



# Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

Appraisal Stage | Date Prepared/Updated: 28-Feb-2018 | Report No: PIDISDSA24379



**BASIC INFORMATION**

**A. Basic Project Data**

Country Afghanistan	Project ID P158768	Project Name Public-Private Partnerships and Public Investment Advisory Project	Parent Project ID (if any)
Region SOUTH ASIA	Estimated Appraisal Date 10-Jan-2018	Estimated Board Date 28-Mar-2018	Practice Area (Lead) Finance, Competitiveness and Innovation
Financing Instrument Investment Project Financing	Borrower(s) Ministry of Finance	Implementing Agency Central PPP Authority	

Proposed Development Objective(s)

The Project Development Objective is to develop a pipeline of feasible private and publicly funded projects.

Components

Strengthening Institutional and Technical Capacity  
Infrastructure Preparation Facility  
Project Management

**Financing (in USD Million)**

Financing Source	Amount
Afghanistan Reconstruction Trust Fund	30.00
Borrower	0.00
IDA Grant	20.00
<b>Total Project Cost</b>	<b>50.00</b>

Environmental Assessment Category

B - Partial Assessment

Decision

The review did authorize the preparation to continue



Other Decision (as needed)

## B. Introduction and Context

1. **There have been substantial improvements in development outcomes in Afghanistan since 2001, particularly in expanded access to basic services such as water, sanitation, and electricity and improved outcomes in education and health.** However, some gains are now being eroded due to growing insecurity. Between January and September 2017, 2,640 people were killed and around 5,380 injured. The number of internally displaced people has increased at an alarming pace: in the first half of 2017 alone, more than 200,000 people have been displaced internally due to conflict and more than 296,000 refugees have returned from Iran and Pakistan. The increased conflict appears to be affecting business and consumer confidence as economic activity is continuing to stagnate. The annual economic growth rate was projected at 2.6 percent in 2017, increasing slightly from the 2.2 percent recorded in 2016. Growth is expected to edge up to 3.2 percent in 2018 but only assuming no further deterioration in the security environment. While this constitutes a moderate improvement compared to 2014 and 2015, it is still significantly below the 9.6 percent average annual rate recorded between 2003 and 2012. In the medium term, growth is expected to remain muted, increasing modestly to 3.6 percent by 2020.

2. **The poverty rate in Afghanistan increased from 36 percent in 2011/12 to 39.1 percent in 2013/14 and is expected to remain high in the medium term, driven by weak labor demand (despite an increasing labor force) and security-related constraints on service delivery.** Rural poverty and living conditions are particularly acute. The unemployment rate is estimated at 22.6 percent. Unemployment is particularly severe among women and low-skilled and illiterate workers. With an average annual population growth rate of 3 percent and with an estimated 400,000 Afghans entering the labor market each year, much higher economic growth is required to improve per capita incomes and to provide quality employment opportunities for the expanding workforce.

3. **Stronger growth is predicated on improvements in security, political stability, steady progress with reform, and continued high levels of aid flows.** Growth could also be enhanced with the right combination of fiscal and policy reforms, including improving budget execution, and reorienting budget expenditures toward labor-intensive and community-based programs that directly reach the population with the greatest needs and with the highest marginal propensity to consume.

4. **Strategic and efficient allocation of scarce public resources for infrastructure and other investments is critical to Afghanistan's self-reliance agenda.** The Government has made significant progress in establishing a public financial management (PFM) system that has contributed to increasing revenues.<sup>1</sup> The PFM system has led to increased and new tax streams, improved tax compliance, and strong nontax revenues, such as foreign aid. Despite these gains, significant fiscal gaps still exist. Public expenditure, at 26.9 percent of gross domestic product (GDP) in 2016, surpassed revenues generated by 16.1 percentage of GDP. So far, the deficit has been largely financed through development partner grants.

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<sup>1</sup> Public revenues increased from about US\$130 million in 2002 to over US\$2.1 billion in 2016, or 10.8 percent of GDP. The revenues of US\$1 billion in the first six months of 2016 mark a 33 percent increase over 2015.



But declining donor resources, coupled with a slower-than-hoped-for increase in the Government of the Islamic Republic of Afghanistan (GoIRA) revenues, will deepen the GoIRA budget deficit.

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

5. **The Project Development Objective (PDO) is to develop a pipeline of feasible private and publicly funded projects.** Given its fiscal constraints, the GoIRA must maximize funds available for infrastructure and other development priorities. The theory of change is that the capacity building and the technical assistance (TA) to streamline the public investment and public-private partnership (PPP) institutional framework and the undertaking of robust pre-feasibility and feasibility studies that are reviewed by relevant committees in alignment with the national development priorities will support sustainable and strategic investment. Once implemented, both the public and PPP financing pipelines developed with project support will provide solutions for priority investment needs and stimulate private sector development for higher economic growth and better service delivery. Given that a range of important development investments will be covered by private sector financing, the GoIRA will be able to concentrate scarce public resources on other priorities in its development agenda, for example, public service delivery to the benefit of the population, especially the poor. This reflects the principles of the World Bank's Maximizing Finance for Development (MFD) approach to development.

#### **Project Beneficiaries**

6. **The project will benefit two main stakeholders:** (a) government institutions in the form of TA and capacity-building training, mainly to the Ministry of Finance (MoF) CPA and Policy Department, relevant development councils (DCs), and other agencies sponsoring PPPs and (b) large, medium, and small private investors by helping identify and prepare infrastructure and other projects and addressing investor concerns.

#### **PDO Results Indicators**

7. Progress in achieving the PDO will be measured by the number of (a) feasibility studies that lead to tendered projects, of which 100 percent have considered gender issues; (b) institutional development recommendations/procedures implemented; and (c) PPP projects tendered, of which 100 percent have considered gender issues.

### **D. Project Description**

8. **To achieve its objective, the project will introduce standard project appraisal and preparation models, along with sound legal, regulatory, and institutional policies that encourage private investment and optimal use of public resources to maximize available finance for development.** The project will provide capacity-building support to relevant government agencies to allocate funds for development investment projects efficiently.

#### **Project Components**



9. **The project has three components.** Component 1 will strengthen the institutional framework and technical capacity of relevant agencies. Component 2 will establish and capitalize an Investment Project Financing (IPF) to support project appraisal and preparation. Component 3 will cover project management.

***Component 1: Strengthening Institutional and Technical Capacity (US\$5.0 million)***

10. **This component will support the creation of a framework to manage public investments and PPPs to align with the proposed PIM.** Leveraging the MFD approach, it will strengthen the coordination between project planning and the budget processes, integrate these processes with the PPP project cycle, and ensure alignment with national development priorities. This component will also strengthen the MoF CPA and Policy Directorate to support the implementation of timely, high-quality public investment and PPP projects.

*Subcomponent 1A: Improving and integrating the PIM-PPP framework*

11. **This subcomponent will fund the following activities:** (a) development of standardized project appraisal documents; (b) development of PPP Law Rules of Procedure (RoPs); (c) review and revision of PPP (and where necessary, related public investment law) laws required to implement an integrated PIM-PPP framework; and (d) preparation of the fiscal commitments and contingent liabilities (FCCL) framework. To facilitate implementation of the PPP legal framework, PPP Law RoPs will be developed to provide a step-by-step guide to line ministries on all aspects of the PPP program, including the institutional roles/responsibilities of the CPA, line ministries, and other stakeholders. These RoPs will include template documents covering PPP project cycle processes and will mirror similar operating guidelines for public projects that come under the Public Procurement Law.

*Subcomponent 1B: Strengthening GoIRA institutional and technical PIM-PPP capacity and awareness*

12. **This subcomponent will support the following activities:** (a) resident advisers to enhance technical capacity, (b) capacity-building program to the CPA and relevant line ministries on project preparation appraisal, and (c) communication and awareness-building campaign. To support implementation of the framework and ensure the preparation of high-quality appraisal documentation, capacity building will be provided to the Ministry of Finance Policy Department (MoFPD), Ministry of Economy (MoEc), and CPA staff. They will be trained under a train-the-trainer approach and they will then provide subsequent trainings to line ministries' staff. This will improve the quality of project proposal from the line ministries.

***Component 2: Infrastructure Preparation Facility (US\$40.0 million)***

13. **This component will support the establishment of the facility for the appraisal, prioritization, and preparation of national priority projects.** The IPF will provide funding for the robust appraisal and preparation of projects, ensure that prioritized projects contribute to the national development agenda and align with maximizing the developmental value of public resources, and be integrated into the budget circular process.

*Subcomponent 2A: Design and establishment of the IPF*



14. **This subcomponent will support the robust design of an IPF to provide a financing vehicle for the appraisal and preparation of pipeline projects.** This will help the GoIRA move from an individual project approach to a systematized program to ensure that projects are prioritized and well-designed. The IPF will have two funding windows, an Appraisal Window and a PPP Project Development Fund (PDF) Window. The IPF governance structure and institutional roles and responsibilities related to decision making, management and oversight of funds, and procurement will be developed.

*Subcomponent 2B: Seed capitalization of the IPF*

15. **This subcomponent will provide seed funding for the two IPF windows.** The IPF Appraisal Window will fund the pre-feasibility studies for all projects proposed by the line ministries as part of the Budget Circular 1 process. This appraisal process will enable the GoIRA to determine each project's strategic fit with national development priorities and decide on the preferred procurement approach, either public or PPP, for each project. The Appraisal Window will also support detailed feasibility studies for approved public projects, aligned with the Budget Circular 2 process. The PPP PDF Window will fund the preparation of detailed feasibility studies and tender documents for projects suitable for PPP financing arrangements. This will enable robust preparation and structuring of PPP transactions.

**Component 3: Project Management (US\$5.0 million)**

16. **This component will finance the Project Management Unit (PMU),** which already exists within the CPA to manage day-to-day operations and monitor project activities, until it is mainstreamed into the Afghan civil service.

### **Project Cost and Financing**

17. The overall project cost is US\$50 million, financed by IDA (US\$20 million) and the Afghanistan Reconstruction Trust Fund (ARTF) (US\$30 million).

## **E. Implementation**

18. **The project is multisector and covers different facets of the GoIRA's budgeting, procurement, and project implementation functions.** The institutional and implementation arrangements for the Public Private Partnership and Public Investment Advisory Project (PPIAP) are designed to align with the budget circular process and the PIM-PPP framework and will require strong coordination across the GoIRA to support smooth implementation. The PPIAP will be managed by a PMU in the CPA, which will be responsible for managing implementation, procurement and financial management (FM), environmental and social safeguards, and monitoring and evaluation (M&E). The PMU will be supported by the MoF Procurement Directorate (PD) on procurement issues and by the MoF Finance Directorate on FM issues.

19. **High-level oversight and centralized coordination is required to ensure smooth project implementation.** Given that development projects often involve multiple entities within the Government, DCs<sup>2</sup> will provide high-level oversight of the budget circular process and the appraisal and preparation of

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<sup>2</sup> The DCs were established under the ANPDF 2017–2021, with the objective of implementing the new NPPs designed under the ANPDF. There are six DCs, including Infrastructure Development, Land and Water, Human Development, and Rule of Law and Anticorruption. Membership of the DCs varies but includes relevant line ministries and government administrative entities.



public and PPP projects prepared under PPIAP financing. Below the level of DCs, centralized coordinating roles in the project cycle process will be played by the Ministry of Finance Budget Department (MoFBD), MoFPD, CPA, and MoEc. The MoFPD and MoEc will review concept notes and pre-feasibility studies prepared by line ministries at the appraisal stage under Budget Circular 1, to ensure projects fit with national development priorities. The MoFBD will clear the public projects for their fit within budget ceilings under Budget Circular 2.

20. **Line ministries will identify and sponsor projects financed under the PPIAP and retain responsibility for the preparation and implementation of projects in their respective sectors.** Technical sector expertise is in the line ministries, and therefore line ministries will be responsible for the preparation of project-related documents, including concept notes, pre-feasibility studies, feasibility studies, and tender documents (for PPPs). The line ministries will also manage the consultants and transaction advisers procured to support project appraisal and preparation. The CPA provides technical support to line ministries to support the preparation and procurement of PPP projects.

#### **F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)**

The PPP subprojects may be funded nationwide. As all subprojects under Subcomponent 2B and/or expected environmental and social footprint of the subprojects are not fully known at this stage (and will not be known until PPP proposals are received by the CPA and sponsoring line agencies), a framework approach will be adopted. The approach considers lessons learned from other projects, sets out a range of screening and review tools for use at both pre-feasibility and feasibility levels to identify and assess potential negative environmental and social impacts of projects, and includes guidelines for preparing relevant mitigation management plans. The approach highlights the importance of citizen engagement and access to information and communication in underpinning effective environmental and social management and describes screening procedures. The nature and magnitude of environmental and social risks and impacts of subprojects are not yet known and will be assessed separately for each subproject, as and when financing proposals are considered by the GoIRA and sponsoring entities. The project investments under Subcomponent 2B will be directed mainly to sub projects where environmental and social risks and impacts are expected to be Substantial. This approach to project implementation will allow for the necessary time to strengthen private sector companies' capacity to prepare the subproject-level environmental and social instruments as per the requirements of the GoIRA and the World Bank. More specifically, with regard to identification of risks and impacts, environmental and social screening, and scoping, Environmental Impact Assessment/Social Impact Assessment (EIA/SIA), site-specific Environmental and Social Management Plans (ESMPs), and Resettlement Action Plans (RAPs) (where needed) will be prepared for all subprojects and would be subject to local disclosure and consultation as per the national law and WB safeguards policies.



**G. Environmental and Social Safeguards Specialists on the Team**

Mohammad Arif Rasuli, Environmental Safeguards Specialist  
Mohammad Yasin Noori, Social Safeguards Specialist

**SAFEGUARD POLICIES THAT MIGHT APPLY**

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	<p>This policy is triggered because the proposed project will finance preparatory TA activities, including full feasibility studies for PPP subprojects. Whereas the TA project will in and by itself not finance these investments, the actual investments themselves, if and whenever and wherever they are implemented, could potentially lead to adverse downstream environmental and social impacts. For these reasons, the proposed project is assigned an Environmental Assessment Category B.</p> <p>The nature, type, and physical locations of the investment projects will be determined by feasibility studies to be carried out during implementation of the proposed project. The borrower has prepared an Environmental and Social Management Framework (ESMF) for the proposed project, to ensure a process is put in place that would ensure the required environmental and social studies and plans are prepared when these investments are identified, in compliance with Afghanistan’s own requirements and with OP 4.01 and other triggered World Bank safeguards policies.</p> <p>Therefore, the ESMF has mandated the preparation of limited Environmental and Social Impact Assessments (ESIAs) that will commence concurrently but independently with the feasibility studies for each investment. The ESMF document also contains the requisite comprehensive Terms of Reference (TORs) for the ESIAs, and if the ESIA is not needed, only an ESMP or a management plan would</p>





be needed and prepared during the implementation stage.

Furthermore, the ESMF has the relevant principles, checklists, guidelines, and other procedures to be applied for each investment and has set forth the principles and procedures/directives to be followed by the borrower once the physical locations of the proposed activities are known.

The ESMF has complied with the World Bank Group Environmental, Health, and Safety (EHS) Guidelines as well with the country's relevant laws and regulations.

The ESMF also contains specific guidelines to determine linked and/or associated facilities. If existing investments are included, the ESMF document includes provisions for carrying out environment and social due diligence, and the Resettlement Policy Framework (RPF) includes due diligence procedures for land acquisition and resettlement of existing investments.

Finally, as it is proposed that laboratory equipment might be supplied in universities, schools, and other institutions as part of Subcomponent 2A, the ESMF has provisions for simple ESMPs to ensure the potential environmental impacts such as chemicals and waste management, wastewater generation, and minor civil works related to the supply of laboratory equipment are properly addressed.

The draft ESMF and the TORs for the ESIA and RAP(s) were subject to meaningful and participatory stakeholder consultations in Kabul, with representation from relevant stakeholders and participation of the relevant subproject areas.

The client has prepared an ESMF that was reviewed and cleared by the World Bank and is disclosed both in relevant places and in the format and languages understandable for the local people in the country and at the World Bank's InfoShop before appraisal. Furthermore, the country has major issues and capacity constraints in environmental management



		<p>of investment projects and for managing occupational, health, and safety issues in the construction industries and should be taken care of by the ESMF tools, which should be properly applied</p> <p>Furthermore, the country has major issues and capacity constraints in Environmental management of investment projects and for managing Occupational Health and Safety issues in the construction industries and should be taken care of by the ESMF tools and to be properly applied.</p>
Natural Habitats OP/BP 4.04	No	<p>Projects should not be selected close to Natural Habitats and therefore this WB Policy is not triggered.</p> <p>Also, during the application of the ESMF tools on the subprojects and preparing ESMPs or undertaking environmental assessment, it will again be ensured that the subprojects are not damaging any natural habitat.</p>
Forests OP/BP 4.36	No	<p>This policy is not triggered as none of the potential subprojects will be in areas having forests. In addition, the ESMF includes screening measures to ensure that there is no land degradation and in rare cases, extreme care, mitigation measures would be planned during the feasibility planning and ESIA process (in case it is needed) and properly implemented.</p>
Pest Management OP 4.09	No	<p>This policy is not triggered. However, the ESMF will provide the necessary screening measures to determine if this policy is to be triggered by specific investments when they are identified.</p>
Physical Cultural Resources OP/BP 4.11	No	<p>This policy is not triggered. However, the updated ESMF comprises guidelines for chance find procedures according to national law.</p>
Indigenous Peoples OP/BP 4.10	No	<p>This policy is not triggered as in the project areas, there are no indigenous peoples who meet the criteria of OP/BP 4.10 and could potentially benefit or be adversely affected by the project's activities.</p>
Involuntary Resettlement OP/BP 4.12	Yes	<p>Under Subcomponent 2B, the PPIAP will finance preparatory TA activities for PPP projects, including pre-feasibility and feasibility studies. The project will</p>



not finance these investments and will, therefore, not have any major direct social impacts or land acquisition impact, but there may be potential indirect impacts from anticipated infrastructure projects in these areas.

A framework approach is adopted as all project investments under Subcomponent 2B could not be identified at the time of project appraisal. The borrower has prepared a stand-alone RPF for the proposed project to guide preparation of RAP(s) (where needed).

Consultations on the first draft ESMF and RPF took place on January 25, 2017, which were attended by the line ministries, private sector companies, academia, and nongovernmental organizations. The MoF conducted a second round of consultations with all these stakeholders on December 17, 2017. The updated ESMF and RPF were shared with stakeholders for their feedback and comments.

The updated ESMF and RPF were cleared by the World Bank on January 9, 2018, and redisclosed in-country on the MoF website and on the World Bank’s external website on January 10, 2018.

The ESMF includes provisions for conducting social safeguards due diligence. The RPF also includes due diligence procedures for land acquisition and resettlement of the affected people

Safety of Dams OP/BP 4.37	No	This policy is not triggered as the project will not be involved in any dam building, rehabilitation, or mining activities which could have tailings dam.
Projects on International Waterways OP/BP 7.50	No	The proposed project is not expected to affect international waterways. The reason is that the subprojects will not divert water from the water course. If there are small-scale industries, proper mechanism and systems, tools, and guidelines created by the ESMF and applied during the implementation will mitigate the deterioration of the water quality.
Projects in Disputed Areas OP/BP 7.60	No	There is no disputed area as defined under this policy.



## KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

### A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

The proposed project will finance preparatory TA activities, including pre-feasibility and feasibility studies for publicly funded and PPP subprojects. The current project will by itself not finance these investments and, therefore, will not have any major impacts. However, these projects could have potential adverse downstream impacts that could be mitigated with preparation and implementation of ESMPs and, if needed, by undertaking further assessments. For these reasons, the proposed project is assigned an Environmental Assessment Category B.

#### Social impacts and risks

The TA activities will not themselves have any major direct social impacts and risks, but there may be potential indirect impacts from subprojects to be supported under Subcomponent 2B of the project. The overall social risks ratings are likely to be Substantial (S) at this stage. The key drivers of social risks for PPIAP may include (a) potential indirect land acquisition impacts from anticipated infrastructure subprojects that will be included for pre-feasibility and feasibility studies; (b) workers' safety/labor influx risk and community safety risks associated with labor camp and workers coming into the project area, which are expected to occur during implementation; and (c) low capacity of local companies to conduct social safeguards studies.

The MoF CPA (through consultants) will conduct social screening and scoping at the pre-feasibility stage. Consulting firms will be engaged to collect information and assess/identify key social risks and identify issues for consideration in more detailed assessments at the feasibility stage. More specifically, with regard to identification of risks and impacts, preliminary social screening and scoping at pre-feasibility stage and SIA, site-specific Social Management Plans (SMPs), and RAPs (where needed) during feasibility stage will be prepared for all projects and will be subject to local disclosure and consultation as per the national law and World Bank safeguards policies.

The project is expected to generate overall positive social impacts.

The borrower has prepared an ESMF and a stand-alone RPF to address potential impacts. These safeguards documents were re-disclosed in-country on January 10, 2018, on the MoF website.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:

The projects to be supported by the PPIAP have not been identified, but projects to be funded are not expected to have significant indirect or long-term environmental impacts that could not be mitigated by applying the relevant mitigation tools provided in the ESMF. The potential environmental impacts would be caused by generation of chemicals, hazardous wastes, wastewater generation, earth moving, transportation, and minor civil works.

Occupational, health, and safety issues of the relevant projects and because of the weak regulatory and enforcement system in the country would also be another important area that should be properly addressed. There is an urgent need to build the required capacity in the relevant agencies.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.

Not Applicable



4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.

The responsible agency for this project is the MoF, which has experience with implementation of World Bank-funded projects, preparation of ESMFs for the SCRTFP, and PFM in the past. However, the MoF still lacks proper capacity to handle all the relevant environmental and social safeguards issues and needs assistance from the World Bank.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.

The key stakeholders include Government institutions to which it will provide TA and capacity-building training. These include the MoF, CPA and Policy Departments, state-owned enterprises and companies, municipalities, and government commissions or other groups established under government order or other entities sponsoring PPPs. Other stakeholders include large, medium, and small private investors..

**B. Disclosure Requirements**

**Environmental Assessment/Audit/Management Plan/Other**

Date of receipt by the Bank  09-Jan-2018	Date of submission for disclosure  10-Jan-2018	For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors
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**"In country" Disclosure**

Afghanistan  
10-Jan-2018

Comments

**Resettlement Action Plan/Framework/Policy Process**

Date of receipt by the Bank  09-Jan-2018	Date of submission for disclosure  10-Jan-2018
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**"In country" Disclosure**

Afghanistan  
10-Jan-2018

Comments



**C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting)**

**OP/BP/GP 4.01 - Environment Assessment**

Does the project require a stand-alone EA (including EMP) report?

Yes

If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report?

Are the cost and the accountabilities for the EMP incorporated in the credit/loan?

**OP/BP 4.12 - Involuntary Resettlement**

Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?

Yes

If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?

Yes

**The World Bank Policy on Disclosure of Information**

Have relevant safeguard policies documents been sent to the World Bank for disclosure?

Yes

Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?

Yes



### All Safeguard Policies

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?

Yes

Have costs related to safeguard policy measures been included in the project cost?

Yes

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?

Yes

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?

Yes

### CONTACT POINT

#### World Bank

Constantine Chikosi  
Lead Operations Officer

#### Borrower/Client/Recipient

Ministry of Finance  
Abdul Mansoor  
Director General  
momin.mansoor@mof.gov.af

#### Implementing Agencies

Central PPP Authority  
Momin Mansoor  
Director General  
momin.mansoor@mof.gov.af



**FOR MORE INFORMATION CONTACT**

The World Bank  
1818 H Street, NW  
Washington, D.C. 20433  
Telephone: (202) 473-1000  
Web: <http://www.worldbank.org/projects>

**APPROVAL**

Task Team Leader(s):	Constantine Chikosi
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**Approved By**

Safeguards Advisor:		
Practice Manager/Manager:	Nabila Assaf	01-Mar-2018
Country Director:	Wezi Marianne Msisha	05-Mar-2018