



Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

Appraisal Stage | Date Prepared/Updated: 03-May-2017 | Report No: PIDISDSA22036



BASIC INFORMATION

A. Basic Project Data

Country	Project ID	Project Name	Parent Project ID (if any)
Maldives	P160739	Maldives Clean Environment Project	
Region	Estimated Appraisal Date	Estimated Board Date	Practice Area (Lead)
SOUTH ASIA	16-Apr-2017	29-Jun-2017	Environment & Natural Resources
Financing Instrument	Borrower(s)	Implementing Agency	
Investment Project Financing	Ministry of Finance and Treasury	Ministry of Environment and Energy, MEE	

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Proposed Development Objective(s)

The Project Development Objective is to improve solid waste management in selected zones.

Components

Component 1: National Solid Waste Management Strategy and Policy

Component 2: Regional Waste Management Systems

Component 3: Island Waste Management Systems

Component 4: Project Management

Component 5: Contingent Emergency Response Component

Financing (in USD Million)

Financing Source	Amount
IDA Grant	17.50



Total Project Cost

17.50

Environmental Assessment Category

A - Full Assessment

Have the Safeguards oversight and clearance functions been transferred to the Practice Manager? (Will not be disclosed)

No

Decision

The review did authorize the preparation to continue

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Other Decision (as needed)

N/A

B. Introduction and Context

Country Context

1. **The Republic of Maldives comprises 26 atolls of 1,192 small coral islands; the 188 inhabited islands are home to 338,000 people.** Despite its uniquely challenging geography, remote location, and widely dispersed small population, Maldives has become an upper-middle-income country by building on its extraordinary natural assets to promote growth and socio-economic development. The country has benefited from rich marine fisheries and from high-end tourism that generates sizeable rents, which have been redistributed to the population to address development challenges.
2. **GDP per capita increased from US\$268 in 1980 to US\$8,356 in 2015, mainly driven by tourism and non-tradable activities related to tourism.** The most recent household survey data (2009/10) show that 5.6% of the population lives on less than US\$1.90 per day; 18.29% live below the poverty line of US\$3.10 a day. The incidence of poverty is similar to that of other upper-middle-income countries. Maldives provides near-universal access to basic electricity, clean water, and sanitation services. Its human development index ranking is second only to Sri Lanka among South Asian countries.



- 3. **Heading into the future, however, Maldives faces considerable economic, public management, and environmental challenges.** The development model is dominated by a volatile tourism industry, which is the biggest source of GDP growth but inherently vulnerable. The cost of delivering public services to a small, widely dispersed population is very high and creates significant fiscal challenges. Economic vulnerability is exacerbated by high transport costs, a small domestic market, and a shortage of local skilled labor. Despite cuts to electricity and food subsidies, public debt is already high, estimated at 69.5% of GDP in 2016. It is projected to increase and peak in the medium term, owing to the large-scale public infrastructure program currently underway. The program includes development of the international airport, construction of a bridge between the airport and Malé (the capital city), and a port relocation and development initiative that may boost growth in the longer term but will likely add to significant fiscal and external risks in the short term.
- 4. **Environmental management challenges are also increasing.** They include the impacts and risks arising from climate change, threats to corals reefs and fisheries, and the unresolved issue of how to manage increasing amounts of solid waste generated in the congested capital, in the tourist resorts that house well over 1 million guests yearly, and the inhabited outer atolls and islands.

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Sectoral and Institutional Context

- 5. **The generation and management of solid waste is one of the most pressing environmental challenges in Maldives.** An estimated 365,000 tons of solid waste are generated annually. Most recent estimates indicate that solid waste is generated at a rate of 1.8 kg per person per day in Malé, 0.8 kg per person per day on the other inhabited islands, and 3.5 kg per person per day in resort islands. In terms of total waste generation, the country’s resort islands and international airport generate waste at nearly six times the rate of the resident local population. Table 1 is an overview of waste composition in the Maldives.

Table 1: Composition of waste streams from various sources, Maldives

Category	Islands	Resorts
Food, garden/yard waste, paper	70%	80%
Recyclables: metals, plastic	3%	5%
Residuals: construction debris, organic and inorganic waste, hazardous substances, etc.	27%	15%
TOTAL	100%	100%

- 6. **Current practices for handling, transporting, and treating waste threaten the county’s prominence as a pristine marine environment and premium tourist destination.** Plastics are washing up on the otherwise uncontaminated beaches. Empirical evidence shows that years of dumping plastics and other waste in the sea are destroying the coral reefs that are vital to national fish stocks and livelihoods. The fisheries sector alone provides a livelihood for 26% of poor households and 11% of all employment nationally. The coral reefs also play a pivotal role in attracting tourism. Damaged reefs are less able to protect the atolls and islands from the impacts of climate change, particularly rising seas, which are an existential threat for Maldives. Dumping of waste into the open sea, and



open burning of waste across the archipelago, create significant public health risks; burning, for example, releases highly toxic gases and carcinogens into the environment.

7. **Most waste generated in the Malé region is mixed and untreated; it is transported daily by boat to Thilafushi, an island near Malé, and deposited on land where it is openly burned in an uncontrolled manner.** Other inhabited islands follow a similar practice of open burning and/or dump their waste into the sea. The resorts send their waste to Thilafushi or practice their own treatment, such as local incineration and composting. While resorts are required by law to have on-site incineration facilities, the majority do not operate their incinerators, with the exception of some resorts that handle waste responsibly, as part of a commitment to a clean environment and to being socially responsible enterprises. The large amount of waste generated by airport and bridge construction is also transported to Thilafushi. The intended volume reduction and pest control achieved by burning waste in Thilafushi is minimal due to the relatively low temperatures achieved and anaerobic conditions sustained by this practice.
8. **Inhabited islands without resorts rarely practice systematic waste management.** Regular waste collection from waste generators (households, businesses, and schools and other institutions) does not exist on most islands. Households and businesses generally use their own means to dump their waste into the ocean or leave it at uncontrolled dumpsites where it is burned periodically. The cost of transportation prohibits the shipment of waste to Thilafushi. Most waste generated on the islands consists of organic materials, but households generally do not practice composting because of the odor (worse in the hot climate) and rodent problems. Plastic water bottles are increasingly used by inhabitants who mistrust the quality of local water. Recycling and waste minimization efforts are often ad hoc, driven by individuals rather than systematic support from local councils or residents. At the same time, unsightly waste dumps and littering on beaches, including waste washed up by the sea, are a major liability for tourism development in the inhabited islands, where other economic activities have extremely limited potential.
9. **The government has responded to these challenges through policies and programs designed to address them in an integrated, sustainable way.** The President of Maldives has made solid waste management a top priority of his administration. The Ministry of Finance and Treasury (MoFT) consistently makes significant budget allocations to the Ministry of Environment and Energy (MEE), which is responsible for coordinating policy and managing and monitoring implementation of operational measures to address these issues. Except for designated cities where MEE has direct responsibility (including Malé, Addu, and Fuvahmulah), local Island Councils (ICs) are responsible and empowered to make decisions regarding waste management. The Waste Management Corporation (WAMCO), a recently revived public corporation owned by the government, is tasked with operating Regional Waste Management Centers (RWMCs) and was recently contracted to manage waste by the cities of Addu, Fuvahmulah, and Malé (including Thilafushi). The Environmental Protection Agency (EPA, a separate entity created by presidential decree) enforces provisions of the Waste Management Regulation 2014.
10. **The government has highlighted the importance and urgency of introducing a sustainable, integrated waste management system in the Greater Malé Region (Zone III)¹ to end uncontrolled pollution and opening burning at the Thilafushi dumpsite for all of the environmental, public**

¹ For the administration of solid waste, MEE divides the country into seven geographic zones, illustrated in the project map in Annex 5.



health, and socio-economic reasons described earlier. Given the complexity and scale of the problem at Thilafushi, cost estimates to successfully address Zone III range from US\$80 million to US\$120 million, which is beyond the capacity of the government and any one development partner to finance in Maldives. There is also a need for analyzing and building consensus on the technical and institutional approach for Thilafushi as well as on a financially viable operational model for the site. The government has committed to initiating pre-feasibility studies. The World Bank will engage closely in future consultations, but Thilafushi is not included in the scope of the proposed project because of the very early stage of deliberations.

11. **A key pillar of government policy is to establish RWMCs in designated zones across the archipelago.** These centers are to provide treatment and disposal services for the inorganic and non-compostable organic waste that individual Island Waste Management Centers (IWMCs) collect from communities in each zone. The role of the IWMCs is to compost suitable organic waste and store other waste in a segregated manner until shipment to the RWMC. MEE is working on several initiatives to roll out the RWMC and IWMC approach. The government introduced a Waste Management Regulation in early 2014 to: (a) implement measures to minimize impacts on human health; (b) formulate and implement waste management standards; (c) implement an integrated framework for sustainable waste management; (d) encourage waste minimization, reuse, and recycling; (e) implement the polluter-pays principle; and (f) introduce an approach of extended producer responsibility. As noted, EPA enforces this regulation.
12. **The government continuously evaluates its programs, policies, and regulations to make course corrections where necessary.** With respect to policy changes, MEE drafted a bill for consideration of the Majlis (the Maldives parliament), which if approved will result in a separate enactment covering management of all waste in the country. This draft is currently under advanced review within the Attorney General’s office, and is expected to be presented to the Majlis for deliberations in 2017. The government also launched its Saaffu Raje (“Clean Maldives”) initiative in 2015 and has started activities across all seven zones. The program has provided guidance to Island Councils to prepare Island Waste Management Plans (IWMPs) and get them approved.
13. **Even with some successes and a notable policy commitment, countrywide implementation of waste management policies and regulations will require major strides in overcoming institutional, financial, and logistical constraints.** Encouraging examples of success are found at Ukhulhas in North Ari Atoll, and emerging good practices in Zone II—supported by the Maldives Environmental Management Project (MEMP), financed by the International Development Association and closed in June 2016. Even so, much of the country still lacks integrated waste management facilities. Of the 117 IWMCs constructed since the 2004 tsunami, most function only partially, and some are defunct. Few treatment facilities for solid waste operate systematically, with the exception of a subset of resorts (mentioned earlier) that handle their waste responsibly. Island-level waste management requires frequent, efficient, and reliable waste collection from waste generators; sufficient and sustainable funding both for waste collection and IWMC operations; strict enforcement of the ban on open or ocean-dumping of waste, and regular transfer of inorganic waste to RWMCs. It also requires improvements in the capacity of Island Council staff to plan and implement waste management.
14. **It is expensive and logistically challenging to operate RWMCs, including transferring waste from the resort islands.** Experience from MEMP indicates that most Island Councils are barely able to raise funds to cover the costs of island operations, so subsidies, either from the government budget



or resort islands, will be needed to support the transfer of waste to RWMCs. Transportation costs can account for 30–50% of the operating costs, because large seaworthy vessels are required to transport waste safely from (often remote) islands across open seas to the waste management centers. A tariff system acceptable to the resort islands, coupled with a strict enforcement mechanism, is required to ensure proper disposal of all waste by transferring inorganic waste to RWMCs, composting organic waste, and incentivizing waste reduction.

15. **Overcoming these obstacles will require sustained planning over the medium to long term, with stronger emphasis on waste recycling and reduction.** Care must be taken not to design waste disposal facilities, such as incinerators, in a way that creates additional demand for waste. In addition, the remoteness of the islands and small volumes of recyclables, complemented by the inherent cyclical behavior of the global recyclables market, complicates this planning problem and requires creative solutions. The Maldives can learn from experiences around the world in this regard and may consider (for example), economic incentives for recycling and reuse, such as taxes on plastic bottles or plastic bags, or outright bans on such items. It may also consider exporting recyclables accumulated at RWMCs via the existing, mostly one-way ocean-trade links with India, a major buyer of recyclables. Efforts should be initiated to translate the principle of extended producer responsibility, enshrined in the Waste Management Regulation, into action, recognizing that success will require collaboration among multiple stakeholders, some with entrenched interests in the current system.
16. **It is difficult for the private sector to participate in these efforts in the short to medium term, given the minimal economies of scale and the perceived and real risks in the areas of public financing and management capacity.** Significantly more regulatory improvements are required, as well as institutional capacity building and infrastructure investments, before commercial participation with private capital can be considered. Some areas, such as those near Greater Malé, are inherently attractive to private capital because of the presence of resorts and the potential for higher income from larger resident populations. Yet recent failures with public-private partnerships in other sectors have reduced the opportunities to leverage private capital for such ventures. In the absence of private capital, public funding is needed to ensure that Maldivians have access to sustainable solid waste management services, and to protect the country's economic assets and the environment.
17. **A decade-long commitment has delivered progress in addressing solid waste management, provided valuable lessons, and raised awareness of this complex and continuing development issue.** The World Bank has engaged with the government over the past decade to address some of the most difficult solid waste management (SWM) challenges. This engagement has fully demonstrated the government's strong conviction that SWM is a critical developmental issue for the Maldives. Implementation of MEMP moved some positive policy and institutional developments forward, and helped Maldives implement new technical approaches such as the island and regional waste management centers. Even so, the limited institutional and human capacity in the sector, and the gap between the cost of providing SWM services and the government's willingness and ability to pay for them, pose serious risks to the operational and financial sustainability of the sector. Key elements of MEMP outputs have yet to become fully operational.
18. **Given the country's unique SWM challenges and the scale of the potential positive environmental, social, and economic impacts of successfully addressing those challenges, the World Bank plans to continue its support to the sector through the proposed project.** In light of lessons from past



engagements, the proposed project will support and strengthen the decision-making process that will identify technical solutions to be implemented under the proposed project. The decisions on technical solutions will be based on engineering, economic, financial, and institutional capacity criteria. Through this framework approach,² the project will enable the provision of targeted support, information, and analysis to the SWM institutions of the Maldives at each critical stage of decision making and project implementation. This flexibility in project design permits adjustments to the project’s interventions when warranted. Recognizing the lessons on the sector’s operational and financial sustainability, the proposed project will also conduct extensive analytical work to clarify the financial and economic drivers affecting the sustainability of SWM in the context of the Maldives, including the issues of affordability, cost recovery, and service standards.

19. **The World Bank recognizes the high risks to continued engagement in SWM in the Maldives, and to the achievement of the project objectives.** In brief, the country’s macroeconomic and fiscal situation may limit government’s financial contributions to the sector, which would in turn affect the sector’s financial and operational viability. The technical design of the project in the form of a framework approach provides flexibility, but it may increase the risk of delays or cost overruns. The limited institutional capacity and the involvement of various stakeholders with sometimes misaligned incentives may limit progress on reforms. These risks and the corresponding risk management measures are detailed in the Risk section of this document.

C. Proposed Development Objective(s)

Development Objective(s) (From PAD)

The Project Development Objective is to improve solid waste management in selected zones.

Key Results

20. **The PDO will be measured through five project-level indicators:** (i) RWMC operational under project (number); (ii) share of total waste in selected zones collected by the IWMCs (disaggregated by inorganic and organic waste) (%); (iii) share of the organic waste in selected zones treated in IWMCs (%); (iv) quantity and share of inorganic waste in selected zones stored and transported to RWMCs (mt/%); (v) share of target beneficiaries with rating “satisfied” or above with the application of the solid waste management approach (user fees, environmental benefits, reliability) (disaggregated by gender).

D. Project Description

21. **Based on lessons from implementing MEMP, the proposed project adopts a general framework approach, which is intended to provide flexibility in implementation in view of the complex**

² The framework approach is presented in detail in the Project Description (Section III).



challenges to be addressed, the complex implementation environment, and limited implementation capacity. While some project activities have already been identified during preparation (including technical assistance and capacity-building activities), the framework approach requires a feasibility assessment process, including Best Practice Environmental Options (BPEO) studies, detailed feasibility studies, and Environmental and Social Impact Assessments (ESIAs), which must be completed before considering any physical and operational investments to establish an integrated waste management system for the targeted Zones IV and V. At project mid-term, the results and recommendations of the feasibility study process will be reviewed to (a) make decisions on the specific investments, on their locations, and on technology choices and (b) allocate funds to finance those investments.³ The first mid-term review is expected to take place 18 months after Board approval. A second mid-term review would take place after 36 months to take stock of implementation and to make course corrections, as needed.

22. In addition, the proposed project will support investments to operationalize the RWMC introduced in Zone II under MEMP, which will include financing to optimize operations of the regional facility at Vandhoo and support household collection, transportation, and treatment of waste in the remaining islands in Zone II.
23. The project includes five components, summarized below. For a detailed project description, see *Annex 2*.

Component 1: National Solid Waste Management Strategy and Policy (US\$3.00 million)

24. This component aims to support the government's efforts to address current challenges to effective SWM in the country. It has three sub-components.
25. **Sub-Component 1.1—Solid Waste Management Strategy.** This sub-component will provide technical assistance for the analysis and implementation of strategic measures addressing current issues on solid waste management, including: (a) preparation of a National Solid Waste Management Strategy; (b) revision of the National Solid Waste Management Policy; (c) quantum and collection of user-fee and tariffs for the collection and treatment of wastes; (d) reduction at source of in select waste streams at source and recycling options therefor; (e) analysis of options to increase uptake of bulk water as an alternative to water in plastic bottles; (f) feasibility of a waste tracking system; (g) development of an extended producer responsibility strategy for the Maldives; (h) economic incentives for recycling and reuse of waste streams; and (i) designing and implementing a national and/or zone-specific information, education, and communication (IEC) campaigns to promote household waste segregation and minimization, and uptake of bulk water.
26. **Sub-Component 1.2—Feasibility Studies and Investment Preparation.** This sub-component will provide technical assistance for the carrying out of a best practical environmental option study and investment pre-feasibility and feasibility studies for determining the most suitable integrated solid waste management system for Zones IV and V, as well as: (a) the specialized environmental and social impact assessments and management plans therefor; and (b) facility/systems management plans.
27. **Sub-Component 1.3—Institutional Capacity Building.** This sub-component will: (a) build capacity of local institutions and individuals—including the Maldives National University (MNU), WAMCO, EPA,

³ The investments will be for goods, works and services.



and WMD—in the solid waste management sector; (b) support the organization of, and participation in, national and international solid waste management events to exchange knowledge experience and lessons learned; and (c) finance the operations and maintenance contracts of the Vandhoo Island’s regional waste management center.

Component 2: Regional Waste Management Systems (US\$7.50 million)

28. This component aims to fully operationalize the RWMC for Zone II established under MEMP, and to support the establishment and operation of SWM systems in Zones IV and V based on the feasibility studies conducted under Component 1.
29. **Sub-component 2.1—Regional Waste Management System in Zone II.** This subcomponent will provide equipment and build storage augmentation facilities and access roads for the operationalization of the RWMC set up in Vandhoo under MEMP. The equipment needs identified include a Jib crane to lift waste containers from vessels bringing waste to the island, a solid waste sorting line, and an excavator.
30. **Sub-component 2.2—Regional Waste Management System in Zone IV and V.** This sub-component will: (a) establish a new common final disposal facility for Zones IV and V, including ancillary facilities and related waste management services, pursuant to the studies carried out under Sub-Component 1.2; (b) partner WAMCO with an international contractor for the operation and maintenance of the established facilities; and (c) pilot public auctions of recyclables to scale up recyclable programs for key waste streams.

Component 3: Island Waste Management Systems (US\$5.00 million)

31. This component aims to support the government in developing and completing island-level facilities for managing the collection, segregation, on-site treatment, and storage of residual waste until final transfer to the common facility. The candidate zones to be included are Zones IV and V, in addition to residual activities in Zone II.
32. **Sub-component 3.1—Island Waste Management System in Zone II.** This sub-component will: (a) provide equipment and mobilization assistance to the Island Councils in Zone II required to improve the capacity utilization of the RWMC at Vandhoo Island, in Zone II, and (b) promote/pilot the use of bulk water dispensers to replace water bottles in Zone II. The study supported under Sub-component 1.1 will inform this effort to determine the feasibility of using such bulk water schemes more widely.
33. **Sub-component 3.2—Island Waste Management System in Zones IV and V.** This sub-component will prepare and implement IWMPs across the atolls in Zones IV and V. The support will include investments to operationalize one of the two or three possible models of integrated waste management systems, depending on population, waste generator profile, land availability, and other relevant parameters. To be eligible for funding, each Island Council will need to have an IWMP approved by the EPA, be subject to an Environmental Assessment and Social Assessment in line with the Environmental and Social Assessment and Management Framework (ESAMF), and have fixed a tariff from each generator of solid waste (whether it is a household or commercial/industrial establishment) to support implementation of the IWMP. Funding is expected to be sufficient to cover all potentially eligible islands in these two zones. This effort will be revisited and updated during mid-term reviews. Note that some islands in Zone V are already supported under the government’s Low Emission Carbon Resilient Development (LECReD) program, funded by the



Government of Denmark and implemented by the United Nations Development Programme to assist Laamu Atoll and its islands by mainstreaming LECReD into local development planning and service delivery. *Detailed selection criteria are provided in Annex 2.*

Component 4: Project Management (US\$2.00 million)

34. This component will strengthen MEE's institutional capacity for project implementation through the establishment and maintenance of a Project Management Unit (PMU) to manage, implement, monitor, and evaluate project activities, including: (a) carrying out financial management and procurement activities; (b) establishing and operating adequate fiduciary and social and environmental management systems, as well as a grievance redress mechanism; and (c) carrying out the project's outreach and communications campaigns, as well as managing the grievance redress system. It will cover staff costs and operational expenses for a communication specialist, monitoring and evaluation (M&E) specialist, and civil engineer. Support staff (such as project coordinators, an assistant procurement officer, and assistant financial management officer) will be drafted into the PMU as needed.

Component 5: Contingency Emergency Response (US\$ 0 million)

35. This component will provide immediate response to an eligible crisis or emergency, as needed. Following an eligible crisis or emergency, the government may request the World Bank to reallocate project funds to support response and reconstruction. To trigger this component, the Government of the Maldives would need to declare an emergency or provide a statement of fact justifying the request for the activation of the use of emergency funding. This component would draw from the uncommitted Grant resources under the project from other project components to cover an emergency response.

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E. Implementation

Institutional and Implementation Arrangements

36. **Project institutional and implementation arrangements include** a Project Board as the main oversight body; a PMU within MEE, with overall responsibility for project implementation; and the Island Councils and WAMCO, with responsibility for operating the IWMCs and RWMC, respectively.
37. **A Project Board under the Chairpersonship of the Minister, Environment and Energy, will be established to provide oversight.** The Board will have participation from other relevant government entities, including MoFT, the Ministry of Tourism, the Local Government Authority, and EPA, to mobilize sufficient high-level coordination to ensure timely decision making and avoid/minimize implementation delays. The Director General of WMD will serve as ex-officio Secretary to the Board, with the PMU acting as the Secretariat.
38. **A dedicated PMU with requisite staffing has been created under the leadership of the Director General of WMD to undertake day-to-day implementation activities under the project.** The PMU will support the Island Councils in the preparation and implementation of IWMPs with help from the Atoll Councils. It will also interact with other ministries—with Fisheries and Agriculture, for identifying suitable uninhabited islands; with Housing, for identifying sites for IWMCs where



needed; and with MoFT and Tourism, for ensuring that resorts give preference to use of the regional center within Zones IV and V. The PMU will also coordinate with EPA to ensure that funding for the islands conforms to the regulatory requirements.

39. **Early in project preparation, the government decided not to use the existing MEMP PMU.** The government weighed this decision carefully, given its strategic objective to limit the number of PMUs operating in the country to an absolute minimum, balanced with the need to ensure adequate capacity to implement the proposed project. The Bank and the government worked closely to ensure that the new PMU arrangements for the proposed project align as closely as possible with the government's objective by bringing the new PMU under WMD in MEE, ensuring that PMU staff contracts and functions comply with civil service rules, and ensuring that decision making by the PMU is limited to project activities and commitments only, and does not run counter to the government's own broader decision-making authority.
40. **The PMU staff will comprise all required technical and managerial staff, including the project manager/coordinator and technical specialists to provide input on financial management, procurement, and safeguards.** A technical advisor/specialist with SWM experience in similar conditions will also be mobilized. Other expertise to be employed by the PMU includes a communication specialist and an M&E specialist. The Director General, WMD, will be the ex-officio project director of the PMU and the key counterpart for the Bank. The PMU will be set up in the WMD in MEE and be responsible for the day-to-day project oversight functions. It will carry out project M&E as an integral part of project management.
41. **Apart from the investments identified to optimize operation of the Zone II RWMC constructed under MEMP, the proposed project follows a framework approach to implementation, as the final locations of the other waste management facilities to be financed will not be decided by appraisal.** Because the locations are not yet known, clear criteria have been established for them. WMD has also prepared guidelines for the development of IWMPs and shared them with the Island Councils to ensure streamlined treatment of each aspect of waste management. The process for identifying the location of the new RWMC will be guided by the BPEO study (see below). While the PMU will be responsible for the implementation of all project activities (including those for other stakeholders like the EPA), the Island Councils and WAMCO will operate IWMCs and the RWMC, respectively. To guide project implementation, a Project Operations Manual (POM)⁴ has been prepared by the PMU.

⁴ In addition to detailing project implementation, fiduciary, and safeguard requirements and procedures, the POM includes the terms of reference (ToRs) for the feasibility studies, guidance on preparation of IWMPs, and criteria for readiness of IWMCs, among other information.



F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)

Maldives is an island nation in the Indian Ocean oriented north-south off India's Lakshadweep Islands. The Maldives consists of 1,192 coral islands grouped in a double chain of 26 atolls. The country's atolls encompass a territory spread over roughly 90,000 km², making it one of the world's most geographically dispersed countries. Over 200 of its 1,192 islands are habituated by the country's population, with an average of 5-10 islands in each atoll being inhabited islands that have infrastructure such as housing, roads and other facilities built in.. A significant number of uninhabited islands in each atoll have also been converted to resorts and tourism facilities as well as house infrastructure such as industrial facilities and airports.

The atolls are composed of live coral reefs and sand bars, situated atop a submerged ridge 960 km long that rises abruptly from the depths of the Indian Ocean. Maldives is noted as the country placed at the lowest elevation in the world, with maximum and average natural ground levels of only 2.4 m and 1.5 m above sea level, respectively. More than 80 per cent of the country's land is composed of coral islands which rise less than one meter above sea level. The islands consist of coral, sea grass, seaweed, mangrove and sand dune ecosystems which are of great ecological and socio-economic significance. Maldives is home to a number ecologically sensitive marine habitats in shallow and intertidal zones which have been designated as protected areas by the Ministry of Environment and Energy (MEE) and these regions and any activities in their vicinity are stringently monitored and managed.

The project focuses on three regions in the Maldives. The Southern region or Zone IV and Zone V, which includes the Atolls of Dhaalu, Faafu, Meemu, Laamu and Thaa and the formal MEMP Project area, Zone II in the North Central Region, which included the Atolls of Raa, Baa, Noon and Lhaviyani. Island level waste management activities will be conducted in inhabited Islands in the project Atolls. The generic topographic, ecological and climatic conditions across the atolls and regions do not vary on great scale.

The project is expected to bring overall positive environmental benefits through ensuring a sound system for solid waste management. While the project activities themselves will facilitate in curtailing the major impacts associated with improper management of solid waste, there still remains the risk associated with the operation of solid waste management facilities and final disposal of solid waste that need to be managed accordingly. In addition, there is also the uncertainty regarding the exact locations of activities to be carried out under the project and project interventions that will involve physical alterations to the environment, such as those that fall within the activities of Components 2 and 3. Detailed feasibility studies and options analyses will determine the nature of the investments.

Potentially the most serious impacts are likely to occur in the construction and operation of the RWMC under Sub-Component 2.1. Based on past experience in the Maldives, it is not possible to build an RWMC on an inhabited islands due to high population densities, coupled with community opposition. The only available alternative is to construct the RWMC on uninhabited islands or in islands with compatible land use such as industrial islands. The nature, magnitude and scale of potential environmental impacts of the regional solid waste management component under Sub-Component 2.1 will only be known once the feasibility studies have been conducted under Sub-Component 1.2 and the technology for final disposal and site are known post the Best Practicable Environmental Option Study (BPEOS) that will be conducted prior to the feasibility study and is built into the project design.

The key impacts that can be envisioned at this stage will be the need for land for the establishment of the RWMC. In the context of the limited land availability due to the geographic setting of the Maldives it is unlikely that there will be uninhabited islands with adequate land area to construct a regional solid waste landfill for waste disposal for a

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20+year period. Reclamation of a shallow lagoons surrounding islands is an option widely used for expanding the land area of islands. Considering the fragile ecosystems in the Maldives, this could result in loss of some areas of coral reef, with potentially irreversible impacts of the marine ecosystem. Considering the environmental damage and the cost incurred for reclamation, the project will not support this option. In order to minimize the adverse impacts on the coral reef system in an uninhabited island, site selection is critical and will be addressed in the BPEO study. Priority will be given to the condition of the reef surrounding the island. Every attempt would be made to select a degraded reef ecosystem, preferably beyond rehabilitation, where the impacts of excavation for a navigation channel for accessing the island, if needed, will be less significant.

By reducing the volume of waste that is currently dumped in the ocean, the project will have long term beneficial environmental impacts. There is potential for adverse impacts on the environment during the construction and operation of the Island’s Waste Management Centers such as those highlighted below but these can easily be managed. Any adverse impacts that may arise from these activities will be identified and addressed through the EA process.

Typical impacts of IWMC establishment and operations will depend on the types of final disposal of organic waste which will be proposed in the feasibility studies. Initial technical assessments indicate that the technical methodologies such as passive composting, windrow composting, in-vessel composting or small scale anaerobic digesters will pose moderate risks and manageable impacts.

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G. Environmental and Social Safeguards Specialists on the Team

Susrutha Pradeep Goonesekera, Mokshana Nerandika Wijeyeratne

SAFEGUARD POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	The project is categorized as an Environmental Category A. The categorization is predominantly due to project activities including the construction of new/upgrading of SWM facilities, addressing management of existing disposal sites and onsite treatment, management and the final disposal of solid waste in proposed facilities, including final disposal facilities for more that 10tons/day of residual solid waste at an the RWMC, under Components 2, that would have significant environmental implications.



While the overall project is environmentally beneficial, physical interventions to establish a sound SWM system will lead to significant environmental impacts and need to be stringently mitigated and managed within the context of the project.

Component 3 will include the establishment of IWMCs and/or upgrading of existing IWMCs that will undertake intermediate treatment of SWM at the Island level. Component 2 will involve the establishment of a RWMC in the Zone IV and V Region. The locations for the new RWMC facilities will be identified during project implementation as part of the Best Practicable Environmental Options Study (BPEOS). An Environmental and Social Assessment Management Framework (ESAMF) has been prepared by GoM which will serve as a roadmap outlining the prerequisite environmental and social screening and assessments that will need to be undertaken for all project activities, as per the national environmental legislations of the Maldives and the Bank's Operational Policies on Environmental Assessment (OP4.01) and other triggered safeguards policies.

Due diligence measures focusing on the RWMC will include a standalone Environmental and Social Assessment (ESIA) for the proposed site and technologies, as per a detailed ToR which has been presented in the ESAMF. The ESIA will be conducted once the location and design for the facility have been finalized via the feasibility studies and BPEO study which are inbuilt in to the project design.

In addition, the ESAMF also outlines a framework for due diligence measures to be taken at all steps of project implementation, including a stringent procedure for environmental management and monitoring of the IWMCs and RWMC at the operational phase. Operations are required to be in line with both national guidelines as well as the World Bank General and Solid Waste Management Sectoral Environmental and Health Guidelines which have been stipulated in the ESAMF.



Sites for the establishment of IWMCs will be selected post the island level preparation of IWMPs and respective feasibility studies, which will stipulate the appropriate technology and exact location and design of the IWMCs. These will then proceed with environmental screening and the preparation of either an ESIA or ESMP as per the screening criteria.

Under Sub-component 2.1, activities in the Zone II would include provision of equipment, augmentation of storage facilities, and access roads on the site at the RWMC. A site specific full Environmental and Social Assessment has already been completed for the RWMC facility and has been cleared by IDA. This Environmental and Social Impact Assessment (ESIA) and Environment and Social Management Plan (ESMP) for the RWMC will be still valid as it takes in to account all these provisions.

For the IWMCs in the MEMP region Environmental and Social Assessments have already been completed taking to account the IWMPs. Over the project period of the original project the key environmental impacts have been mitigated and well-managed, thus the same safeguard instruments, which include ESMPs for each respective IWMC. These will also remain valid as the project will only be providing vehicles and equipment, which were included in the original design.

The ESAMF has been consulted, cleared and disclosed to the public as per the National Environmental Act of the Maldives and World Bank Safeguard policies.

Natural Habitats OP/BP 4.04

Yes

This policy is triggered because all of the country's islands are surrounded by coral reefs which are significant natural habitats. The overall project will not conduct any activities within designated protected areas and project interventions will facilitate in mitigating pollution and degradation of such ecosystems due to inappropriate SWM. Adequate measure to screen, identify and mitigate



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		any potential impacts to coral reefs, island vegetation and associated fauna and flora have been included in the ESAMF.
Forests OP/BP 4.36	No	There are no areas classified as forests in Maldives. Any potential impacts on island vegetation are covered through OP/BP 4.04.
Pest Management OP 4.09	No	In Health care services and the Island Councils in inhabited islands take stringent measures such as spraying of waste accumulated areas in the Islands with public health pesticides as a part of routine control against mosquitoes for dengue control programs implemented by the relevant governmental authorities as per WHO standards. The ESAMF includes reference to monitoring and mitigating any vector outbreaks using the national processes. The project will not finance the purchasing of any pesticides, herbicides or other chemical poisons. Thus, the policy is not triggered.
Physical Cultural Resources OP/BP 4.11	No	No project-supported activities are expected in the vicinity of or will affect physical cultural resources, as defined by OP/BP4.11. However, the project environmental screening format does include screening for PCRs specifically and chance find procedures have been included as part of mitigation measures defined in the ESMF and OP/BP 4.01.
Indigenous Peoples OP/BP 4.10	No	There are no identifiable indigenous communities in the Maldives.
Involuntary Resettlement OP/BP 4.12	Yes	The interventions leading to the construction and expansion of IWMCs could lead to future involuntary loss of crop and/or land taking as a small percentage of the communities rely on surrounding land for agriculture and livelihood. As a result, a resettlement policy framework (RPF) has been prepared as part of the ESAMF in line with the Bank's policy on Involuntary Resettlement. Waste picking and waste scavenging have not been currently identified within the project area as it not culturally practiced in the Maldives.
Safety of Dams OP/BP 4.37	No	This policy is not triggered as there will be no activities that invest on dams or water retention structures. The project does not depend on any



existing dams or water retaining structures.

Projects on International Waterways OP/BP 7.50 No

The proposed project activities do not have any impacts on international waterways and therefore this policy is not triggered

Projects in Disputed Areas OP/BP 7.60 No

There are no disputed areas in the Maldives therefore this policy is not triggered.

KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

The project is expected to bring overall positive environmental benefits to the project areas through ensuring a sound system for solid waste management is established in the project regions. While the project activities themselves will facilitate in curtailing the major impacts associated with improper management of solid waste there still remain the risks associated with the operation of solid waste management facilities and final disposal of solid waste that need to be managed accordingly. In addition there is also the uncertainty regarding the exact locations of activities to be carried out under the project and project interventions that will involve physical alterations to the environment, such as those that fall within the activities of Components 2 and 3 which will be fueled by feasibility studies that will determine the nature of the investments.

Component Specific Environmental Impacts

Component-1

This component aims to support the government’s efforts to address current challenges to effective SWM in the country, via providing technical assistance and studies to support the countries Solid Waste Management Strategy, will provide technical assistance and will fund detailed feasibility analyses and studies for the development of tailored integrated waste management systems in Zones IV and V and focus on institutional capacity building on SWM.

Component 1 will thus not involve any physical interventions and will bring about strong positive environmental impacts in the long term, by strengthening the implementation of national level sound waste management activities via policy directives, awareness and education which will help promote sound solid waste management throughout the country. It will also build local technical capacity within the sector which will help maintain the sustainability of sound waste management in the country.

Component-2

Sub-Component 2.1 will support Activities in the Zone II which will include the following investment activities in Zone II for operationalization of the facilities created under MEMP at the RWMC in Vandhoo. Site specific full Environmental and Social Assessments have already been completed for the RWMC facility and Vandhoo and has been cleared by IDA. Over the project period of the original project the key environmental impacts have been mitigated and well-managed, thus the same safeguard instruments, which include the Environmental and Social Impact Assessment (ESIA) and

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Environment and Social Management Plan (ESMP) for the RWMC will be valid for the continuity of these projects. All environmental and social impacts identified during the implementation of MEMP have been well implemented and operational phase impacts are continuously monitored to ensure good compliance at the RWMC and at Island level.

In terms of operational aspects, an Operation Manual for operating the RWMC is in place and staff training on sound management of the incinerator and operation of the system in a manner that will manage environmental impacts has also been conducted. The Installation of emission controls/monitoring system to monitor compliance with standards as per the ESMP of the RWMC has been completed as well. The RWMC will maintain air emission standards as per the EU standards which have been set in the National Waste Incineration Guidelines. Routine monitoring of the ESMP is conducted by the relevant agencies of the Ministry of Environment and Energy.

Potentially the most serious impacts are likely to occur in the construction and operation of the RWMC under Sub-Component 2.2. Based on past experience in the Maldives, it is not possible to build an RWMC on an inhabited islands due to high population densities, coupled with community opposition. The only available alternative is to construct the RWMC on uninhabited islands or in islands with compatible land use such as Industrial Island. The nature, magnitude and scale of potential environmental impacts of the regional solid waste management component under Sub-Component 2.2 will only be known once the feasibility studies have been conducted under Sub-Component 1.2 and the technology for final disposal and site are known post the Best Practicable Environmental Option Study (BPEOS) that will be conducted prior to the feasibility study and is inbuilt in to the project design.

The key impacts that can be envisioned at this stage will be the need for land for the establishment of the RWMC. In the context of the limited land availability due to the geographic setting of the Maldives it is unlikely that there will be uninhabited islands with adequate land area to construct a regional solid waste landfill for waste disposal for a 20+year period. Reclamation of a shallow lagoons surrounding islands is an option widely used for expanding the land area of islands. Considering the fragile ecosystems in the Maldives, this could result in loss of some areas of coral reef, with potentially irreversible impacts of the marine ecosystem. Considering the environmental damage and the cost incurred for reclamation, the project will not support this option. In order to minimize the adverse impacts on the coral reef system in an uninhabited island, site selection is critical and will be addressed in the BPEO study. Priority should be given to the condition of the reef surrounding the island. Every attempt would be made to select a degraded reef ecosystem, preferably beyond rehabilitation, where the impacts of excavation for a navigation channel for accessing the island, if needed, will be less significant.

Component-3

All parts of this component will support the development and completion of island level facilities for managing collection, segregation, on-site treatment of waste and storage of residual waste, until its eventual transfer to the RWMC. The candidate zones for the project are currently IV and V.

This component will fund the preparation, feasibility and implementation of Island Waste Management Plans and the establishment of Island Waste Management Centers (IWMCs) on inhabited islands. It is unlikely to cause any irreversible environmental impacts, they will be subject to screening criteria in order to determine their reference to the EA processes. Environmental impacts arising from the construction and operation at IWMC's are not likely to be significant. Approximately 130 IWMC's have been constructed across the Maldives under previous projects and none have progressed beyond an ESMP in terms of environmental assessment requirements. This is predominantly as the



facilities often deal with less than 10 tons of waste per day.

By reducing the volume of waste that is currently dumped in the ocean component 3 will have long term beneficial environmental impacts. There is potential for impacts on the environment during the construction and operation of IWMC's such as those highlighted below but these can easily be managed. Any adverse impacts that may arise from these activities will be identified and addressed through the EA process.

Typical impacts of IWMC establishment and operations will depend on the types of final disposal of organic waste which will be proposed in the feasibility studies. Initial technical assessments indicate that the following forms technical methodologies such as passive composting, windrow composting, in-vessel composting or small scale anaerobic digesters will mostly leader to construction phase impacts and operational impacts such as emissions to air, leachate, odors, minor risk of fire and pose moderate risks. With prior experience in the Maldives, it can be deduced that impacts from IWMCs are minimal and can be managed in a sound manner.

Overall Social Impacts

The project does not envisage any significant adverse social impacts. However, the interventions leading to the construction and expansion of IWMCs could lead to future cases of involuntary loss of crop, land taking as a small percentage of communities rely on surrounding land for agriculture and livelihood. As a result, a resettlement policy framework (RPF) has been prepared as part of the ESAMF in line with the Bank's OP4.12 on Involuntary Resettlement. Potential positive impacts during construction phase include increased employment opportunity in the construction sector. While the construction of IWMCs are likely to be sourced locally, the construction of the RWMC - requiring skilled labor - may involve the use of expatriate/migrant/non-local labor but no influx is expected as the works are small and phased. It is also likely that the construction of the RWMC will be in an uninhabited island where there is no host community. Positive socio-economic impacts can also be expected during operational phase including creation of new employment opportunities in relation to operation of the RWMC, IWMC and waste transport vessels.

The investments under Component 2 and 3, will be preceded by a Best Practice Environmental Options (BPEO) study embedded in the Feasibility Study (FS). This will assist the Atoll and the Island Councils, as well as its communities, in identifying the scope of the current issues related to SWM and identify potential options of addressing the issues that will be environmentally and socially beneficial to the communities and the best option taking the environment in to key consideration.

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

The social and environmental impacts of the proposed project is deemed to be positive and sustainable in the long term. The project is also expected to improve the overall socio-economic status of the communities, including women, as a result of the potential opportunities vis a vis the recyclables.

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

Several alternatives will be considered under the BPEO / FS for the selection of the regional waste management option and selection of the final disposal method and location of the RWMC would be based on a detailed analysis guided by the ESAMF and the BPEO study. The feasibility studies for individual Island Waste Management Centers will also consider alternative means of island level treatment for organic waste to deduce the best alternative to treat municipal solid waste at the island level that will have the best suitability and minimal impacts.



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

An Environmental and Social Assessment and Management Framework (ESAMF) in lieu of an overall project-specific Environmental Assessment (EA) and Social Assessment (SA) has been prepared as details of specific sites and design of the IWMCs, RWMC and other project physical interventions in the project Zones are not known. These will be deduced post technical and financial feasibility studies which will be conducted in the case of IWMCs for each respective Island and in the case of the RWMC for the technology and location selected via a Best Practicable Environmental Option (BPEO) study. The ESAMF primarily includes an assessment of generic impacts that are typically associated with anticipated interventions, under the project, which are similar to the World Bank funded MEMP project which closed in early 2016. It provides guidance on the management of environmental and social safeguards in line with project interventions to ensure stringent due diligence and has been informed by the lessons learned during the implementation of safeguards within the context of the MEMP Project. The ESAMF outlines detailed guidelines of measures for environmental and social risk mitigation and institutional arrangements for conducting environmental and social assessment, instruction to the preparation of Environmental and Social Assessments (ESIAs), Environmental and Social Management Plans (ESMPs), the BPEO study and other such measures as well as implementation and monitoring.

All interventions will be subject to an environmental and social screening with the objective to: (a) determine the anticipated environmental and social impacts, risks and opportunities of sub-project; and (ii) determine if the anticipated impacts and public concerns warrant further environmental analysis, and if so to recommend the appropriate type and extent of Environmental Assessment needed as per the set criteria in the ESAMF.

The ESAMF takes in to account the applicable safeguard policies as well as national legislative environmental requirements and the World Bank Group General Environmental Health and Safety Guidelines and the Guidelines for the Solid Waste Management Sector. It serves as a guide to the level of environmental analysis and mitigation required for all interventions supported by the project which will have the potential to trigger negative environmental impacts and thereby ensure compliance with the World Bank's environmental safeguard policies and the relevant national Environmental regulations during implementation. As a category A project, all physical activities financed under the project in general will be subject to Environmental Assessment, however from the experience of the MEMP project the following can be concluded. While it is envisioned that many of the Island level activities financed under the project may not require full ESIAs and ESMPs will be sufficient, as per the scale of the interventions which will focus on redesign, rehabilitation and upgrading to fit new designs post the feasibility studies, all new construction of IWMCs will require ESIAs, once deemed necessary post the screening procedures. The establishment of the RWMC in Zone IV and V will warrant a full-scale ESIAs to be carried out as per the national EIA regulation. All physical sub-projects/activities will prepare ESMPs that will describe and prioritize the actions needed to implement mitigation measures, corrective actions and monitoring measures necessary to manage the impacts and risks identified in the screening assessments, ESIAs. Measures and actions that address identified impacts and risks will favor the avoidance and prevention of impacts over minimization, mitigation wherever technically and financially feasible. Where risks and impacts cannot be avoided or prevented, mitigation measures and actions will be identified so that the activities operate in compliance with applicable national laws and regulations and meets the requirements of relevant World Bank EHS standards which draw from international best practice.

The experience of the MEMP has shown that social safeguards issues are non-existent during similar project modalities. However, the interventions leading to the construction and expansion of IWMCs could lead to future cases of involuntary loss of crop, land taking as a small percentage of communities rely on surrounding land for agriculture and livelihood. There are no indigenous communities living in the Maldives.



The MEE has good capacity in terms of technical aspects as well as management and implementation of safeguards drawing from both the MEMP experience and a host of other Bank and donor funded projects within the ministry. The MEE has seconded an environmental specialists from the EPA to focus on the tasks and responsibilities outlined in the ESAMF in the role of an Environmental and Social Coordinator (E&S Coordinator) within the PMU. A team of Environmental and Social officers will be posted in each of the project Atolls and report to the E&S Coordinator. He/She will report to the Project Manager and will work closely with the assigned team, Island Councils, Environmental Protection Agency. The E&S Coordinator and team will be responsible for ensuring the overall implementation of the ESAMF and will also liaise with other agencies, contractors and engineering supervisors at the island level to implement safeguards mitigation measures. The E&S Coordinator will be responsible for monitoring and evaluation of safeguards implementation and will report on compliance and status of performance indicators. A team of Environmental and Social officers assigned to the Atolls in Zone IV will be responsible for covering the project sites and will work closely with the consultants, contractors and staff at the sites and with the E&S Coordinator centrally. The E&S Officer at the Atoll level will also be the first level of contact for any grievance/feedback for the community. The E&S Coordinator will take the leadership to orient staff and implementing partners of the ESAMF and on how to operationalize it on the ground. The EPA, as the main environmental regular or, will work closely with the PMU, providing clearance and guidance on technical requirements for respective safeguard assessments by issuing specific TORs, conducting review of safeguard documents that will require their clearance and also ensure the needs for operational monitoring are well incorporated in to the project.

The project will provide training in environmental management and on environmental and social management to the MEE PMU staff, WMD, EPA, IC and contractors to improve institutional capacity. The cost for monitoring and supervising the implementation of environmental and social project regulations have been integrated into the overall project investment cost

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

Even within the MEE, there are several Departments and Agencies that will be closely linked with the implementation of the MCEP. These include the Waste Management Department (WMD), Environment Protection Agency (EPA), MEMP PMU to name but a few. Among the Ministries, the Ministry of Finance, Ministry of Housing, Ministry of Health and the Ministry of Tourism will take center stage. WAMCO, the tourist resorts, and the respective Atoll Councils and Island Councils, including its community members, will be key to a successful implementation of the project.

Public consultations were held with affected stakeholders at Island and Atoll Council levels during the preparation of ESAMF in November 2016. In addition the draft ESAMF has been disclosed online in the MEE website since 18, November 2016. Further consultations will be undertaken as part of the feasibility studies and assessments. These should be duly documented in the respective outputs of the consultancies. In addition, the technical coordinators, E&S Coordinator and the island level officials will be required to undertake continuous consultations with stakeholders and report as part of safeguards monitoring. As part of the ESAMF, guidance on preparing an entitlement framework has been provided. All safeguards related documents were disclosed in-country through the MEE website on 01, February 2017 and in World Bank's InfoShop on 01, February 2017. No sooner the project commences implementation, the project is expected to have regular consultations with local stakeholders on issues related to environmental and social issues.



B. Disclosure Requirements (N.B. The sections below appear only if corresponding safeguard policy is triggered)

Environmental Assessment/Audit/Management Plan/Other

Date of receipt by the Bank	Date of submission to InfoShop	For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors
19 November 2016	01 February 2017	17 February 2017

"In country" Disclosure

The Ministry of Environment Website : <http://www.environment.gov.mv/v1/download/1415>

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C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting) (N.B. The sections below appear only if corresponding safeguard policy is triggered)

OP/BP/GP 4.01 - Environment Assessment

Does the project require a stand-alone EA (including EMP) report? YES

If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report? YES

Are the cost and the accountabilities for the EMP incorporated in the credit/loan? YES

OP/BP 4.04 - Natural Habitats

Would the project result in any significant conversion or degradation of critical natural habitats? NO

If the project would result in significant conversion or degradation of other (non-critical) natural habitats, does the project include mitigation measures acceptable to the Bank? YES

The World Bank Policy on Disclosure of Information

Have relevant safeguard policies documents been sent to the World Bank's Infoshop? YES

Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs? YES



All Safeguard Policies

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies? YES

Have costs related to safeguard policy measures been included in the project cost? YES

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies? YES

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents? YES

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CONTACT POINT

World Bank

James Orehmie Monday
Senior Environmental Engineer

Gaurav D. Joshi
Senior Environmental Specialist

Borrower/Client/Recipient

Ministry of Finance and Treasury

Implementing Agencies

Ministry of Environment and Energy, MEE
Ahmed Murthaza
Director General
ahmed.murthaza@environment.gov.mv



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>

APPROVAL

Task Team Leader(s):	James Orehmie Monday Gaurav D. Joshi
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Approved By

Safeguards Advisor:	Maged Mahmoud Hamed	
Practice Manager/Manager:	Kseniya Lvovsky	
Country Director:	Idah Z. Pswarayi-Riddihough	

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