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

Concept Stage | Date Prepared/Updated: 05-Jan-2017 | Report No: PIDISDSC18566

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#### **BASIC INFORMATION**

## A. Basic Project Data

Country Liberia	Project ID P159961	Parent Project ID (if any)	Project Name Cheesemanburg Landfill and Urban Sanitation Project (P159961)
Region AFRICA	Estimated Appraisal Date Feb 27, 2017	Estimated Board Date May 30, 2017	Practice Area (Lead) Social, Urban, Rural and Resilience Global Practice
Lending Instrument Investment Project Financing	Borrower(s) Ministry of Finance and Development Planning	Implementing Agency Project Implementation Unit (PIU) at Monrovia City Corporation (MCC)	

#### Financing (in USD Million)

Financing Source	Amount
Liberia Reconstruction Trust Fund	10.50
Total Project Cost	10.50

Environmental Assessment Category

B-Partial Assessment

Track II-The review did authorize the preparation to continue

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

No

Other Decision (as needed)

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#### **B. Introduction and Context**

#### **Country Context**

Liberia with 4.5 million inhabitants (2015) has made considerable progress in its socio-economic development since 2003 after the civil war ended. The country has revived state administration and rebuilt some priority infrastructure but is yet to return to the economic standing and pre-war poverty levels. GDP per capita increased from 529 million US Dollars in 2000 to 2.053 billion US Dollars in 2015. Despite this growth, Liberia continues to be among the poorest economies in Africa. The Ebola epidemic in 2014-2015 affected the whole country with over 10,000 people affected

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and 4,610 death. This epidemic contributed to weaken the economy of the country, which was on the rise after the civil war. The Ebola epidemic highlighted the importance of a clean urban environment, and the adequate disposal of both liquid and solid waste. The City of Monrovia had a functioning system of waste collection that reduced the spread of the infection in the capital city were the majority of the urban population is concentrated.

#### Sectoral and Institutional Context

The solid waste sector in Monrovia and other urban centers has gradually acquired greater importance within the Government of Liberia's (GoL) development agenda. The GoL's Medium Term Economic Growth and Development Strategy (2013-2017) aims, among others, to increase access to sanitation and reduce disposal of solid waste in unmanaged sites, to develop a comprehensive policy on solid waste in Liberia and to support youth job creation replicating the solid waste community-based activities initiated under the Emergency Monrovia Urban Services (EMUS) project outside of Monrovia.

Demography: The population of the Greater Monrovia is estimated at 1.2 million inhabitants with a waste generation rate of 756 tons/day. Under EMUS, on average 330/tons/day was collected in 2014 and 2015 (approximately 42% of the waste in the Greater Monrovia).

Landfill site: The currently operational Whein Town landfill site, developed in 2012 as an emergency and temporary facility, seem to have reached its maximum capacity. After a long process of site identification, GoL and Monrovia City Corporation (MCC) has now acquired a 100 acre land situated near Cheesemanburg Township as a replacement for Whein Town landfill. The lack of funds has delayed the development of the new landfill till the Liberia Reconstruction Trust Fund (LRTF) which clearly understood the urgent need for a new site before Whein Town closed completely, has accepted to allocate the funds for this new operation. The GoL/MCC has taken the necessary steps to acquire the land including payment of about US\$200K to the land owners as purchase price. The Lands Administration Department is in the process of finalizing the land titling process in the name of the MCC.

Waste Minimization. Citizens' attention has been brought to the important need to minimize waste through recycling, reuse and composting. A pilot operation funded under the EMUS AF3 is underway at the Fiamah secondary transfer station. The lessons learned will be leveraged for future scaling up of recycling. It will reduce the cost of transportation and final disposal as well as provide revenue from the sale of recyclable material and positive gain in environmental impact. A pilot recycling program initiated in Monrovia seven months ago has not done as well due to a malfunction in the market for plastic and it only diverts a small percentage of the total domestic waste generated. The operating contracts for the two transfer stations have built-in incentives for recycling. However, it is estimated that the material currently recycled is far below the recycling potential, which is estimated at around 20%<sup>1</sup>. Likewise, composting which has the potential to reduce organic waste transported for disposal at the landfill has not yet crystalized.

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Cost recovery and Financial Sustainability: Due to a lack of adequate municipal revenue to support solid waste management operations, the solid waste sector in Monrovia relies heavily on budget transfer from the national governments and donors. A cost recovery options study was completed in March 2014. The study presented 3 options for reducing cost including service charges to households and businesses. The implementation of these options have not yet been possible due to post-conflict and high poverty context in the country but also the recent Ebola crisis. The options are still being discussed, and the city is in the process of developing an agreed way forward. This operation will provide an opportunity to support the GoL implementing some of the recommendations from this study.

Operating Costs. The operating cost in Liberia per ton collected and disposed is at par with or below that in other developing countries<sup>2</sup>. Currently, it is about \$40/ton (\$3.7 million per year)<sup>3</sup>. This cost is funded by the public sector through a combination of donor and Government funds. It is worth noting that EMUS funded 100% of the operating cost in 2010 and 2011, reduced it to 80% in 2012, then 60% in 2013. The balance has been financed by the Government through a combination of MCC and central budget funds through a special Solid Waste Account set up for this purpose. However, since September 2014, funding has reverted to 100% as a result of the Ebola outbreak and Government shifting all available resources to fighting the menace.

Municipal Revenues. In low-income countries, solid waste management operating cost is typically between 20 to 55% of city revenues. In Liberia however, the operating cost exceeds 200% of city's revenues including transfer from the central government. MCC has a long way to go to match up its revenues with expenditures generally but most importantly in the SWM sector. Projections from an Artelia Studies of financial management sustainability for SWM in Monrovia revealed that MCC has a significant untapped revenue potential. In order to capture it, a combination of legal enablers, rate revisions, and improved collection administration were recommended by the studies and MCC is pursuing actions including getting more households to directly pay for their SWM needs.

Before the war, the MCC promulgated and implemented a number of Ordinances with regard to property taxation, solid waste fees and other municipal matters. After the war, some of these Ordinances have been re-activated but their implementation is selective. The two largest sources of revenue for the municipality are the municipal tax and the solid waste related tax and fees. A revised municipal tax structure has been introduced in 2010 and is applicable for establishments<sup>4</sup> only (not households). The rate of the municipal tax, however, is outdated and needs revision. A solid waste tax is collected from establishments (USD 40 to 260 per annum depending on size and nature of the establishment). The solid waste fees regulation provides for collecting fees from households too but this has not

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<sup>&</sup>lt;sup>2</sup> The average cost of collection and disposal in developing countries is between \$ 30.00 - \$80.00 per ton (World Bank, "What a Waste", 2012).

 $<sup>^{3}</sup>$  Cost to collect approximately 60% of the waste in Monrovia proper or 45% of the waste in greater Monrovia (330 t/day x 24 days/month).

<sup>&</sup>lt;sup>4</sup> I.e. institutions and businesses as opposed to households.

been implemented (due to unavailability of mode of collection – incomplete cadastral information, no city street addressing or roster of properties, no property valuation, and no property tax rate provisions).

Private sector participation: The private sector has been playing an important role in the waste management businesses due to the inability of the public sector to provide the service following the war. In 2009, the approach was formalized by the Monrovia Letter of Sector Policy, which spells out private participation as a key principle for achieving efficiency gains. Since then, MCC has outsourced several municipal waste services, and the municipality has been providing oversight and technical supervision. Under EMUS, the waste system was further upgraded. Two collection contracts were awarded that serve the North and South ends of town, including the operations of one transfer station in each area. The sanitary landfill at Whein town is operated by another private operator. A separate weight-bridge operator and an environmental auditor have also been procured. Finally, thirty three (33) community-based small and medium enterprises (CBEs) have been given formal contracts by MCC following competitive tender for door-to-door collection. All contracts are performance-based to ensure value for money. Important characteristics of the arrangement are that CBEs originate from the communities in which they serve. There has also been the introduction of the concept of paying for service. While charges by CBEs are minimal and cover only their cost, CBEs introduced the notion that service is not free.

#### Relationship to CPF

This project will contribute to the Bank's twin goals of reducing poverty and boosting shared prosperity by improving access to solid waste services in Monrovia, avoid the disproportional impact that uncollected and untreated solid waste could have on the urban poor and (equally important) create jobs, and contribute to making Monrovia and participating cities more resilient to flooding. Such actions would improve the generation of high economic rates of return through significant environmental and public health benefits, and improved livability, urban resilience, and city competitiveness. The project will also assess and mitigate potential social impact on the informal waste recyclers, some of whom live in extreme poverty.

The recent Ebola crisis and related issues impacting the health of the very poor in Liberia have real implications for the hygiene and environmental health of all neighborhoods. The role played by solid waste management in cleanliness of the environment is not in doubt. The Country Partnership Strategy focuses attention on disaster risk management as a cross-cutting issue. Much of the flooding disasters that have befallen Monrovia and other cities in Liberia in the last ten years are caused by the large amount of uncollected thrash/waste that block waterways and streams. The formation of beaver dams behind waste blocking the pathway of flowing waters has had influence in the flow of run offs after rains that have increased in intensity and also out of sync with known rainfall cycles. This solid waste management intervention is also consistent with the Bank's strategy to provide multi-sector support to the Government of Liberia.

#### C. Proposed Development Objective(s)

To support increased access to solid waste management (SWM) services in Greater Monrovia. The project proposes to support the Government of Liberia to undertake requisite studies and the construction of a sanitary landfill at

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Cheesemanburg to serve as a regional SWM facility for the Greater Monrovia (Cities of Monrovia, Paynesville, Browerville, Tubmanburg and Cheesemanburg Township). Beneficiary secondary cities including Kakata, Buchanan, Gbanga and Ganta will receive technical assistance to provide solid waste services to citizens particularly in disadvantaged communities. The project also proposes to support the preparation of a more comprehensive urban resilience project.

Key Results (From PCN)

- People in urban areas provided with access to regular solid waste collection under the project (number)
- Secondary cities benefiting from capacity building (number)
- Percentage of operation and maintenance cost recovered through user charges (percentage)
- Sanitary landfill constructed (binary)
- Solid waste collected and properly disposed over the life of the project (tonnage)
- Percentage of waste generated that gets recycled and composted (percentage)
- Municipal Officials in participating cities trained in management of waste (number)

#### **D. Concept Description**

The program is being conceived as a <u>Series of Projects (SOP)</u>, to pursue a "programmatic approach" in sequence, given limited budget available and the huge needs involved. It proposes to focus efforts on Monrovia and five targeted secondary cities. As a first order of business, the program proposes to consolidate the gains made in solid waste management operational system in Monrovia. It proposes to do so, through fully supporting the studies and construction of the first cells of a 50-year sanitary landfill to be located at Cheesemanburg to be utilized as a regional SWM facility for neighboring cities to Monrovia. It would support targeted secondary cities to put in place systems (personnel, organizational, financial, and others) to start off properly structured solid waste management system for each city through studies and some works.

Flooding of most cities has been on the ascendency for a while now mostly as a result of the changing precipitation patterns as well as intensity at previously considered odd times in the cycle of rainfall in the sub-region. The next phases of this programmatic effort will focus on strengthening the resilience of the country to urban flooding and improve urban mobility through rehabilitation and reconstruction of several degraded urban infrastructure. The very poor tend to live at "cheapest lands" that are mostly located at areas too vulnerable to floods and other catastrophes including peri-urban neighborhoods where basic services are non-existent and living conditions are insanitary. The lack of jobs and services in peri-urban neighborhoods in most Liberia's cities has led to frequent human mobility in their search for better jobs, opportunities and economic survival.

The effort to improve urban mobility through smart investment that would help reduce traffic congestion in the capital city is as much an economic issue as it is a freedom of movement for citizens caught in neighborhoods where jobs are just not available.

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Phase one of the Program: Due to limitations in the amount of financing available, the first phase of the series would concentrate on the studies and construction of the Cheesemanburg landfill which has become so critically needed to replace the Whein Town landfill that is due to close by mid-2017 at the latest, and start preparatory studies for future operations. The upcoming closure of the Whein town landfill will result in a lack of disposal facility to accommodate over 330 tons of waste collected daily from the city of Monrovia. The alternative of not having a new landfill would have definitely a significant impact on human health and the environment in a country that has recently gone through the Ebola crisis. The accompanying components are structured for this first phase, to cement up the sustainability in the SWM sector and bring on board new cities to maximize the result. This first phase is proposed to last about 4 years and assumes that at least, one additional financing will complement the currently available funds which will definitely not suffice for this necessary scope of the project at this point. It is well established and the MCC has made a direct appeal to the World Bank to support the operational cost of managing SWM in the City of Monrovia. It is conservatively estimated that the City will need at the very least an amount of about US\$3.5 million per annum to sustain minimum waste collection and disposal in the city. These costs are not fully covered in the amount that is now available for the construction of the Cheesemanburg landfill. Additional resources that should be mobilized from either IDA or some TF resources. However, the availability of the IDA and LRTF resources for OPEX will be contingent upon the Government of Liberia meeting pre-established performance targets in the mobilization of internal revenues to reduce gradually the dependency of the sector to donor funds for OPEX. These performance criteria and targets will be established during project preparation.

An urban planning and cost-recovery technical assistance components would be added in the first phase of the project to support improving the spatial development of the primate as well as the secondary cities to pave the way for a better future urban investment operations as well as starting to address the key issue of financial sustainability of municipal services.

Phase two of the Program: The next phases will seek to expand on the opportunities, and scale up after lessons are learned from all targeted cities. During the second phase the project proposes to include focus on resilience of Liberia Cities, Disaster Risk Management (DRM), flooding, climate change issues and urban and land planning matters. The main objective would be to expand on the resilience, performance, efficiency and efficacy of the participating cities (all Regional capitals would be included at this stage) to move towards financially self-sustaining SWM and Urban development operational model. It is proposed that the second phase lasts a period of about six years with financing need for that phase, estimated at about US\$ 60 to 100 million per annum, in today's dollar terms. This may require co-financing or parallel financing from other donors to complement the resources through IDA and LRTF.

Phase three of the Program: Further lessons would allow the third phase to scale up resilience, SWM business, urban planning, intergovernmental fiscal transfers, DRM, and flood mitigation efforts to ALL Liberia's secondary cities (including all County capitals). By this point, well documented systems (FM, Procurement, Safeguards, Institutional Development and Project Management model) that would have been fully tested by the end of the second phase of the operation would be deployed through well scripted and standardized manuals of operation to ensure that there is an important shift towards institutional aggregation/performance benchmarking. The third phase

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would require financing amount of higher than US\$ 150 to 200 million per annum and could last a total of about 7 years (inclusive of at least one additional financing).

### **Proposed Phase One of Program description:**

<u>Proposed Component 1</u>: Technical Studies and construction of the new Cheesemanburg regional landfill (US \$5.12 million equivalent): It is proposed that this component will include (1a) carrying out the feasibility study and preparing the detailed engineering design, operation and maintenance manual, environmental and social studies for the Cheesemanburg regional landfill facility, (1b) construction of the sanitary landfill to accept solid, liquid/sludge, asbestos and medical waste for treatment and final disposal. Upon completion, this new facility will replace the existing landfill located at Whein Town; and (1c) following positive results of the evaluation of the pilot plastic recycling program started under the third Additional Financing (3AF) of the Emergency Monrovia Urban Sanitation Project (EMUS) at designated collection points—the Stockton Creek and Fiamah transfer stations, the program proposes to extend and scale up recycling in Monrovia.

Proposed Component 2: Performance-based Budgetary Support for Solid Waste Collection and Disposal (US\$4.5 out of which US\$1.4 million equivalent may be available through this operation): This component is proposed to assist the MCC to maintain the solid waste management services in the neighborhoods currently served and expand the service coverage to underserved neighborhoods. This component will particularly contribute to the secondary collection and transportation of solid waste from designated collection points in the participating cities to the landfill site, and the management of two secondary transfer stations, landfill and weighbridges. However given the ongoing challenges associated with low cost recovery, this component will be designed to support gradual improvements in cost recovery in parallel with service quality improvements. The budgetary support will close the gap between the OPEX for delivering good quality solid waste service but will be contingent upon the government meeting pre-agreed and realistic performance target for revenue mobilization. These improvements may also include MCC providing a minimum standard of solid waste services, extending services to areas not currently served and implementing waste minimization measures such as recycling of plastic waste. The budgetary support would be on a declining basis and conditioned upon the government meeting established targets for revenue mobilization and service quality. A technical assistance component will be included to support the government in implementing the cost recovery options identified in 2014 as well as to start addressing some of the fundamental bottleneck for municipal revenue mobilization (eg: lack of street addressing).

<u>Proposed Component</u> 3: Strengthening Institutional and Technical Capacity of participating Municipalities (US\$1.8 million equivalent): Through the life of EMUS effort was made to support GoL/MCC to build capacity for managing solid waste in the city of Monrovia. In this new operation, this component is proposed to provide similar support to the five secondary cities as well as those proposed to be served by the new regional landfill facility. Actions would include (3a) Leveraging the local expertise and experience from MCC (as well as international experience to support the five participating secondary cities in solid waste project implementation and management. Provision of technical assistance, (as-needed consultant's services) and training to strengthening participating Municipalities' capacity to

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plan, design and deliver solid waste and other services; and (3b) finance a public sensitization campaign regarding solid waste management and recycling for the participating secondary cities. An assessment of training effectiveness will be undertaken six months after the project effectiveness. It is proposed that this component also supports activities related to program management and coordination. This would include program implementation costs (exclusive of personnel fees for the Project Implementation Unit (PIU) now fully absorbed into MCC, equipment, vehicles, fuel, office space), and communications costs, and operating costs related to the procurement, supervision, auditing and evaluation of program activities.

<u>Component 4:</u> Technical Assistance to Improve Urban Planning and Management (US\$2.18 million equivalent): The EMUS has project has unveiled the correlation between municipal solid waste management and other urban infrastructure and services. Uncollected solid waste is the main cause of blockage of drainage channels that leads to flooding in urban areas. In addition, proper solid waste management collection and transport depends upon reliable urban infrastructures such as road networks and a proper land use planning that accounts for needed solid waste management infrastructures. This component will provide technical assistance to MCC in identifying bankable infrastructure and services pipeline projects, which could be financed through future projects. This technical assistance will include the preparation of an urban development plan for the city of Monrovia.

Component 5: Contingent Emergency Response Component (US\$0): it is proposed that the program includes an important Contingent Emergency Response Component (CERC) in accordance with OP10, paragraphs 12 and 13, for situations of urgent need of assistance that may crop up during the life of this program. This will allow for rapid reallocation of project proceeds in the event of a natural or man-made disaster or crisis that has caused or is likely to imminently cause a major adverse economic and/or social impact. To trigger this component the Government would need to declare an emergency or provide a statement of fact justifying the request for the activation of the use of emergency funding. To allocate funds to this component the Government may request the Bank to re-allocate project funds to support response and reconstruction. If the World Bank Group (WBG) agrees with the determination of the disaster, and associated response needs, this proposed component would draw resources from the unallocated expenditure category and/or allow the government to request the Bank to re-categorize and reallocate financing from other project components to cover emergency response and recovery costs. This component could also be used to channel additional funds should they become available as a result of an emergency. Disbursements would be made against a positive list of critical goods or the procurement of works, and consultant services required to support the immediate response and recovery needs. An Emergency Response Operations Manual will apply to this component, detailing financial management, procurement, safeguards and any other necessary implementation arrangements.

An indicator reflecting the potential funding of emergency activities through CERC would be added to the Project's Results Framework. In addition, the Operations Manual of the Program will include additional specific results indicators, depending on the interventions that the CERC supports. For example, a possible new indicator could read as follows if the CERC is triggered: number of beneficiaries benefiting from emergency response and recovery activities.

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

The landfill site is located in Cheesemanburg Township, Montserrado County. The site has been extensively used for farming activities over the years. So there is no primary vegetation in the area. The Po River and the Dima Creek run along the eastern and southern boundaries of the site, respectively. The construction and operation of the landfill may not have any negative impact on these water bodies as they are not located within the immediate environs of the site. There are several communities in the surrounding areas of the site but not in the immediate vicinity of the site to trigger a relocation. However, agricultural lands acquired for the construction of the landfill site may lead to reduced land size of the affected families or households for their agricultural activities. An Abbreviated Resettlement Action Plan (ARAP) will be is being prepared to address the anticipated adverse impacts of land acquisition and other resettlement issues.

### B. Borrower's Institutional Capacity for Safeguard Policies

The Monrovia City Corporation (MCC) is the agency responsible for managing solid wastes services in the Municipality of Monrovia. The MCC is therefore the implementing agency of the proposed Cheesemanburg Landfill and Urban Sanitation Project through its project implementation unit, which has been implementing the Emergency Monrovia Urban Sanitation Project (EMUS) since 2009. Despite its experience in implementing World Bank-financed project, capacity at the MCC for safeguards implementation is weak. Neither the MCC nor its project implementation unit has the capacity to monitor and ensure contractors' compliance and implementation of project safeguards instruments, especially during operation phase of the proposed landfill. Implementation of safeguards instruments is the utmost responsibility of the implementing agency. Strengthening of MCC's environmental and social management capacity is therefore crucial. A senior environmental and social professional, qualified to ensure implementation of the safeguards instrument is recommended as part of the project staff. Safeguards training will be conducted prior to inception of project implementation and intermittently throughout the project duration. The MCC will also need to explore the possibility of partnering with other government agencies for technical assistance, especially those with strong environmental management capacity such as the Infrastructure Implementation Unit (IIU) of the Ministry of Public Works, and the Environmental Protection Agency of Liberia (EPA).

#### C. Environmental and Social Safeguards Specialists on the Team

Gloria Malia Mahama, Sekou Abou Kamara

# D. Policies that might apply

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	OP/BP 4.01 has been triggered because the landfill construction will involve several civil work and waste

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		management activities that have the potential to adversely impact the biophysical environment as well as the health and safety of the public in the surrounding areas and those involved directly involved with the project activities. Given the nature of this project, potential adverse impacts may arise during all stages of the project including construction, operation and post-closure phases. An ESIA which includes a detailed ESMP is being developed to ensure that all associated environmental and social impacts are clearly identified with defined mitigation measures and monitoring activities provided.
Natural Habitats OP/BP 4.04	No	The project activities will not have any impacts on natural habitats. The site has been used for farming for decades and is predominantly covered by secondary vegetation. No sensitive ecosystems will be affected by the project.
Forests OP/BP 4.36	No	The project activities will not involve investment in forest or protected areas or related forestry activities that have the potential to adversely impact forests, or restrict people access to or use of forest resources.
Pest Management OP 4.09	No	The project activities do not involve procurement, transportation or storage of pesticides or pesticide application equipment.
Physical Cultural Resources OP/BP 4.11	Yes	There are no recognized physical cultural resources in the project area. However, OP/BP 4.11 has been triggered for precautionary reason since the construction of the landfill includes activities that involve large excavation activities such as construction of leachate pond and drainage system, excavation of landfill cells/trenches and construction of access roads. The ESIA will include a chance find procedure that outlines the steps to be followed in case of chance finds.
Indigenous Peoples OP/BP 4.10	No	This not applicable to the project area and to Liberia at large.
Involuntary Resettlement OP/BP 4.12	Yes	The project includes the construction of a landfill and other ancillary structures. One hundred (100) acres of land in the Township of Cheesemanburg is acquired from 4 families by MCC. The proposed site are farm lands and would not require physical relocation. The acquisition will however reduce the amount of land that is currently being held (or owned) by these families and may restrict their access to land resources during and after the construction. An Abbreviated Resettlement Action

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		Plan (ARAP) is being prepared by the client and will contain safeguard measures aimed at addressing the anticipated adverse impacts of land acquisition and other resettlement issues.
Safety of Dams OP/BP 4.37	No	Project activities do not involve construction of new dam or renovation of existing dams.
Projects on International Waterways OP/BP 7.50	No	The project activities will have no impact on international waterways.
Projects in Disputed Areas OP/BP 7.60	No	Project activities are not within disputed areas.

# E. Safeguard Preparation Plan

Tentative target date for preparing the Appraisal Stage PID/ISDS

# Jan 16, 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 Environmental and Social Impact Assessment (ESIA) and the Abbreviated Resettlement Action Plan (ARAP) are ongoing and should be completed before end of December 2016.

#### **CONTACT POINT**

#### **World Bank**

Kwabena Amankwah-Ayeh, Farouk Mollah Banna Sr Urban Spec.

# **Borrower/Client/Recipient**

Ministry of Finance and Development Planning

#### **Implementing Agencies**

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# **APPROVAL**

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Safeguards Advisor:	
Practice Manager/Manager:	
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