

INTEGRATED SAFEGUARDS DATA SHEET CONCEPT STAGE

Report No.: ISDSC13700

Date ISDS Prepared/Updated: 04-Aug-2015

Date ISDS Approved/Disclosed: 08-Aug-2015

I. BASIC INFORMATION

A. Basic Project Data

Country:	Zimbabwe	Project ID:	P154861
Project Name:	Zimbabwe National Water Project (P154861)		
Task Team Leader(s):	Chloe Oliver Viola		
Estimated Appraisal Date:	05-Oct-2015	Estimated Board Date:	15-Oct-2015
Managing Unit:	GWA01	Lending Instrument:	Investment Project Financing
Sector(s):	Water supply (80%), General water, sanitation and flood protection sector (20%)		
Theme(s):	Rural services and infrastructure (60%), Municipal governance and institution building (20%), Water resource management (20%)		
Financing (In USD Million)			
Total Project Cost:	20.00	Total Bank Financing:	0.00
Financing Gap:	0.00		
Financing Source			Amount
Borrower			0.00
Zimbabwe Reconstruction Fund (ZIMREF)			20.00
Total			20.00
Environmental Category:	B - Partial Assessment		
Is this a Repeater project?	No		

B. Project Objectives

The proposed project development objective is to strengthen the capacity of water sector institutions to improve the access to and the quality of water and sanitation services in selected growth centers and to improve water resources planning.

This will be achieved through strengthening the capacity of ZINWA and the Ministry of Environment, Water and Climate through investments in seven growth centers and technical

assistance. The project is expected to directly benefit about 50,000 people living in the seven growth centers and indirectly benefit the seven local authorities, national government and ZINWA through technical assistance

C. Project Description

The project will have three components with indicative costing as below:

- Component 1: Growth Center Water and Sanitation Improvements (\$14 million)
- Component 2: Technical Assistance (\$5 million), including (2.1) National Water Resources Master Plan; (2.2) TA for a Water Services Regulator; (2.3) TA to Local Authorities; (2.4) Institutional Strengthening of ZINWA; and (2.5) Training
- Component 3: Project Management (\$1 million)

Component 1: Growth Center Water and Sanitation Improvements (US\$ 14 million): This component will finance investments in water supply and sanitation rehabilitation and upgrading in 7 growth centers. Detailed designs (including bills of quantities and tender documents) and preliminary Environmental Impact Assessments (EIAs) were completed for all 7 growth centers in 2014 (with funding from the A-MDTF) in order to address all short, medium and long term investment needs. Investments will include physical expansion (within the same public landholding) and rehabilitation of water treatment works, boreholes, transmission mains, storage and service reservoirs, distribution system, connections and meter installation and replacement. The works will also include minimal works to restore operation of the wastewater treatment systems in the project areas. The works planned will include clearing and desludging, repairs of inlet works and fencing and operators facilities. The investments are estimated at about US\$ 14 million. A summary of the costs for each growth center (and the respective catchment in parenthesis) is presented below:

Guruve (in Manyame catchment):	\$1,507,300
Gutu (Runde):	\$ 949,200
Lupane (Gwayi):	\$2,969,900
Madziwa (Mazowe):	\$2,698,800
Mataga (Mzingwane):	\$1,575,400
Nembudziya (Sanyati):	\$2,590,800
Zimunya (Save):	\$1,772,900
Total	\$14,064,300

The seven highest priority stations for the purposes of this Project are all termed “Growth Centers” were selected from the 50 stations, one per water catchment area based the number of beneficiaries and the expected economic benefit of the Project. The most important consideration for selection of priority stations was to address underserved areas where mostly the poor live, including where new communities have come up, or schools and clinics and other public institutions that need a supply of good, safe water. Practical considerations were also factored in such as the readiness of ZINWA designs, priority stations needing attention particularly for expansion of networks, as well as taking into consideration ZINWA’s own recommendations. Financial and economic viability was also taken into account.

Component 2: Technical Assistance (US\$ 5 million): Technical Assistance (TA) will be provided to strengthen the capacity of the relevant national and local institutions needed to ensure the sustainability of the investments and improve the overall planning, regulation and reform of the sector. There will be five sub-components of TA:

Sub-component 2.1: National Water Resources Master Plan: The Government has requested TA under the Project to develop a national water resources master plan. The Master Plan will build on the National Water Master Plan of the early 1990s and the subsequent Catchment Outline Plans developed in the mid-2000s. The Master Plan is expected to cover the following key areas: a full understanding of the quantity, quality and spatial distribution of the water resources available in Zimbabwe (surface water and groundwater); a characterization of the different uses (consumptive and non-consumptive) and users (energy, domestic, recreational, environment, agriculture, industry, mining) and an assessment of the varying demands (across catchments, national, sub-national and trans-boundary); assessment of the resilience of the water resources to climatic variability and indicative adaptation measures to climate change. The master plan will assess the gap between supply and demand and update previous supply assumptions using the latest climate change modelling data. Investment needs for the sector will be assessed as well as other measures needed to restore meet national development goals. The Terms of Reference for the Master Plan will be prepared to include due attention to environmental considerations, including (among others) adequate in-stream environmental flows; protected areas and aquatic habitats of high conservation priority; environmental criteria for future site selection of dams or other new water infrastructure; and watershed catchment management. It is expected that MEWC will analyze and outline the institutional mechanism necessary to manage the TA including the option of strengthening the Water Resources Sub-Committee of the National Action Committee (NAC) to assume the role of a Steering Committee for the TA.

Sub-component 2.2: TA for a Water Services Regulator: The Government has decided to set up a water and wastewater services regulatory authority and has approved a Cabinet Memorandum in April 2015 to this effect. The memo proposes the setting up of a single sector regulator that would cover both water resources regulation as well as water and sanitation services. The main purpose of the regulator will be to balance the interest of the consumer – whose interest is best service at least cost – with that of providers who are generally a monopoly position, but need to receive predictable periodic tariff adjustments that are cost reflective and sustainable along with adequate access to water resources. The regulator will thus ensure that the agreed rules are fairly implemented and that all people are served with at least a basic service and at a minimum acceptable standard. MEWC requested the Bank to support the setting up of the regulator. Bank support will be through the proposed Project and through TA from the Water and Sanitation Program. The following areas of support were proposed: (i) developing a roadmap for the establishment of the regulator based on international good practice detailing: institutional options; required legislative amendments; a business and financial plan for the regulator; (ii) south-south learning exchange; (iii) integrating or interfacing Service Level Benchmarking (SLB) currently being practiced by 32 municipal councils into the regulatory process; and (iv) office setup costs as appropriate.

Sub-component 2.3: TA to Local Authorities: Two activities have been proposed by the Ministry of Local Government, Public Works and National Housing (MLGPWNH) for consideration under this sub-component.

TA to support Local Authorities and ZINWA formalize water service agreements: Six of the proposed investments under this project are all in the jurisdiction of Rural District Councils. The seventh, Lupane, was re-categorized as an Urban District Council in 2015. As the capacity of these councils is limited – most not having or being in a position to hire an engineer – MLGPWNH and MEWC confirmed that the councils would need to develop a service provision agreement with an operator to ensure the sustainability of the proposed investments. In line with the 2013 National Water Policy all of these Local Authorities – as the Water Service Authority – will need to develop a

water service provision agreement with a service provider for the investment, operation and maintenance of the water production operations. In some cases this service provision agreement should also cover sewerage. The project will assist Local Authorities and ZINWA pilot these agreements, either through formal Water Service Agreements or through Memoranda of Understanding between both parties. The clear separation of roles between the Water Service Authority (the Local Authority) and the Water Service Provider (in this case ZINWA) will also allow for future potential private sector participation through local operators or other.

Promoting Sanitation Improvements in Small Towns: Sanitation in small towns is a major challenge and institutional responsibility for it is unclear. It is proposed that MLGPWNH will develop a TOR for a sanitation assessment to be carried out. Based on this assessment, some investments would then be channeled towards improving identified sanitation needs as appropriate, taking care to avoid any environmentally sensitive activities or sites, or any involuntary taking of land. In two of the small towns (Gutu and Zimunya) existing waste stabilization ponds, currently under the management of ZINWA, will be rehabilitated. Options for community mobilization for sanitation will be identified, and where necessary potential for community revenues using wastewater implemented (small-scale irrigation, growth of duckweed, etc). Sanitation promotion and hygiene education will also be considered during project preparation.

Sub-component 2.4: Institutional strengthening of ZINWA: In 2014, at the request of ZINWA, the Bank financed a skills audit and strategic gap analysis to identify key areas to strengthen ZINWA. Three key areas were identified as priorities: (i) a need to separate the utility and water resources function of ZINWA – as identified in the National Water Policy; (ii) a lack of commercial orientation and (iii) a lack of customer focus and poor stakeholder management. The following areas have been proposed for support under the project.

Improving the commercial and customer care orientation and functions of ZINWA: Financial records of ZINWA indicate that it is currently not in a good financial situation and is making losses. Some of the key drivers for ZINWA to be in this situation include high non-revenue water and low revenue collection. The assessments carried out on ZINWA highlight the institutional inadequacies of ZINWA as one of the key issues needing attention. There is no full-fledged commercial department in ZINWA that is charged with managing its day-to-day commercial functions that include (i) customer care, (ii) dedicated debt management (iii) connections, and (iv) metering; (v) non-revenue reduction and (v) billing. ZINWA has recently established a “commercial unit”, however the mandate of this unit is to explore new business opportunities for ZINWA. Under the project it is proposed that a consultant be hired to assist ZINWA to design and setup an effective commercial services department which shall have as its main functions revenue generation through connections, metering, billing, and revenue collection including debt management. The consultant will assist ZINWA in developing/refining its service and customer charters, set up a customer care unit and propose a road map for a fully-fledged modern and responsive customer care unit. The improvement in customer care functions will improve the image of ZINWA and lead to better complaints handling resulting in enhanced willingness to pay by customers. The commercial services department will also manage customer care function.

Citizen Engagement: There is a realization that effective engagement of citizens will lead to better service delivery and accountability. The Beitbridge Impact Assessment, for example, makes a number of general recommendations on how to maximize state building dividends in infrastructure projects, such as: (i) identify and address inequalities that may be long-standing or that have emerged during recent crises; (ii) support local authorities (in this case RDC/ULA and ZINWA) to clearly

brand improvements in service delivery to ensure citizens recognize that it is government institutions that are delivering results; and (iii) collect base-line and end-line data on citizen attitudes and confidence in domestic institutions to assess whether investment has changed citizens perceptions. Government is moving towards requesting state enterprises including ZINWA to provide people-centered services. It is also pressing for greater citizen engagement and accountability. The National Water Policy also states the need for customer and stakeholder involvement as a way of increasing accountability in the water sector. In recent months ZINWA has established water committees in areas where it supplies water including some of the project areas. The project will finance a TA to develop a citizen engagement and commercialization strategy for ZINWA building on current initiatives by ZINWA and drawing from the general guidelines and recommendations of the water policy and other government policy documents. This activity will require close consultation and collaboration between ZINWA and local authorities. The strategy should address among other things gender and vulnerable groups including HIV and Aids. The TA should also propose possible institutional arrangements/realignment of ZINWA to be able to effectively deal with citizen engagement. Activities including under citizen engagement, which will most likely fall under the commercial department, will also need to be complementary with the stakeholder consultation under the safeguards work.

Gender: The Bank will assist the Government to develop a gender strategy for the Project, and suggested that the Government consider involving the Ministry of Gender in the appropriate way.

Sub-component 2.5: Training: MEWC will develop a training plan, together with ZINWA and other relevant agencies, for support under the Project. The training plan will include training needs of all project implementing entities, such as MEWC, MLGPW, and Local authorities in the project areas, but will focus on the operational training needs required by ZINWA to implement the project and ensure sustainability of the investments. There will also be on-the-job training through mentoring by consultants hired to support the PIU. The needs assessments have identified capacity gaps in the areas of utility management (commercial and customer care functions, non-revenue water management), asset management, project management, procurement, safeguards and, monitoring and evaluation. From the assessments and discussions with ZINWA and other key stakeholders it is evident that there is need to strengthen ZINWA, and other agencies, in these areas. ZINWA is also not familiar with World Bank procedures and policies for project implementation. This is due to the absence of World Bank support for nearly two decades during which period most government entities including ZINWA has not implemented Bank financed projects.

Component 3: Project management (US\$ 1 million): ZINWA will set up a Project Implementation Unit (PIU) to manage the project. The PIU will directly manage component 1 and act as a secretariat to the various lead ministries for sub-component 2.1, 2.2 and 2.3. The PIU will be staffed with 5-7 staff, including a Project Manager and include competence in engineering, procurement, financial management, safeguards and monitoring and evaluation. The PIU may also have secondees (focal point officers) from other entities participating in the project. The Project Manager, shall be the link person with the World Bank and will work closely with each Project Implementation Team (PIT) established in the catchments. The PIU shall be responsible for monitoring progress in each catchment and shall be responsible for all procurement. The PIU shall also be responsible for : (i) overall coordination of project activities; (ii) managing the project's special account and ensuring proper and timely project accounting and reporting of project expenditures (iii) preparing consolidated progress reports. The Project Manager will use the quarterly reports from the PITs in the catchments to prepare a consolidated progress report. The report should cover: (i) progress to date in the implementation of the project; (ii) challenges and proposed actions to address them; (iii) status

of the procurement process of key goods and materials; and (iv) status of disbursement and projection (v) the environmental and social safeguards and (vi) monitoring and evaluation. The PIU shall submit the report to the Government and the Bank. The PIU will also serve as its Secretariat and shall coordinate the PSC meetings and prepare minutes of the PSC meetings.

Project Implementation Team: A Project Implementation Team (PIT) will be established at catchment level to implement the sub-project in the catchment and coordinate all other project activities that will involve the catchment. The PIT shall comprise the Operations Engineer, financial support staff, environmental and social staff, secondees from the Local Authorities, and other staff as appropriate. The Operations Engineer shall be the PIT Team leader and shall report to the Project Manager and the Catchment Manger via the Operations Manager. The Catchment Manger shall be tasked with overseeing progress on works in the catchment. The PIT will be responsible for day-to-day activities related to the project. It shall be responsible for drawing/approving specifications of goods, works and services in the catchment including preparing procurement requests to be forwarded to the PIU. The PIT shall also be responsible for daily supervision and certification of works, preparation of payment certificates, receiving and verifying material specifications as well as maintaining accurate project records (materials, work done and labor and equipment returns). The PIT shall also oversee the consultants working on activities in the catchment. The PIT is expected to meet regularly and shall prepare progress reports covering progress to date, disbursement progress , update on procurement , safeguards compliance, monitoring and evaluation aspects, bottlenecks affecting progress and proposed measures to address them and plan of action for remaining works and, progress and disbursement projection.

Monitoring and Evaluation: The project will play close attention to M&E as this is the first investment project in Zimbabwe in over a decade, and can inform future investments in the water sector and other sectors. ZINWA will set-up an M&E system in the PIU that will report to the Project Steering Committee and the Bank. The PIT in each catchment will conduct regular (monthly) reviews to assess physical progress, progress towards targets including connections, identify implementation bottlenecks and propose solutions to speed up progress and a program. The PIT will prepare monthly reports based on these reviews and forward to the PCU. The Project Coordinator will use the quarterly reports from the catchments to prepare a consolidated progress report. A consultant will be hire d to assist the PCU and PIT in conducting periodic m onitoring and evaluation and preparing M&E progress reports. The PCU should send the monthly progress report to the SC and share the same with the Bank.

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

Water resources in Zimbabwe are managed by the Zimbabwe National Water Authority (ZINWA) based on the seven catchments boundaries following after the seven major rivers in Zimbabwe. The proposed project will be implemented at seven priority water supply schemes selected, one from each of the catchment out of a combined fifty assessed schemes. The seven schemes are Madziwa (Mazowe catchment), Guruve (Manyame Catchment), Nembudziya (Sanyati Chatchment), Gutu (Runde Catchment), Mataga (Mzingwane Catchment), Zimunya (Save Catchment) and Lupane (Gwayi Catchment). These schemes are operational and the host environment is already impacted by the earlier developments of the schemes and also other related land developments projects by the host Rural District Councils (RDCs).

The sources of water for the above schemes vary from boreholes (Lupane), rivers (Madziwa, Guruve, Gutu) and existing dams (Lupane, Zimunya, Mataga and Nembudziya). The schemes fall within

specific district that is administered by the District Administrators (DA) while development is championed by the Rural District Council (RDC). The source rivers and dams are multi-purpose, combining domestic water supply, animal drinking, irrigation water and environmental use. In all the cases, the water available is said to surpass the current combined water demand. The targeted project interventions will be implemented in RDC high and medium density planned residential areas. In some cases, the planned areas are already built up while other areas are not yet built up though the layouts for the land developments are already finalized and approved. ZINWA used these approved layouts to develop the distribution networks.

The exact footprints of the project will be limited to existing transmission routes while the distribution networks will be limited to the servitude areas provided in the development layouts. In all project areas, there will be no resettlement due to the planned nature of the targeted distribution areas. Inspection of the project areas showed that the building lines are clear of structures that could have obstructed the installation of the water distribution networks. There is a minimum of four meters between houses and the internal roads are nine meters wide plus servitude areas, thereby giving adequate work room for manual trenching without interfering with household activities. The land on which the project treatment plants and ancillary works will be located belongs to the RDCs.

In two (Gutu and Zimunya) of the seven schemes related RDCs, the sanitation services are managed by ZINWA through stabilization ponds. In the other five RDCs, the sanitation systems vary from septic tanks for institutional and low density areas to pit latrines in some high density areas. The increased water supply in Gutu and Zimunya is likely to result in direct increase in effluent generated, thereby stretching the capacity of the stabilization ponds.

Despite the high level of planning in the project areas, the adequacy of the water sources and the rehabilitation nature of the project scope, the following issues will be critical for sustainable implementation of the project;

- Occupational safety and health considering the heights or depths of the water treatment infrastructure (Treatment plant, sedimentation tanks and storage tanks) and water treatment chemicals handling.
- Public safety and convenience during trenching (along public roadways).
- Rehabilitation of trenched areas.
- Accommodation facilities on ZINWA or RDC land at subproject sites; currently, in one of the sites the chemical dosing room is used as office, laboratory, and sleeping room.
- Consultation of other water users and efficient allocation during water shortage periods.
- Water quality management through staff training, adequate equipment and water quality monitoring.
- Citizen engagement and feedback.
- Backwash effluent treatment and disposal (at environmentally suitable sites).
- Potential increase in effluent generation.

E. Borrowers Institutional Capacity for Safeguard Policies

The parent ministry for project implementation is the Ministry of Water, Environment and Climate. Two distinct organizations under this ministry are the Environmental Management Agency (EMA) and ZINWA. ZINWA is responsible for implementation of component 1 of the project (infrastructure development) which is the one with potential negative environmental and social impacts. EMA administers the The parent ministry for project implementation is the Ministry of Water, Environment and Climate. Two distinct organizations under this ministry are the Environmental Management Agency (EMA) and ZINWA. ZINWA is responsible for implementation of component

1 of the project (infrastructure development) which is the one with potential negative environmental and social impacts. EMA administers the Environmental Management Act which requires ZINWA to put in place Environment and Social Management Plan (ESMP) for each of the seven schemes and EMA will review and certify the projects before implementation. The RDCs have the mandate to protect the environment and communities under their jurisdiction, therefore ZINWA is not only obliged to comply with EMA requirements, but also the local authority bye-laws. To ensure adequate compliance with local development standards, ZINWA is part of the RDCs committee member on development. The external monitoring mechanism is therefore double (EMA and the RDCs). ZINWA's participation in RDC processes will expose it to any feedback about any negative impacts experienced by the local people during project implementation. The RDCs have an Environment Officer and a Social Welfare Officer who will help ZINWA with external monitoring feedback.

Internally, ZINWA has a Water Quality and Environment Protection Unit whose mandate is to assure delivery of quality water to the consumers and also protect the environment, employees and the community from negative impacts that may arise from some of ZINWA infrastructural projects. This unit participates in formulation of Environment and Social Impact Assessments (ESIAs) and Resettlement Action Plans (RAPs) for ZINWA infrastructure developments. The unit also review ESIAs for other projects that may have negative impacts on the water resources. This unit is represented at head office and at catchment level. This conformation will ensure that the safeguards agenda is well represented and coordinated from head office while there is staff to implement on the ground. The head office and the catchment staff are a good balance of water and environment related qualifications including Biological Sciences, Environmental Studies, Geography and Water Resources Management. Looking at the internal expertise of ZINWA, external monitoring mechanism in the form of EMA and respective RDCs the project can be implemented with full compliance with the safeguards requirements.

Despite the available internal capacity, there is need to specifically capacitate the unit with more awareness on World Bank specific safeguards requirements, implementation and monitoring processes. The Bank Safeguards team will work closely with ZINWA and the RDCs to ensure maximum compliance.

F. Environmental and Social Safeguards Specialists on the Team

George Campos Ledec (GENDR)

Kristine Schwebach (GSURR)

II. SAFEGUARD POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	This is a Category B project because it involves rehabilitation and expansion of existing rural water supply infrastructure with minimum negative environmental and social impacts. The potential impacts are very localized and reversible in most cases. With respect to water abstraction and use, there would be no real cumulative impact from the 7 water supply subprojects, because each one is (by design) in a different watershed catchment.
Natural Habitats OP/BP 4.04	Yes	The water sources are habitat for fish and other

		aquatic life although the impact on aquatic ecology is expected to be relatively minor. The transmission mains would follow planned alignments, some of which traverse areas of natural vegetation although most would follow existing pipeline routes and road rights-of-way.
Forests OP/BP 4.36	No	The project is not expected to affect the health and/or quality of forests, or bring about changes in forest management. There are no gazetted forest areas that would be affected by the project. There would be very minimal impacts upon non-gazetted wooded areas from the new rights-of-way for transmission mains.
Pest Management OP 4.09	No	Construction and operation of the project is not expected to require any pest, vector, or weed management. This will be verified during project preparation. In the event that any control measures might be needed (such as for floating aquatic weeds), a Pest Management Plan would be prepared for each relevant subproject prior to appraisal.
Physical Cultural Resources OP/BP 4.11	No	The specific project areas are not known to have any physical cultural resources that would be affected by the project. Chance Finds Procedures will be part of each ESMP, in the event that anything of cultural interest is unearthed during the civil works.
Indigenous Peoples OP/BP 4.10	No	There are no people within the project area who meet the Indigenous Peoples criteria of OP 4.10.
Involuntary Resettlement OP/BP 4.12	Yes	The project areas are well planned and have no potential for resettlement. There are no encroachments on the road reserves (rights-of-way) where the water mains would be installed and the building lines between houses were observed in all constructed areas. There are no temporary structures within building lines. Rehabilitation and expansion of water treatment works would be on existing ZINWA and RDC landholdings. Some of the targeted areas are actually new developments that are being developed and not yet inhabited. Recent field visits have confirmed that the specific locations of all project-supported civil works lack human habitation (including by squatters) and that no private property that would need to be taken for project works.
Safety of Dams OP/BP 4.37	Yes	Several of the subprojects would obtain water from existing dams with dam walls higher than 15 meters. The safety of these dams will be verified during project preparation, along with the need for any

		follow-up measures to ensure consistency with OP 4.37.
Projects on International Waterways OP/BP 7.50	No	The applicability of OP 7.50 will be determined during project preparation.
Projects in Disputed Areas OP/BP 7.60	No	The project is not located in a disputed area.

III. SAFEGUARD PREPARATION PLAN

A. Tentative target date for preparing the PAD Stage ISDS: 15-Jul-2015

B. Time frame for launching and completing the safeguard-related studies that may be needed.

The specific studies and their timing¹ should be specified in the PAD-stage ISDS:

Environmental and social screening carried out by Zimbabwe's Environmental Management Agency (EMA) of each water supply subproject concurs with the World Bank Category B and confirms that a full Environmental and Social Impact Assessment (ESIA) is not needed. For each of the 7 subprojects, an Environmental and Social Management Plan (ESMP) will be submitted to EMA as well as to the World Bank for review before project appraisal. Each ESMP will specify the measures needed to mitigate (avoid, minimize, restore, and/or compensate for) any adverse environmental or related social impacts. In addition, each ESMP will include (i) an analysis of alternative water intake sites and (ii) verification that the amount of water abstracted would not significantly affect downstream flows.

IV. APPROVALS

Task Team Leader(s):	Name: Chloe Oliver Viola	
<i>Approved By:</i>		
Safeguards Advisor:	Name: Johanna van Tilburg (SA)	Date: 05-Aug-2015
Practice Manager/ Manager:	Name: Jonathan S. Kamkwala (PMGR)	Date: 08-Aug-2015

¹ Reminder: The Bank's Disclosure Policy requires that safeguard-related documents be disclosed before appraisal (i) at the InfoShop and (ii) in country, at publicly accessible locations and in a form and language that are accessible to potentially affected persons.