



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

Appraisal Stage | Date Prepared/Updated: 19-Jan-2018 | Report No: PIDISDSA22879



BASIC INFORMATION

A. Basic Project Data

Country Panama	Project ID P157575	Project Name Support for the National Indigenous Peoples Development Plan	Parent Project ID (if any)
Region LATIN AMERICA AND CARIBBEAN	Estimated Appraisal Date 22-Jan-2018	Estimated Board Date 13-Mar-2018	Practice Area (Lead) Social, Urban, Rural and Resilience Global Practice
Financing Instrument Investment Project Financing	Borrower(s) The Republic of Panama	Implementing Agency Ministry of Government	

Proposed Development Objective(s)

The Project Development Objective (PDO) is to strengthen: (a) the capacity of Indigenous authorities and the Borrower to jointly plan development projects and programs; and (b) the delivery of selected public services in the Indigenous territories in alignment with the vision and priorities outlined in the National Indigenous Peoples' Development Plan.

Components

Institutional strengthening and governance capacity for the GoP and Indigenous Authorities
Improved quality and cultural pertinence of select public service delivery in the 12 Indigenous territories
Project Management, Monitoring and Evaluation

Financing (in USD Million)

Financing Source	Amount
Borrower	5.20
International Bank for Reconstruction and Development	80.00
Total Project Cost	85.20

Environmental Assessment Category

B - Partial Assessment

Decision

The review did authorize the preparation to continue



Other Decision (as needed)

B. Introduction and Context

Country Context

- Panama has emerged as one of the fastest growing economies in the world. Between 2008 and 2016, real GDP growth averaged 6.7 percent, more than double the average of 2 percent for the Latin America and the Caribbean Region (LCR).**¹ This strong growth stems from numerous factors including the transfer of Panama Canal management and operations to Panama in 2000 and high rates of public and private investment. Panama's continuous improvements in infrastructure have helped to maintain its position as one of the most competitive economies in LCR (after Chile and Costa Rica).² Based on the national poverty line, overall poverty fell from 33.8 percent in 2008 to 22.1 percent in 2016. Extreme poverty also fell, going from 15.3 percent and to 9.9 percent in the same period.³
- Despite these positive trends, Indigenous peoples (IPs) in Panama, who represent 12 percent of the national population, continue to live in extremely vulnerable and unequal conditions as compared to non-Indigenous Panamanians.** Differing rates of poverty reduction have led to the concentration of poor people in rural and Indigenous territories. While poverty and extreme poverty rates are estimated at 6.5 and 2.5 percent in urban areas, and at 26.6 and 10.2 percent in non-Indigenous rural areas, in Indigenous territories 86 percent of the population live in poverty and 66 percent of the population live in extreme poverty.⁴
- Panama represents among the most significant ethnic-based access gaps and inequality rates in the region with women often being the worst off.** Indigenous peoples living in *comarcas* (legally recognized semi-autonomous regions) earn on average a daily wage of \$3.06 versus \$10 per day for non-Indigenous rural people and \$16.60 for the non-Indigenous national average.⁵ Per the 2010 National Population and Housing Census, Indigenous peoples lag far behind non-Indigenous populations in terms of access to basic services. For example, as of 2010, life expectancy within Indigenous territories was estimated to be between 7 and 9 years lower than the rest of the country. Similarly, only 61 percent of Indigenous peoples (IPs) had access to piped water and 18.7 percent had access to sanitation, compared to 95 and 63.9 percent of non-Indigenous Panamanians, respectively. In education, enrollment rates for Indigenous children are almost 10 percentage points lower than for non-Indigenous children and nearly two-thirds

¹ Panama GDP data: Instituto Nacional de Estadística y Censo (INEC), LCR data: WDI: <http://databank.worldbank.org>

² World Economic Forum. The Global Competitiveness Report 2017-18.

³ 2008 data: Alvarado, R. and Diéguez, J. (2011). Actualización de las líneas de indigencia y pobreza, Panama 2011. MEF

2016 data: Moreno, O. (2017). Pobreza e indigencia por ingreso y características socioeconómicas. Marzo 2016. MEF

⁴ CEDLAS and the World Bank. Socio-Economic Database for Latin America and the Caribbean (SEDLAC), 2015.

⁵ 2015 Market Labor Survey Panama.



(63.6 percent) of Indigenous women do not have a primary education, compared to 55.3 percent of Indigenous men.⁶ In health, child mortality is twice as high for Indigenous children vs. non-Indigenous children under five years (38 vs. 19 per 1,000 live births) and maternal mortality is over four times higher for Indigenous women than for non-Indigenous women (462 IP women per 100,000 live births versus 92 non-IP women per 100,000 births).

4. **Panama is one of the most biologically diverse countries in the world (forests cover 40% of Panama's territory), yet deforestation is a growing concern.** Panama ranks 14th among countries most exposed to multiple hazards based on land area, experiencing intense and protracted rainfall, windstorms, floods, droughts, wildfires, earthquakes, landslides and tropical cyclones, many related to the Southern Oscillation/El Niño-La Niña cycles. Climate change threatens to increase vulnerability of both human and ecological systems to these hazards, many of which will become less predictable, more frequent and more intense in the future.⁷ Secondary impacts include economic losses and impacts on livelihoods, particularly for Indigenous peoples given their high levels of dependence on their natural surroundings for their food, as well as medicinal and customary practices. Especially vulnerable is Guna Yala, an archipelago of 365 Islands where 52 Indigenous communities live, and the coastal areas of Bocas del Toro where several Ngobe Indigenous peoples depend on agricultural production for their livelihoods.⁸

Sectoral and Institutional Context

5. **Panama is home to approximately 3.4 million people, with Indigenous peoples making up approximately 12 percent of the total population or 417,559 people.** Indigenous peoples in Panama come from seven ethnic groups or peoples, each with distinct cultural identities: Emberá, Wounaan, Naso, Guna, Bribri, Buglé, and Ngäbe. Most these peoples live in twelve collectively occupied territories, of which five are recognized as *comarcas* (See Map in Annex 1). The *comarcas*, where 47 percent of Indigenous peoples live, make up over 22 percent of Panama's land mass and include some of its richest natural resources. The other 53 percent of Indigenous peoples live in Indigenous communities located in the non-*comarca* Indigenous areas or territories, with varying levels of legal recognition and autonomy, or have migrated to urban areas.
6. **Four reinforcing factors contribute to the inequalities between non-Indigenous Panama and Panama's Indigenous territories: (i) the remote and disperse nature of Indigenous communities; (ii) the lack of personnel to provide quality and culturally pertinent⁹ services; (iii) low-levels of**

⁶ 2010 National Population and Housing Census, cited in *Situación de las Mujeres Indígenas de Panama* (2016): 87.

⁷ Disaster Risk Management Program Panama; Magrin et al., 2007. Latin America. Climate Change 2007: Impacts, Adaptation and Vulnerability. Contribution of Working Group II to the Fourth Assessment Report of the IPCC.

⁸ GFDRR. 2011. Climate Risk and Adaptation Country: Panama.

⁹ For the purpose of this Project "*cultural pertinence*" is defined as: "incorporating the voice and preferences of beneficiary populations, as established by their cultural norms, values and ways of living, into the design and delivery of investments and the measurements of their success." Lack of cultural pertinence in public investments and service delivery is considered by the Indigenous populations in Panama as a violation of their rights and a contributing factor to these services' low levels of effectiveness. The project specifically works on improving cultural pertinence through three areas: (i) ensuring that the project is fully aligned with the aspirations and priorities of the people it intends to benefit; (ii) creating and expanding the intercultural



public investment; and, (iv) weak Government of Panama (GoP) capacity for planning and coordination both across sectors and with Indigenous authorities. Difficult access leads to higher costs for building and maintaining public infrastructure and services, and makes it more difficult to mobilize qualified personnel. For example, density of health personnel in the Indigenous territories is by far the lowest in Panama, with for instance 2.2 health workers per 10,000 inhabitants for the *comarca* Ngobe Bugle compared to the national average of 29.5 per 10,000 inhabitants.¹⁰ Education is the only sector that has started to adapt service provision to Indigenous culture and language, offering intercultural bilingual education (IBE) for first grade, and in some cases up to third grade, in approximately 20% of schools in Indigenous communities. In water and sanitation, public programs tend to ignore local knowledge leading to low community ownership and low levels of sustainability of the operation and maintenance of water systems in Indigenous communities.

7. **Difficult access is in turn exacerbated by historically low levels of public investment in Indigenous territories.** Between 2014 and 2015 only 2.3 percent of total central government investment spending (US\$89.4 million out of US\$3.9 billion) went to Indigenous *comarcas*,¹¹ even though they are home to 5.7 percent of the population, and half of the extreme poor.¹² This translates into \$436 per capita investments in Indigenous *comarcas* versus \$997 in the whole country and \$1,028 outside of *comarcas*.
8. **The development impact of investments has been weak due to poor capacity among government agencies to plan and coordinate public investments across sectors and with Indigenous authorities.** Whereas the Ministry of Government (MINGOB) has held the mandate to promote and coordinate public policy for IPs, historically this mandate has been underfunded, understaffed, and in general, non-operational. At the same time, coordination has been hindered due to the lack of structured platforms for upstream consultation with IP authorities and among government agencies. Given this institutional gap, line ministries have invested in Indigenous territories in an *ad hoc* and marginal way, based on minimal information about local contexts and priorities. Furthermore, implementation of investments is slow due to excessive bureaucratic and administrative controls for public spending and weak public sector fiduciary capacity. Finally, public information constraints, where only three 3 of the 12 territories have standardized disaggregated data, challenge planning and evaluation of development investments and outcomes.
9. **However, important structural change is underway in the Government's engagement with IPs, spurred by a dialogue initiated in 2012.** This dialogue was triggered by a series of conflicts that

bilingual education system and designing an intercultural health system; and (iii) improving the cultural sensitivity of civil servants and public service providers.

¹⁰ Contraloría General de la República – INEC Año 2012.

¹¹ Information is not available for the other seven territories without *comarca* status.

¹² Data for central government investment spending was obtained from the *CGR of Panama*, National Institute of Statistics, Table 343-04, which includes current and capital expenditures by all central government institutions in 2014 (as of Sept 16, 2015). Data on investment in the *comarcas* is based on 2015 data from the Ministry of Economy and Finance (as of Sept 15, 2015).



turned violent. The initial dialogue resulted in a political agreement to form a national Roundtable (referred to as the “IP Roundtable”), consisting of representatives of the affected Ngobe Indigenous communities and all 12 Indigenous governance structures of Panama, and the National Government and Assembly. The IP Roundtable was mandated to prepare a National Integrated Development Plan of the Indigenous Peoples of Panama¹³ (referred to as the “National IP Plan”) with the support of the United Nations Development Programme (UNDP).

10. **The Plan represents, for the first time in Panamanian history, a national consensus among the 12 Indigenous authorities on a common vision for their development.** It outlines two critical conditions for development: (i) that Indigenous authorities play a front-seat role as partners in defining, designing, implementing, and evaluating development investments delivered within their territories; and (ii) that development programs should address the multi-dimensional aspects of well-being based on Indigenous cultural norms, values and ways of living. The Plan outlines objectives, actions, and indicators for 15 years and is organized around three pillars, namely: (i) political and legal (governance and land rights); (ii) economic (productive activities and food security); and (iii) social (access to basic infrastructure and services). After a two-year consultative process, facilitated by UNDP, the Plan was approved by all 12 Indigenous Councils and Congresses and presented to the GoP at the end of 2014.

11. **The current Administration has demonstrated strong commitment to work with the IP Roundtable and implement the Plan.** The GoP is undertaking significant efforts to create an institutional and governance platform to promote a more productive dialogue, improved coordination, and more effective investments in Indigenous territories aligned with the Plan. The Directorate of Indigenous Affairs has been converted into the Vice Ministry of Indigenous Affairs (VMAI). MINGOB has also negotiated an institutional space within the Government’s Social Cabinet¹⁴ to align policies and public investments of key line ministries with the Plan, and the GoP passed a Presidential Decree on January 26th 2017 to institutionalize this body as a permanent national space for dialogue and planning between Indigenous Authorities and the GoP. Furthermore, this project commits the GoP to the implementation of the IP Plan for at least five years, regardless of any possible change in administration resulting from the 2019 political cycle.

12. **The Bank’s technical assistance (TA) during project preparation has served as a catalyst to support the GoP and the Indigenous authorities to start implementing the Plan.** Since 2015, the Bank has been supporting MINGOB with TA to: (i) ensure that the Plan was integrated into the institutional planning and budgeting processes; (ii) involve Indigenous authorities and communities in the prioritization of sectors and types of investments; (iii) carry out the necessary

¹³ http://www.pa.undp.org/content/dam/panama/docs/documentos/undp_pa_final_plan_desarrollo_pueblos_indigenas.pdf

¹⁴ The Social Cabinet is the advisory body to the Executive’s Cabinet Council on social development. It is a forum to discuss the national social agenda and to prepare, coordinate and evaluation the GoP’s social policy. It consists of a technical secretariat and a multisectoral commission of high level technical staff from participating ministries and autonomous directorates.



technical work to prioritize sectors and types of investments together with the Indigenous authorities and communities; (iv) explore different implementation alternatives, including the analysis of fiduciary and results implications; and (v) serve, when called upon to do so, as a trusted third-party to help overcome potentially divisive differences in opinion over the Plan's implementation. The Bank will draw on its global IP experience to continue playing this role as part of project implementation support.

13. **Through the Project, MINGOB is generating interest from other donors and line agencies within Panama for the implementation of the Plan.** For example, the technical work carried out for project preparation is now being leveraged by the Ministry of Health (MINSa) and the Ministry of Education (MEDUCA) for their investment planning. The Food and Agricultural Organization (FAO) and MINGOB recently signed an Inter-Institutional agreement to start investing in pilot activities under the Plan's second pillar for productive development, with interest also being demonstrated by the Inter-American Development Bank (IADB), the Ministry of Agricultural Development (MIDA), and the Authority for Small and Medium Size Enterprises (AMPYME). The Secretariat for Decentralization, the Institute for National Statistics (INEC), the Ministry of Social Development (MIDES), among others, have requested opportunities to present and consult their strategies at the IP Roundtable meetings. The Bank's continued support for MINGOB is instrumental to ensure that the Plan's implementation platform reflects international best practice for administrative, fiduciary, safeguards, and operational procedures.

C. Proposed Development Objective(s)

Development Objective(s) (From PAD)

14. The Project Development Objective (PDO) is to strengthen: (a) the capacity of Indigenous authorities **and the Borrower to jointly plan development projects and programs; and (b) the delivery of selected** public services in the Indigenous territories in alignment with the vision and priorities outlined in the National Indigenous Peoples' Development Plan.

Key Results

D. Project Description

15. **The Project will finance three components over five years, described below. For additional details on each component's activities, see Annex 1.**
- a) **Component 1: Institutional strengthening and governance capacity for the GoP and Indigenous authorities (US\$5.5 million to be financed by IBRD).** The objective of this component is to enhance the capacity of the GoP and the Indigenous authorities to carry out key governance functions necessary to improve the opportunities and living conditions in Indigenous territories.¹⁵ This component addresses critical structural barriers related to weak

¹⁵ Consultation processes and diagnostics under this component will include a gender component (when relevant) to guarantee indigenous women's participation and ensure that their priorities are taken into account.



capacity, lack of relevant information for planning and service provision, gaps in regulatory frameworks, and weak coordination and consultation platforms, among others. It will finance three subcomponents that support: (i) institutional strengthening for the VMAI to effectively plan and coordinate public policies, investments, dialogue and conflict resolution with IPs; (ii) capacity building and strengthening of Indigenous authorities for effective governance within their territories; and (iii) institutional strengthening and support for a select set of line ministries and other critical actors to enhance public planning and investments in Indigenous territories.

- b) **Component 2: Improved quality and cultural pertinence of select public service delivery in the 12 Indigenous territories (US\$66.3 million to be financed by IBRD).** The objective of this component is to help reduce the inequalities in access to, and quality of services between Indigenous and non-Indigenous communities. It will do this by improving the quality and cultural pertinence of service provision in health, education, and water and sanitation based on the IPs' vision and priorities for these sectors. Investments under this component will support: (i) the construction of new and rehabilitation of existing infrastructure; (ii) capacity building and TA for existing and new service providers to improve quality of service delivery, and for communities and youth to promote behavioral change; and (iii) the participatory design, with relevant Indigenous stakeholders, and implementation of an intercultural health system and expansion and strengthening of the IBE.
- c) **Component 3: Project Management, Monitoring and Evaluation (US\$11.17 million, of which \$US6.17 million is to be financed by IBRD and US\$5 million is to be financed by GoP).** The objective of this component is to ensure overall project management delivers on the expected range of investments, is agile and transparent, and maintains effective participation and coordination among the key stakeholders. This component will finance MINGOB's Project Coordination Unit (PCU) activities for: (i) supervision of the Project Executing Agency (PEA); (ii) planning and coordination with the IP Roundtable and partner agencies; (iii) management of flow of funds from the Bank to the GoP; (iv) reporting to the Project Steering Committee (PSC) and to the Bank; (v) communications; (vi) monitoring and evaluation; and (vii) audits. This component will also finance the costs of a PEA to support MINGOB's PCU with key technical, operational, administrative and fiduciary functions.

E. Implementation

Institutional and Implementation Arrangements

16. **The Project is led by MINGOB with the technical participation of MINSA and MEDUCA, and with implementation support provided by a Project Execution Agency (PEA). The IP Roundtable will serve as the platform for ongoing consultation and coordination with Indigenous authorities throughout project implementation.** The implementation arrangements include a Project Steering Committee (PSC), a Project Coordination Unit (PCU) within MINGOB's VMAI, a PEA and partner agencies. An assessment will be carried out through an early Mid-Term Review to determine if the functions carried out by the PEA can be handed over to the respective ministries,



and the PEA can be phased out. Annex 2 includes a table of each actor's composition, roles and responsibilities and a diagram demonstrating how they interrelate for implementation.

17. **At the highest level, the Project will be overseen by a PSC.** The PSC will be established through a Ministerial resolution made by MINGOB prior to project effectiveness. It will be co-Chaired by the Minister of MINGOB or her/his delegate, and a representative of the National IP Roundtable, and be comprised of two additional political delegates representing the IP Roundtable, a representative of the Ministry of Economy and Finance (MEF), of MINSA, and of MEDUCA. The PSC will serve as the highest-level oversight body, meeting twice annually or in extraordinary circumstances as deemed necessary to review project implementation reports, endorse annual operations plans, and resolve high-level disputes among the actors involved in project implementation.
18. **A PCU within MINGOB's VMAI will oversee project implementation on behalf of the Government, and have specific responsibility for implementing the activities foreseen in component 3,** including: (i) overall project coordination and reporting to the Bank, MEF, the CGR, and the PSC; (ii) contracting and supervision of the PEA; (iii) preparation of annual work plans; (iv) ensuring proper implementation of the inter-institutional agreements with key partner agencies; (v) implementing the Project's communications strategy; (vi) designing and implementing the Project's monitoring and evaluation system; and (v) hiring the service necessary to carry out Project audits. The PCU will also serve as the primary channel of communication and coordination with the IP Roundtable and all other external parties. The PCU will maintain a small core team and will not replicate any technical, administrative, or fiduciary functions established for the PEA over components 1 and 2. The PCU has already been established within MINGOB's institutional structure and the budget request has been processed with MEF to secure 2018 local funds to recruit the agreed upon team and cover their operating expenses. The PCU team will be absorbed into the VMAI's Directorate for Indigenous Development upon project completion. Annex 2 includes more detail on the composition, roles and responsibilities of the PCU.
19. **A PEA will carry out project implementation of Components 1 and 2, as outlined in the Annual Operations Plans and in accordance with the procedures established in the Project's Operations Manual.** The PEA will be hired through a competitive process and will report to MINGOB's PCU. For Components 1 and 2, the PEA will directly manage all procurement processes, contracting, payments, and accounting, and prepare fiduciary, safeguards and technical progress reports as requested by the PCU for relevant GoP institutions, and the World Bank. The PEA will include a team of project management, financial management (FM), procurement, planning/M&E, infrastructure, technical sector, and safeguard specialists. An Operational Account will be held by the PEA and used for making payments for the project. The ToRs of the PEA will incorporate its role in designing and implementing a plan to gradually transfer implementation functions to the GoP as conditions enable. The Operations Manual will be reviewed during Project appraisal, and an acceptable advanced draft will be provided to the Bank by Project Negotiations.
20. **Other institutions playing important roles in Project implementation include partner agencies.** Partner agencies are institutions or directorates responsible for proposed activities (VMAI for governance; MEDUCA for education; MINSA-DISAPAS for water and sanitation; MINSA-



Directorate for Indigenous Health for health; INEC for census; and select Universities for higher education). The roles and responsibilities of these agencies are defined in the Inter-Institutional agreements (when necessary) and in the Operations Manual. The partner agencies will ensure ongoing coordination through a technical level inter-institutional committee. This committee will be chaired by the PCU General Director and include representation of the already established focal points for each partner agency (MINGOB, MINSAs, MINSAs-DISAPAS, MEDUCA, MEF), all of whom hold at least a Directorate level position. The Committee will meet monthly to ensure fluid ongoing coordination and to address operational bottlenecks, negotiate and follow-up on the activities, costs, and target results for each year's Annual Operations Plans (AOPs) (within the scope of the already agreed upon project activities). For infrastructure and equipment investments, the partner agencies are responsible to ensure that the investment will be allocated the necessary budget for staffing and operating costs once delivered. The PEA can support partner agencies with consultants to help them carry out their roles, as part of the institutional strengthening action plan. Details on the roles of the partner agencies are included in Annex 2.

21. **The IP Roundtable will serve as a permanent platform for coordination and consultation with Indigenous authorities to ensure that the Project remains aligned with the Plan.** The IP Roundtable will continue to assign three technical specialists to work within the PCU to ensure that their vision and priorities are reflected in all project planning and coordination activities. The IP Roundtable will also nominate three additional non-technical representatives to serve on the PSC to represent the full Roundtable's concerns and priorities with the highest level GoP authorities in project oversight. In addition, to ensure that all 12 Congresses and Councils are fully informed and have a structured opportunity to provide feedback throughout project implementation, the IP Roundtable will meet at least 4 times per year to review implementation progress, provide feedback on key outputs defined in the ESMF, facilitate the flow of information, and address grievances.

22. **The institutional arrangements of the Project will evolve over time: as the capacity of MINGOB and key line ministries increases, these institutions will take over the functions initially carried out by the PEA.** The proposed PEA arrangement is an interim mechanism to allow the GoP to deliver specific services in the Indigenous territories, despite institutional constraints stemming from weak capacity and overly bureaucratic controls and procedures. Component 1 will dedicate significant resources to carry out the institutional assessments and provide the support necessary to strengthen the GoP's capacity to plan, invest, and provide quality and culturally pertinent services in Indigenous territories while strengthening the Indigenous authorities' capacity to be effective partners in improving the well-being of their populations. During the Mid-Term Review, the Project team will assess the enabling legal and operational conditions in the implementation environment and the readiness of the relevant institutions to effectively take over the continued implementation of the project. When deemed feasible, the relevant institution(s) will take over the roles and responsibilities that are initially carried out by the PEA, allowing for the phasing out of the PEA contract.^[3]

^[3] The contracts to be issued through the PEA will take such a transition in implementation arrangements into account. As part of the MTR, the detailed arrangements to facilitate a hand-over will need to be developed.



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

Panama is home to the following seven Indigenous ethnic groups or peoples, with distinct cultural identities and governance structures: the Emberá, Wounaan, Naso, Guna, Bribri, Buglé and Ngäbe, representing a population of almost 418,000 or over 12 percent of the Panamanian population. The Project area covers the twelve collectively occupied territories where most Indigenous Peoples in Panama live. These territories comprise five semi-autonomous comarcas and seven Indigenous territories or collective lands. The Indigenous comarcas are sizeable, comprising 22.2 percent of the country’s area and some of Panama’s richest natural resources and cultural diversity. In 2010, approximately 196,059 Indigenous people lived in comarcas, while 221,500 lived in other Indigenous territories or collective lands or had migrated to urban areas. Despite significant differences among territories in regard to the levels of formalization and legal recognition of tenure, each territory exercises a certain level of autonomy and is governed by its traditional Indigenous Congress or Council, which also vary greatly in their levels of consolidation, number of people represented, and institutional structures. The Indigenous territories of Panama also contain many of the country’s protected areas such as the International Park and Biosphere Reserve La Amistad, Darien National Park, and Palo Seco Forest Reserve. Steep slopes, heavy rainfall, and erodible soils create conditions susceptible to erosion and sedimentation, for which bioengineering may be an excellent mitigation option. Access is difficult and often relies on rivers which are passable by barges for only a few months a year, creating logistic problems for larger projects. Flora and fauna rescue and management will be required as standard practice even for minor projects.

G. Environmental and Social Safeguards Specialists on the Team

Cristina Elizabeth Coirolo, Social Safeguards Specialist
Michael J. Darr, Environmental Safeguards Specialist

SAFEGUARD POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	OP/BP 4.01 is triggered as the Project will support the construction, expansion and-or rehabilitation of small-scale infrastructure, in the health, education, governance and water and sanitation sectors. These works, are expected to generate minimal or moderate environmental risks and potential impacts. The Project is categorized as B because its potential environmental and social impacts are likely



to be site specific, temporary, and readily mitigated with standard measures.

Given the multiple works nature of the project and the additional planning needed to finalize investment decisions on sites/investments, an ESMF was prepared to guide screening, assessment and mitigation processes for all works. Generic Environmental Management Plans (EMPs) for typical small works have been prepared and included within the ESMF. The ESMF details the procedures to evaluate social and environmental risks through project screening, to optimize site selection and design, and to avoid and exclude high-risk projects (Category A or III under Panamanian regulations). The ESMF uses World Bank safeguard objectives to identify any subproject requiring further investigation or assessment.

The Project Social Assessment was informed by community consultation process in all 12 territories, consisting of 35 workshops with the participation of 2,062 Indigenous community members, facilitated by their local authorities and including dedicated workshops with Indigenous women. These consultations served to identify priority investments to be financed across eligible sectors, and key social risks related to project implementation. The latter include: (i) the potential for conflicts unrelated to the Project between the GoP and IP communities/Authorities affecting the political or operating context; (ii) the failure of the GoP and the Project to deliver quickly and effectively on the broad expectations raised by consultation processes; (iii) internal conflicts or governance issues among Indigenous Authorities that complicate or delegitimize project decisions; (iv) lack of meaningful consultation/participation of beneficiary community members in specific investments to ensure cultural pertinence and community ownership; (v) conflicts between contractors and communities or IP Congresses; (vi) the lack of active participation and ownership over project activities by Indigenous women given low levels of female participation in IP Congresses and Councils; and (vii) the potential for loss of access to land for certain community



members, if those lands are designated by communities as the adequate lands for public works.

The social chapter of the ESMF establishes screening criteria and procedures to respond to these social risks, including: (i) mechanisms for the involvement of IP stakeholders in project decision-making and for documenting broad community support for investments at national, territorial and community levels; (ii) verification that all land donations are voluntary per OP/BP 4.12; and (iii) a grievance redress mechanism (GRM) to channel and resolve project related conflicts and grievances across various levels, from the Project Steering Committee to the community level within the 12 IP Territories. A Gender Strategy was also prepared, based on results from a dedicated workshop with national Indigenous women’s organizations, and is included as an Annex to the ESMF. The Gender Strategy presents detailed activities that have been included within the scope of work of the Project’s activities as well as gender-specific indicators to be monitored by the Results Framework.

The National IP Roundtable was consulted directly for approval on all critical path decisions related to project preparation and design, and validated the Project’s final proposed design, five-year scope of activities, including the preliminary list of works prioritized in each territory, the Project’s ESMF and Gender Strategy. No revisions were requested to the latter two documents, and evidence of validation is provided through the IP Roundtable meeting minutes, signed on December 7, 2017.

Natural Habitats OP/BP 4.04	Yes	OP/BP 4.04 is triggered for precautionary purposes as some investments may be close to, lie within, or cross through protected areas. The ESMF includes criteria and procedures to avoid and minimize these risks and manage potential negative impacts on natural habitats, and establishes procedures and mechanisms for screening activities against OP/BP 4.04.
Forests OP/BP 4.36	Yes	OP/BP 4.36 Forests is triggered as a precaution, because there is some potential for clearing of forest or trees during small civil works. The Policy will be



		applied in conjunction with OP/BP 4.04. The project will not support investments in forest materials harvesting, reforestation, watershed management related activities, or any other activities that could affect forest use or management.
Pest Management OP 4.09	Yes	OP/BP 4.09 (Pest Management) is triggered to allow for incidental pesticide use, particularly termite treatment for building foundations, as required. A list of prohibited pesticides is included in the ESMF and a Pest Management Plan is not required, as there are no significant issues anticipated.
Physical Cultural Resources OP/BP 4.11	Yes	OP/BP 4.11 is triggered as a precaution as the Project will invest in Indigenous territories where aspects of cultural value and protection may require additional measures to assess and manage risks. A chance-find procedure is included in the standard EMP contained in the ESMF.
Indigenous Peoples OP/BP 4.10	Yes	<p>OP/BP 4.10 is triggered since all project beneficiaries are Indigenous and the project will be operating in the 12 traditional Indigenous territories, where the populations meet the four criteria established in the Policy. A separate Indigenous Peoples Plan (IPP) has not been developed for the Project as all beneficiaries are Indigenous and thus, per OP/BP 4.10, the Project's preparation and design fully integrate the Policy's objectives and have been informed by the social assessment and extensive community consultations.</p> <p>The ESMF establishes specific procedures to respond to the key social risks associated with project implementation, including:(i) mechanisms for the involvement of IP stakeholders in project decision-making and for documenting broad community support for investments at national, territorial and community levels; (ii) verification that all land donations are voluntary per OP/BP 4.12; and (iii) a grievance redress mechanism (GRM), and; (iv) strategies to promote the inclusion of Indigenous women and youth in project benefits.</p>
Involuntary Resettlement OP/BP 4.12	No	OP/BP 4.12 is not triggered given preferences expressed during Project preparation by Indigenous Authorities and the GoP to screen out works that would require involuntary land acquisition or resettlement. If works require new land or land



		<p>under alternative uses, they will only be deemed eligible if the proposed land can be attained through voluntary donations. This corresponds with the current practices of the line ministries involved in the Project (MINSA, MEDUCA) for the acquisition of land for construction of public infrastructure in Indigenous territories. The ESMF establishes detailed procedures for Voluntary Land Donation (VLD) to be applied to the Project, including eligibility and due-diligence requirements and a screening form to facilitate operationalization.</p>
Safety of Dams OP/BP 4.37	No	<p>OP/BP 4.37 is not triggered as the Project will not support the construction or rehabilitation of major dams nor will it support other investments that would rely on the services of an existing major dam.</p>
Projects on International Waterways OP/BP 7.50	Yes	<p>OP/BP7.50 is triggered because the Project will support water and sanitation investments, and three of the Indigenous territories (Bri-Bri, Naso, and Collective lands of the Embera Wounaan) include communities within the following international water basins: Sixaola, Changinola, and Jurado. However, given the limited amounts of water to be abstracted and the localized nature of the sources, the Task Team has concluded that while the activities financed under the Project consist of additions or alterations of the ongoing scheme, they: (i) will not adversely change the quality or quantity of water flows to the other riparian; and (ii) will not be adversely affected by the other riparian possible water use. Accordingly, an exception to the notification requirement is being requested. The ESMF includes screening criteria and procedures to identify and deem ineligible any investments that could affect International Waterways per the provisions of this Policy.</p>
Projects in Disputed Areas OP/BP 7.60	No	<p>OP/BP 7.60 is not triggered as there will be no subprojects in disputed areas.</p>



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 Project is considered Category B. Investments will support institutional strengthening and governance capacity for the GoP and Indigenous Authorities, and improved quality and cultural pertinence of public service delivery and infrastructure in Indigenous territories. This includes a suite of small civil works across the following sectors: health, water and sanitation, and education. The principal environmental risks are those associated with poor practices in the construction of small civil works, with resulting potential impacts to habitat (OP/BP 4.04) and possibly physical cultural resources (OP/BP 4.11).

The key social risks associated with project implementation include: (i) the potential for conflicts unrelated to the Project between the GoP and IP communities/Authorities affecting the political or operating context; (ii) the failure of the GoP and the Project to deliver quickly and effectively on the broad expectations raised by consultation processes both for the Plan and specifically for the Project; (iii) internal conflicts or governance issues among Indigenous Authorities that complicate or delegitimize project decisions around works selection and design and/or outcomes of participatory processes to deliver new programs, training, and curriculum; (iv) lack of meaningful consultation/participation of beneficiary community members for specific investments within communities to ensure cultural pertinence and community ownership; (v) conflicts between contractors and communities or IP Congresses; (vi) the lack of active participation and ownership over project activities by Indigenous women given low levels of female participation in IP Congresses and Councils; and (vii) the potential for loss of access to land for certain community members, if those lands are designated by communities as the adequate lands for public works.

If left unmitigated, these risks could ultimately result in the failure of the proposed Project to achieve its objectives and erode the legitimacy of the GoP and Indigenous Authorities to utilize the National IP Development Plan as a platform for dialogue and development.

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

The Project will result in long-term positive impacts by transforming the capacity of the GoP and the Indigenous authorities to jointly plan development projects and programs in alignment with the vision and priorities outlined in Indigenous Peoples National Development Plan. At the same time, it will improve the cultural pertinence and quality of select public services and infrastructure in education, health, water and sanitation and governance in Indigenous territories. These dual goals should contribute to reducing the inequality rates and significant ethnic-based gaps in access to basic infrastructure and services that have characterized development in Indigenous territories of Panama.

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

Different project design alternatives were assessed to attempt to address the two key social risks of: (i) effectively delivering on expectations and commitments raised by the National IP Plan and project consultations with Indigenous peoples; and (ii) ensuring that the Project maintains the ownership and vision of the Indigenous authorities in its scope and design. To address the first risk, the Project design needed to not only address what to finance but focus significant efforts on designing how to deliver quality results. This required the use of selectivity in order to reduce the number of processes and actors involved in implementing funds; designing a procurement strategy that foresees and mitigates access, climatic, and market risks and constraints; and ensuring that the Project would have the support of



an experienced entity to implement the fiduciary, technical, operational and administrative functions for project an agile and transparent flow of funds. Secondly, adopting a multi-sectoral and integral approach (infrastructure, services, legal reform, governance etc.) for project interventions was critical to ensuring that the project scope remained faithful to the Indigenous peoples' vision outlined in their IP Plan. Whereas this adds to complexity, the Project design attempts to make it feasible by limiting the scope of sectors to four that are managed by three Ministries, and proposed an integral approach to investments where, for example, where water and sanitation needs are taken into account when building health posts or new schools. Another example includes the integral types of interventions that the Project will support across each sector ranging from sectoral governance issues such as the capacity of the line Ministry, information systems and legal regulations, to improving infrastructure while also supporting service delivery (e.g. teacher training, school management, IBE curriculum development). In regards to IP ownership over the design, in many instances, Indigenous authorities expressed a desire to directly manage project resources. At early stages of project design, the alternative to prepare the project as a Community Driven Development (CDD) type operation was assessed. However, in light of Panamanian's administrative and legal framework and the limited number of formal business and organizations that exist in Indigenous territories, this type of model would have greatly reduced the scale of investments that could be supported, and would have failed to address broader structural and governance issues critical for improving public service delivery in Indigenous territories. This decision was discussed at the IP Roundtable and the current design was validated by the 12 Indigenous traditional structures.

During project preparation, an initial screening was done to exclude projects in unsuitable areas such as flood zones, those without existing access, or those without available land. During implementation, there will be additional topographic, land and technical studies to ensure feasibility of siting, and further consultations with the beneficiary communities will be made to ensure optimum design and minimal impact of individual interventions.

Finally, the social risk related to involuntary resettlement, was thoroughly assessed during Project preparation. After undergoing basic training on the Bank's OP/BP 4.12, it was decided by the GoP and the Indigenous Authorities, that there was no need within the project to involuntary take land for the proposed works. Almost all the areas where infrastructure works will take place within collectively titled communities, and the use of those lands has already been assigned by the communities for public type service use (i.e., health/education). Where new lands are needed, the prefeasibility assessment for each proposed investment applied an initial screening to exclude projects without available land, existing access, or requiring involuntary land acquisition or resettlement. This screening also assessed the topographic and climatic considerations such as those lands unsuitable for works due to their location in flood zones. The ESMF establishes protocols and screening checklists and procedures to ensure that land donations are fully voluntary and free of coercion.

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 Project has been developed based on the work carried out by the IP Roundtable, where MINGOB represented the GoP to prepare the Plan. This Plan, after two years of consultation, was approved by the 12 Indigenous Congresses and Councils in 2014 and presented to MINGOB, in representation of the Varela Administration, as the Indigenous peoples proposal for their long-term development. The Project will finance MINGOB's effort to create the institutional and operational platform to start implementing the Plan, potentially creating a space to leverage additional resources and actors to achieve the Plan's broader objectives and scope of priorities. Whereas MINGOB has never implemented a project with international financing, and has limited experience in the sectors of education, health and water and sanitation, the two-year project preparation has significantly strengthened MINGOB's capacity to: (i) plan and coordinate with the Indigenous authorities and with key line ministries on Indigenous peoples issues; (ii) strengthen



their technical understanding of the issues and innovations unique for Indigenous peoples across the project's four sectors; and (iii) develop their understanding of operational, administrative and fiduciary procedures and Bank standards, in order to design the Project's implementation model.

During project preparation MINGOB, with the support of the Bank, organized and refined the scope of intervention by holding multiple inter-institutional roundtables to gauge commitment and capacity of other line ministries to participate in project implementation. MINGOB also implemented an extensive consultation process comprehensive of 35 workshops with the participation of 2,062 Indigenous community members, facilitated by their local authorities and including dedicated workshops with Indigenous women together with Indigenous authorities in all 12 territories. This process allowed MINGOB to systematize community priorities by sector to serve as the first input into scope of potential project investments. MINGOB, with the support of the Bank, mapped for the first time, all the Indigenous communities within the 12 territories and the public investments planned, programmed or under implementation in these communities. This exercise allowed MINGOB to filter out investments already underway while at the same time, providing a concrete planning tool for other Ministries to visualize their investments in IP territories and in many cases gaps. At the national level, MINGOB has organized multiple consultation meetings with the IP Roundtable, including mobilizing the political and technical representatives of the 12 territorial Congresses and Councils to meetings 3-4 times per year in order to consult all critical level project design decisions and maintain an open and fluid communication flow. For the past two years, MINGOB has hired 3 technical representatives nominated by the IP Roundtable to participate in all technical aspects of project preparation, including all project preparation missions, and has subsequently created long-term positions for these three technical representatives to ensure their continued daily participation during project implementation. On December 6th and 7th, 2017 the IP Roundtable validated the Project's final proposed design, five-year scope of activities, including the preliminary list of works prioritized in each territory, the Project's ESMF and Gender Strategy. The evidence of this validation is provided through the IP Roundtable meeting minutes, signed on December 7, 2017.

An ESMF was prepared by MINGOB that details the procedures to evaluate social and environmental risks through project screening, to optimize site selection and design, and to avoid and exclude high-risk projects (Category A or III under Panamanian regulations). The ESMF uses the Panamanian regulatory scheme to categorize risk and potential impact, and uses World Bank safeguard objectives to identify any subproject requiring further investigation or assessment. The ESMF also provides an EMP with standard mitigation measures for simple projects that uses elements of Panama's Good Environmental Practice protocols to screen, assess, and manage environmental and social impacts. Whereas an initial list of prioritized works have gone through a pre-feasibility screening and assessment, the final decision on works will only take place once each proposed investment undergoes: (i) the relevant planning process within the line ministry to confirm adequate demand; (ii) topographic, land and technical studies to ensure feasibility of siting (in process for almost all cases); and (iii) designs are prepared, consulted with the beneficiary communities, and approved by the line Ministry.

The social chapter of the ESMF includes screening criteria and procedures to respond to the Project's key social risks, including: (i) mechanisms for the involvement of IP stakeholders in project decision-making and for documenting broad community support for investments at national, territorial and community levels; (ii) verification that all land donations are voluntary per OP/BP 4.12, and; (iii) a grievance redress mechanism (GRM) to channel and resolve project related conflicts and grievances. A Gender Strategy was also prepared to ensure that Indigenous women's concerns and priorities are fully reflected in the Project design and implementation. This strategy was prepared in a dedicated workshop with national Indigenous women's organizations and has been validated by the IP Roundtable. The Gender Strategy presents detailed activities that have been included within the scope of work of the Project's activities as well as gender-specific indicators to be monitored by the Results Framework. The Gender Strategy is



included as an Annex to the ESMF.

MINGOB's Project Coordination Unit (PCU) located within the Vice Ministry of Indigenous Affairs (VMAI) will be responsible to the Bank for ensuring compliance with the ESMF and all aspects of project implementation. The PCU will carry out this function as part of its oversight and supervision role of the Project Executing Agency (PEA). The PEA will be tasked with the day to day implementation of the ESMF. The PCU will include specialists on communications, PEA supervision, and for Project monitoring and evaluation. It will also maintain the three technical representatives, nominated by the IP Roundtable to ensure ongoing communication and feedback with the Indigenous Authorities and participating communities. During implementation, their responsibilities will include: (i) ensuring that community grievances, conflicts and information requests are addressed in a timely and effective manner; (ii) facilitating participation of the IP Roundtable and 12 Congresses and Councils in the Project; and (iii) supporting territorial level consultation processes as needed. The IP Roundtable will also serve a critical function in the implementation of the Project and ESMF, as the structured platform for ongoing consultation and coordination with the 12 Indigenous Congresses and Councils. The IP Roundtable will nominate three representatives (different from those assigned to the PCU) to serve on the Project's Steering Committee. Finally, the IP Roundtable will meet at least four times a year (financed by the project) to review project implementation progress, provide feedback of key outputs as defined in the ESMF, facilitate communication and information flows, and raise and resolve grievances.

The PEA will recruit as part of its core team, environmental and social specialists, per Terms of Reference (ToRs) agreed upon with the Bank. The primary functions of these specialists will be to ensure that: (i) the procedures established in the ESMF are incorporated into the provisions of bidding packages, ToRs, technical specifications and contract documents; (ii) the ESMF's procedures for free, prior and informed consultation and attainment of broad community support are effectively implemented; (iii) environmental and social provisions are included within the ToRs for firms supervising works, and carry out E&S supervision for non-works contracts; (iv) track, monitor and resolve grievances and the adequate implementation of the Project's GRM; (v) ensure that works supervision firms are carefully assessing contractors' behavior and engagement within beneficiary communities and, if issues arise, that they are addressed quickly and effectively; and (vi) prepare safeguards reports for the PCU, IP Roundtable, Project Steering Committee (PSC) and Bank per the agreed annual operations work-plan. Evidence of broad community support will be required for all community-level interventions through the mechanisms described in the ESMF. For works projects, this support should be documented prior to the line Ministry submitting the project profile (SINIP) through the national budgeting system.

The Project GRM will operate at various levels, from the Project Steering Committee to the community level within the 12 IP Territories. The PCU include a Communications Specialist to coordinate the implementation of the Project communications strategy to ensure that beneficiaries, stakeholders and audiences at various levels remain informed on progress of project implementation. The PCU will also be responsible for maintaining a centralized GRM database to document the resolution of conflicts and grievances, and would also be responsible for resolving complaints against or raised by the PEA. As part of the PCU's supervision of the PEA, and to further ensure checks and balances in the management of grievances, the PEA will be required to report to the PCU on all grievances received and their resolution. The three technical representatives of the IP Roundtable within the PCU will provide a channel independent from the PEA for the raising of grievances and concerns through continuous communication with Traditional Authorities on the IP Roundtable and at the local level in territories where projects are being executed. The technical representatives would also participate in conflict resolution processes, as needed. The National IP Roundtable would play a proactive coordination and political role to ring-fence the project from other conflicts and issues between the GoP and Indigenous peoples, and ensure legitimacy and transparency in their role in project management. Finally, the PSC will serve as the highest-level venue for the resolution of serious complaints against the



Project, PCU, or PEA, including responsibility for resolving political or coordination barriers raised by the PCU. The PSC will also ensure that the Project does not deviate from the Plan’s intentions and proposed types of actions – which will be critical for ensuring continued broad community support for the project and sustainability of its implementation arrangements.

The PCU has gained social safeguards capacity through undertaking the social assessment and preparing the ESMF. Additionally, the Bank provided training on social and environmental safeguards to MINGOB and Indigenous technical specialists from the 12 Indigenous territories, including to the three Indigenous technical specialists nominated by the National IP Roundtable. Capacity building on social and environmental risk management for the PCU, PEA and Indigenous stakeholders will continue prior to and during implementation, as required.

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 are the Authorities and communities of the Emberá, Wounaan, Naso, Guna, Bribri, Buglé and Ngäbe ethnic groups residing in the 12 collectively occupied Indigenous territories of Panama. The ESMF was distributed to the Indigenous Authorities of the 12 Congresses and Councils on September 24, 2017 for internal review prior to the workshop with the National IP Roundtable and MINGOB on December 6-7, during which the IP Roundtable validated the Project’s proposed final design, ESMF and Gender Strategy. Validation was documented through the Meeting minutes of the IP Roundtable, signed on December 7th, 2017 and annexed to the ESMF. The final version of the ESMF will be published on the MINGOB and World Bank websites, and distributed to the IP Roundtable.

Other Project stakeholders include MEDUCA, MINSA and other partner agencies that will benefit from actions to strengthen their capacity to fulfill their institutional mandates with Indigenous peoples and ensure effective inclusion of these populations in the services, information and benefits they deliver.

B. Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other		
Date of receipt by the Bank	Date of submission for disclosure	For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors
20-Jul-2017	08-Jan-2018	
"In country" Disclosure		
Panama		
08-Jan-2018		
Comments		
Indigenous Peoples Development Plan/Framework		
Date of receipt by the Bank	Date of submission for disclosure	
20-Jul-2017	08-Jan-2018	



"In country" Disclosure

Panama

08-Jan-2018

Comments

Pest Management Plan

Was the document disclosed prior to appraisal?

Date of receipt by the Bank

Date of submission for disclosure

No

"In country" Disclosure

If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.

If in-country disclosure of any of the above documents is not expected, please explain why:

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?

Yes

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

Yes

OP/BP 4.04 - Natural Habitats



Would the project result in any significant conversion or degradation of critical natural habitats?

No

If the project would result in significant conversion or degradation of other (non-critical) natural habitats, does the project include mitigation measures acceptable to the Bank?

NA

OP 4.09 - Pest Management

Does the EA adequately address the pest management issues?

Yes

Is a separate PMP required?

No

If yes, has the PMP been reviewed and approved by a safeguards specialist or PM? Are PMP requirements included in project design? If yes, does the project team include a Pest Management Specialist?

NA

OP/BP 4.11 - Physical Cultural Resources

Does the EA include adequate measures related to cultural property?

Yes

Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?

NA

OP/BP 4.10 - Indigenous Peoples

Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?

NA

OP/BP 4.36 - Forests

Has the sector-wide analysis of policy and institutional issues and constraints been carried out?

NA

Does the project design include satisfactory measures to overcome these constraints?

NA

Does the project finance commercial harvesting, and if so, does it include provisions for certification system?

No

OP 7.50 - Projects on International Waterways

Have the other riparians been notified of the project?

No

If the project falls under one of the exceptions to the notification requirement, has this been cleared with the Legal Department, and the memo to the RVP prepared and sent?



Yes

Has the RVP approved such an exception?

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

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APPROVAL

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