Public Disclosure Copy

# INTEGRATED SAFEGUARDS DATA SHEET APPRAISAL STAGE

Report No.: ISDSA8238

**Date ISDS Prepared/Updated:** 14-Oct-2014

Date ISDS Approved/Disclosed: 15-Oct-2014

### I. BASIC INFORMATION

### 1. Basic Project Data

Country:	China	Project ID:	P145533			
Project Name:	China Contaminated Site Management Project (P145533)					
Task Team	Qing Wang					
Leader:						
Estimated	22-Oct-2014	Estimated 30-Apr-2015				
Appraisal Date:		<b>Board Date:</b>				
<b>Managing Unit:</b>	GENDR	Lending	Investment Project Financing			
		<b>Instrument:</b>				
GEF Focal	Persistent Organic Pollutant	ts.				
Area:	0					
Sector(s):	Other industry (70%), Publi	c administration- Inc	dustry and	trade (30%)		
Theme(s):	Pollution management and	environmental health	n (80%), E	nvironmental policies		
	and institutions (20%)					
1 0 1	rocessed under OP 8.50 (	0 •	very) or C	<b>)P</b> No		
8.00 (Rapid Response to Crises and Emergencies)?						
Financing (In US						
Total Project Cos	st: 75.00	Total Bank Fin	Total Bank Financing: 0.00			
Financing Gap:	0.00					
Financing Sour	rce		Amount			
Borrower			60.00			
Global Environment Facility (GEF)			15.00			
Total 75.00						
Environmental	vironmental A - Full Assessment					
Category:						
Is this a	No					
Repeater						
project?						

### 2. Global Environmental Objective(s)

The project development objective (also the global environmental objective) is to improve the country's capacity for managing site contamination, and demonstrate identification and cleanup of

sites contaminated with POPs and other hazardous chemicals in an environmentally sound manner.

#### 3. Project Description

The Project will include activities at both national and provincial levels. Chongqing municipality and Liaoning province as pioneers with strong commitment and ownership for managing contaminated sites have been selected as the two demonstration areas among four municipalities or provinces (Requests of Expression of Interest were sent to 11 provinces and municipalities), which expressed interest to participate in the Project.

The Project will support investment, technical assistance (TA) and administration measures and technical guidelines development for the cleanup of contaminated sites (control of contaminated sites). Sites for pilot cleanups will be POPs (and other hazardous chemical) contaminated sites. The Project will also include TA and administration measures and technical guidelines development for prevention of industrial contaminated sites and agricultural contaminated land.

From contamination identification to cleanup closeout, risk assessment helps form management decisions made at each stage of a site or land's life cycle. The goal of the human health and environmental evaluation process is the development of risk information to determine whether a removal action and/or remedial action is necessary, or conversely, whether the site may be closed out with no further action. The Project will introduce and transfer knowledge on human health risk-based remediation approach.

The Project consists of three components described below:

Component 1: Capacity Development for Prevention and Control of Site Contamination

Sub-component 1.1: Development of Administrative Measures, Technical Guidelines and Financing Options for Contaminated Site Cleanup. As MEP is working on the Soil Pollution Prevention and Control Law and its Implementation Rules and has issued four Technical Guidelines on cleanup of contaminated sites, this sub-component will focus on development of other necessary technical guidelines for both prevention and control of site contamination. These will include: (i) technical guidelines for pollution risk prevention and control at the producing industries; (ii) technical guidelines for prevention and control of environmental pollution during industrial enterprise relocation; and (iii) Best Available Techniques (BAT) list of remediation for POPs contamination. This sub-component will also include development of administrative measures on professional qualifications of site cleanup companies, information disclosure and public participation at the national level. In Chongqing and Liaoning, this sub-component will include development and issuance of administrative measures for management of contaminated sites and environmental supervision for site remediation, and environmental risk screening levels for contaminated sites. This sub-component will also support studies on possible financing options (including public and private partnership - PPP) and market incentives for contaminated site cleanup.

Sub-component 1.2: Knowledge Management and Awareness Raising in Support of Prevention and Control of Site Contamination. This sub-component will develop and provide systematic training courses for nation-wide government officials and cleanup practitioners on laws, regulations, technical guidelines/standards, and environmental and social safeguard requirements for contaminated site cleanup (including occupational and community health and safety), and for polluting industries in Chongqing and Liaoning on establishment of environmental and social management systems (ESMS) to prevent soil and groundwater pollution. Knowledge exchange and

experience sharing events or workshops will be organized. It is expected that a national training system for prevention and control of site contamination established under the Project will continue beyond the project life through the issuance of administrative measures for training.

This sub-component will also conduct public awareness activities for prevention and control of site contamination, and community involvement (public consultation) activities for cleanup demonstrations under Component 2.

Sub-component 1.3: Management Tools for Prevention and Control of Site Contamination. This sub-component will develop a national database for POPs contaminated sites by carrying out initial site investigation and risk assessment of POPs sites in China: mainly POPs pesticides, e-waste and PFOS contaminated sites, as well as mercury contaminated sites (as relevant) and developing a national database. The national database is expected to be expanded and used by MEP and other ministries after the project life for monitoring and managing contaminated sites in China. A national priority list of these POPs sties will be produced based on environmental and health risks and other factors.

This sub-component will also support feasibility study for constructing a knowledge and remediation center in Chongqing by collecting information on all potential contaminated sites in Chongqing, assessing currently available in-situ and ex-situ remediation approaches and technologies, and presenting the business potential forsuch a center. Based these results, a business plan will be prepared considering possible PPP to make sure that the center will be able to operate efficiently and competitively. It is expected that the center in Chonqing will provide advisory services and contamination treatment services resulting from future cleanup of many of municipalities contaminated sites.

This sub-component will also, for the purpose of demonstration, support establishing regional soil and groundwater contamination prevention and warning system at the Changshou Industrial Park in Chongqing. This will include identification and investigation of the soil and groundwater contamination risks (including POPs) of the Park and assessment of these risks to determine risk-acceptable, risk-warning, and risk-mitigation areas, which can provide a risk source layout for the Park. Based on the risk source identification and assessment, an integrated environmental management system, including hazardous material tracking and information reporting system, environmental safety planning, early risk warning, emergency management, and impacts and remediation option assessment after pollution incidents will be developed. Experience learned will be shared with other industrial parks in China for potential replication.

Anxiety is growing in China about contaminated soil in the country's agricultural centers (such as Hunan province) and the potential effects on the food chain. Some farmland soil in suburbs of most cities is polluted with heavy metals and organic pollutants (mainly POPs) as indicated by the national soil survey results. Hunan has requested a loan from the World Bank (to be delivered in FY 2017) to support its efforts on improving agriculture production base safety and quality by cleaning up heavy metal (such as cadmium, lead and arsenic) and organic pesticide contaminated farmland, cutting off polluted water irrigation, reforming cropping system, and applying integrated pest management for reducing chemical use. This sub-component will also support screening cost-effective remediation technologies through small-scale field pilots and reviewing the policy gaps for prevention and control of agricultural land contamination in Hunan. These outputs will support the technical design of the lending project in Hunan and will be shared with other provinces. This activity will be managed by FECO with technical support from the Hunan Provincial Agriculture Department.

Sub-component 1.4: Technical Expert Team and Project Monitoring and Evaluation. This sub-component will support hiring of international and national technical experts with both site cleanup knowledge and remediation engineering experience, to support FECO and the two Project Management Units' (PMU) daily management of the project. This sub-component will also support monitoring and evaluation of the project outcome indicators and results by collecting evidence-based information and data, as well as organizing the project launch and completion workshops.

## Component 2: Cleanup Demonstrations of Sites Contaminated with POPs and Other Hazardous Chemicals

This component will demonstrate the cleanup of several sites (estimated 5-6 in total) contaminated with POPs (and other chemicals). Before a site is ready for remediation action, site investigation, risk assessment to determine remediation goals, remediation program, environmental and social management plan (ESMP), and public consultation and information disclosure will be carried out, prepared, approved and documented. The first demonstration site, which used to be a pesticides warehouse in Chongqing (Ganshui site), has been identified and confirmed during project preparation. According to the construction planning 2003-2020 for Guanshui Town Qijiang County, the site is planned for residential land in future. A site-specific cleanup Environmental Assessment (EA) report has been prepared for this site with detailed contamination scope and proposed remediation plan (see Annex 2). The remediation process will include site clearing, protection of building structure, wall surface peeling, excavation, packaging of contaminated materials, transportation to and storage at the treatment site, treatment/disposal and remediation completion. No aftercare of the site is needed because it will be fully cleaned up with the removal of contaminated materials. Remediation of this site will be initiated as soon as the Project is approved.

The other sites will be confirmed during project implementation. A preliminary site selection has been carried out, and identified another seven potential candidate sites from a total of 160 potential POPs contaminated sites (mainly chemical and industrial production sites and some warehouse sites and e-waste sites). The sites were screened using such criteria as impact on human health and environment, site contamination characteristics, location, size, redevelopment potential etc. The site cleanup EA reports will be prepared for each site selected under this component and approved by the Bank before initiating the bidding process for remediation. The EA report for the Ganshui site will be used as a model EA for the other sites.

#### Component 3: Project Management

This component will support incremental operating costs associated with project management, including day-to-day project implementation, procurement and financial management, and environmental and social safeguards functions carried out by FECO, the Chongqing PMU and the Liaoning PMU, including coordination and collaboration among national and local government agencies, non-government agencies and the private sector (land owner, polluter or land redeveloper; see Annex 3 for implementation arrangements

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

The project location is nation-wide with the focus on the two selected demonstration areas: the Liaoning province and the Chongqing municipality. The policy and technical guideline development, capacity building, development of national database of POPs contaminated sites, and TA activities for the Industrial Park and arable land contamination under the Component 1 will be at both national

and local levels. For site cleanup demonstrations under the Component 2, it is expected that there will be 5 to 6 sites in total to be cleaned up under the project. Before a site is ready for remediation action, site investigation, risk assessment to determine remediation goals, remediation program, environmental and social management plan, and public consultation and information disclosure should be carried out, prepared, approved and documented. During the project preparation, one site in Chongqing (Ganshui site) was investigated and a remediation program was proposed. Additional 7 candidate sites were identified, but will be confirmed during project implementation for participating in the project. These sites are located in Chongqing, Liaoning, Guangdong, Hunan and Tianjin. These sites are chemical (pesticide) production locations, storage warehouses and e-waste disposal sites.

### 5. Environmental and Social Safeguards Specialists

Peishen Wang (GTIDR) Meixiang Zhou (GSURR)

6. Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	The project itself is an environmental remediation and risk reduction effort. While, given potential environmental and health risks of POPs and other hazardous chemical contamination and the possibility that hazardous materials will need to be excavated, packaged, and transported for exsitu treatment as part of remediation works, the project is classified as Category A as per OP4.01.
Natural Habitats OP/BP 4.04	No	The contaminated sites are brown-field locations and unlikely to be located in any natural habitats, therefore the policy is not triggered.
Forests OP/BP 4.36	No	The project will not affect any forests. The policy is not triggered.
Pest Management OP 4.09	No	The project does not involve the procurement or use of pesticides. The policy is not triggered.
Physical Cultural Resources OP/BP 4.11	Yes	Based on the information provided in the candidate site selection report, the project is not expected adversely impact physical cultural resources, as none of the identified sites is located in the area of physical cultural resources.  However, during site remediation, contaminated soils will be excavated for either in-situ or ex-situ treatment. Physical Cultural Resources might be found during excavation. Therefore, the ESMF has included provisions for managing chance finds which will be included in the ESMP for each site.  Chance finds procedure has been included in the ESMP for the Ganshui site.
Indigenous Peoples OP/BP 4.10	Yes	The project is expected to have social impacts on

		local community and residents using or living near the contaminated sites, who might be indigenous peoples. Therefore, the policy is likely triggered but will be determined for each site during project implementation (except for the first site). Site-specific EA will address Indigenous Peoples if confirmed by the site investigation.  This policy is not triggered for the first site - Ganshui site.
Involuntary Resettlement OP/BP 4.12	Yes	The first site (Ganshui site in Chongqing) was investigated, and a site-specific environmental assessment for this site has been carried out that also investigated social impacts. The Bank involuntary resettlement policy OP/BP4.12 is triggered because the household living on the site will need to be temporarily resettled during remediation of the site. An abbreviated resettlement action plan has been prepared for the affected household.
		Additional 7 candidate sites have been identified during project preparation stage; four or five of these 7 sites will be confirmed as demonstration sites during implementation stage. Site remediation of these sites is likely to involve land acquisition, house demolition and involuntary resettlement. An Environmental and Social Management Framework (ESMF) has been prepared to define procedures for screening, analysis, consultation and determination and implementation of control measures in line with the Bank safeguards policies
Safety of Dams OP/BP 4.37	No	The project doesn't involve any dams. The policy is not triggered.
Projects on International Waterways OP/BP 7.50	No	The project doesn't involve any international waterways. The policy is note triggered.
Projects in Disputed Areas OP/BP 7.60	No	The project is not located in any disputed area. The policy is not triggered

## 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:

The project itself is an environmental remediation and risk reduction effort which aims at supporting the Chinese government's efforts to improve its capacity for managing contaminated

sites, and demonstrate identification and cleanup of sites contaminated with POPs and other hazardous chemicals, and thus has significant positive environmental and social benefits through eliminating POPs pollution sources at demonstration sites and enhancing environmental quality of the project area.

The environmental and social safeguards issues are mainly related to the site cleanup demonstration activities under the Component 2, including: potential environmental and health risks involved in contaminated site excavation, building demolition, contaminated waste packaging/ transportation/storage; possible land acquisition and resettlement of local residents; social disturbance of site enclosure, excavation and traffic; nuisance of noise and dust; potential environmental impacts of ex-situ contamination remediation at new locations and final disposal of remediated soils. These impacts, though likely to be site-specific, could be significant to the environment and community health if not well-managed. Therefore, the project is classified as Category A as per OP4.01 Environmental Assessment.

For effective implementation, a first demonstration site has been identified and prepared for implementation once the project is approved. It is a used pesticide storage house in Ganshui Town of Qijiang District of Chongqing City. The warehouse was built in 1961, and used to store various pesticides, including HCHs, DDTs, Methamidophos, Dimethoate, and Asomate. The sensitive receptors near the site include residential houses, one school and three office buildings (with distance of 30-360m). There are a couple living on the site as doorkeeper of the empty warehouse. During site remediation, this couple needs to be temporarily relocated and will come back to their house upon completion of remediation of the site. Based on the detailed investigation of the Ganshui site area, there is no presence of indigenous people.

Preliminary and detailed site samplings have been conducted and contamination of arsenic and  $\alpha$ -HCH and  $\beta$ -HCH are confirmed, with soil concentrations over (a few times) the screening level of the Beijing Contaminated Site Environmental Risk Screening Levels (DB11/T811 -2011) which is the only soil pollution screening standard in China. Risk assessment has been conducted for the site, based on which and environmental risk screening levels in several countries (Netherland, US, etc.), the cleanup targets for this site is determined as 20 mg/kg, 0.2 mg/kg and 0.22 mg/kg respectively, i.e the screening levels stipulated in the DB11/T811 -2011 for these chemicals. The total contaminated soil to be remediated within the boundary of the warehouse covers an area of ca. 250m2 and maximum depth of 1.5m (total volume of ca. 150 m3). There is no indication of groundwater contamination according to site sampling. It is concluded that the soil contamination is limited within a certain area of the warehouse, with not very significant contamination. Remediation of such a small site with small amount of contaminated soil is likely to have site specific and readily manageable impacts.

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

The selected pilot sites for cleanup demonstration under the project are likely to be used for higher-value land development (e.g. real estate) after pollution remediation. These factors are taken into considerations by the risk assessment of the project, where long-term land use development is considered as exposure scenario analysis. It is also likely that for some demonstration sites to be selected and remediated during project implementation, the site contamination and optimal remediation solutions may guide the land use planning in the long-term to ensure overall maximized environmental, social and economic benefits.

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

#### impacts.

Alternative remediation technology selection is an important key part of the site cleanup activity, and has been incorporated into the ESMF for demonstration sites to be implemented during the project implementation stage.

For the first demonstration of site, i.e. Ganshui site in Chongqing, alternative technologies has been conducted with consideration of over 20 in-situ and ex-situ remediation technologies in terms of technical feasibilities, applicability, environment and economic aspects. Considering the advantages and disadvantages of remediation technologies, time requirement of the Ganshui subproject, Plan I (anaerobic biodegradation and phytoremediation) and Plan II (cement kiln coprocessing) were designed for treatment of the contaminated soils of Ganshui site, and if Plan I fails to remedy the contaminated soil to the target level, then the alternative II will be the final resolution. No aftercare of the site is needed because it will be fully cleaned up with the removal of contaminated materials.

A protocol for switching from Plan I (alternative treatment) to Plan II (incineration) will be developed before initiating the bidding process for site cleanup. The Project aims to introduce alternative technologies. Due to the very small amount of waste of 150m3 in this site, the alternative treatment is more expensive than co-incineration in the cement kiln. There are therefore incentives that could quickly put pressure on switching to Plan II for various reasons. Therefore, a strong protocol will be needed to make sure that everything that can be reasonably done to make Plan I successful has been done, and that in case of set-backs or disappointing intermediate results, first every effort is made to turn matters around before diverting to Plan II is even considered. The protocol will therefore not only prescribe the efforts that are required to focus on Plan I to make it work and adjust if needed, but also will set some rules for (a) under what conditions diverting to Plan II could be considered, and (b) how this would be decided and who would need to authorize this. This will be subject to a Bank no-objection.

## 4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.

The project plans to conduct site cleanup remediation for 5-6 demonstration sites during the implementation stage. To address the potential environmental and social impacts envisaged for the demonstration sites cleanup and remediation, the ESMF has been prepared to guide the safeguards preparation and implementation for demonstration sites. The ESMF specifies procedures for environmental and social safeguards documents preparation as per requirement of World Bank safeguards policies and national laws/regulations. Site-specific EA reports for the demonstration sites will be prepared during project implementation stage following the ESMF requirements.

For the first demonstration site in Chongqing (Ganshui site), a full environmental assessment has been prepared, which covers site investigation/monitoring, risk assessment, alternative analysis of remediation technologies, remediation plan, environmental and social management plan and public consultation and information disclosure. Based on site investigation, the site is found to be contaminated with  $\alpha$ -HCH,  $\beta$ -HCH and arsenic which, according to risk assessment, will cause unacceptable health risks. Through comprehensive analysis of alternative remediation technologies, a final remediation plan has been developed, i.e. anaerobic biodegradation + phytoremediation as key pilot plan, and cement-kiln incineration as a backup plan.

For the temporary relocation of the one family (janitor family of the warehouse), consultation has been conducted with the affected family and the warehouse owner. Based on consultations,

compensation is to be provided to the family for a temporary relocation of four months, with budget included in the environmental and social management plan in the EA. Their house (and the connecting warehouse) will be adequately protected by professional engineering design to ensure safety condition upon their return.

Besides the first demonstration site, there are additional 7 candidate sites have been identified through a site selection study conducted during project preparation stage. Initial safeguards screening has been conducted for these sites following the ESMF procedures to confirm the World Bank safeguards policy applications as recorded in this ISDS. The detailed site investigation and remediation will be conducted latterly during project implementation stage.

Activities under the project Component 1 are TA and capacity building activities. Environmental and social safeguard issues will be integrated into the TA activities as needed following the Bank's Interim Guidelines on the Application of Safeguard Policies to Technical Assistance Activities in Bank-Financed Projects and Trust Funds Administered by the Bank.

The project national implementing agency will be the Foreign Economic Cooperation Office (FECO) of the Ministry of Environmental Protection. FECO has been designated as the national lead implementing agency for all POPs activities for implementation of the POPs Convention since 2002. It has prepared and implemented 12 POPs projects financed by the GEF, five of them are supervised by the World Bank and three of the five have been completed. FECO has accumulated experiences and capacity of managing POPs projects according to the Bank's safeguard and fiduciary requirements.

The selected two demonstration areas: Chongqing municipality and Liaoning province, are pioneers in China who have taken early actions on contaminated site remediation (e.g. issuance of local contaminated site regulations and implementation of site remediation etc.), and remains highly committed to implement the project following Bank's safeguards policies. Both have previous experiences of managing remediation of large contaminated sites. The project may also involve provincial governments in other provinces for site cleanup demonstrations, and site cleanups in other provinces will be managed by FECO.

However, the capacity of FECO and the two demonstration areas for assessing and managing the potential environmental and social risks and impacts associated with the project is weak. In China, the most commonly used but relatively expensive remediation practice is excavation followed by ex-situ treatment, such as depositing contaminated soil in an off-site landfill, and/or neutralizing with incineration treatment. In-situ remediation technologies which are often less costly whilst taking more time to implement, are still in the early stage of research and piloting. Furthermore, the concept of risk assessment and risk management for contaminated sites has not been accepted widely and used normatively yet. Therefore, capacity building activities have been thoroughly designed in Component 1 of the project to provide training to these local governments and site remediation practitioners during the project implementation stage.

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

The key stakeholders of the contaminated site cleanup will include site owners, project affected people, local community and government organizations and concerned NGOs, as well as project management agencies (two PMUs and FECO). Public consultation and information disclosure is an important part of the site cleanup process. Requirements of consultation with project affected

people are incorporated into the ESMF based on the World Bank safeguards policy requirements. For each site cleanup project, at least two rounds of public consultation will be conducted with participation of project affected people: (i) first round at TORs stage or at the preliminary site investigation stage during which local public shall be informed of the general information of the project (site cleanups) and consulted on their concerns; (ii) second round when the site-specific draft EA is available in which the key findings of environmental assessment and mitigation measures are provided to public for comments and feedback. The draft and final site EA documents will be locally disclosed in the project areas.

For the Ganshui site, public consultations were conducted during the EA preparation in November 2012 and March/ July 2014. Over 80 people in the nearby communities were consulted during the process. All consulted public expressed broad support to timely implementation of the site remediation. Main concerns from the public are traffic disturbance and noise/dust impacts, for which due attention has been given in the environmental and social management plan. The full draft Ganshui EA report has been disclosed in the website of Chongqing Environmental Protection Bureau on July 11, 2014 with announcement published in the Chongqing Evening Newspaper dated July 12, 2014.

### **B.** Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other				
Date of receipt by the Bank	02-Sep-2014			
Date of submission to InfoShop	15-Oct-2014			
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	15-Oct-2014			
"In country" Disclosure				
China	11-Jul-2014			
Comments: In country" Disclosure: the website of Chongqing Environmental Protection Bureau on July 11, 2014 with announcement published in the Chongqing Evening Newspaper.				
Resettlement Action Plan/Framework/Policy Process				
Date of receipt by the Bank	02-Sep-2014			
Date of submission to InfoShop	15-Oct-2014			
"In country" Disclosure				
China	11-Jul-2014			
Comments: In country" Disclosure: the website of Chongqing Environmental Protection Bureau on July 11, 2014 with announcement published in the Chongqing Evening Newspaper.				
Indigenous Peoples Development Plan/Framework				
Date of receipt by the Bank	02-Sep-2014			
Date of submission to InfoShop	15-Oct-2014			
"In country" Disclosure				
Comments:				
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 [×]	No [	]	NA [	]
If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report?	Yes [×]	No [	]	NA [	]
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	Yes [×]	No [	]	NA [	]
OP/BP 4.11 - Physical Cultural Resources					
Does the EA include adequate measures related to cultural property?	Yes [×]	No [	]	NA [	]
Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?		No [	]	NA [	]
OP/BP 4.10 - Indigenous Peoples					
Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?	Yes [ ]	No [	]	NA[×]	]
OP/BP 4.12 - Involuntary Resettlement					
Has a resettlement plan/abbreviated plan/policy framework/ process framework (as appropriate) been prepared?	Yes [×]	No [	]	NA [	]
If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?		No [	]	NA [	]
The World Bank Policy on Disclosure of Information					
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	Yes [×]	No [	]	NA[]	
Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?	Yes [×]	No [	]	NA[]	
All Safeguard Policies					
Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes [×]	No [	]	NA[]	
Have costs related to safeguard policy measures been included in the project cost?	Yes [×]	No [	]	NA[]	
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	Yes [×]	No [	]	NA[]	

Have satisfactory implementation arrangements been agreed	Yes [ × ]	No [	]	NA [	]
with the borrower and the same been adequately reflected in					
the project legal documents?					

## III. APPROVALS

Task Team Leader:	Name: Qing Wang	
Approved By		
Regional Safeguards Advisor:	Name: Peter Leonard (RSA)	Date: 15-Oct-2014
Practice Manager/ Manager:	Name: Iain G. Shuker (PMGR)	Date: 15-Oct-2014