

**INTEGRATED SAFEGUARDS DATA SHEET
APPRAISAL STAGE**

Report No.: ISDSA13111

Date ISDS Prepared/Updated: 14-Sep-2015

Date ISDS Approved/Disclosed: 14-Sep-2015

I. BASIC INFORMATION

1. Basic Project Data

Country:	Philippines	Project ID:	P153042
Project Name:	Inclusive Partnerships for Agricultural Competitiveness (P153042)		
Task Team Leader(s):	Rabih H. Karaky		
Estimated Appraisal Date:	16-Sep-2015	Estimated Board Date:	29-Jan-2016
Managing Unit:	GFA02	Lending Instrument:	Investment Project Financing
Sector(s):	General agriculture, fishing and forestry sector (30%), Agro-industry, marketing, and trade (20%), Rural and Inter-Urban Roads and Highways (20%), Agricultural extension and research (15%), Irrigation and drainage (15%)		
Theme(s):	Rural markets (30%), Rural services and infrastructure (30%), Rural non-farm income generation (20%), Other rural development (10%), Rural policies and institutions (10%)		
Is this project processed under OP 8.50 (Emergency Recovery) or OP 8.00 (Rapid Response to Crises and Emergencies)?			No
Financing (In USD Million)			
Total Project Cost:	231.72	Total Bank Financing:	100.00
Financing Gap:	0.00		
Financing Source			Amount
Borrower			131.72
International Bank for Reconstruction and Development			100.00
Total			231.72
Environmental Category:	B - Partial Assessment		
Is this a Repeater project?	No		

2. Project Development Objective(s)

The Project Development Objective is to improve access to markets and enhance the competitiveness of smallholder farmers in the targeted Agrarian Reform Community (ARC) clusters.

3. Project Description

The proposed project is designed to enhance market opportunities through an inclusive beneficiary-led approach. Farmers organizations (FOs) would be the main vehicle for delivering project support and assistance. Participating FOs would be existing or emerging producer or marketing groups, irrigator associations, or cooperatives. Targeted FOs would be small or large in scale but would fulfil basic criteria of formal registration, and basic organizational governance. The project will achieve its stated objective through the implementation of the following three components.

Component I: Support Services for Enhanced Market Linkages

a. **Extension and Business Development.** This sub-component aims at enhancing the knowledge and capability of FOs in the ARC clusters to help them respond to market opportunities. Rapid assessments, market matching fora and subsequent technical advice will facilitate the scoping of potential market opportunities, identify the existing constraints, devise potential solutions to address them, and determine the corresponding capacity needs. An appropriate combination of technical, business, and operational training will be provided using the approach of Farmer Field Schools (FFS) and Farm Business Schools (FBS). Training of trainers will be conducted to build the capacity of local service providers and lead FOs in providing extension and business development services to farmers and FOs through supply chain networks. Additional, packages of technical and organizational capacity development support for FOs will be provided once specific needs have been identified.

b. **Land Tenure Improvement.** This sub-component will encourage on-farm land investment through securing individual land titles. Farmers holding collective land titles are unable to gain access to loan finance and are less likely to invest in land development. The project would support the subdivision of collective Certificates of Land Ownership Awards (CLOAs), on a demand driven basis, through land surveying, boundary demarcation, and titles registration. In addition, the project will support the DAR to strengthen its land tenure improvement program through conduct of policy studies, identification of new land tenure instruments and conduct of pilot activities to clarify succession planning for inter-generational land transfer, avoid land fragmentation and enhance the likelihood of longer term productive land use.

c. **Rural Infrastructure.** This sub-component would support critical infrastructure necessary to enhance farm productivity and access to markets for the targeted ARC clusters. Infrastructure investments such as farm to market roads (FMRs), small scale irrigation, community water supply and multi-functional community buildings would contribute to increased agricultural productivity and the reduction of marketing costs. ARC cluster plans highlight important infrastructure linking key production areas with access networks as prioritized through joint planning between FOs, LGUs and in line with provincial sector priorities. Government counterpart funds provided through regular budget allocations will support investments in FMRs and bridges. Other infrastructure will be supported through project funds.

Component II: Investments in Productive Partnerships

a. The project would provide grants to exiting or newly emerging registered FOs to support smallholder farmers in the ARC clusters to increase their competitiveness, business orientation and market position and to make them attractive business partners in the value chain. The Grant would be provided through two windows: (a) small grants between PhP 400,000 and PhP 1,000,000; and (b)

larger grants above PhP 1,000,000 and below PhP 10,000,000. To ensure ownership and commitment, the applicants for both windows would need to match the grant amount with counterpart funds or cost-sharing of 40% which would come from the FOs' own resources and/or from commercial loans. Under the small grants window, up to 50% of the matching proportion put forward by the FOs would be valued in kind. Sub-projects would be demand driven and could include investments to improve productivity, product quality, production facilities (nurseries, green houses), semi-processing and marketing, production of value added agricultural products, food safety promotion and improvement, business management, new product development, other income-generating activities and provision of services. The project would also support the management and implementation costs of the Matching Grant Program (MGP) including the costs of grant management units, equipment, technical assistance, and incremental operating costs.

b. The Borrower has indicated that it may later request to use matching funds to finance land acquisition on pilot basis, possibly during the second half of project implementation to address the bottlenecks of the CARP inter-generation land transfer. This will be informed by the policy studies undertaken under sub-component 1.2, and would be contingent on the successful implementation and evaluation of the MGP, particularly the small grant window. Should such a request be made, the project would be restructured if necessary and RVP approval will be sought in accordance with Bank instructions. Selection criteria developed such a pilot would need to ensure that land acquisition would take place on voluntary basis by self-selected organized groups of eligible beneficiaries and from willing eligible sellers. The acquired land would be free from any legal impediment, particularly related to the tenure situation, labor situation, and/or other environmental and land use restrictions.

Component III: Project Management, Monitoring and Evaluation

The purpose of this component is to provide support to the project implementing agencies at the central, regional, and provincial levels in project management and coordination, technical operation, financial management, procurement, social and environmental safeguards, and monitoring and evaluation (M&E). The component will finance activities on: (a) project orientation workshops and training; (b) engagement of technical assistance and short term experts; (c) design and installation of M&E and Management Information System; (d) conduct of M&E surveys and reviews (baseline, mid-term and end of project evaluation); (e) procurement of office equipment and vehicles; and (f) incremental operating costs.

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

The project will target 50 ARC Clusters covering 301 agrarian reform communities in 44 provinces spread across 14 regions (CAR, Regions I, II, III, IV-A, IV-B, V, VI, VII, VIII, X, XI, XII and ARMM). The provinces are Abra, Benguet, La Union, Pangasinan, Ilocos Sur, Ilocos Norte, Cagayan Isabela, Nueva Vizcaya, Bulacan, Bataan, Nueva Ecija, Pampanga, Tarlac, Zambales, Batangas, Quezon I, Quezon II, Marinduque, Oriental Mindoro, Occidental Mindoro, Palawan, Albay, Camarines Sur, Masbate, Sorsogon, Camarines Norte, Capiz, Iloilo, Aklan, Negros Occidental, Bohol, Negros Oriental, Cebu, Eastern Samar, Leyte, Northern Samar, Western Samar, Misamis Occidental, Sarangani, Davao del Norte, Davao Oriental, Maguindanao, Lanao del Sur and Basilan.

5. Environmental and Social Safeguards Specialists

Maya Gabriela Q. Villaluz (GENDR)

Victoria Florian S. Lazaro (GSURR)

6. Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	<p>The project will finance demand-driven productive partnerships between smallholder organizations and private commercial sector that would contribute to raising farm productivity and household income of beneficiaries. Environmental impacts are expected to be mostly temporary and/or short term and are readily manageable. The project is categorized as a "B" consistent with the nature of these impacts and the requirements of OP4.01.</p> <p>Since the sub-projects and specific sites within the ARC clusters targeted by the project still have to be determined, the borrower has prepared an Environment and Social Management Framework (ESMF), which includes a template for the Environment and Social Management Plan (ESMP). The ESMF also includes screening procedures to guide the proponents on the type of safeguards instruments that need to be prepared depending on the sub-projects that would be funded. The ESMF was presented in several public consultations, with the stakeholder participation properly documented. The ESMF was also publicly disclosed at the national and local levels and in the World Bank's InfoShop. All sub-projects will be screened according to the following categories: (a) Category A subprojects - these are highly unlikely because the environmental impacts are expected to be modest since the scope and nature of the sub-projects are mainly small-scale, rural and agriculture-based; (b) Category B - impacts are site-specific; reversible; less adverse than Category A and mitigation measures can be designed more readily. (c) Category C - minimal or no adverse environmental impacts, no EA required. As part of the EA process, public consultations with all stakeholder groups (potentially affected communities, NGOs, POs and farmer groups) will be conducted for subprojects in accordance with the ESMF.</p> <p>OP 4.01 also applies to the technical assistance (TA) activities in Components 1 and 2 which would provide training support to the farmers and farmer associations to enhance their technical and business management skills. The Terms of Reference (TORs) for the capacity building activities will be reviewed and agreed with the borrower to ensure that the environmental or social issues relevant to the project and raised during public consultations are taken into account and addressed in the training modules.</p>
Natural Habitats OP/BP	Yes	While the project will not lead to loss of natural habitats,

4.04		this policy is triggered as all sub-projects can only be identified during implementation and it is possible that any of the subprojects might affect natural habitats. The ESMF includes screening for impacts on natural habitats and measures to address these impacts.
Forests OP/BP 4.36	No	The project is not envisaged to trigger this policy as project activities will be undertaken in agricultural areas. There may be cutting of few trees for some of the infrastructure support facilities but is not expected to affect forests and forest health or forest-dependent communities. The ESMF explicitly prescribes avoidance of significant environmental impacts of proposed sub-projects on forest areas.
Pest Management OP 4.09	Yes	This policy is triggered since the project will finance agriculture operations that could raise potential pest or disease vector management issues and require for the increase usage of pesticides under the project. The screening procedures include the scanning of pest management concerns. The ESMF is complemented by a Pest Management Framework (PMF) that provides the scope and coverage in the preparation and implementation of a Pest Management Plan (PMP) to address pest management issues. In sub-projects that require an EA, the ESMP will be accompanied by a PMP. Where pest management concerns are present, even if the sub-project does not require an EA, a PMP will still be prepared to adequately prescribe the appropriate alternative technologies or mitigating measures. The EA will be presented in a public consultation and disclosed. The PMP is based on on-site evaluations of local conditions conducted by appropriate technical specialists with experience in participatory integrated pest management (IPM). IPM training will be conducted as part of the project to educate the agricultural workers and farm organizations. The IPM approaches include certified pesticides, its proper application and handling, as well as biological control, cultural practices, and the development and use of crop varieties that are resistant or tolerant to the pests. In case the need to procure chemical-based fertilizers and pesticides arises, the proponent will indicate how the list of pest control products was developed and agree this with the Bank before the list is authorized for procurement.
Physical Cultural Resources OP/BP 4.11	Yes	OP 4.11 is triggered since the sub-projects may involve the restoration and rehabilitation of existing agricultural lands or the reconstruction of small civil works in rural, open areas where physical cultural resources may be

		present. In case of chance finds, procedures on how to manage them are described in the ESMF. A chance finds clause would be included in the bidding documents and all construction works contracts.
Indigenous Peoples OP/ BP 4.10	Yes	Several of the target ARC clusters are located in provinces known to have Indigenous Peoples (IPs) and ancestral domains. However, the project is demand-driven so it is difficult at this stage to identify whether IPs and their ancestral domains would be involved and affected by the project. An IP Framework (IPF) was formulated to ensure that IP participation is not undermined and that the design of capacity building for FOs also makes provision for assistance to organizations of which IPs are members. The IP Framework was presented in a public consultation, attended by different IP groups. Together with the ESMF, it was disclosed nationwide and locally, with subsequent IP Plans to be disclosed in a similar manner. The IPF was disclosed in the WB Infoshop, and the IP Plans will be disclosed accordingly.
Involuntary Resettlement OP/BP 4.12	Yes	Component 2 may include small infrastructure investments as identified by the FOs and their partners to improve access to markets. This may include production and marketing infrastructure, such as greenhouses, storage facilities, solar dryers, access roads and other priority small scale rural infrastructure specific to productive partnerships investments. While most of the expected sub-projects are for rehabilitation of existing projects, the demand driven approach in sub-project selection may lead to green investments which would require new land acquisition. This would be determined with more certainty during sub-project preparation. A simple Land Acquisition and Resettlement Policy Framework (LARF) with clear protocol for voluntary land donation and other land acquisition modalities have been formulated and accepted by major stakeholders for the project in a public consultation. DAR has satisfactorily formulated and implemented a LARF under the ARCDP2 which was used as a reference in formulating a new LARF for the project. The LARF was disclosed nationwide and locally by DAR and in the WB Infoshop. Subsequent Resettlement Action Plans (RAPs) will be disclosed in a similar fashion.
Safety of Dams OP/BP 4.37	Yes	The menu of sub-projects includes community based multipurpose infrastructure such as small-scale earthen reservoirs for irrigation and water supply which may generate minor, localized and temporary social and environmental impacts. Anticipated environmental impacts include soil erosion, siltation and pollution of

		<p>waterways from agricultural activities. The project's screening checklist identifies potentially related impacts to ensure that appropriate measures are incorporated during site selection, project design and implementation.</p> <p>For small dams that will be supported by the project, the project requires that these dams be designed by qualified engineers. This requirement is spelled out in the ESMF.</p> <p>For small dams that will be supported by the project, the project requires that these dams be designed by qualified engineers. This requirement is spelled out in the ESMF.</p>
Projects on International Waterways OP/BP 7.50	No	The project would not trigger this policy.
Projects in Disputed Areas OP/BP 7.60	No	The project would not trigger this policy.

II. Key Safeguard Policy Issues and Their Management

A. Summary of Key Safeguard Issues

<p>1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:</p> <p>The project will support activities that will improve farmer organizations' access to markets and productive partnerships, directly contributing to the twin development goals of the World Bank of reduced poverty and shared prosperity particularly by giving opportunity for poor farmers, landless farmworkers and women to get involved in capacity building, training on technology and participation as workers in the proposed agribusiness projects. It will also benefit private corporations that will partner with farmer organizations for improved production and access to market. The activities, with the exception of the construction and operation of the sub-component on Rural Infrastructure Services, community based small-scale, multi-purpose infrastructure will be implemented at the individual farmer level in which case environmental and social impacts are expected to be minor, localized, and short term. As part of project preparation, the Department of Agrarian Reform prepared an ESMF that includes an analysis on the potential environment and social impacts of the project and proposed subprojects. Among the community-based multipurpose infrastructure subprojects, the following may generate social and environmental impacts: farm-to-market roads, short-span bridges, small-scale earthen reservoirs for irrigation and water supply. Anticipated environmental impacts include soil erosion, siltation, pollution of waterways from agricultural activities and noise, odors and wastes from processing and packaging of agricultural products. The project may also lead to an increase in usage of pesticides for fruit and vegetable production. However, since organic farming and IPM will be promoted and supported by the project, any potential increase in pesticide use is assessed to be minor. Key social safeguard issues may include the acquisition of right-of-way or the opening up of temporary alternative routes existing residential or agricultural production sites. These activities could result in the temporary and permanent loss of lands or livelihoods for the farmers, therefore, full and proper assessment of land tenure and livelihood aspects, as well as Indigenous Peoples rights, will be undertaken at the subproject level. It is difficult at this stage to identify whether IPs and their ancestral domains would be involved and affected by the project. An IP Framework (IPF) was formulated to ensure that IP participation is not undermined and provisions for assistance to IPs are provided. In case</p>

<p>there are PCR and IPs to be affected in future investments, it has been agreed with DAR that the World Bank OP 4.10, 4.11, and 4.12 will be applied, respectively.</p>
<p>2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:</p>
<p>Long term environmental impacts are assessed to be positive with the: (a) promotion and support of IPM; (b) water and soil conservation measures in the production activities; and (c) waste management in the value added processing and packaging of agricultural products.</p>
<p>3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.</p>
<p>Alternative sites will be considered for the location of the community infrastructures to avoid involuntary resettlement especially the loss of dwelling units and livelihoods. The final location will consider use of government land that does not have any settlers that will be affected whenever feasible. The project will adopt alternative schemes using IPM and sustainable and climate-smart agricultural practices for the agricultural production activities and the use of environment-friendly practices and techniques in the processing and packaging of the agricultural products to adequately manage potential environmental impacts.</p>
<p>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.</p>
<p>The Department of Agrarian Reform prepared an ESMF during project preparation which was disclosed locally in English and in the Bank's Infoshop prior to appraisal. The ESMF included, among others, the legal frameworks, the assessment of environmental and social impacts of the sub-projects, mitigating measures, institutional arrangements for carrying out the sub-project screening and the implementation of the ESMF, training and capacity building, monitoring and reporting and the screening checklist for each type of sub-project to be supported by the project. The ESMF is also accompanied by an IPF, a LARF and a PMF and were all presented in public consultations, with IP groups in attendance. In the initial screening, it was learned that 22 of the target 44 provinces have IP presence in municipalities covered by target ARC clusters. This will alert project implementers in seeking IP participation to the project where they are present.</p> <p>DAR has implemented previous projects funded by the Bank where they have consistently been able to satisfactorily met safeguards requirements. Key staff have been designated in the PMO to manage the environmental and social safeguards requirements of the project. They will also be responsible for the institutional arrangements and the capacity building needs of the PMO, sub-project proponents, Local Government Units (LGUs) and farm organizations as well as the supervision of the safeguards operations. The project includes supporting the capacity building of the DAR with regard to the use of the ESMF, LARF, IPF, PMF and the preparation and implementation and monitoring of safeguards instruments.</p>
<p>5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.</p>
<p>The key stakeholders include agricultural producers that wish to make the transition from subsistence to semi-commercial and/or commercial agriculture. During preparation several public consultations and focused group discussions were held by DAR with broad participation from stakeholders including representatives of farmer and producer organizations, LGUs and NGOs, private business and other service providers in the various regional offices and in the proposed project sites. DAR has likewise consulted with partner implementing agencies which includes the Department of Agriculture (DA), Department of Interior and Local Government (DILG), Department of Trade and Industry (DTI), Department of Public Works and Highway (DPWH),</p>

Department of Environment and Natural Resources (DENR), National Irrigation Administration (NIA), Bureau of Soils and Water Management (BSWM), Land Bank of the Philippines (LBP), and the National Commission on Indigenous Peoples (NCIP), among others.

B. Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other	
Date of receipt by the Bank	22-May-2015
Date of submission to InfoShop	22-May-2015
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	00000000
"In country" Disclosure	
Philippines	19-May-2015
<i>Comments:</i> www.dar.gov.ph	
Resettlement Action Plan/Framework/Policy Process	
Date of receipt by the Bank	22-May-2015
Date of submission to InfoShop	22-Jun-2015
"In country" Disclosure	
Philippines	19-May-2015
<i>Comments:</i> www.dar.gov.ph	
Indigenous Peoples Development Plan/Framework	
Date of receipt by the Bank	22-May-2015
Date of submission to InfoShop	22-Jun-2015
"In country" Disclosure	
Philippines	19-May-2015
<i>Comments:</i> www.dar.gov.ph	
Pest Management Plan	
Was the document disclosed prior to appraisal?	Yes
Date of receipt by the Bank	22-May-2015
Date of submission to InfoShop	22-May-2015
"In country" Disclosure	
Philippines	19-May-2015
<i>Comments:</i>	
If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.	
If in-country disclosure of any of the above documents is not expected, please explain why:	

C. Compliance Monitoring Indicators at the Corporate Level

OP/BP/GP 4.01 - Environment Assessment	
Does the project require a stand-alone EA (including EMP) report?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]

If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report?	Yes [] No [] NA []
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	Yes [] No [] NA []
OP/BP 4.04 - Natural Habitats	
Would the project result in any significant conversion or degradation of critical natural habitats?	Yes [] No [] NA []
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 [] No [] NA []
OP 4.09 - Pest Management	
Does the EA adequately address the pest management issues?	Yes [×] No [] NA []
Is a separate PMP required?	Yes [×] No [] NA []
If yes, has the PMP been reviewed and approved by a safeguards specialist or PM? Are PMP requirements included in project design? If yes, does the project team include a Pest Management Specialist?	Yes [×] No [] NA []
OP/BP 4.11 - Physical Cultural Resources	
Does the EA include adequate measures related to cultural property?	Yes [] No [] NA []
Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?	Yes [] No [] NA []
OP/BP 4.10 - Indigenous Peoples	
Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?	Yes [×] No [] NA []
If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?	Yes [] No [] NA []
If the whole project is designed to benefit IP, has the design been reviewed and approved by the Regional Social Development Unit or Practice Manager?	Yes [] No [] NA []
OP/BP 4.12 - Involuntary Resettlement	
Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?	Yes [×] No [] NA []
If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?	Yes [×] No [] NA []
Is physical displacement/relocation expected?	Yes [] No [] TBD []
Provided estimated number of people to be affected	

Is economic displacement expected? (loss of assets or access to assets that leads to loss of income sources or other means of livelihoods)	Yes [<input type="checkbox"/>] No [<input type="checkbox"/>] TBD [<input type="checkbox"/>]
Provided estimated number of people to be affected	
OP/BP 4.37 - Safety of Dams	
Have dam safety plans been prepared?	Yes [<input type="checkbox"/>] No [<input checked="" type="checkbox"/>] NA [<input type="checkbox"/>]
Have the TORs as well as composition for the independent Panel of Experts (POE) been reviewed and approved by the Bank?	Yes [<input type="checkbox"/>] No [<input checked="" type="checkbox"/>] NA [<input type="checkbox"/>]
Has an Emergency Preparedness Plan (EPP) been prepared and arrangements been made for public awareness and training?	Yes [<input type="checkbox"/>] No [<input checked="" type="checkbox"/>] NA [<input type="checkbox"/>]
The World Bank Policy on Disclosure of Information	
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
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 [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
All Safeguard Policies	
Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Have costs related to safeguard policy measures been included in the project cost?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]

III. APPROVALS

Task Team Leader(s):	Name: Rabih H. Karaky	
<i>Approved By</i>		
Safeguards Advisor:	Name: Peter Leonard (SA)	Date: 14-Sep-2015
Practice Manager/ Manager:	Name: Nathan M. Belete (PMGR)	Date: 14-Sep-2015