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Project Information Document/ Integrated Safeguards Data Sheet (PID/ISDS)

Concept Stage | Date Prepared/Updated: 26-Oct-2017 | Report No: PIDISDSC21311



BASIC INFORMATION

A. Basic Project Data

Country Central African Republic	Project ID P162245	Parent Project ID (if any)	Project Name Water and Electricity Upgrading Project (P162245)
Region AFRICA	Estimated Appraisal Date Oct 16, 2017	Estimated Board Date Dec 19, 2017	Practice Area (Lead) Water
Financing Instrument Investment Project Financing	Borrower(s) Ministry of Economy, Planning, and International Cooperation	Implementing Agency Ministry of Development of Energy and Water Resources, Société des Eaux de Centrafrique (SODECA), Energie Centrafricaine (ENERCA)	

Proposed Development Objective(s)

The Project Development Objective (PDO) is to increase access to improved water and electricity in Bangui and selected towns and to ameliorate ENERCA's and SODECA's operational performance.

Financing (in USD Million)

Financing Source	Amount
IDA Grant	20.00
Total Project Cost	20.00

Environmental Assessment Category B-Partial Assessment	Concept Review Decision Track II-The review did authorize the preparation to continue
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Other Decision (as needed)



B. Introduction and Context

Country Context

1. The Central African Republic (CAR) is a landlocked country with a history of recurrent conflict and political instability. Located in central Africa, the CAR borders six countries and has a land area of 620,000 square kilometers, but is sparsely populated with an estimated population of only 4.9 million of which 60% live in rural areas (World Bank, 2017). Since gaining independence in 1960, CAR has experienced only two peaceful transitions of power, in 1993 and 2016. As a result of the most recent conflict, which erupted at the end of 2012, roughly one-quarter of the population was internally displaced or had to flee to neighboring countries. While active conflict has largely come to an end, CAR remains politically fragile, with armed groups still present in the territory and relations between communities tense.

2. As noted by the National Recovery and Peace Building Plan 2017-2021 (RCPCA), fragility in CAR stems not only from the most recent crisis, but a long deterioration of the socio-economic and security situation.¹ In 2014, CAR ranked 187 out of 188 countries on the United Nation's Human Development Index. The last available data indicates that over two thirds of the CAR's population lived below the international poverty line of \$1.9 per day even prior to the latest violent conflict (PovcalNet, 2016). Population health has been negatively impacted by the lack of development and repeated conflict, with a present life-expectancy of only 51.4 years, compared to 59 years for Sub-Saharan Africa as a whole, and an infant mortality rate over 60% above the Sub-Saharan average (World Bank, 2017).

3. Recent developments, however, have been encouraging. The transitional government installed in 2014 drafted a new constitution and organized presidential and legislative elections, which were held relatively peacefully on February 14, 2016 with strong international support. Originally considered an aid orphan, CAR is now heavily reliant on the international community as emergency aid is beginning to give way to long term development assistance. At a donor conference in Brussels held on November 17, 2016, the international community pledged an unparalleled US\$2.2 billion to cover the most urgent needs for the period 2017-2021 as reflected in the Recovery and Peacebuilding Assessment (RPBA) prepared by the authorities.

4. The RPBA is a five-year plan that relies on a progressive increase of interventions along with improvements in security and the gradual redeployment of a capable public administration across the country. It consists of three pillars: (i) critical reforms to promote peace, security, and reconciliation as essential underpinnings to recovery; (ii) reforms to help renew the social contract between the state and the population by building state presence and capacity to provide basic social services such as education, health, energy, water, and sanitation; and (iii) measures to facilitate rapid improvement of the business environment and to improve natural resources management, including of minerals and timber.

Sectoral and Institutional Context

5. CAR is endowed with abundant water and energy resources, but these have not been developed into effective services for the population. Both the water and electricity sectors are marked by inadequate infrastructure, a weak policy and regulatory framework, and utilities that struggle to recover costs and thus to maintain and expand services sustainably.

6. **Water Sector.** The country's average annual rainfall is 1,343 millimeters, and its annual renewable water resources per capita are estimated at 37,000 m³, far above the Sub-Saharan African average of 7,000 m³. However, the availability of safe drinking water is extremely low across the country, especially in rural areas. Less than a third of CAR's population has access to piped water, and fewer than two percent on-premises. Access to improved sanitation is below

¹ The RCPCA is grounded in recognition of the need to address the five core drivers of fragility and crisis over time to break the cycle of violence: i) a lack of social cohesion; ii) political power and the capture of scarce resources concentrated in the hands of a small elite that manages a state with very legitimacy; iii) imbalances between Bangui and the rest of the country, notably the north-east, which have fueled a sense of marginalization and exclusion; iv) a cycle of violence and trauma and a population in distress; and v) a lasting state of insecurity.



22 percent nationally, and as low as seven percent in rural areas (WHO / UNICEF, 2015). This is particularly problematic in the densely settled capital, which lacks a conventional sanitation system. WASH related diarrheal disease ranks among the top-five causes of morbidity and mortality in the CAR, and is a key contributing factor to child and maternal malnutrition, which is the primary risk factor for death and disability in the CAR (IHME, 2017).

7. **Energy Sector.** CAR's energy generation potential is large, especially hydroelectric sources, yet electricity access is extremely low even by Sub-Saharan African standards. Total installed capacity is 25 MW, of which 18 MW are available. Just eight percent of CAR's population has access to electricity, with access rates ranging from about 35 percent in Bangui to about two percent in rural areas (World Bank, 2016). Bangui experiences rolling blackouts for up to 16-18 hours each day. While Bangui is supplied with a mix of hydro and thermal resources, outside the capital city, electricity is even scarcer and largely reliant on diesel generators. Firms that require reliable electricity are compelled to purchase their own generators, greatly increasing production costs. This systematically discourages investment in more sophisticated industrial or service activities and prevents CAR's economy from diversifying away from low-value-added agricultural commodities and natural resources. The World Bank *Doing Business* report for the CAR highlights electricity as a major constraint, with electricity cost to businesses more than three times higher than the sub-Saharan average, and minimal reliability of supply and tariff transparency (World Bank, 2016).

Water Sector Institutions

8. Since 2003 the authorities have been attempting to strengthen the institutional and legal framework for the water sector with mixed results. A revised Water Law adopted in 2006 forms the basis for the sector's institutional arrangements.

9. The Water Law called for the creation of five new institutions: (i) the National Agency for Water and Sanitation (*Agence Nationale de l'Eau et de l'Assainissement*, ANEA), (ii) the National Council for Water and Sanitation (*Conseil National de l'Eau et de l'Assainissement*, CNEA); (iii) the Agency for the Water Sector and Sanitation Basins (*Agence de Bassin du Secteur de l'Eau et de l'Assainissement*, ABSEA); (iv) the Regulatory Agency for the Water and Sanitation Sector (*Agence de Régulation pour le Secteur de l'Eau et de l'Assainissement*, ARSEA); and (v) the National Fund for Water and Sanitation (*Fond National pour l'Eau et l'Assainissement*, FNEA).

10. However, out of the five new agencies envisioned by the Water Code, so far only ANEA is operational and currently responsible for implementing rural water and sanitation policies. Overall sector leadership remains with the General Directorate of Water (*Direction Générale de l'Hydraulique*, DGH) in the Ministry of Mines, Energy, and Water (*Ministère de Mines, l'Energie et de l'Hydraulique*, MMEH).

11. The Water Corporation of Central African Republic (*Société des Eaux de Centrafrique*, SODECA) is the national urban water utility. SODECA was established in 1949, partially privatized in 1991, and largely renationalized in 1999-2003. While SODECA is officially classified as a semi-public company, the Government currently holds 97.5 percent of SODECA shares with the remaining 2.5 percent held by the private bank, *Ecobank*. A 2001 agreement between the Government and SODECA granted it a concession to manage drinking and industrial water production, treatment, distribution, and sale in the Bangui area and seven secondary cities (Bouar, Berberati, Bambari, Bozoum, Bossangoa, Carnot and Ndele). In 2016, Bangui accounted for 97.5 percent of the 12.9 million m³ produced by SODECA in 2016 (SODECA, 2017). The water facilities in secondary towns deteriorated during the crisis due to looting and lack of maintenance, as well as a dearth of qualified manpower after staff fled provincial cities to seek refuge from the civil conflict.

12. A national water master plan elaborated in 2001 aimed to progressively incorporate all 16 district capitals in SODECA's perimeter. However, as SODECA is struggling even to supply its present perimeter, this has not yet been implemented and SODECA's presence remains concentrated in Bangui and western CAR. This has contributed to political tensions stemming from an impression that eastern CAR has been traditionally neglected by the central authorities.



13. Investments in water and sanitation have been extremely limited in recent years even within SODECA’s perimeter. Both the urban and rural water sectors are almost entirely dependent on CAR’s development partners which have focused primarily on short-term emergency support. The water master plan developed for Bangui estimated that a total of FCFA 210 billion (US\$420 million) will be required to increase the capital’s piped water access rate to 80 percent by 2030.

14. Few donor partners are presently supporting the WASH sector and the focus has been on targeted relief of bottlenecks rather than systematic, long-term development. Important emergency assistance was provided by UNICEF, the International Committee of the Red Cross (ICRC), and European Union (EU), supplying SODECA with treatment chemicals (ICRC and UNICEF), replacing nearly four kilometres of transmission lines in Bangui (ICRC) and constructing point-sources (ICRC, UNICEF, and EU). In Bangui, the PURISU Project (World Bank) has provided US\$6.8 million for the construction of solar-powered mini-networks and 2,000 house connections. The African Development Bank (AfDB) is financing a US\$14 million project to assist SODECA with the rehabilitation of one pumping station, the replacement of distribution lines and construction of boreholes, as well as of public latrines in Bangui and its environs. Potential interventions by China and Saudi Arabia are currently being considered. These projects, however, have been limited in scope and focused on targeted relief of specific infrastructure constraints, falling short of a systematic, long-term improvement of SODECA’s infrastructure and restoration of its operational viability.

15. The present water facilities thus remain outdated and unable to meet demand. Bangui has only one pumping station on the Ubangi River and one drinking-water production plant, which has not been rehabilitated since 1986. The drinking water plant in Bangui has a daily capacity of only 36,000 m³, while demand is expected to reach at least 170,000 m³ per day by 2030. A full 40 percent of the primary water-distribution system is made of aged asbestos-cement, causing high technical losses. SODECA does not collect enough revenue to cover its operating costs and is not able to purchase an adequate supply of water treatment chemicals, relying on external assistance.

16. A lack of reliable energy further reduces SODECA’s operating capacity and increases operating costs. SODECA’s facilities depend on power from the Central African Energy (*Energie Centrafricaine*, ENERCA), the national electric utility. However, the power supplied by ENERCA is highly unreliable and SODECA facilities are often forced to use expensive standby generators, significantly increasing production costs. Expensive imported treatment chemicals and an inefficiently large workforce (12.5 staff per 1,000 connections) have further increased operating costs. SODECA has struggled to raise matching revenues with an estimated cost-recovery ratio of less than 60%. Tariff levels have not been increased since 1998, technical water losses to leakages are estimated to be high and bill collection is low. The public sector, in particular, accounts for nearly a third of SODECA sales, but has generally not paid for its use of water.

17. SODECA’s technical and operational performance is extremely weak as summarized in Table 1 below.

Table 1: Water Sector - Key performance indicators (2016)

Parameter	Value
Piped Water Access (SODECA Perimeter)	30% ²
Total Accounts in Bangui	19,830
Active accounts in Bangui	15,482
Total Accounts in 7 secondary cities	2,853
SODECA Staff	284
Staff per 1000 connections (per active connection)	12.5 (18.3)
Total Production, SODECA Perimeter	13 million m3
Volume Billed, m3 (percentage of production billed)	4,816,038 m3 (38%)

² Extrapolation by World Bank team based on total number of known active accounts compared to urban population in SODECA’s perimeter



Amount Billed (incl. VAT)	CFA 2.1bn (US\$3.4m)
Percentages of bills to Public Sector	29%
Collections (incl. VAT, excl. one-off arrears payment)	CFA 1.25bn (US\$2m)
Bill Collection Rate	60%
Average Tariff achieved per m3 (incl. VAT)	CFA 429 (US\$0.7)
Cost Recovery	58%
Short-term Liabilities (2013)	CFA 10.4 bn (US\$16.8m)
Financial Debt	CFA 790m (US\$1.3m)

Energy Sector Institutions

18. CAR’s electricity sector is also governed by MMEH, but through the Energy Directorate (*Direction Générale de l’Energie*, DGE). In addition to MEH and DGE, key public agencies include: (a) the state-owned, vertically integrated national power utility, ENERCA, which is responsible for the generation, transmission, and distribution of electricity; (b) the Autonomous Electricity Sector Regulatory Agency (*Agence Autonome de Régulation du Secteur Électricité*, ARSEC), which was established in 2005; and (c) the Rural Electrification Agency (*Agence Centrafricaine d’Électrification Rurale*, ACER), which was launched in 2008 to promote access to electricity in communities outside ENERCA’s service area.

19. Prior to the 2013 crisis CAR’s total installed capacity was around 25 MW, including both hydropower and thermal generation, of which more than 20 MW were operational. Two hydropower plants at Boali, approximately 85 kilometers from Bangui, remain functional with a combined capacity of 18 MW. However, actual production fluctuates between 13 and 16 MW. Of the 16 district centers ENERCA was supplying with generators prior to the crisis, only three are currently receiving electricity (Mongoumba, Mobaye, Bossangoa).

20. Several of CAR’s development partners are investing in the rehabilitation of the power sector. In partnership with ENERCA, the World Bank and the French Development Agency (*Agence Française de Développement*, AFD) are implementing projects to improve the functionality of Boali 1 and 2 hydropower systems. AfDB is attempting to bring the Bangui thermal power plant back on line and is also planning to finance the expansion of Boali 2 with the goal of doubling its capacity. Meanwhile, the Chinese government will carry out the installation of 10 MW of new capacity at Boali (Boali 3), in addition to other prospective investments in solar energy.

21. The total technical and non-technical electricity losses in the country are estimated at over 50 percent, more than twice the Sub-Saharan African average of 18-20 percent, which is already high. Technical losses are estimated at 40 percent of total energy production while the collection rate is at just 65 percent. Most technical losses are the result of obsolete and dilapidated infrastructure, while non-technical losses are caused by illegal connections, faulty meters, unmetered consumption, ineffective lump-sum billing practices, and electricity resale. The poor quality of electricity services discourages consumption among paying customers and creates incentives to use costly and environmentally damaging diesel generators.

22. Although the energy sector has been liberalized in principle, in practice ENERCA remains responsible for 100 percent of sectorial investment and operations. The 2013 crisis compounded the already severe challenges facing CAR’s energy sector. Key infrastructure was looted or destroyed, exacerbating the existing deficiencies in the distribution network in Bangui and in the generating capacity of provincial cities. ENERCA lacks the funds to cover essential maintenance and operations, much less the enormous amount of capital required to rebuild the sector’s infrastructure. Current tariff levels do not cover operating costs and as a consequence ENERCA has resorted to borrowing from local banks to cover its operational costs, and its chronic insolvency poses a growing threat to CAR’s shallow financial sector. While several of CAR’s development partners are working to rehabilitate the country’s generation and transmission capacity, far more investment will be required to bring CAR’s energy sector up to the standards of comparable countries.



23. Rehabilitating the Boali 1 and 2 hydropower plants was the first component of the World Bank’s Emergency Power Response Project (EPRP), a US\$10.5 million initiative implemented in conjunction with AFD (US\$8 million IDA, US\$2.5 million AFD). Under the EPRP’s second component, a total of 101,000 energy-efficient compact fluorescent lamps (CFLs) were distributed to more than 25,000 households in order to reduce energy usage for lighting purposes during peak demand. Another component included the installation of new cables, transformers, and other upgrades to the distribution network to reduce technical and non-technical losses. The last component, which entails the installation of 5,500 prepaid meters, is currently underway and should be completed by the second quarter of 2017.

24. The energy sector’s poor operational and commercial management is reflected in its high operating costs, poorly maintained infrastructure, frequent service interruptions, load shedding, very high technical and nontechnical losses, poor customer service, ineffective billing systems, below-cost-recovery tariffs, unreliable accounting and financial management systems, persistent underinvestment, and lack of qualified staff. These weak performance indicators are interconnected; addressing them will therefore require a comprehensive plan and sustained effort.

Table 2: Energy Sector - Key performance indicators

Parameter	Value
Electricity Access rate	8% (35% in Bangui and 2% outside Bangui)
Number of electricity customers	27,500 (2016)
Installed capacity	25 MW of which 18 MW is available (2016)
Energy mix	98% hydropower and 2% diesel (2016)
Share of private sector in generation	0% (2016)
Average cost of service	US\$0.20 / kWh (2014)
Average tariff	US\$0.12 / kWh (2016)
Average T&D losses	40% (2016)
Electricity bill collection rate	65% (2016)
Utility debt	US\$ 127m of debt (of which 49% long-term debt), or 15x annual turnover

Relationship to CPF

25. The proposed project contributes directly to the objectives of the recent IDA Turnaround Eligibility Note (TEN) for CAR, which in turn supports the RPBA process, and is aligned with the World Bank’s twin goals of ending extreme poverty and promoting shared prosperity.

26. The TEN provides the framework for the provision of preliminary support to recovery and development, and is the latest strategy document that outlines the rationale for Bank support to CAR to rebuild after the events of 2012. The TEN focuses on a combination of stabilization efforts and development activities and outlines key projects to be prepared in the medium term, explicitly targeting the water, sanitation, and energy sectors in its proposed turn-around program (World Bank, 2016).

27. Consistent with TEN objectives, the proposed project will help to rebuild the state-citizenry social compact in target areas in and outside Bangui where there are currently no water supply or electricity services, will strengthen the presence of state services, and help build trust between the state and its citizens.

28. A Systematic Country Diagnostic (SCD) is currently being prepared and the new Country Partnership Framework (CPF) is expected to follow in FY18.

29. The proposed project is aligned with the Bank’s twin goals of ending extreme poverty and promoting shared prosperity. Reliable and affordable sources of clean water and electricity are an essential precondition for a healthy population and robust economic activity, especially in the CAR’s context of high WASH-related disease rates and



constrained economic activity. The project will reduce exposure to unsafe drinking water and hygiene, increase access to electricity and lay the technical and institutional foundation for a sustainable future service expansion. This is expected to reduce poverty and boost shared prosperity by reducing health-related costs (direct treatment costs and indirect costs through missed work), reduce negative impacts associated with lower school attendance due to water- and hygiene-related tasks, and improve economic activity both of businesses and in private homes due to better access to power.

C. Proposed Development Objective(s)

Note to Task Teams: The PDO has been pre-populated from the datasheet for the first time for your convenience. Please keep it up to date whenever it is changed in the datasheet.

30. The Project Development Objective (PDO) is to increase the access to improved water and electricity in Bangui and selected towns and to ameliorate ENERCA's and SODECA's operational performance.

Key Results (From PCN)

31. Progress towards this PDO will be measured by the following key performance indicators:

- People provided with access to improved water sources (number) (Corporate Results Indicator)
- People provided with new or improved electricity service (number) (Corporate Results Indicator)
- Water losses per year in the project area (%)
- Electricity losses per year in the project area (%)

D. Concept Description

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SAFEGUARDS

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

For both components, the Project will focus on the town of Bangui and up to two secondary towns among the following list: Berbérati, Ndélé, Bria, Bangassou, Kaga Bandoro, Sibut, and Bambari. The social connection program for water which has no significant safeguard impact will be implemented in all urban areas covered by SODECA. For the energy sector, work in Bangui will entail rehabilitation of distribution network and installment of pre-paid meters in the Bangui area, and the purchase of back-up electric/mechanic equipment for the Boali 1 hydroelectric system. Work in up to 2 secondary cities will entail rehabilitation of generation capacity and distribution network.

B. Borrower's Institutional Capacity for Safeguard Policies

The Project will be implemented by the existing PIU in charge of different transport projects with major infrastructure activities, like construction of roads. This PIU has successfully implemented several World Bank projects in the past, and



has reasonable capacity in implementing environmental and social safeguard measures in infrastructure projects. The PIU is adequately staffed with experienced specialists in environmental and social aspects, nevertheless additional support (staff or consultant) may be required to alleviate the workload of the PIU which will have various projects under preparation and/or implementation. The PIU will monitor the overall implementation of the Environmental and Social activities, while SODECA and ENERCA will be the implementing agencies of their respective components, water and electricity; any capacity strengthening measure deemed necessary to improve the safeguard function during implementation of the operation will be taken into account.

C. Environmental and Social Safeguards Specialists on the Team

- Lucienne M. M'Baipor, Social Safeguards Specialist
- Grace Muhimpundu, Social Safeguards Specialist
- Claude Lina Lobo, Environmental Safeguards Specialist
- Joelle Nkombela Mukungu, Environmental Safeguards Specialist

D. Policies that might apply

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	The project is classified B because of the expected moderate magnitude of the negative impacts that would result from its activities. Instead, and apart from risks during exploitation, the overall impact of the project is expected to be substantially positive due to improvement of access to basic services (water and electricity). As the proposed project is processed through OP 10.00 Para 12, the preparation of the environmental and social safeguards assessment documents has been deferred to the implementation stage, within 6 months of project effectiveness. The Project Appraisal Document (PAD) will include an action plan and a timetable agreed with the Borrower for the preparation of the ESIA/ESMPs which will be consulted upon, and publicly disclosed both in country and at the InfoShop within 6 months into project effectiveness and prior to the commencement of project civil works.
Natural Habitats OP/BP 4.04	No	The project will not finance activities that affect natural habitats.
Forests OP/BP 4.36	No	The project will not finance activities related to forest exploitation, harvesting, direct or indirect forest degradation, and increased access to forests.
Pest Management OP 4.09	No	The project will not finance activities related to transport, distribution, storage or use of pesticides or similar chemicals that could threaten environmental and human health.



Physical Cultural Resources OP/BP 4.11	Yes	The project is not expected to have an impact on physical cultural resources. Nevertheless, this policy is triggered because of the nature of civil works for water and electricity activities that will be financed under the first two components. To prevent the destruction during implementation, “Chance-Finds” mechanism/approach will be embedded in the ESIA/ESMPs to adequately mitigate such risks and impacts.
Indigenous Peoples OP/BP 4.10	No	There are no Indigenous Peoples in the project areas.
Involuntary Resettlement OP/BP 4.12	Yes	The project will include rights of way for the water distribution and electricity transmission/distribution networks, and minimal land acquisition for water and energy production facilities, and water storage facilities. Therefore, the Borrower will prepare a Resettlement Policy Framework (RPF) that will be consulted upon and disclosed in-country and at the Bank Infoshop within 3 months into project effectiveness. The RPF will provide useful guidance for the preparation of site specific Resettlement Action Plan (RAP). During project implementation, the screening process will determine whether land will be acquired and whether a sub-project specific Resettlement Action Plan (RAP) is required; in that case RAP(s) will be prepared, amply consulted upon and publicly disclosed both in-country and at the InfoShop prior to the physical start of project activities civil works.
Safety of Dams OP/BP 4.37	Yes	The project triggers: OP/BP 4.37 on Safety of Dams because the project will procure electrical/mechanical back up equipment for the Boali1 hydropower station. The project will also launch a study to assess dam safety which was planned under the Emergency Power Response Project (P114111), but was never completed due to shortage of funding.
Projects on International Waterways OP/BP 7.50	No	The project will not finance activities that will interfere with international waterways; either in terms of water withdraw or discharge of pollutants.
Projects in Disputed Areas OP/BP 7.60	No	The project intervention areas are not under dispute.

E. Safeguard Preparation Plan

Tentative target date for preparing the Appraisal Stage PID/ISDS

Oct 31, 2017



Time frame for launching and completing the safeguard-related studies that may be needed. The specific studies and their timing should be specified in the Appraisal Stage PID/ISDS

The project team proposes to trigger Paragraph 12 of OP 10.00 (Situations of Urgent Need of Assistance or Capacity Constraints) as the Borrower experiences capacity constraints because of fragility within a fragile state. Consequently, the project team proposes to proceed under the process of OP 10.00, Paragraph 12 to defer the completion of the environmental and social safeguards instruments to project implementation stage, within 6 months of project effectiveness.

As per IDA guidelines, a project level safeguards planning document will provide a time-bound outline setting forth the steps and the sequential planning and coordination for project activities; nevertheless, at least two general safeguard instruments (an Environmental and Social Management Framework - ESMF, and a Resettlement Policy Framework - RPF) have already been identified and are under preparation.

Because of lack of resources, the Borrower is preparing a request for a Project Preparation Facility in order to get resources for the project preparation, including to conduct the following activities already identified by the Borrower: ESMF, RPF, ESIA(s) for water activities, ESIA(s) for energy activities, and RAP(s) when required.

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