



Environmental and Social Review Summary  
Concept Stage  
**(ESRS Concept Stage)**

Date Prepared/Updated: March 12, 2020 | Report No: 146859



**BASIC INFORMATION**

**A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
Nicaragua	LATIN AMERICA AND CARIBBEAN	P167434	
Project Name	Nicaragua Caribbean Coast Emission Reduction Program		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
ENR	Investment Project Financing		
Borrower(s)	Implementing Agency(ies)		
Ministry of Environment and Natural Resources (MARENA),	Marena		

Proposed Development Objective(s)

**The objective of the proposed carbon finance transaction is** to reduce environmental degradation and carbon emissions through incentive payments for actions that result in reduced deforestation and land degradation in the Caribbean Coast, the BOSAWAS Forest Biosphere, and the Indio Maíz Biological Forest Reserve regions of Nicaragua, through verified emission reductions (ER) transparently distributed among relevant stakeholders according to a benefit sharing plan.

Financing (in USD Million)	Amount
<b>Total Project Cost</b>	US\$55M

**B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?**

No



### **C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]**

The ER Program's Carbon Finance Transaction has two components: (1) ER Verification – verification of and payment for measured and reported ERs generated by the Government's ER Program; and (2) Benefit Sharing – distribution of the ERPA payments according to a BSP

Component (1): ER Verification. The objective of this component is to verify the ER Program's performance in reducing emissions. The component provides results-based payments for reduced emissions from land use change. ERs are expected to result from implementation of the underlying activities of the ER Program (the activities described in the ERPD) that are expected to ultimately generate ERs), which will support a combination of enabling conditions and sector and cross-sectoral activities, with a focus on forests. These activities are organized along four inter-related, strategic lines of action that respond in an integrated fashion to different conditions and drivers of deforestation and include: 1) Increasing conservation and the value of forests; 2) Increasing productivity, sustainability and competitiveness of climate friendly production systems; 3) Promoting investments and employment creation by green business; and 4) Improving institutional enabling conditions.

The basis for payments under the ERPA is verified ERs reported by the Program Entity (MARENA). In the draft ERPD that has been submitted by the Government to the FCPF, in advance of the Carbon Fund Participants meeting in July 2019, Nicaragua has provided a detailed approach to measure emissions in the ER Program jurisdiction. This approach is consistent with the methodology for estimating baseline emissions and has been rigorously assessed by an independent Technical Advisory Panel against the requirements stipulated in the Carbon Fund Methodological Framework. The same methodology will form the basis of future emissions monitoring. The Program Entity will submit periodic ER monitoring reports during the term of the ERPA, which will be independently verified. If deforestation and degradation are reduced across the entire ER Program area compared to their individual historical baseline emissions, and forest carbon stocks are enhanced compared to its respective historical baseline, the verified volume of ERs, combined with the negotiated unit price agreed in the ERPA, will then translate into corresponding payments. As part of this transaction, ERs will be transferred from the Program Entity to the FCPF Carbon Fund via the Nicaragua's national registry of verified emissions to a centralized carbon registry managed by the Climate Change Group.

Component (2): Benefit Sharing. The revenue from ER payments would be shared according to an agreed BSP, that is being designed in accordance with the criteria in the Carbon Fund Methodological Framework and in a manner that is acceptable to the World Bank. The draft BSP foresees benefit distribution proportional to the contribution of each beneficiary or group of beneficiaries to the generation of emissions reductions and carbon sequestration for which the GoN would receive results-based payments. In the development of benefit sharing arrangements, the Government would consider the most effective way to reach the diverse group of stakeholders that are likely to contribute most directly to reducing emissions, ways to incentivize these stakeholders, and recognition of historical and continued sustainable land use. Given these considerations and stakeholder consultations to date, indigenous peoples and Afro-descendant communities and small and medium producers have been prioritized as beneficiaries. The decisions on the distribution of such resources would be taken with the participation of representatives of key stakeholders in equal conditions. Benefits would take the form of project or activity funding



for investments in sustainable, low emission development for Indigenous communities and direct cash payments to individual landowners participants.

At the time of ERPA signing, at least an advanced draft BSP needs to be submitted by the Government, reviewed by the Bank through a Quality Enhancement Review, and publicly disclosed (once acceptable to the Bank). A final BSP is required no later than prior to the first ERPA payment. As per the ERPA General Conditions, the Program Entity shall share a significant part of the monetary and non-monetary benefits achieved in connection with the implementation of the ER Program with relevant stakeholders, which have been identified as communities, government institutions, and private sector.

The Emissions Reduction Program is expected to conserve, recover, and reduce pressure on forests to reduce forest emissions by 14.32 MtCO<sub>2</sub>e for 5 years, by improving and intensifying production systems, conserving forests and their biodiversity, and creating off-farm employment. The strategy of the program will be based to a large extent on the existing national policies and legal framework and the strengths of the country and the Caribbean region. In doing so, the strategy takes advantage of and improves the ongoing transition to economic development less dependent on deforestation, while promoting inclusion, sustainability, dialogue, partnerships and alliances, and more intensive use of natural resources, as described in the National Human Development Plan of Nicaragua.

The underlying ER Program will attack the main drivers of deforestation – expansion of the agricultural frontier based on extensive livestock and agricultural land use, underlain by institutional and productive barriers and weaknesses and migration - by implementing a territorial-based production-protection model that is more intensive, more sustainable, more equitable, and less carbon-dependent. Building upon and enhancing the considerable socioeconomic and legal progress achieved by Nicaragua in recent years, the model will synergistically combine forest conservation, sustainable forestry, agricultural production, off-farm employment, and improvements in underlying productive and institutional/legal enabling conditions, to reduce emissions, achieve more sustainable land use, and improve food security and conservation of biodiversity. It will also emphasize the strengthening of family economies, the defense of nature, and adaptation to climate change and will be based on inclusion, dialogue, partnerships, and consensus. In so doing, it is expected that the Program will impact more than 3 million ha of the forest landscape, thereby benefiting more than 1.1 million inhabitants of 26 municipalities and 23 indigenous and Afrodescendant territories found in the accounting area.

The Emission Reduction Program consists of four strategic lines and their action lines, which are described below:

Strategic line 1: Forest conservation

- 1.a. Improvement of territorial and forest governance in indigenous and afro-descendant territories.
- 1.b Community Forest Management (CFM)
- 1c. Promotion of natural regeneration and social reforestation.

Strategic line 2: Intensified sustainable production systems

- 2a Establishment of agroforestry trusts
- 2b Establishment of silvopastoral trusts
- 2c Reforestation with species of commercial value on land already deforested



Strategic line 3: Increasing off-farm employment

Promotion of "green" investments, mainly agro-industrial and forestry, by PRONicaragua and PRONicaribe.

Strategic Lines 4: Institutional Enabling Conditions

4a) Institutional coordination and policy harmonization

4b) Forest and land use monitoring.

4c) Better use and dissemination of information by public institutions, education and public awareness.

4d) Improved enforcement of laws, policies, regulations and standards.

4e) Improvement of resources and institutional capacities in order to better control the use of land and natural resources and promote the sustainable use of land.

It is estimated a net reduction of 11 million tons of CO<sub>2</sub> in a period of 5 years and the implementation of a mechanism of payments by results (expost) of US\$55M, being understood as Payments by Results the verification of the reductions agreed between the Country and the Carbon Fund of the FCPF.

The total budget of the ERPD is estimated to be US\$ 80.5 million for a period of seven years (a preparatory period of 2 years, plus 5 years for the intervention). The totals for each year during the implementation phase range from US\$12.6 million (year 1) to US\$18.8 million (year 2).

Most of the budget (62%) is associated with production, silvopastoral and agroforestry systems, mainly due to the costs associated with credit lines, credit guarantees, technical assistance and in-kind incentives for the social reforestation program.

About twenty per cent (20%) of the budget is allocated to interventions aimed at forest conservation; of this amount, just under two-thirds is dedicated to improving forest governance in indigenous territories, while the remainder is allocated to community forest management in indigenous territories, natural regeneration and social reforestation, mainly in fragile areas in those territories.

About ten per cent (10%) of the budget is allocated to ensuring enabling conditions in institutions, in particular regarding emissions monitoring, land use, impact of interventions, safeguards and benefit sharing.

1. **With a population that exceeds six million, Nicaragua made impressive gains in recent years in poverty reduction and economic growth.** Between 1994 and 2016, real gross domestic product growth averaged 4 percent. In 2016, the country reached a 4.7 percent growth, which was primarily driven by a robust domestic demand and a strong export performance. Consumption spending and gross fixed capital formation, as well as net external demand, also contributed positively to the development of real gross domestic product. Extreme poverty also decreased from about 17 percent in 2005 to about 8 percent in 2014. Similarly, the official overall poverty rate decreased from about 48 percent in 2005 to about 30 percent in 2014. This reduction was driven mainly by growth from higher labor incomes in the agricultural sector in rural areas. Remittances from abroad and a demographic transition towards a more prominent working age population also had a direct impact on poverty reduction.
2. **Despite the progress made, Nicaragua remains the second-poorest country in Latin America in terms of average per capita income and the fourth-poorest in terms of poverty rates.** In 2014, 1.7 million Nicaraguans (a third of the population) still lived below the overall official poverty line, and about 43 percent of the population lived in rural



areas and two out of three of said people (68 percent) are defined as living in poverty (World Bank 2015). Fifty-three percent (53%) of Nicaragua's municipalities are considered extremely poor, most of which are in the Caribbean Coast of Nicaragua. The rural poor are more likely to work in agriculture which, though its relative weight has decreased overtime, remains a key sector in the country's economy. The Northern and Southern Regional Autonomous Caribbean Coast regions (RACCN and RACCS) and Río San Juan department have the lowest human development indices (0.50-0.55) of Nicaragua. In addition, there is a large group that, while not poor, is highly vulnerable to the risk of falling into poverty if exposed to external shocks.

**Agriculture makes a considerable contribution to the country's economy, but its growth is being made at the expense of forests.** The agriculture sector accounted for 17 percent of gross domestic product (2015), 15.8 percent of goods exports (2010-2015), and 30 percent of total employment (2014). Furthermore, much of the decline in rural poverty between 2005 and 2014 derived from higher earnings in agriculture, with the incremental change in incomes accounting for about 50 percent of total poverty reductions at the national level and almost 80 percent in rural areas of the country. However, Nicaragua's land-agriculture productivity is the lowest (US\$717/hectare) among regional peers and is causing the loss of approximately 72,500 hectares of forests annually (a rate of loss of 2.25 percent), contributing to undermine the country's natural resource base and increasing its exposure to climate change hazards. The expansion of productive activities on environmentally valuable forest lands raises concerns about the current model based on the development of the agriculture frontier.

3. **Nicaragua needs support to strengthening enforcement of compliance with the extensive regulations and plans it has enacted to protect natural resources and biodiversity and to reduce deforestation.** The agriculture frontier continues advancing at a rapid rate, compromising the integrity of vital resources for agriculture production and for sustaining the livelihoods of the rural poor -such as soils, water, and biodiversity- and exacerbating land conflicts.

#### D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]

The ER Program accounting area includes the North Caribbean Coast Autonomous Region (RACCN) and the South Caribbean Coast Autonomous Region (RACCS), the Special Development Regime of the territories located in the upper Wangki and Bocay watershed, the BOSAWAS Biosphere Reserve in the north and Indio Maiz Biological Reserve in the south. The BOSAWAS Reserve lies within the RACCN and the departments of Jinotega and Nueva Segovia, while the Indio Maiz Reserve is found partly in the Rama y Kriol territory located in the RACCS and partly in the department of Rio San Juan. The two Autonomous Regions and the upper Wangki and Bocay watershed make up 49% of the national territory and 83% of the accounting area, while the two Reserves make up 10% of the national territory and 17% of the accounting areas.

The total area of carbon accounting consists of 7,023,717 ha, of which 3,188,867 are covered by forests. The RACCN, the special development regime of Alto Wangki and Bocay, as well as BOSAWAS represent an area of 4,008,037 ha, of which, in turn, 2,054,573 ha (51%) are forests and the RACCS and the Indio-Maíz Reserve represent an area of 3,015,680 ha, of which, in turn, 1,134,293 ha (37%) are forests.

Nicaragua has around 7% of the world's biodiversity. The accounting area of the RE Program has the largest number of mammal species with 154 species, equivalent to 66% of the mammal fauna of Nicaragua with species of importance for conservation (endangered species), including 5 feline species, as listed in Appendix I of CITES. Nicaragua has 23.34% of the total terrestrial herpetofauna species present in Central America and in the accounting area some of the herpetofauna species in critical danger of extinction



At the national level there are reports of 6014 species of flora. In the accounting area of the RE Program, 13 endemic species are registered, which represent 12.5% of the endemism of flora at the national level. Nicaragua has identified two regions of high flora endemism at the national level.

In the RE Program there are 4 of the ecosystems identified as most relevant, the deciduous forests (inshore and submontane) with 17,223 ha; mangrove with 30,598 ha and the cloud forests, with an area of 1,059,791 ha because of the level of vulnerability and a wide range of biological threats. The accounting area is an important physical space for conservation, represented mainly by the Mesoamerican biological corridor. At the accounting area level, it has 7 biological corridors that contribute to the connectivity of endemic and foreign species: Amerrisque Musum Corridor; Atlantic Biological Corridor; Central Corridor; El Castillo - San Juan; Musun -Quiragua -Masigue; Peñas Blancas - Bosawas; Saslaya - Wawa. The biological corridors comprise a total of 1,447,135.95 ha of accounting area. As for the dynamics of change of use of the 2005-2015 biological corridors, the biological corridor with the greatest deforestation is the Atlantic Biological Corridor with 529,765 ha.

The reduction in forest cover is mainly related to the advance of the agricultural frontier, which causes fragmentation in biological connectivity. The agricultural frontier has historically moved from the Pacific, through the central zone and in recent years concentrated almost exclusively on the Caribbean Coast. The lowest percentages of biodiversity abundance are found mainly in the agricultural frontier areas of the accounting area. Deforestation in the Caribbean region accounted for half of all deforestation that occurred in the country between 1983 and 2000; then it reached 70% in the period 2000-2005, 85% between 2005 and 2010. This accelerated tendency continues.

The Caribbean Coast is characterized by its multi-ethnic population represented by the original and Afro-descendant peoples: Miskitos (120,817), Branches (4,1845), Mayangnas (9,756) and Ulwas. Other peoples include Afro-descendants Garifuna and Creoles. The population of the RACCS is mostly mestizo (81%), and Creole (8.5%); The population of the RACCN, on the other hand, is predominantly Miskito (72%) (72%) and mestizo (22%). The Caribbean Coast is therefore multicultural and multilingual, with Miskito, Creole and Spanish being the most widely used languages, while the Mayangna, Ulwa, Garifuna and Rama languages are used in smaller geographical areas.

While it is true that both poverty and extreme poverty have been shined in half since 2005, Nicaragua is the second poorest country in the Western Hemisphere, and RACCS, RACCN and Río San Juan have the lowest human development indices (0.50-0.55) of Nicaragua. The latest socio-political crisis registered since April 2018, is revealing the fragility of the country's economic resilience and could pose significant challenges for the further economic development of the country.

Land Tenure context in the ER Program accounting area includes communal property(53%) and that belongs to indigenous and Afro-descendant peoples; private property (46.7%) and no titled land (2%). A preparatory study did not identify barriers or conflicts in property rights over land tenure in the accounting area. The communal lands in Nicaragua possess special protection, according to Law 445. Regime of communal property of the indigenous peoples and ethnic communities of the autonomous regions of the Atlantic Coast of Nicaragua and the Bocay, Coco, Indio and Maiz rivers. It was identified that in some territories there are problems caused by the presence of illegal third parties and the national government is making efforts to solve the problem using actions to clean up public property registries,



recognition of agrarian reform titles, accelerating the judicial resolutions for lawsuits and mediation and resolution of conflicts between population groups

Nicaragua is currently in a profound socio-political crisis. The trigger was the pension reform proposed by the Nicaraguan Institute of Social Security (INSS) on April 16, 2018. This reform gave spark to massive civil protests in different part of the country, with its peak moment during the month of June 2018, where the whole country was paralyzed, and due to public manifestation and barricades that the protesters erected on main roads of the country. There are at least two additional accumulative factors that could have contribute to the social uneasiness, resulting in the social unrest: 1) The peasant movement “in defense of the land” that is in opposition to the Law 840, which favored the construction of an interoceanic canal, and that started since 2010, and ii) the protest of students and environmentalist in April 2018 against what they consider to be an inefficient response of the government to the burning (fire emergency) of the Indio Maíz Reserve.

The response of the government to the protest of April, is considered by many sources as disproportionate, with allegation of human rights abuses. Actors like the Inter-American Commission on Human Rights, International Amnesty, UN High Commissioner for Human Rights, the United States Government that enacted the Nicaragua Human Rights and Anticorruption Act of 2018, and that has already been applied to several outstanding members of the government of Nicaragua among others, voiced their concerns and recommendations. The crisis has resulted in a downfall of the economy of the country lasting up to now, and with no solution yet in sight.

#### D. 2. Borrower’s Institutional Capacity

MARENA (project Implementation Unit (PIU)) is responsible for the overall implementation of ER Programs in Nicaragua and Ministry of Finance and Public Credit- MHCP would create a unit to coordinate REDD+ finance and implement specific benefit-sharing plans in coordination with MARENA. In order to achieve the objectives materially consistent with the requirements of the ESF, the PIU works in conjunction with other institutions such as Ministry of Agriculture (MAG), Nicaraguan Institute of Agricultural Technology (INTA) National Forest Institute (INAFOR) and National Institute for Territorial Studies (INETER), Ministry of Family, Communal, Cooperative, and Associative Economy (MEFCCA). In addition, the ER Program will include the active participation of the indigenous territorial governments (ITGs) - *The territorial and communal governments are responsible for decision making related to land and natural resource use and management, in line with the autonomy of the RACCS and RACCN.-*, community organizations, cooperatives, universities, and other organizations.

MARENA is the country’s leading agency for applying the country’s main environmental legislation. This includes regulations on: environmental impact assessment, biodiversity, climate change, forest, wetlands, RAMSAR sites protection, among others. The main MARENA departments that will be working in the project are: protected areas, biodiversity, and climate change.

Even though MARENA has experience in implementing world bank projects, e.g. Biological Corridor and PACCAS, they will need to strengthen their capacity for the management of the environmental and social standards. The capacity of MARENA and other project participating agencies on managing the Project will be assessed during project preparation. Training and capacity building activities will be provided during project preparation and implementation. Social and environmental professionals will be hired to work in the project PIU in MARENA and will have responsibility to work





and trained MARENA departmental offices that will benefit from the project. Since it assumed the coordination of the project the PIU has shown good capacity among all agencies involved in the project, resolving conflicts and achieving objectives and goals.

The preparation of underlying activities, as well as the Readiness process for the ER Program for Nicaragua has revealed important capacity challenges in regard to safeguards implementation – now the new Environmental and Social Standards – and the Grievance Redress Mechanism (GRM). Limited institutional capacity and financial resources underlie inadequate vertical and horizontal coordination of public policies; imperfect and incomplete allocation of rights to forest lands, land titling and zoning; the limited availability, dissemination, and use of information for decision making and land use planning; and the low level of monitoring, control, and enforcement of land and natural resource use.

Prior to ERPA signing, there will be an assessment to further identify details on capacity building, staffing and training needs of the implementing and other involved agencies. It will consider, in particular: (i) the new areas of substantive coverage of the World Bank’s Environmental and Social Framework (ESF), as compared to the World Bank safeguards and the national/regional framework; (ii) the ability of the technical REDD+ team to effectively manage the execution and operation of the Program in line with the objectives of the ESF, and (iii) its capacity to monitor and report on the preparation of any requisite safeguard instruments at the ER Program activity level. Any capacity strengthening measures will be reflected in the Environmental and Social Commitment Plan (ESCP).



To implement the ER Program activities the GoN is planning to align existing institutional initiatives and land-use projects as well as preparing a new GCF and a new CEF7 project. Still MARENA would be responsible for overall ER Program coordination at the national level, assisted by a multi-stakeholder Advisory Committee composed of several institutions involved in land use, land-use change and forestry in Nicaragua. The Regional Governments, Regional Council, and Secretaries of Natural Resources and Environment would be responsible for ER Program coordination at the regional level.

Several institutions would contribute to the ER Program implementation through existing activities, including the following:

MARENA: INAFOR - Forest conservation.

INAFOR: - Improve institutional enabling conditions for forest management and land use.

MEFCCA: Forest conservation; - Intensification of sustainable production systems and - Improve institutional enabling conditions for forest management and land use.

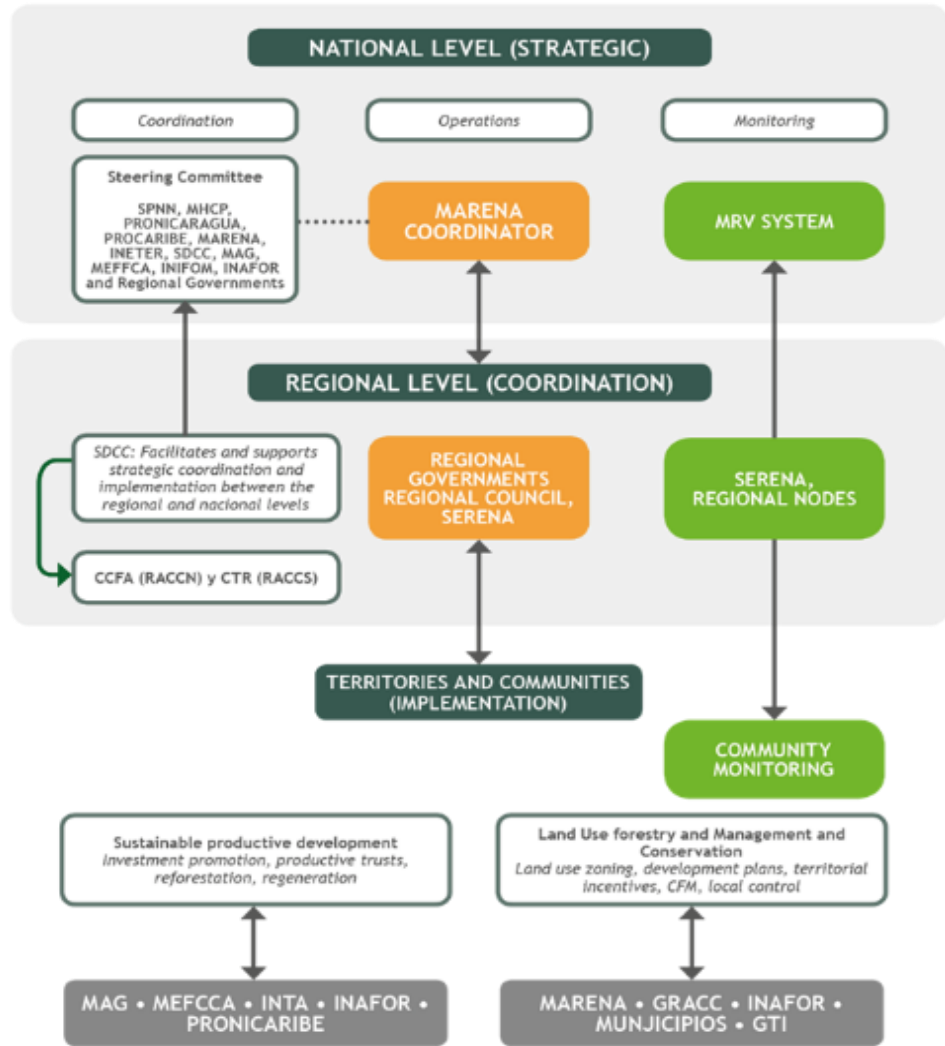
INAFOR: – Forest Conservation and - Improve institutional enabling conditions for forest management and land use.

INTA: - Intensification of sustainable production systems and strategic

MAG: - Intensification of sustainable production systems and strategic, and - Improve institutional enabling conditions for forest management and land use.

MHCP: - Improve institutional enabling conditions for forest management and land use.

Figure 1. Institutional Arrangements for ER Program implementation





## II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

### A. Environmental and Social Risk Classification (ESRC)

High

#### Environmental Risk Rating

High

The Project is not likely to generate a wide range of significant adverse risks and impacts on the environment. The risks and impacts themselves are mostly temporary, predictable and/or reversible. There is a low probability of serious adverse effects on the environment, and the effects of the Project on areas of high value or sensitivity are expected to be positive, given the mainly environmental conservation characteristic of the project, reducing emissions from deforestation and forest degradation, effects on biodiversity and living natural resources. Nevertheless, given the nature of the instrument, it is classified as high risk.

Some examples of potential adverse risks and impacts on the environment are related to the implementation of infrastructures such as the opening of new paths, that can generate risks such as the opening of new deforestation fronts, runoff, the removal of the vegetation, the loss of biodiversity due to the invasion of non-native species and environmental degradation due to the canopy open and the increased risk of fires.

Forest management and restoration activities can generate risks associated with the use of fertilizers, pesticides and hydrocarbon pollution by the use of machinery. Risks related to the production chain can also be associated with these strategies through the purchase of seeds and seedlings, or even timber for fencing.

The vast majority of these risks and impacts are predictable and specific mitigation actions reduce their probability of occurrence. However, ensuring risk does not become an impact depends too on the capacity and commitment of the Borrower to manage such risks and impacts not only the generating fronts but also the engagement of the stakeholders involved, which are crucial to achieving the goal of the Project.

The risks and impacts that are being identified in the ESMF will be discussed with stakeholders and others risks can be added during the engagement process. Despite this, for each risk or impact a mitigation action, according to the mitigation hierarchy is being developed and will be part o a specific Guideline.

#### Social Risk Rating

High

Based on the analysis of the underlying activities of the ER Program and discussions with the government, the ER Program per se is not likely to cause significant negative impacts on human populations. On the contrary it is expected to have positive impacts on vulnerable and systematically excluded groups through the increase in employment and business opportunities, and the improvement of the livelihoods of people with small land properties. Furthermore, the ERP will foster the adoption of sustainable and productive land-uses. It is also expected to enhance livelihoods through a more coordinated support from various public programs that would generate increased revenues from sustainable practices (agriculture and forestry), thus generating rural employment. Impacts on physical, cultural, and/or



archeological sites, economic displacement, land acquisition or resettlement are thought to be minimal and will be analyzed in depth during preparation. Furthermore, a strong focus will be put on the capacity building of the social and safeguards team of the PIU, which will foster the continuity of social considerations throughout and after the life cycle of the underlying activities.

However, there is an important contextual social risk associated with possible local social conflicts stemming from the distribution of the benefits of the Payments for Results/benefit sharing schemes. Furthermore, as mentioned in section (D) of this ESRS, the current social political context in Nicaragua is sensitive and could pose challenges for the governance of the project. This existing, tense, socio-political context is coupled with competing interests and demands of different land holders including indigenous communities with land titles, and people without land title, and illegal logging activities. There are also risks identified and related to restriction of traditional access to natural resources.

To manage social risk, Nicaragua shall manage the ERP through a participatory approach and apply citizen engagement and beneficiary feedback mechanisms. This will help create timely feedback loops and ensure inclusion and active participation of beneficiaries from vulnerable groups in order to avoid any kind of discrimination. The Stakeholder engagement process is expected to provide inputs to generate strategies to avoid, minimize or mitigate the risks mentioned above.

Given the limited information, the borrower is preparing different frameworks in application of the standards and more detailed ESF plans will be done after appraisal.” Specifically, the risks identified for the social side will be mitigated through a Process Framework (PF) and an IPPF.

If during preparation it is revealed that ER Program might have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation, the PF and activities will require FPIC with affected communities as required under ESS7. The circumstances in which FPIC will apply are: (a) have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation; cause relocation of Indigenous Peoples from land and natural resources subject to traditional ownership or under customary use or occupation; or have significant impacts on Indigenous Peoples cultural heritage that is material to the identity and/or cultural, ceremonial, or spiritual aspects of the affected Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities’ lives.

The PF and an IPPF is pertinent, because, even though broad geographic areas are defined, specific participant communities are not. Hence, the purpose of the process framework is to describe the process by which potentially affected communities and affected population will participate in planning, designing the restrictions, as well as in proposing the mitigation measures. Under the same rationale, the IPPF will be developed.

Because of the sensitive socio-political context of the country, and of the project’s area of influence, this screening exercise is also recommending conducting during project preparation, a Social and Conflict Analysis to assess the degree to which, the program may exacerbate existing tensions and inequality within society, both within the communities affected by the program, and between these communities and others that may have a negative effect on stability and human security. We are proposing that this be done before project appraisal.



There will be the need for an in-depth stakeholder involvement during ER Program preparation and its life cycle. The Stakeholder Engagement Plan (SEP) -that will be culturally appropriate,- will put a strong focus on inclusive stakeholder management, and the ER Program Document and its benefit sharing (in preparation) plan shall be managed through a participatory approach and apply citizen engagement and beneficiary feedback mechanisms. This will help create timely feedback loops and ensure inclusion and active participation of beneficiaries from vulnerable groups to avoid any kind of discrimination.

## **B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered**

### **B.1. General Assessment**

#### **ESS1 Assessment and Management of Environmental and Social Risks and Impacts**

##### ***Overview of the relevance of the Standard for the Project:***

The Standard is relevant. The ER Program is expected to generate benefits for local communities through the adoption of sustainable and productive land uses, as well as significant positive impacts on forest conservation, as it aspires to tackle the main direct drivers of deforestation and forest degradation to promote emissions reductions.

The underlying activities of the project are: 1.1) Improved forest and land use management and governance in indigenous territories; 1.2) Community forest management; 1.3) Promotion of natural regenerations and social reforestation (reforestation cruzade); 2.1) Silvopastoral trusts; 2.2) Promotion of Agroforestry systems; 2.3) Commercial reforestation; 3.1 Strengthening of private or government institutions that promote private investment (PRONicaragua/PRONicaribe) private or government institutions that promote private investment; 4.1) Harmonization of policies and improved institutional coordination; 4.2) Improved regional and local forest and land use monitoring; 4.3) Better information gathering, use, and dissemination; 4.4) improved application of laws, policies, regulations, and norms, and 4.5) improved institutional resources and capacities in order to better control land and natural resource use and promote sustainable land use.

The specific underlying activities over which the overall ER strategy is based, pose potential direct, indirect, and in some cases cumulative, social and environmental risks and impacts that need to be adequately addressed and mitigated.

The Environmental and Social Screening during Concept Note stage identified that the ER Program's underlying activities will generate overall positive impacts related with landscape restoration and promote sustainable and resilient land use practices. However, there is an important contextual social risk associated with possible local social conflicts stemming from the distribution of the benefits of the Payments for Results/benefit sharing schemes.

The socio-political context of Nicaragua is also sensitive as an accumulation of tensions stemming from conflicts between indigenous communities and campesinos – colonos (agricultural frontier colonist,) land grabbing, coupled with competing interests and demands of different land holders and people without land title, and illegal logging activities.

Furthermore, there are risks identified related to indigenous territories and forms of forest administration; restriction to indigenous populations of traditional access to natural resources, and local social conflicts for distribution of the



benefits of Payments for Environmental Services. These risks are coupled with a high environmental risks related to activities that if not well monitored (eg. use of pesticides and silvopastoral activities) could promote land use change, degradation of forests and natural resources, and conversion of natural and critical natural habitats.

The socio political context of the country, described in section D, also sets a sensitive and complicated scenario for the management and governance of the project, since the program will take place where there are already existing tensions around land and natural resource use.

Because specific communities that will be part of the program are still not defined, a draft Environmental and Social Management Framework (ESMF) is being developed. This is being done in a participatory way, and that complies with country environmental legislation and the ESS1, evaluating social and environmental risks and potential impacts associated. The ESMF will continue to be consulted and will be disclosed prior to project appraisal.

The ESMF will include i) an exclusion list of activities, such as the introduction of invasive species in plantations, or the land titling over regional conservation areas; (ii) a screening plan to identify, avoid and mitigate any potential negative environmental, health, safety, and social impacts associated with underlying activities; (iii) a process for categorizing, in terms of expected level of environmental and social risk, and assessing and safeguarding future potential underlying activities to be included under the ER Program; (iv) good practices for potential activities such as community forestry, sustainable management of forest landscapes, guidelines for sustainable exploitation of timber and non-timber products, productive reconversion, national and international certification, value chain development, access to markets, and certification processes, as well as for the preservation of critical natural habitats sustained by these forests, inter alia.

The ER Program has the flexibility to include activities during ER Program implementation. In this sense, the ERP-ESMF will include a process to screen/evaluate such activities to ensure that they will be implemented in a manner consistent with the environmental and social safeguard provisions of the document.

Based on the identified risks and impacts, the draft ESMF should develop the following safeguards documents: Integrated Pest Management Guidelines; Guidelines for Biodiversity Action Plan; Guidelines for Labour Management Procedures (including code of conduct; Guidelines for Forest Management Plans (for both commercial and small-scale activities); Guidelines for Cultural Heritage; Indigenous Peoples Framework; Process Framework in case restriction of access to natural resources occurs; and an Stakeholder Engagement Plan (SEP), with its grievance redress mechanism. These safeguards documents will be part of the Environmental and Social Commitment Plan – ESCP and will be finalized before ERPA signing phase containing the measures and actions to ensure compliance with the Environmental and Social Standards (ESSs).

### **ESS10 Stakeholder Engagement and Information Disclosure**

The main stakeholders are MARENA and other relevant government institutions mentioned in section D2, regional and municipal governments, indigenous and afro descendants territorial and communal governments, and actors such as community groups, indigenous peoples, and small and medium-sized producers. Potential stakeholders also include private enterprises and NGOs that operate in the jurisdiction, and whose actions contribute to the achievement of the ER



Program's objectives, to the extent that they act through public-private alliances and/or public-private-communal alliances that help to promote low-emissions development.

MARENA will prepare a Stakeholder Engagement Plan (SEP) that will accompany the ER Program's preparation and implementation phase. The SEP will outline a) who the key stakeholders are; b) how they will engage with them, especially regarding indigenous peoples' representatives, members of the afro descendant communities (if applicable), women of all ethnicities, and other vulnerable groups; c) how often the engagement will occur throughout the ER Program; d) how feedback will be solicited, recorded and monitored over the ER Program; e) who will be responsible with this engagement; f) timeline for this engagement; g) budget, h) culturally appropriate and i) human resources, among other details. To avoid or minimize the risk of leaving certain vulnerable groups behind, the SEP will describe the measures that will be used to remove obstacles to participation in the benefits of the ER Program, and how the views of differently affected groups will be captured. Where applicable, the SEP will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable, focusing on IPs and small farmers without formal organizations

Dedicated approaches and an increased level of resources may be needed for communication with such differently affected groups such as remote and dispersed populations so that they can obtain the information they need regarding the issues that will potentially affect them (positively or negatively). The stakeholder engagement process will begin as early as possible and will guide the ER Program through implementation. Feedback will be integrated into the SEP. Prior to ERPA signing, the SEP will be consulted and disclosed.

The existing Grievance Redress Mechanisms developed by MARENA for the sake of this program, will be further strengthened during preparation in order to better receive and facilitate resolution of concerns and grievances and ensure agility, access, prompt response timeframes, and respect for confidentiality.

## **B.2. Specific Risks and Impacts**

### **A brief description of the potential environmental and social risks and impacts relevant to the Project.**

#### **ESS2 Labor and Working Conditions**

This Standard is relevant, based on the underlying activities of the ER Program. The ER Program for Nicaragua will be implemented primarily by government staff from the implementation Ministries (Finance, Environment, Forest, Protected Areas, Agriculture). In line with ESS2, where government civil servants are working in connection with the project, whether full-time or part-time, they will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement, unless there is an effective legal transfer of their employment or engagement to the project. ESS2 applies to government civil servants related to the project in regard to provisions of paragraphs 17 to 20 (Protecting the Work Force) and paragraphs 24 to 30 (Occupational Health and Safety). These will be covered by the ESMF when project-related.

At the same time, ER Program underlying activities may also include small-scale community-based projects, and projects where most activities are carried out by contractors and subcontractors. In this sense, the ER Program and the underlying activities may encompass the hiring of different types of workers (direct workers, community-based labor, consultants). In the case of community labor, the Borrower will assess whether there is a risk of child labor or forced labor, identifying those risks consistent with paragraphs 17 to 20 of the ESF. The Labor Management Procedure, to be developed by the Borrower as an annex to the ERP-ESMF (refer to Table 1, Section II), will include specific provisions for each type of expected Bank labor. The LMP would serve as the basis for preparation of more specific Labor Management Plans as needed during implementation, applying any requirements that are relevant given the nature of the activity.



This includes: terms and conditions of employment, non-discrimination and equal opportunity, and the establishment of workers' organizations. It will also include codes of conduct. MARENA will develop a Grievance Redress Mechanism (GRM) for project workers and before the hiring of workers.

The number of workers is not known at this time and will be estimated before project appraisal. Because of the nature of the program -no physical work will be required- Foreign labor influx related impacts are not expected. The ER Program will promote transparency in terms and conditions of employment, nondiscrimination and equal opportunity where possible. Procedures to address condition of employment will be set out in the Labour Management Procedures. During ERP implementation, the LMP will be revisited and updated as required and as additional labor related risks or issues unfold.

### **ESS3 Resource Efficiency and Pollution Prevention and Management**

This ESS is relevant in a precautionary way in cases where some of its underlying activities may pose a risk of environmental pollution and degradation of natural resources (soil, water). These include commercial reforestation and commercial agroforestry, use of technologies, equipment, and inputs through technical assistance, implementation of community development plan and community forestry management systems, among others. These activities may generate environmental pollution and degradation by an inadequate: (i) use of pesticides and agrochemicals; (ii) consumption of water resources and consequent degradation of water quality and quantity (affecting users downstream); (iii) use of gas and oils for equipment; etc. The fact that these activities are likely to involve smallholders (less equipped to handle/manage potentially dangerous chemicals) makes it particularly important to include appropriate guidance and provisions in the ERP-ESMF. The ERP-ESMF will also include specific measures to prevent and mitigate the pollution of natural resources, mainly soil and water, when handling hydrocarbons (oil and gas) for equipment in forestry and agroforestry activities.

The ERP contains mainly underlying activities which support sustainable forestry activities. The ERP's ESMF will stipulate that underlying activities will avoid the use of prohibited pesticides at the national level and those prohibited in the international lists that are applicable. An Integrated Pest Management Plan is to be prepared and finalized in time for ERPA signing and before board approval. At Substantial measures on training and potentially equipment should be considered in the budgeting for ESMF/IPMP implementation.

### **ESS4 Community Health and Safety**

This ESS is relevant

The ERP-ESMF will consider the potential risks and impacts to community health and safety from ER Program implementation and operational stages and guide the development and implementation of specific safeguards instruments, including emergency plans, particularly in regard to emergencies from exposure to climate vulnerabilities (e.g., forestry fires, floods, and landslides) and man-made hazards (e.g., emergencies from exposure to pesticides and agrochemicals, and accidents due to unsafe use of equipment during forestry activities). To address these risks, the ERP-ESMF will include:

- (i) Specific language on the prevention of incidents and accidents due to unsafe use of equipment and technology, including particularly training and capacity building measures.
- (ii) Core principles of ESS4 will be considered in the Integrated Pest Management described under ESS3.





- (iii) Provisions on Emergency Responses related to climate disasters.
- (iv) Specific language on the prevention of violent encounters and accidents/fatalities during forestry supervision, an activity promoted under the ER Program’s underlying activities.

There may be a need to improve accessibility to Program buildings and offices for the public. Some modifications may be necessary for facilitating access to program information and systems to people with special needs. As for now the program doesn't envisage risks and impacts (as a result of project's activities) associated to road safety and gender based violence.

#### ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The standard is relevant.

The ER Program will not finance physical infrastructure and is not expected to cause physical displacement to formal or informal occupants. No involuntary land taking will be financed. In both cases, any activities that would lead to these will be screened out in the EMSF. **However, the ER Program underlying activities could lead to the restriction of access to natural resources**, or access to protected areas or communal forest lands. This could imply that new resource access rules will be stipulated and lead to a restriction of access to natural resources in parks or protected areas for communities. Underlying activities could also lead to the loss of economic assets.

The decisions on the creation of co-management arrangements will be sought through the participation of communities, Indigenous Peoples, and municipalities. However, there could be the case that for some community members, these arrangements may imply restriction, thus, a Process Framework (PF), (in case restriction of access to legally designated parks and protected areas), will be prepared by the client before ERPA signing. The instruments will outline the procedures the client will follow during ERP implementation in order to define impacts covered under ESS5.

The PF will describe the process for resolving disputes relating to resource use restrictions that may arise between or among affected communities. The PF will take into consideration cultural knowledge and will be consulted through participatory consultation processes in the ER Program areas and the capital. Feedback from the consultations will be integrated into the PF.

In line with ESS7, if during preparation it is revealed that underlying activities under the ER Program might have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation by IPs, the Process Framework, as well as any underlying activity leading to the use of such PF, will require FPIC with affected communities.

#### ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

This standard is relevant because many of the activities support forest management and conservation, including in Legally protected areas, natural and critical habitats that are the habitat of endangered, migratory, and threatened species. Some activities will focus on forests, their protection/management as well as community linkages and use of these resources and nontimber forest products. The ESMF is assessing possible risks to natural and critical habitats to ensure that program activities carried out in these areas will be consistent with ESS6 guidelines. To address the mentioned risks, the ERP-ESMF will include:

- (i) A list of ineligible activities under the ER Program umbrella, including (particularly relevant for this ESS): (a) any activity that may produce adverse impacts on critical natural habitat in accordance with the criteria set out in ESS6, classified by Marena (b) the introduction and/or promotion of use of invasive species and/or



non-native species (not currently established in the region). Where alien species are already established in the region, the underlying activities implementors will undertake diligence in not spreading them into areas in which they have not already become established; (c) land use change from non-disturbed forests (to be classified by structural parameters such as size, stratification, presence or absence of significant disturbances by specific studies already performed or mapped by Marena), to plantations, agroforestry systems, and silvopastoral systems. These will be located on land that is already converted or highly degraded (excluding any land that has been converted in anticipation of the project);

- (ii) A screening plan for activities to identify potential negative impacts on biodiversity conservation.
- (iii) A process for categorizing (in terms of expected level of environmental risks and impacts), and assessing and safeguarding future potential underlying activities to be included under the ER Program. Underlying activities that pose adverse impacts over critical natural habitats will not be financed (ineligible activities).
- (iv) Procedures to determine the need for development of site-specific assessments and guide the implementation of safeguard measures, adequately applying the Mitigation Hierarchy and following GIIPs. Such measures include: guidelines for sustainable exploitation of timber and non-timber products and avoid overexploitation; measures for forest fire prevention and control practices; procedures for preventing hydrological changes and consequent impacts on water users downstream of the areas of intervention; measures to ensure that any activities undertaken in legally protected areas and areas of international recognized biodiversity importance are consistent with the area's protection status and and/or management and designation objectives; among others.
- (v) Guidelines for the development and implementation of Forest Management Plans, which should take into account the requirements of the ESS6, for both commercial and small scale activities, required for those specific underlying activities that include the promotion and development of forestry plantations, agroforestry systems, reforestation activities and community-based forest management for timber and non-timber products.
- (vi) Guidelines for the development and implementation of a Biodiversity Action Plan (BAP-Guidelines, required for those specific underlying activities that pose adverse residual impacts on natural and critical natural habitats and the biodiversity they support.
- (vii) Activities to strengthen the relevant Government institutions and stakeholders to comply with this standard and the corresponding provisions to be included in the ERP-ESMF.

Sustainable management of living natural resources: Since the ER Program's underlying activities involve primary production and harvesting of living natural resources, the Borrower will assess the overall sustainability of these activities, as well as their potential impacts on habitats, biodiversity and communities (including cumulative impacts). In the case of small-scale forestry activities, these will follow principles of this ESS in regard to time-bound planning for achieving sustainable management. Regarding commercial forestry plantations, the Borrower will ensure such operations are certified according to required by ESS6.

Primary producers: Underlying activities related to the establishment of plantations, agroforestry systems, and silvopastoral systems, may entail the purchase of plants, seeds or other products such as wood, that are known to originate from areas where there is a risk of significant conversion or significant degradation of natural or critical habitats. The ERP-ESMF will include an evaluation of the systems and verification practices used by the primary suppliers (mainly nurseries). According to the obtained results, the Borrower will establish systems and verification practices in line with requirements of Paragraph 38 of ESS6.

## ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities



This standard is relevant. The ERP will apply ESS7 as a large segment of the beneficiaries are expected to be indigenous and afro descendant peoples (indigenous peoples ).

It is not expected that the underlying activities of the ERP will have a negative impact on indigenous peoples or other minorities. The main challenges stem from the need to ensure that the underlying activities take into consideration IPs in line with ESS7. Furthermore, it is important to: (i) improve targeting of indigenous peoples, particularly those in areas of difficult access, (ii) support communication and outreach challenges due to geography, culture, and at times, language, (iii) ensure that access to services is provided in a culturally adapted manner will be critical and will require institutional strengthening of the PIU at the various levels, and (iv) strengthen grievance redress mechanisms tailored to indigenous people's customs.

An Indigenous Peoples Framework (IPP-Framework) will be prepared, consulted, and disclosed before ERPA signing. The IPPF will identify the potential positive and negative impacts on IPs and provide recommendations on how to screen for them and avoid them, but also how to promote IP participation in ER Program and benefits. It will contain specific guidelines on culturally adequate consultations/dialogues, as well as measures to ensure joint planning, capacity building and culturally-inclusive implementation of activities, promoting equally distributed benefits for the population, including women and youth. In addition, the IPPF will establish guidelines and criteria for the preparation of Indigenous Peoples Plans (IPPs), to be drafted when required and during implementation once concrete activities require it. The IPPs will be developed in line with ESS7 and will describe the specific actions, budgets, and indicators and will encourage inclusion of affected Indigenous Peoples and communities during their implementation.

The IPPF will be consulted, on each activity area, in a culturally-sensitive manner, with IP communities and/or their representatives, as appropriate, to ensure communities' broad support to the ER Program. Feedback will be integrated into the IPPF. The IPPF will be disclosed, online and in a location accessible to potentially affected communities.

Relevance of this ESS will be further assessed during the preparation when a more detailed description of the underlying activities is available

#### **ESS8 Cultural Heritage**

The Standard is Relevant. The ERP will focus on forestry activities, the improvement of livelihoods, and sustainable land management practices - in which physical cultural resources are likely to be found in forest or rural areas, and some of the objects identified may be pre-Hispanic structures, sacred sites, protected land, inter alia. Chance finds procedures, will be considered through a Guideline on Cultural Heritage, which will be an annex to the ESMF.

Nicaragua has important historical sites and cultural monuments. For example, it is believed that thousands of years old stone pyramids lay intact deep in the jungle of Indio Maíz. Some call it a lost city of ancient Indians. The site, called Canta Gallo is also sacred to the Rama indigenous people

#### **ESS9 Financial Intermediaries**

The project does not involve Financial Intermediaries.

### **B.3 Other Relevant Project Risks**



**Should "Other Relevant Project Risks" be disclosable?**

Social protests unleashed on 18 April 2018 reflect a critical political moment in Nicaragua. The crisis in the country could pose relevant risks to the project schedule and emission reduction targets.

**C. Legal Operational Policies that Apply**

**OP 7.50 Projects on International Waterways**

No

The Project will not affect international waterways as defined in the Policy. Therefore, this Policy is not triggered.

**OP 7.60 Projects in Disputed Areas**

No

The Policy is not triggered because the Project will not be implemented in areas known to involve disputed areas.

**III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE**

**A. Is a common approach being considered?**

No

**Financing Partners**

No financing partners are envisaged for this operation.

**B. Proposed Measures, Actions and Timing (Borrower's commitments)**

**Actions to be completed prior to Bank Board Approval:**

The Borrower will develop a specific ERP-ESMF, together with individual guidelines for the preparation of site-specific safeguards instruments, which will safeguard the underlying activities under the ER Program umbrella, in line with the requirements of the Bank's ESF.

Table 1 below summarize the different assessments and safeguard instruments required.

**Table 1.** Required Environmental and Social safeguards instruments

E&S safeguard assessments and instrument		Applicable Standard	Type of Document	Due date	Responsible
1	Environmental and Social Management Framework (ERP-ESMF)	All	Stand-alone, with subsequent annexes	Finalized before ERPA signature	Client
2	Integrated Pest Management Guidelines (IPM-Guidelines)	ESS 3	Annex to the ERP-ESMF	Finalized before ERPA signature	Client
3	Guidelines for a Biodiversity Action Plan (BAP-Guidelines)	ESS 6	Annex to the ERP-ESMF	Finalized before ERPA signature	Client
4	Guidelines for Labour Management Procedures (LMP-Guidelines), including code of conduct	ESS 2	Annex to the ERP-ESMF	Finalized before ERPA signature	Client



5	Guidelines for Forest Management Plans, for both commercial and small-scale activities	ESS 6	Annex to the ERP-ESMF	Finalized before ERPA signature	Client
6	Guideline on Cultural Heritage	ESS8	Annex to the ERP-ESMF	Finalized before ERPA signature	
7	Indigenous Peoples Framework (with subsequent IPPs where necessary)	ESS7	Annex to the ERP-ESMF	Finalized before ERPA signature	Client
08	Process Framework in case restriction of access to natural resources occurs	ESS5	Annex to the ERP-ESMF	Finalized before ERPA signature.	Client
09	Stakeholder Engagement Plan (SEP)	ESS 10	Stand-alone	By appraisal	Client with WB

Based on previous conversations with the government, it is expected that the development of the ERP-ESMF and corresponding specific guidelines will be conducted as part of Nicaragua’s ERPD preparation.

Due diligence will confirm the specific safeguard instruments that are needed (as more detailed description of the underlying activities is available and relevance of ESSs is further assessed), and will inform the design of the E&S safeguard assessments and instruments included in Table 1.

**Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):**

The ESCP will address the implementation and subsequent drafting of Plans, as applicable. It will also include:

- Consultation and disclosure needs and timelines.
- Regular Reporting: need of preparing and submitting regular monitoring reports on the implementation of the ESCP.
- Third party monitoring to determine level of adherence of underlying activities with ERP-ESMF and MARENA’s risk management system.

**C. Timing**

**Tentative target date for preparing the Appraisal Stage ESRS**

30-Sep-2019

**IV. WORLD BANK ES OVERSIGHT**

Corporate advice/oversight will be provided by an Environmental and Social Standards Adviser (ESSA) during project preparation

**V. CONTACT POINTS**

**World Bank**

Contact:	Norman Russle Howard Taylor	Title:	Senior Social Development Specialist
Telephone No:		Email:	nhowardtaylor@worldbank.org
Contact:	Maria Ines Miranda Ramos	Title:	Senior Environmental Specialist
Telephone No:	5761+1073 /	Email:	mmirandaramos@worldbank.org



**Borrower/Client/Recipient**

**Implementing Agency(ies)**

**VI. FOR MORE INFORMATION CONTACT**

The World Bank  
1818 H Street, NW  
Washington, D.C. 20433  
Telephone: (202) 473-1000  
Web: <http://www.worldbank.org/projects>

**VII. APPROVAL**

Task Team Leader(s):	Zenia Maria Salinas Vallecillo
Practice Manager (ENR/Social):	Maria Gonzalez de Asis Recommended on 24-May-2019 and 12-Mar-2020
Environmental and Social Safeguards Advisor (ESSA):	Svend E. Jensby for Noreen Beg (ESSA) Cleared on 26-Jul-2019