcomponent would be funded by the regional integration grant.

Design of the foundational ID systems would also include the development of grievance-redress mechanisms to collect and respond to beneficiary issues with the implementation and roll-out of the national IDs.

Component 3 – Promoting IDs for free movement and service delivery
This component would support up-take of the regionally compatible IDs through financing of authentication devices for selected users. Consultations with beneficiaries and other stakeholders would help identify which services are most in-demand and/or problematic from the standpoint of IDs. Potential services include border posts and social safety net transfers. Depending on the services supported, the regional integration grant could finance authentication devices regarding cross-border movement in keeping with the ECOWAS Free Movement Protocols between member states.

In many African countries today, individual public programs and private companies have set up their own ID systems, creating a situation where multiple parallel identification systems are in use across programs. This fragmentation results in inconsistent data, confusion amongst the population and a significant duplication in resources. For example, in Cote d'Ivoire separate ID systems are used to access education, health insurance, and banking services, as well as for registering, paying, and transacting with civil servants. Whereas individual agencies and programs may need to have some degree of differentiation in the use of IDs, the core problem arises when there is no strong foundational ID in place that can be use across multiple functional applications.

There are large potential benefits from integration through the use of a common foundational ID across public programs and private sector entities. The use of a common foundational ID can reduce the cost to both the government and the beneficiary by eliminating unnecessary duplication of efforts for creating, assigning, and maintaining different IDs. There are also efficiencies across programs that should be exploited; for example, an ID that is accepted by the banking system for authentication and know-your-customer (KYC) purposes can be used by recipients of government-to-persons (G2P) transfers directly into bank accounts for purposes such as social assistance transfers, scholarships, or pensions. Finally,

cross-country mutual recognition using regional standards for foundational IDs can allow for portability of benefits and access to services across the country and across borders.

Establishing mutually recognizable IDs that work across ECOWAS would yield not only yield benefits directly to free movement but also a host of services. For migrant workers, for example, being able to authenticate themselves with national ID documents across borders could facilitate regional managed labor migration schemes and open up more regulated remittance channels resulting in welfare benefits for them and their families. Mutual recognition of IDs within ECOWAS would also facilitate access to financial services, government-to-persons transfers, and access to/portability of benefits across borders.

SAFEGUARDS

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

This is a regional project to provide technical assistance to ECOWAS and with activities to be implemented across the entirety of both Cote d'Ivoire and Guinea. At a regional level, the project will work with ECOWAS to develop regional standards to apply in other ECOWAS member states in future phases of this SOP. At the country level, he project will aim to register people for identification in all parts of Cote d'Ivoire and Guinea. Given the nature of activities to be implemented, no safeguards policies are expected to be triggered.

B. Borrower's Institutional Capacity for Safeguard Policies

The proposed project falls under Category C, as no activity is expected to directly or indirectly affect social and environmental aspects in the borrower's territories. Still, both Cote d'Ivoire and Guinea have extensive experience in implementing safeguards policies, through World Bank-financed infrastructure projects in many sectors such as agriculture, water, energy, transport, and telecom. ECOWAS has very limited experience in World Bank-funded operations, however, as a Category C project, and particularly given the nature of engagement with ECOWAS, there are not safeguard policy measures envisioned as necessary.

C. Environmental and Social Safeguards Specialists on the Team

Alexandra C. Bezeredi, Abdoulaye Gadiere

D. Policies that might apply

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	No	
Natural Habitats OP/BP 4.04	No	
Forests OP/BP 4.36	No	
Pest Management OP 4.09	No	
Physical Cultural Resources OP/BP 4.11	No	
Indigenous Peoples OP/BP 4.10	No	

Involuntary Resettlement OP/BP 4.12	No
Safety of Dams OP/BP 4.37	No
Projects on International Waterways OP/BP 7.50	No
Projects in Disputed Areas OP/BP 7.60	No

E. Safeguard Preparation Plan

Tentative target date for preparing the Appraisal Stage PID/ISDS

Dec 18, 2017

Time frame for launching and completing the safeguard-related studies that may be needed. The specific studies and their timing should be specified in the Appraisal Stage PID/ISDS

N/A

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