

# Appraisal Environmental and Social Review Summary Appraisal Stage (ESRS Appraisal Stage)

Date Prepared/Updated: 12/03/2020 | Report No: ESRSA01169

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Yemen Restoring Education and Learning Project (P175036)

#### **BASIC INFORMATION**

#### A. Basic Project Data

| Country              | Region   | Project ID               | Parent Project ID (if any) |
|----------------------|--|--------------------------|----------------------------|
| Yemen, Republic of   | MIDDLE EAST AND NORTH<br>AFRICA                | P175036                  |                            |
| Project Name         | Yemen Restoring Education and Learning Project |                          |                            |
| Practice Area (Lead) | Financing Instrument                           | Estimated Appraisal Date | Estimated Board Date       |
| Education            | Investment Project Financing                   | 11/24/2020               | 12/17/2020                 |
| Borrower(s)          | Implementing Agency(ies)                       |                          |                            |

#### Proposed Development Objective

The project development objective is to maintain access to basic education, improve conditions for learning and strengthen education sector capacity in selected districts of the Republic of Yemen.

Financing (in USD Million)

Amount

Total Project Cost 152.80

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

Yes

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

The Yemen Restoring Education and Learning (REAL) will seek to maintain access to primary education, improve learning outcomes and strengthen education sector capacity in selected districts. The proposed Project has two main components: (i) priority interventions to sustain access and ensure learning, and (ii) strengthening local capacity and system resilience.

Activities under the first component will ensure a minimum functioning of a target school by focusing on four key areas: (a) support to teachers; (b) school feeding; (c) learning materials, and (d) rehabilitation of school infrastructure including WASH facilities in target schools. The second component will aim to deliver remote learning to children, when schools are closed due to the coronavirus or other shocks that may arise. It will also finance local capacity

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building for managing education in emergencies and fragile settings. Two additional components will cover the cost of the implementing agencies associated with project management and a Contingent Emergency Response. Given the volatility of the security situation, the heterogeneity of education challenges, and the weakened capacity of the Government, the project design is based on the principles of flexibility, innovation, and strengthening local capacities to ensure that education services reach school-aged children in target areas.

The project will be implemented by UNICEF, WFP and Save the Children, in partnership with the local institution Public Works Project (PWP) based on their demonstrated capacities from ongoing activities in Yemen and global expertise and will be centered around the school with the community playing an active role in planning, implementation, and monitoring.

#### D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The project will support sustainable access to primary schools at selected districts in Yemen. A multi-layered approach of targeting has been applied using a composite severity index and a sector-specific index that prioritizes support related to education service delivery. The methodology relies on four weighted key indicators: number of school-age children in need, Share of IDPs, access severity, presence of partners. A preliminary list of potential governorates could include Aden, Al Maharah, Amran, Lahej, Saa'dah and Taiz where the project will target around 800-1000 schools (depending on the size) in a limited number of both urban and rural districts. The districts within these governorates will be selected using the same targeting methodology.

The selected governorates represent highland and lowland which are the main agro-ecological systems in Yemen. The climate of Yemen is characterized as semi-arid, where rainfall is generally limited but with significant variations depending on the elevations. Temperatures are generally high, particularly in the coastal regions. The highlands enjoy a temperate, rainy summer with an average high temperature of 21 °C (69.8 °F) and a cool, moderately dry winter with temperatures occasionally dipping below 0 °C (32.0 °F) at some places.

The project will have significant positive social impacts in the education sector in Yemen. It will help address the immediate gaps and needs of education services, and restore children's access to education in the targeted areas, stop the depletion of human capital and strengthen education management capacity in the country. The project will tackle the critical factors through its interventions, restore and sustain access to education for the children in the selected districts. The immediate beneficiaries of the proposed project are school-age children (6-15), their teachers and school-based staff, particularly girls and female teachers. At the same time, the project help improve and strengthen education management capacity at various levels of the government and among communities. This will have long-term benefits for the country. Investing in education infrastructure, human resources and the younger generations is aligned with the overall strategy of recovery and reconstruction in Yemen and will help address the fundamental causes of fragility, conflict and contributes to peace building.

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

The proposed implementing agencies are UNICEF, WFP and Save the Children. i) UNICEF will provide payments to teachers, school supplies, develop national distance learning system and will provide capacity building to Ministry of Education (MOE), governorate and district officials and to principals/administrators; ii) Save the Children will be implementing activities related to teacher training, and learning materials; and iii) WFP will provide school feeding activities. For the activities supervised by UNICEF, the Public Works Project (PWP) would be contracted for the

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rehabilitation of school infrastructure including WASH facilities and will monitor and supervise the implementation of these activities.

UNICEF has prior experience in working with the Bank on two projects – the Emergency Health and Nutrition Project (EHNP) and Emergency Crisis Response Project (ECRP) and is well equipped with experienced staff with good capacity, although without previous experience with the ESF. UNICEF's WASH cluster is staffed with an Environmental and Social Safeguards Consultant and an Environmental Health Officer. Nonetheless, for the proposed project UNICEF will assign at least one Environmental Expert and one Social Expert to be fully engaged and support the management of ESHS risks and impacts. It should be mentioned that UNICEF has a well-established grievance mechanism (GM) system which is already used under ongoing operations (Emergency Cash Transfer).

WFP and Save the Children have limited staffing in E&S risk management - Save the Children has one gender specialist and WFP has one GBV specialist - and both agencies have limited experience with WB financed projects in Yemen, therefore, they will delegate UNICEF with the responsibility for overseeing the environmental and social aspects of the entire project, including through a consolidated grievance mechanism (GM) system. Each agency will define its own respective management structure and workers to implement the Project. They will work closely and coordinate with UNICEF environmental and social staff in the E&S risk management related to their project works.

Generally, PWP has demonstrated adequate arrangements in managing environmental and social aspects of the World Bank-supported operations of the Yemen Emergency Crisis Response Project (159053), the Integrated Urban Services Emergency Project (P164190) and Yemen Desert Locust Response Project (P174170). Currently, PWP maintains adequate institutional arrangements for the implementation, monitoring, and reporting on safeguards aspects, staffed with an Environmental and Social Officer in Sana'a and at regional/governorate level. It is expected that similarly for this project, the safeguards implementation and monitoring arrangements will include environmental and social safeguards experts. PWP will need to dedicate Environmental and Social Officer to manage and supervise activities for the rehabilitation of schools infrastructure including WASH.

UNICEF, WFP and SCI will define their own respective management structures to implement the Project, including management of environmental and social risks. Each agency will determine the number of environmental and social experts required depending on the nature of the project components implemented by each agency and submit their respective environmental and social staffing planning to the World Bank before project approval. Each agency will identify qualified environmental and social staff and resources and assign them to the Project and support the management of ESHS risks and within a month of project effectiveness.

During the project implementation, relevant virtual ESF trainings will be provided by World Bank ESF specialists to the implementing agencies teams and also to the relevant institutions involved in the project implementation. The implementing agencies will also identify other key environmental and social trainings that will be incorporated and delivered in a training plan. Third Party Monitoring Agent (TPMA) service will be used under the project to implement tasks related to monitoring and reporting on certain technical aspects, including environmental and social safeguards' aspects.

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

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# A. Environmental and Social Risk Classification (ESRC)

Substantial

Environmental Risk Rating Moderate

The environmental risks and impacts of this project are rated 'Moderate' given the nature and small scale of the proposed rehabilitating works consisting in the upgrading of existing WASH facilities in schools under component 1. Environmental risks and impacts expected under this project may include: noise, dust, solid waste generation, as well as workers safety including occupational health and safety. The environmental risks and impacts are expected to be site-specific, reversible, and of low magnitude that can be mitigated following appropriate measures.

To mitigate potential environmental risks and impacts, site-specific Environmental and Social Management Plan (ESMPs) will be prepared and will include E&S mitigation measures for contractors.

However, given that key E&S instruments are deferred and potential E&S risks and mitigations are unknow, the corporate oversight for this project is retained by the RSA. Accordingly, the task team will continuously review the ESRC following the outcome of the deferred E&S assessment and the E&S performance during the implementation.

Social Risk Rating Substantial

The project will have significant positive social impacts in the education sector in Yemen. It will help address the immediate gaps and needs of the education service, restore and help sustain children's access to education in the targeted areas, and strengthen education management capacity in Yemen. Project interventions will contribute to the recovery, reconstruction and long-term peace building efforts in the country.

Project interventions, however, may carry substantial social risks related to exclusion of eligible population from project benefits, risks of SEA/SH, labor issues – including risks of child and forced labor, possible tension and conflicts among beneficiary communities and districts, and possible corruption and elite capture of the cash payment incentives. Possible factors of exclusion and vulnerability could be due to gender, social and economic status. Non-transparency of cash payment process, inadequate disclosure of project information related to assistance schemes and their implementation arrangement could lead to tensions and even conflict among the beneficiaries, local communities and even districts or potential supplier contractors. Students, female teachers, and project female staff could also face SEA/SH issues, including vulnerability of students to sexual abuse/harassment in return for school feeding and supply of materials. There are also potential safety risks for students and teachers if the route to school is unsafe. Based on the above, the social risk rating of the project is recommended as substantial. COVID-19 and other communicable diseases are other potential risks associated with community health and safety.

The project is expected to have only minor impacts due to rehabilitation works for WASH facilities in schools. No land acquisition or resettlement is planned.

#### 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

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

ESS 1 is relevant as there are potential environmental and social risks and impacts associated with the Project's interventions. Environmental risks and impacts might result from rehabilitating works of WASH facilities in schools under component 1. These risks and impacts, such as noise, dust, waste, and occupational health and safety (OHS) risks, are expected to be minor, site-specific and reversible. To mitigate such potential environmental risks and impacts, site-specific Environmental and Social Management Plan (ESMPs) will be prepared including environmental and social prescriptions for contractors. The site-specific instruments will be prepared, reviewed and disclosed for each construction site prior to work commencement. The preparation and implementation of the site-specific ESMPs will be the responsibility of UNICEF representation in Yemen which will subcontract the implementation of rehabilitation works to PWP as a key local implementation partner. Both UNICEF and PWP have adequate arrangements for managing environmental and social aspects as part of implementing ongoing World Bank-supported operations as explained in section D.2 above. However, during the project implementation, this arrangement may be improved if needed.

To mitigate the identified social risks, the project has followed a two-prong approach in designing the necessary interventions. First, the project will incorporate the required social considerations and interventions into its project component design to address the potential risks. Gender considerations, for example, are mainstreamed in the project design through the beneficiary school selection criteria and indicators, targeted assistance for female teachers, specific training program on gender, GBV and SEA/SH. Similarly the project design will also include an enhanced information disclosure practice for adequate and timely disclosure of relevant project information to the public to address the issue of transparency and possible risk of tension and conflict. The project will also put in place robust financial management and monitoring system against risks of corruption and elite capture. Second, the project will develop stand-alone social instruments to address certain risks, such as a stakeholder engagement plan, labor management procedures and GBV/SEA/SH action plan. Differentiated measure will also be included for potential children with disabilities, orphans, etc. such as providing ramps for wheelchairs, handrails, etc. The learning materials will be designed to be accessible for disabled children. These issues will be elaborated in the project ESMF and site-specific WASH facility design. Additional risks include the potential of COVID-19 transmission for workers. These risks could be mitigated by adopting social distancing, use masks, hand sanitizers and hygiene.

Operational and Maintenance (O&M) Risks: the O&M environmental and social risks may include traffic risks for children, food risk, fire risks, etc. The Project Operation Manual (POM) will include mitigation measures and institutional arrangements for O&M phase such as traffic safety plan for children, food safety, fire safety and management of WASH facilities.

Security risks to project workers and key stakeholders including children: the implementing agencies will prepare and implement their plans for managing security risks to their own staff and their workers/partners and key stakeholders including children which will include mitigation measures such as the use of UN "Saving Lives Together" framework or preparation of security management plan.

Additionally, the following security mitigation measures, should be adopted in the security management plan: "(a) establishing a clear mechanism to identify security threats to the project and to communicate changes in threat levels to the various parties involved in project implementation; (b) establishing communication and facilitation arrangements that enlist the support of all relevant political and community actors at the national, governorate, and

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local levels to promote safe and politically neutral implementation of the project; and (c) suspending project activities in areas where political and governance risks cannot be effectively managed. Additionally, mitigation measures include the establishment of clear implementation arrangements which emphasize the independence of decision making by any political and/or public-sector entity."

The project will prepare a project environmental and social management framework (ESMF). The ESMF will document the above risks assessment, their mitigation approach, specific interventions already included in the project design, and requirements and guidance to develop specific actions at district and school level. The ESMF will also describe the steps involved in screening, assessing and mitigating potential negative environmental and social impacts of the project's investments and will recommend procedures, arrangements and measures to:

- Enhance positive and sustainable environmental and social outcomes associated with Project implementation;
- Support the integration of environmental and social aspects associated with the numerous sub-projects into the decision making process;
- Minimize environmental degradation as a result of either individual subprojects or their cumulative effects;
- Support and assist with the achievement of compliance with applicable laws and regulations and with relevant World Bank standards on environment and social development issues.

The scope of the ESMF will cover all project component. The CERC in the ESMF will be based on an indicative list of activities related to the likely emergencies that led to the CERC's inclusion in the project. This section will describe the potential emergencies and the types of activities likely to be financed and evaluates the potential risks and mitigation measures associated with them. The ESMF will also indicate which kinds of emergency response actions can proceed with no additional environmental or social assessment, and which activities would require assessment - and at what level- prior to being initiated.

Furthermore, the ESMF will cover social risk assessment, gender mainstreaming, GBV/SEA/SH action plan, vulnerability analysis and considerations, labor management procedures, information disclosure, OHS, security risk, monitoring and evaluation, training and capacity building in environmental and social risk management. The project will follow the ESMF and prepare site-specific ESMPs during project implementation. The preliminary SEP has been prepared prior to project appraisal. Given the urgency of the situation, the preparation of this project is being processed according to the provisions of paragraph 12 of Section III of the Bank Policy: Investment Project Financing (Projects in Situations of Urgent Need of Assistance or Capacity Constraints), for a situation where the country is in urgent need of assistance because of a natural or man-made disaster. To facilitate an accelerated timetable to deliver support to Yemen through the proposed project, the preparation of the Environmental and Social Management Framework (ESMF), LMP and final SEP is deferred until after World Bank Board approval, within one month of project effectiveness.

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

The Project will establish a structured approach to engage with stakeholders that is based upon meaningful consultation and disclosure of appropriate information, considering the specific challenges associated with the Restoring Education and Learning. Given the urgent nature of the project and the impact of COVID-19 restrictions and ongoing discussions on the Project's design, including its final targeting strategy, consultations have been limited to

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coordination meetings between the three implementing partners and the World Bank. The Preliminary Stakeholder Engagement Plan will be updated within one month after the Effective Date and shall be implemented throughout project implementation.

UNICEF: is currently the Co-lead for the Education cluster in Yemen, along with SCI, and is in constant contact with key stakeholders at national, governorate, district and local levels. More specifically, the following stakeholders provided UNICEF with feedback regarding needs and priorities in the education sector: (i) Government Counterparts (MoE in Aden, Education authorities in Sana'a), (ii) Development Partner Working Group (WG) members/Local Education WG members; (iii) Education cluster members, including UN Sister Agencies such as WFP; iv) International and national NGOs (INGOS) represented in the country, including SCI; (v) Water, Sanitation, and Hygiene (WASH), Health and Nutrition actors, both at the National and Regional levels.

WFP: is utilizing the WB fund to support the continually implemented School Feeding Program (SFP) where a detailed engagement process was conducted in 2018 with the relevant stakeholders in the line ministries of the IRG and the De-Facto Authorities of North Yemen also unofficially consulted. Additionally, consultation with UN Sister Organizations including FAO, UNICEF, UNWOMEN, IFAD, IOM, UNDP were carried out and INGOs.

SCI: Save the Children International (SCI) engages regularly with key education stakeholders in Yemen through various channels, platforms and coordination mechanisms, as well as bilaterally, including with national authorities (IRG and the De-Facto Authorities of North Yemen), UN agencies, other INGOs, national civil society, communities, and beneficiaries.

Along with UNICEF, SCI is the Co-lead of the Education Cluster in Yemen, which meets on a monthly basis, either face-to-face or virtually. SCI is also the co-coordinator of the Local Education Group and the Development Partners Group (LEG/DPG) with UNESCO, to ensure greater coordination across the humanitarian-development nexus.

Due to the COVID-19 crisis, the implementing agencies should adopt careful approach for conducting consultations. The Bank has developed technical note and suggested alternative ways for conducting consultations including focus group meetings, online platforms, and TV, radio and dedicated phone-lines. WHO has issued guidelines and advisory on stakeholder engagement and public consultations in the current COVID-19 situation. The project will also follow these guidelines in implementing the project.

As the project was prepared under para 12, a preliminary SEP has been prepared, consulted and disclosed prior project appraisal. This preliminary SEP has identified and analyzed the key stakeholders and proposed the preliminary timing and methods of engagement with stakeholders.. Stakeholders of the project include: i) project beneficiaries positively impacted, like teachers (males and females), students, principals and administrative staff, students' parents; ii) direct project workers including the implementing agencies staff, education sector staff working on project, PWP staff, iii) local interested parties, like relevant government officials at governorate and district levels, local political groups, NGO, CSOs; and iv) contracted workers, consultants, national, and local media, Social Media activists, NGOs, and the public at large. Additionally, the GM will be deeply introduced during consultations and the contact information will be disseminated and disclosed with the revised SEP that is expected to be available no later than one months after project effectiveness.

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It should be mentioned that the three implementing agencies have well-established independent Grievance Mechanisms in place, that are based on common principles, have similar processes and policies for receiving and handling complaints and feedback, as well as for data protection; and include inter-agency referral mechanisms. They are designed to be accessible, collaborative, expeditious, and effective in resolving concerns, and each incorporates multiple, relevant entry points/channels for inputs to be submitted. If a grievance is received by an agency that relates to another implementing agency, the details of the complainant and the nature of the grievance will be forwarded to the concerned agency, with the complainant's permission. In addition, the agency that received the original grievance also gives the contact details of the concerned organization to the complainant.

#### **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

ESS2 is relevant. The project implementation will involve direct workers, contracted workers, and supply workers. The direct workers will include staffs of the 3 implementing agencies and possibly staffs assigned to work full time on the the project from the education sector. The Contracted workers will include staffs at the governorate and district levels working on the project, construction workers engaged by UNICEF/PWP, consultants staffs, contracted rural female teachers, contractor for School Kitchen Program engaged by WFP as well as community mobilizers. The project may consider civil servants such as government officials, formal teachers and principals. The primary supply workers will include food providers for schools feeding. It is difficult to estimate the scale of workforce of various implementing teams and partners at this stage before they are engaged and mobilized. These details can be provided when updating the SEP and LMP later.

Labor related issues could include child labor, discrimination, working conditions, and risks associated with SEA/SH. Additional risks include the potential of COVID-19 transmission for workers. These risks could be mitigated by adopting social distancing, use masks, hand sanitizers and hygiene.

A grievance mechanism (GM) will be provided for project workers to raise work related concerns where workers will be informed of GM at the time of recruitment. A labor management procedure will be developed and will be included in the ESMF one month after effectiveness. All three Implementing agencies will comply with Section 2 of the General Environmental Health and Safety Guidelines (EHSGs) on Occupational and Health Safety and also section D of ESS2 and will apply to all project workers including civil servants workers. In accordance with ESS2, children under the age of 18 will not be allowed to work on the project. The use of forced labor or conscripted labor on the project is also prohibited.

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

ESS3 is relevant. Activities related to the rehabilitation of WASH facilities in schools might result in generating solid waste and increase of water use. To mitigate such risks, adequate measures will be identified as part of the site-specific instruments, including the provisions for environmental and social risk mitigations in the bidding documents

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for contractors, for example, to ensure proper water management and appropriate disposal of wastes associated with rehabilitation works.

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

The implementing agencies will avoid and mitigate any potential adverse impacts on the health and safety of students and teachers, mainly during the rehabilitation of WASH facilities in schools. Social risks associated with corruption, elite capture and conflict for accessing project benefit will be mitigate by an open, transparent, and inclusive stakeholder holder engagement and by a robust grievance mechanism, as outlined in the Stakeholder Engagement Plan.

An initial GBV risk screening was conducted by the team against the proposed activities under the project. Students, female teachers, female project workers, including staff of the ministries, implementing agencies could face GBV/SEA risks, including sexual harassment. The risk is particularly high, given the conflict environment, the urgent need for education services and materials benefits to be delivered under the project, as well as the weak governance conditions. The project will carry out an in-depth and comprehensive GBV/SEAH risk assessment and develop a project a GBV action plan. Both assessments and action plans will be included in the project ESMF.

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

ESS5 is not relevant. The type of activities under this project will not involve construction that will require land acquisition causing physical or economic displacement.

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

ESS6 relevance will be assessed during the project implementation. So far, no construction activities are expected under this project that could affect modified habitat, natural habitat and critical habitats (protected areas, flora or fauna). It is not anticipated that the Borrower will purchase natural resource commodities that are known to originate from areas where there is a risk of significant conversion or significant degradation of natural or critical habitats. The ESMF will propose relevant procedures that will prevent any adverse impacts to the natural habitat and critical habitats.

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

ESS7 is not relevant. The project will not have impact on indigenous people as defined in ESS7.

#### **ESS8 Cultural Heritage**

Ess8 is not relevant. It is not anticipated that the proposed project activities will cause any adverse impact on cultural heritage. However, the ESMF will propose measures to be taken in case of "chance finds" mainly during the WASH activities.

#### **ESS9 Financial Intermediaries**

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ESS9 is not relevant. There are no financial intermediaries involved in the project.

#### C. Legal Operational Policies that Apply

**OP 7.50 Projects on International Waterways** 

No

**OP 7.60 Projects in Disputed Areas** 

No

B.3. Reliance on Borrower's policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework?

No

Areas where "Use of Borrower Framework" is being considered:

N/A

#### **IV. CONTACT POINTS**

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Implementing Agency(ies)

#### V. FOR MORE INFORMATION CONTACT

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## **VI. APPROVAL**

Task Team Leader(s): Almedina Music, Samira Halabi

Practice Manager (ENR/Social) Pia Peeters Cleared on 03-Dec-2020 at 08:07:45 GMT-05:00

Safeguards Advisor ESSA Gael Gregoire (SAESSA) Concurred on 03-Dec-2020 at 19:46:3 GMT-05:00

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