



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

Concept Stage | Date Prepared/Updated: 14-Sep-2016 | Report No: PIDISDSC19428



BASIC INFORMATION

A. Basic Project Data

Country Romania	Project ID P160751	Parent Project ID (if any)	Project Name Justice Services Improvement Project (P160751)
Region EUROPE AND CENTRAL ASIA	Estimated Appraisal Date Oct 03, 2016	Estimated Board Date Jan 31, 2017	Practice Area (Lead) Governance
Lending Instrument Investment Project Financing	Borrower(s) Ministry of Public Finance	Implementing Agency Ministry of Justice	

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Financing (in USD Million)

Financing Source	Amount
International Bank for Reconstruction and Development	67.95
Total Project Cost	73.61

Environmental Assessment Category
B-Partial Assessment

Concept Review Decision

Track II-The review did authorize the preparation to continue

Other Decision (as needed)

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B. Introduction and Context

Country Context

Over the last 25 years, Romania has made significant progress in developing its institutions for a market economy. European Union (EU) accession in 2007 was the driving force behind structural reforms and modernization efforts, both of which continue. Romania recovered relatively quickly from the financial crisis, and is now the fastest growing economy in the EU with a Q2 2016 growth rate of 6.0 percent. Growth has been shared with the bottom 40 percent in Romania, with the average income of the lowest income households' growing by 6.9 percent, as opposed to 4.8 percent for the general population between 2000 and 2013.

Romania also continues to be the second poorest country in the EU with one of the highest emigration rates. Large pockets of poverty and inequality remain across the country. One-third of the population is severely deprived materially in the sense of not being able to afford items considered necessary to lead an adequate life. Within the EU, Romania has the highest proportion of rural population (at 45 percent), the highest incidence of rural poverty (over 70 percent), and one of the largest gaps in living and social standards between rural and urban areas. Amongst the population, children, young people and Roma continue to face higher risks of poverty than others. The child poverty rate is more than 30 percent nationwide and 50 percent in rural areas. While 22 percent of the Romanian population is at risk of poverty, the ratio for Roma residing in marginalized communities is almost four times higher, and three times higher than their immediate non-Roma neighbors.



This significant gap in living standards between Roma and non-Roma neighbors in the same marginalized communities is mirrored in similar gaps on human development and social inclusion outcomes and suggests that there is a strong ethnic dimension to poverty and social exclusion.

Romania has access to significant EU funding to support its reform efforts. For the period 2014-2020, over 36 billion EUR is available for investment in various areas from creating jobs and growth to promoting innovation, as well protecting the environment and supporting social inclusion. Up until recently, Romania's absorption rate of EU funds has also been the lowest in the EU, though this has improved markedly since 2012, up to 75 percent by mid-2016. There has also been wide variation, with low absorption rates for agricultural and transport programs, and high absorption rates (more than 95 percent) rates for governance and public administration programs. While further improvements in absorption are expected in the current period, it is difficult to imagine that all available funds will be absorbed, which leaves precious grant resources on the table and misses opportunities to create fiscal space and support economic growth. With this in mind, the Romanian authorities are conscious of the need to improve programing and effective implementation of EU resources and have secured the Bank's assistance in this area to bring in best practices from other member states.

Governance and government effectiveness in Romania has improved in recent years from 43.5 percent in 2012 to 55.8 percent in 2014 according to the World Bank's World Governance Indicators.¹ Nonetheless, access to, and quality of, services remains uneven with Bucharest and other larger cities far better served than the rural areas. Government is increasingly looking to deliver services at scale and find solutions that harness information communications technology (ICT), while also ensuring adequate physical services. Internet penetration has grown fast from 39 percent in 2010 to 58 percent in 2015.

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Sectoral and Institutional Context

At the time of EU accession in 2007, the European Commission (EC) established a Cooperation and Verification Mechanism (CVM) to monitor progress in strengthening the country's judicial system. In order to meet the CVM requirements, Romania carried out a major overhaul of its legislative framework by adopting a new civil code, civil procedure code, criminal code, criminal procedure code and insolvency code. At the same time, areas of concern remain. The major reform to the core legal framework as well as frequent passing of new laws and insufficiently prepared changes to existing laws create challenges for the judicial system. Adjudication is perceived as inconsistent therefore undermining legal certainty. Combined with perceptions of corruption, it also undermines its credibility. For potential users, lack of familiarity with ever-changing laws is an obstacle to access to justice. Poor and vulnerable groups in particular face additional challenges such as discrimination and ineffective access to legal aid. Challenges posed by judicial infrastructure, especially in poorer parts of the country, remain significant. The use of ICT is not up to evolving European standards and does not sufficiently utilize ICT potential to access courts and their services and to manage the performance of the judicial system overall. This is also the case for other institutions closely linked to the courts, such as the prosecution service.

Against the backdrop of the CVM, the Bank conducted a Judicial Functional Review in 2012, which provided a thorough analysis and objective assessment of the performance of the justice system with recommendations for aligning with EU benchmarks. Many of these recommendations have been adopted by the Government, and according to the regular CVM report/assessment, Romania continues making substantial progress in the provision of justice. In its CVM Report of January 2016, the Commission commended Romania's performance in strengthening the performance of its judiciary, stating that:

'The Romanian judicial system as a whole has continued to demonstrate professionalism, including a capacity to adapt to significant changes in the civil and criminal codes, efforts to unify jurisprudence and a willingness to defend the independence of the judiciary. The track record of the key judicial and integrity institutions in addressing high-level corruption has remained impressive. This continued trend is a sign that Romania is developing sustainability in progressing towards the CVM objectives.'

In February 2016, Commissioner Juncker noted that, if Romania maintains the level of implementation expected, the CVM may come to an end within this Commission's term (by 2019).

Since 2005, the Bank has been supporting judicial reform in Romania through the Judicial Reform Project (JRP), a 130 million USD investment lending operation (P090309) that has built the capacity of the Ministry of Justice (MOJ), courts, Superior Council of Magistracy (CSM) and the sector's training institutions. The JRP has supported an overhaul of the core legislative framework through technical assistance for the drafting and implementation of the civil code, the civil procedure code, the criminal code, and the criminal procedure code as well as the insolvency

¹ <http://info.worldbank.org/governance/wgi/pdf/c186.pdf>



code. The JRP has further addressed service delivery constraints caused by inadequate and decrepit judicial infrastructure, with new construction or rehabilitation of more than 16 courthouses completed (and two more ongoing) in accordance with internationally recognized design standards. The JRP also equipped all courts with audio-recording systems to ensure transparency and an ICT system for the management of resources across all institutions of the judicial system. The JRP is scheduled to close in March 2017.

Romania is generally on par with EU average for court performance, with a few exceptions. Timeliness in case processing is on average with the EU, and Romania has the highest clearance rate (at 120 percent) within the EU. According to the Business Environment and Enterprise Performance Survey (BEEPS), the percentage of firms reporting that the courts are not a problem for business operations has jumped from 28 percent in 2008 to 73 percent in 2013. However, the judicial system has found it challenging to keep up with reforms to the core legal framework, frequent passage of new laws, and amendments to existing laws. Adjudication is often perceived to be inconsistent, undermining legal certainty. Although Romania has continued to make progress on the rule of law, steadily increasing from 55.6 percent in 2012 to 63.5 percent in 2014, it continues to rank at only 20th out of 24 comparators in 2015 in Europe and North America. While Romania's ranking in the 2015/2016 World Economic Forum's Global Competitiveness Report overall is 53rd out of 140, it ranks significantly lower for the quality of its public institutions (82nd). It ranks 91st for the efficiency of the legal framework to settle disputes, 66th for judicial independence, and 65th for irregular payments and bribes to obtain favorable judicial decisions. In terms of corruption, according to BEEPS, the percentage of firms reporting that bribery is frequent in dealing with the courts has dropped from 14 percent in 2008 to 1 percent in 2013, which is now better than the EU11 and ECA and EU11 averages. The judiciary has also developed a track record in tackling corruption, with a large number of prosecutions and convictions, including in high-profile cases.

Despite a generally good performance, challenges related to access to justice persist. Especially in poorer parts of the country where the inadequacy of judicial infrastructure impedes the delivery of services. According to the European Commission for the Efficiency of Justice (CEPEJ), the legal aid budget is among the lowest in the EU at less than 1 EUR per inhabitant and provides inadequate access, particularly for vulnerable groups. Justice sector institutions have a limited culture of engaging with communities, and civil society organizations (CSOs) have limited experience in promoting relations with these institutions. Potential users are deterred by an insufficient awareness of legal rights and obligations, a lack of familiarity with ever-changing laws and a lack of readily accessible information on the functioning of the justice system. Vulnerable groups place the least trust in the justice system to be responsive to their needs. The perception of corruption and unfair treatment, and the perceived inexistence of legal support services, including primary legal information and advice, are further barriers to using the justice system. In particular, citizens of Roma origin fear discrimination by police and, to a lesser degree, officials of other justice institutions, which together with perceptions of ineffectiveness of state justice institutions to provide timely and effective solutions of disputes leaves Roma communities to resolve certain disputes among Roma within the communities and for disputes with non-Roma to seek community support in resolving them.

In Romania, the justice sector is largely automated and reliant on ICT applications. However, investment in ICT has been inadequate in recent years, leaving Romania backsliding vis-à-vis evolving European and international standards. Most hardware in use across the sector is approximately 10 years old, purchased just prior to accession using EU PHARE funds. Hardware and software are quickly becoming obsolete, and workstations across the country are unable to run the core systems needed for the sector to operate, such as case management systems, document management, audio recording systems and basic security and anti-virus systems. By analogy, similar backsliding at the Romanian tax office led to a system collapse during a demonstration to the public in 2016.

The Romanian Government has a solid strategy for judicial reform and modernization over the next five years. The World Bank's Judicial Functional Review in 2012 provided recommendations which formed the basis for the Government's Strategy for the Development of the Judiciary (2015-2020), which was adopted by Government Decision No. 1144 in December 2014. Based on the Strategy, the Action Plan for the Implementation of the Strategy (2015-2020) was adopted by Government Decision No. 282 in April 2016. Both the Strategy and the Action Plan were the subject of public consultation and debate that included the justice institutions and the legal professions. The Action Plan sets out specific measures and sub-measures to be taken, each of which is costed and attributed to responsible agencies and donors. The Action Plan is being monitored by a committee and working group comprising the institutions.

Under the Action Plan, a large suite of technical assistance activities is supported by EU structural funds. The Operational Program for Administrative Capacity (POCA) allocates 500 million EUR, with the overall objective to create a modern administration capable of facilitating socio-economic development.

Under POCA, two priority axes support justice reform: Axis 1.3 aims to develop and implement standard systems and modern and efficiency management instruments in the judicial system. This supports approx. 50 million EUR for a range of institutional strengthening measures, including significant upgrades to integrated case management systems, management training, standardization, audio/visual recording, business intelligence, alternative dispute resolution etc. Axis 2.3 aims to improve transparency and integrity in the judiciary, including access to justice and quality of services. This supports communications, social inclusion activities targeting vulnerable groups, especially Roma, standardization



of ethics and integrity procedures, professional training, unification of case law etc. and is open for proposals by civil society, professional associations and partnerships with public institutions. POCA supports up to a maximum of 20 percent financing for hardware and civil works, and in some cases up to a maximum of 10 percent. Planning under the current phase of POCA is at an advanced stage. Calls for proposals will open in October 2016 and activities are due to commence in 2017. To fully utilize available EU funds, the Romanian Government is vigilant to ensure that engagement by other donors in the justice sector demonstrates a high degree of complementarity and synergy with POCA.

Based on the successful implementation of the JRP and the Judicial Functional Review, the Government has requested a new investment lending operation of 100 million EUR to support the implementation of the Action Plan. Under the Action Plan, the Romanian Government looks to the World Bank to support a series of measures that relate predominantly to ICT hardware and civil works, focusing on the courts, the National Trade Registration Office (NTRO) (attached to the courts) and the prosecution service (known as the Public Ministry). Implementation of these activities will complement and leverage POCA funding and support the implementation of the recommendations of the Judicial Functional Review.

The first phase of IBRD lending will be limited to 64 million EUR in Fiscal Year 2017 and, subject to satisfactory performance in the early stages of project implementation, an additional amount may be available through additional financing or a new phase of the project.

Relationship to CPF

The project supports all three pillars of the Country Partnership Strategy 2014-2017. It is key part of Romania's efforts supported under the first pillar to create a 21st century government with justice sector institutions efficiently delivering quality services that are accessible to all. In coordination with the Subnational Doing Business study on starting a business and enforcing contracts in Romania, the project will contribute directly to the country's development goal of an enhanced business environment through improved service delivery and therefore support the second pillar on economic growth and job creation. Moreover, the project targets areas with underserved poor and marginalized populations in particular. It therefore contributes to the third pillar as it aims at increasing social inclusion by building activities promoting citizen engagement and community outreach into all project components.

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C. Proposed Development Objective(s)

To improve the efficiency and accessibility of targeted justice institutions.

Key Results (From PCN)

The proposed Project focuses on improving the performance of three justice sector institutions: the National Trade Registry Office, the courts, and the Prosecution Service. A key aspect of better performance is increased responsiveness to the needs of users and potential users, in particular those of poor and vulnerable groups.

The proposed project therefore expects to achieve the following key results:

1. Increased awareness among target groups of their rights and obligations under Romanian law, particularly in relation to recently adopted laws;
2. Improved online availability of selected justice services; increased number of beneficiaries accessing these services; and improvement in their satisfaction with these services;
3. Improved physical condition of selected courts to meet minimum standards of service delivery; and improved satisfaction of court users at these courts (measured by surveys of institutional and end users);
4. Improved quality and reliability of case management processes; and practices more closely aligned with key EU Directives on legal aid, victim support and access to information.

The specific indicators will be defined during project preparation. Possible indicators may include: increased availability of services; increased traffic/clicks on relevant websites; improved satisfaction measured through surveys of institutional and end users, citizens and the public;



improved data integrity of case management systems. Indicators will be disaggregated to the extent possible by case/service type, location, gender, and target group.

D. Concept Description

Component 1: Improving Court Operations

Based on the needs identified by the 2015-2020 Strategy for the Development of the Judiciary and the Action Plan, this component will include (i) investments in ICT across the judiciary to maintain and enhance core functions of the courts, (ii) courthouse rehabilitation and construction to improve the system's ability to deliver services in poor and underserved regions of Romania, and (iii) citizen engagement and community outreach activities to increase responsiveness of the courts to the needs of local communities, especially poor and vulnerable groups.

The ICT investments will improve the quality and efficiency of operations across the court network. In the short term, WAN and LAN infrastructure will enable fast and secure electronic exchange of information within courts and between courts in a complex. This will also enable audio recording software financed under the JRP to operate efficiently. Courts will be encouraged to move from paper to electronic format, as more scanning equipment will be available and e-filing pilots may be expanded. Free Wi-Fi may be offered to lawyers and parties in courthouses, saving time and improving user satisfaction. Large investments will be made in ICT equipment, mainly standard hardware (desktops, printers, scanners, servers etc.) and software (document management, archiving, legal templates, Anti-Virus, audio recording etc.) to replace obsolete equipment that was purchased in 2006. Reliable hardware and software will reduce security breaches and system outages across the country and save time and frustration among judges and court staff, enabling them to focus on core functions. Moreover, in the medium term, these ICT investments will provide the necessary building blocks to enable the large-scale upgrades of systems being financed through technical assistance under POCA. These include the re-engineering of the integrated case management system, the availability of audio/visual recordings, large-scale e-filing, alternative dispute resolution, case management of the asset recover office, and tools for the integration of the EU's e-justice portal and cooperation with EU member states.

Investments in judicial infrastructure will improve court operations at first instance courts in various locations across Romania, in an effort to improve the delivery of services to poor and underserved populations. During project preparation, the MOJ and the Bank developed a list of priority court infrastructure based on the following selection criteria: court caseloads, the condition of infrastructure; and the needs of poor and vulnerable communities (including by taking into account the local human development index, GDP per capita, wage distribution, share of Roma population, and employment rates). Based on the prioritization exercise, six sites were selected, all of which are existing sites in very poor condition and requiring extensive rehabilitation. The improved infrastructure will comply with design standards that were developed under the JRP based on international good practice, including compliance with EU and international standards for physical accessibility and for the treatment of prisoners, victims of crime, juveniles etc. The prioritization exercise also identified a reserve list of additional sites that could be upgraded in the event of additional financing or a new phase of the project.

To accompany the hard infrastructure investments, citizen engagement and community outreach activities will aim to increase the responsiveness of the courts to the needs of local communities, especially poor and vulnerable groups. Based on findings of a qualitative needs assessment conducted in preparation of this project and lessons learned from the JRP that did not have any demand side activities, this project takes a two-pronged approach focusing on access for actual and potential court users at the local and national level. First, at the local level, the proposed civil work sites will provide suitable anchors for engagement with local communities and targeted outreach to vulnerable groups including Roma and other ethnic minorities, refugees, women, children, elderly, people with disabilities, LGBTI, and others. Specific activities will promote dialogue between justice sector officials including judges, prosecutors, staff, lawyers and other legal professions, and CSOs, community representatives and citizens around justice sector challenges, objectives and achievements. Based on local needs and opportunities, such activities may include the establishment of ad hoc mechanisms, such as court open days, community round-tables and workshops, as well as the establishment of more permanent local contact points providing primary legal information and advice. Legal information campaigns at local level can address specific needs to increase legal literacy and improve access to legal counsel. Second, at the national level, the project will target key laws that affect poor and vulnerable groups nationwide, and seek to address information barriers to use the courts. This may include training, information campaigns on the personal insolvency framework, lay guides to accessing legal aid, or information for self-represented litigants on how to navigate the court system. Moreover, the MOJ will assess the feasibility of establishing a pilot grant scheme under the anticipated additional financing for courts to apply for support to activities specifically dedicated to increasing the responsiveness of the courts to community needs.

Component 2: Enhancing National Trade Registry Office Performance



This component supports the NTRO at the central level and at local level in 42 locations throughout Romania to improve the services they offer to a wide range of end-users, including businesses, financial institutions, insolvency practitioners, attorneys, bailiffs, notaries, courts, prosecutors and citizens, in line with EU standards. Based on the needs identified by the 2015-2020 Strategy for the Development of the Judiciary and the Action Plan, this component will include investments in ICT as well as citizen engagement and community outreach.

First, the project will support the design, development and implementation of an enhanced electronic archiving system of all business information. This will enable NTRO's key users (businesses, financial institutions, insolvency practitioners, attorneys, bailiffs, notaries, courts, prosecutors, citizens etc.) to access business-related information 24/7 on the NTRO portal. (Such access is currently only available internally and during business hours.) This will provide greater convenience and time-saving across the economy. ICT hardware investments will upgrade the NTRO data centers (primary and back-up) with modern equipment and enhance the performance of ICT systems, better secure NTRO data and improve business continuity. The project will also support the initial stages of development of an Insolvency Procedures Bulletin that will support the new personal insolvency framework, which is an important tool for information and user-interface with citizens who are struggling to make ends meet. The project will also support the initial phases of development of the NTRO Electronic Bulletin, which is required under EU law to establish the interconnectivity of the Romanian business registry and insolvency registers of other EU member states. The full rollout of these two bulletins would be supported through either additional financing, or a new phase of the project.

Citizen engagement and community outreach activities aim at increasing the responsiveness of the NTRO to the needs of potential and actual users with a particular focus on micro and small enterprises, especially those operated formally or informally by persons belonging to poor and vulnerable groups. First, a needs assessment among potential and actual users will be carried out, with a particular focus on vulnerable groups. Second, the project will support targeted awareness and capacity enhancement campaigns for groups of actual and potential users as well as training of NTRO staff and other relevant professionals to raise their awareness of particular user needs. These outreach activities are intended to help establish a regular dialogue forum between NTRO professionals with CSOs and relevant user groups. An area of focus will be the handling of cases of personal insolvency.

Component 3: Improving Operations at the Prosecution Service

The ICT investments at the Public Ministry will improve the core functions of the prosecution service in a manner similar to the courts. The WAN and LAN rollout in all prosecution offices as well as cabling and reconfiguration of the LAN of the Bucharest Tribunal's Prosecutor Office will enable prosecutors to share information quickly and securely. In addition, the investments in the General Prosecutor's Office's main and secondary data centers will lay the foundation for the Public Ministry to implement the EU-funded design of an audio/video records management system which will ultimately ensure that prosecution interviews with witnesses and defendants are recorded in compliance with human rights standards. And a range of security upgrades to physical buildings will improve the safety at the workplace and promote the integrity of prosecutors' work.

The citizen engagement activities under this component will be carried out in conjunction with those under component 1. Activities are aimed at increasing the responsiveness of the prosecution service to the needs of local communities and especially vulnerable groups including Roma and other ethnic minorities, refugees, women, children, elderly, people with disabilities, LGBTI, and others. This project has a two-pronged approach. First, at the local level, the proposed civil work sites for courthouse rehabilitation and construction will again provide suitable anchors for engagement of the prosecution services with local communities and targeted outreach. Specific activities such as community round-tables and workshops will focus on promoting a platform for dialogue between justice sector officials including prosecutors and prosecution service staff, police, lawyers and other legal professions, and CSOs, community representatives and citizens at the local level around justice sector challenges, objectives and achievements. Legal information campaigns at local level will address specific needs to increase legal literacy and improve access to legal counsel and primary legal aid. Second, at the national level, the project will include training of legal professionals to increase their capacity to use local level feedback and effectively respond to the particular needs and challenges faced by vulnerable groups and to address stereotyping and discrimination, in particular regarding Roma.

Component 4: Project Management

This component will be dedicated to effective management of the project. It will provide funding for the operating costs of the Department for Implementation of Externally Funded Projects (DIEFP) at the MOJ to act as the project implementation unit for the project. The Government will fund the salaries of the DIEFP and the project will fund the operating costs, which will include the multi-stakeholder justice surveys and related analytic work and outreach.

SAFEGUARDS



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

Component 1 includes construction and rehabilitation of courts to improve the system’s ability to deliver services in poor and underserved regions. Construction will comply with design standards developed under the JRP based on EU requirements and international good practice for accessibility and treatment of detainees, victims of crime, juveniles etc. Refurbishing will involve altering interior spaces and plan layouts, and adapting existing spaces for new functions. While many activities will be carried out country-wide, the activities relevant for safeguards are the civil works. The locations of the selected courts have been determined: Costesti, Calafat, Horezu, Tg Neamt, Carei, Corabia. However, the anticipated investments for the rehabilitation/adaptation of the selected courts are not yet defined. Engineering investigations are needed to decide on the respective solution, followed by the preparation of detailed designs for each site. The locations have been assessed during field visits. There are no social safeguards issues such as land acquisition and resettlement. Based on field investigations, the environmental team confirmed the Category B rating. Whilst engineering investigations and designs are expected to commence in early 2017, the MOJ will prepare an ESMF, publicly consulted and disclosed by appraisal, in accordance with Bank rules.

Only after preparation of feasibility study and decision on solution to have identified all potential environmental and social impacts of these subprojects, the site specific ESMPs will be prepared and specific mitigation measures identified.

All investment sites are expected to be located within existing rights of way and on land owned by the MOJ. Designs will be prepared to minimize potential environmental and social impacts. The PIU at the Ministry of Justice will be responsible for organizing and conducting a public consultation at central level with the involved institutions, representatives of local authorities and affected group prior to completion of ESMF. Site-specific ESMPs will be prepared for each sub-project and disclosed locally before procurement commences for the civil works. No cultural or historical assets will be negatively affected. Only two court buildings (Carei and Corabia) are 'historical monuments'. Romania cultural heritage protection system is well developed with responsibility for monitoring and enforcement conducted by the Ministry of Culture, in line with Bank safeguard requirements

B. Borrower’s Institutional Capacity for Safeguard Policies

The Project will be implemented by a very experienced Project Implementation Unit: the Department for the Implementation of Externally Funded Projects at the Ministry of Justice. Throughout the implementation of the ongoing Judicial Reform Project, the PIU has complied with safeguard requirements at all times. The capacity has therefore been assessed as adequate.

C. Environmental and Social Safeguards Specialists on the Team

Valerie Morrica, Cesar Niculescu

D. Policies that might apply

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	The policy is triggered due to the civil works under the Project. An ESMF and site specific ESMPs will be



prepared.

Natural Habitats OP/BP 4.04 No

Forests OP/BP 4.36 No

Pest Management OP 4.09 No

Physical Cultural Resources OP/BP 4.11 No

Indigenous Peoples OP/BP 4.10 No

Involuntary Resettlement OP/BP 4.12 No

The due diligence to date shows that civil works sites will not include land acquisition, and even where sites are on public land, it has been determined that there are no users, squatters, informal settlers on these lands that may be impacted by the civil works.

Safety of Dams OP/BP 4.37 No

Projects on International Waterways OP/BP 7.50 No

Projects in Disputed Areas OP/BP 7.60 No

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E. Safeguard Preparation Plan

Tentative target date for preparing the Appraisal Stage PID/ISDS

Sep 22, 2016

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 draft ESMF was submitted to the World Bank on 6 September, 2016. Public consultations will be held at central level by 20 September, 2016. The finalization of the ESMF is scheduled for 28 September, 2016.

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APPROVAL

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