

INTEGRATED SAFEGUARDS DATA SHEET APPRAISAL STAGE

Report No.: ISDSA355

Date ISDS Prepared/Updated: 25-Apr-2012

I. BASIC INFORMATION

1. Basic Project Data

Country:	Africa	Project ID:	P126579
Project Name:	Regional Eastern Africa Power Pool Program (APL1) (P126579)		
Task Team Leader:	Paivi Koljonen		
Estimated Appraisal Date:	10-Apr-2012	Estimated Board Date:	21-Jun-2012
Managing Unit:	AFTEG	Lending Instrument:	Adaptable Program Loan
Sector:	General energy sector (100%)		
Theme:	Regional integration (90%), Infrastructure services for private sector development (10%)		
Financing (In USD Million)			
Financing Source		Amount	
BORROWER/RECIPIENT		157.10	
International Development Association (IDA)		684.00	
African Development Bank		354.30	
FRANCE Govt. of [MOFA and AFD (C2D)]		82.00	
Total		1277.40	
Environmental Category:	A - Full Assessment		
Is this a Repeater project?	No		

2. Project Objectives

Project objectives are to: (a) increase the volume and reduce the cost of electricity supply in Kenya; and (b) provide revenues to Ethiopia through the export of electricity from Ethiopia to Kenya.

3. Project Description

The project has two components:

Component A. Construction of a High Voltage Direct Current (HVDC) transmission interconnection between Ethiopia and Kenya.

Sub-Component A1. Transmission Lines. Construction of about 1,045 km of bipolar 500 kV HVDC overhead transmission line and towers.

Sub-Component A2. Substations. Construction of one AC/DC converting substation in each side of the line, one in Ethiopia and one in Kenya. Each substation will have a capacity of 2,000 MW. These stations convert AC power into DC in Ethiopia and DC power into AC in Kenya (and vice versa as needed).

Sub-Component A3. System Reinforcement. Reinforcements in Kenya of substations and transmission lines necessary to integrate regional interconnections, while managing the increased demand at the commissioning time of the interconnection for reliable operation of the Kenyan grid

Sub-Component A4. Environmental and Social Management. Implementation of the Environmental and Social Management Plans and the RAPs.

Component B. Project Management and Institutional Capacity Building

Sub-component B1. Project Supervision and Management. Financing of the services of a Supervision Consultant, short-term consultants for implementation units and project management.

Sub-component B2. Capacity Building. Technical assistance, planning studies, and capacity building to EEPKO and KETRACO, focusing on HVDC operations and maintenance, power trading, project management, procurement and financial management, environmental and social management.

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

Ethiopia:

The project area is located in the Southern part of the country, in two Regional States; namely, Oromia and Southern Nations and Nationalities and Peoples Regional States (SNNPRS). The transmission line starts from the outskirts of Sodo town in Sodo Zuria woreda in SNNPRS, where the converter substation is located and terminates in Mega woreda of Oromia region along the border between Ethiopia and Kenya. The line route inside Ethiopia is about 433 km and traverses eight Woredas and 34 rural kebeles in Wolyta Sodo, Humbo, Mirab Abaya, Arba Minch, Konso, Yabello and Dire until it reaches the border with Kenya. The first section (204 km) of the transmission line is located in SNNPRS and the second section (229 km) in Oromia region.

The first section of the line traverses mainly through rural areas without crossing a single urban center. Most of the rural villages are densely populated with intensively cultivated farmlands, mainly crop production dependent on rain-fed agriculture, using traditional methods of cultivation with very little land that is not cultivated. The second section of the line is mostly uninhabited with very low cultivation and thinly distributed population.

While no potential significant adverse environmental risks are foreseen as a result of the erection of pylons and substations, and stringing of the transmission lines, a ground-truthing visit on the Ethiopia side of the selected route for the transmission line in December 2011 had shown that there could be potential threats to the Konso cultural landscape and the Konso-Gardula (Borena Administrative Zone) paleontological and archaeological sites. In June 2011, the Konso Cultural Landscape was demarcated and declared a World Heritage Site by UNESCO. The ESIA consultants have sought advice from the Ethiopian Authority for Research and Conservation of Cultural Heritage (ARCCH) and have carried out field work in the Borena Administrative Zone with the view of studying whether the transmission line could impact the historically and culturally important water wells and living religious and burial places.

The transmission line will be rerouted away from the disclosed paleontological and archaeological sites (at bends 34 and 35) on the Ethiopia side of the line. The line will slightly traverse a very small portion of the eastern edge of the demarcated Konso Cultural Landscape but the ARCCH and the consultants who carried out the Environmental and Social Impact Assessment (ESIA) are of the opinion that any potential impacts arising from construction of pylons and substations may be insignificant. The ESIA and Environmental and Social Mitigation Plan (ESMP) have proposed appropriate mitigation measures and mitigation plans.

Kenya

The project area lies within the Rift Valley, Central, and Eastern Provinces of Kenya. The transmission line traverses the country from North to South through Marsabit, Samburu, Laikipia, Nyandarua, and Nakuru Counties and terminates in Suswa, about 100 km west of Nairobi. The line traverses mainly rural areas of the five Counties. The total length of the line is about 612 km. Most of the project areas are sparsely populated except the settlement areas of Nyandarua and Nakuru Counties. Route selection has guarded heavily populated areas.

The project traverses two Important Bird Areas, Dida Galgalu Desert and Lake Ol Bollosat. The Marsabit National Park and Losai Natural Reserve are also traversed by the line. Dida Galgalu and Lake Ol Bollosat are important bird areas that are recognized as such by the Birdlife International. This implies that the two areas host avian diversity of significant conservation values. Marsabit National Park and Losai National Reserve are gazetted protected areas of importance to conservation. The Marsabit National Reserve is located 560 km to the north of Nairobi in the Marsabit County. The reserve covers an area of 1,600 km² in the middle of the desert wilderness, and includes a Forest Reserve on the forested Mount Marsabit, (although the Transmission line will not traverse the forested part off the reserve). The region surrounding the Marsabit Reserve is of dry and barren semi-desert character. The Marsabit Reserve is a protective area for large mammals such as buffalo, zebra, giraffe, cheetah, antelope, oryx, greater kudu, elephants, rhinoceroses, lions, leopard and numerous species of birds. The Losai National Reserve is located to the south-west of the Marsabit County, across the Kaisut Desert. The reserve is characterized by a semi-desert landscape with rugged terrains, seasonal rivers, a lava plateau with scattered volcanic plugs covered with thorn bushes, and a zone of impenetrable mountain forest on the north-eastern edge of the central highlands, and, while now significantly degraded, includes the Melako Conservancy within the Reserve, which is attempting to protect the habitats of the sand grouse. The Laikipia – Samburu ecosystem, also in the project area, cannot be considered a ‘biodiversity hot-spot’ in the sense of having a wide diversity of endemic and/or endangered species, although it is host to lions, wild dogs, Grevy’s zebra, eland, elephants, reticulated giraffes and patas monkeys. The Longonot-Suswa area is prone to soil erosion and is currently under pressure from human activities.

The project traverses a region of known paleontological and archaeological significance, which has not been systematically studied, necessitating provisions for chance finds during construction.

5. Environmental and Social Safeguards Specialists

Zarafshan H. Khawaja (AFTCS)

Noreen Beg (AFTEN)

Yasmin Tayyab (AFTCS)

Nyambura Githagui (AFTCS)

Edward Felix Dwumfour (AFTEN)

6. Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	This policy is triggered due to the construction of the interconnector, requiring the identification, mitigation and monitoring of potential adverse environmental and social impacts. An Environmental and Social Impact Assessment (ESIA)/Environmental and Social Management Plan (ESMP) has been prepared for both Ethiopia and Kenya.
Natural Habitats OP/BP 4.04	Yes	This policy will not be triggered for Ethiopia since the project will not affect any natural habitats on the Ethiopian part of the line. It is triggered in Kenya as the project will traverse Important Bird Areas and will skirt Protected Areas and wildlife corridors.

Forests OP/BP 4.36	No	This policy will not be triggered for either Ethiopia or Kenya side since no natural forests will be traversed by the line or affected by the erection of pylons and substations.
Pest Management OP 4.09	No	
Physical Cultural Resources OP/BP 4.11	Yes	The Konso Cultural Landscape and the historically and culturally important water wells and living religious and burial places in the Borena Administrative Zone in Ethiopia are located in the vicinity of the interconnector. The route has been diverted away from disclosed paleontological and archaeological sites (at bends 34 and 35). While the line will pass slightly outside of the demarcated Konso Cultural Landscape, the Ethiopian Authority for Research & Conservation of Cultural Heritage (ARCCH) is of the opinion that potential impacts may be insignificant. In Kenya, the route traverses a region of known paleontological and archaeological significance, which has not been systematically studied; hence provisions will be made with the National Museums of Kenya (NMK) for possible chance finds during construction.
Indigenous Peoples OP/BP 4.10	No	
Involuntary Resettlement OP/BP 4.12	Yes	The route of the interconnector, with 433 km in southwestern Ethiopia and 612 km in Kenya is being selected to minimize displacement of the existing population or direct impact on their economic activities. In Kenya, the project will affect about 1,200 people (380 households), mainly residents of the Central and Rift Valley Regions. Of these, only 9 households will need to be relocated. A Resettlement Action Plan (RAP) has been prepared for the Kenya portion of Project consistent with the policy provisions of OP 4.12. In Ethiopia, current estimates indicate that about 5,743 people (1,165 households) will be affected by the Project. Since the precise routing of the RoW has not yet been finalized, a Resettlement Policy Framework (RPF) has been prepared consistent with the policy provisions of OP 4.12 as a guide to the preparation of a RAP when the routing of the RoW has been finalized. The objective of the Kenya RAP and the Ethiopia RPF is to ensure that all affected people will be compensated for their losses at replacement cost and provided with rehabilitation measures to assist them to improve, or at least maintain their pre-project standard of living and income earning capacity.
Safety of Dams OP/BP 4.37	No	
Projects on International Waterways OP/BP 7.50	No	
Projects in Disputed Areas OP/BP 7.60	No	

II. 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:

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:

Ethiopia

Social

Construction of the transmission line is expected to result in change in land use and land acquisition along its alignment. A major impact will be loss of farmland used to grow cereal and perennial crops such as bananas and mangoes. Permanent land acquisition for the right-of-way (RoW) will likely involve footing areas for the towers and the site of the substation in Wolyta/Solodo which will also affect people currently using the site for grazing purposes. Temporary land acquisition will be required for erection of towers and stringing of conductors. Given that the Project is linear in nature, only a portion of farmlands or irrigation structures will be affected, mostly in rural areas. The Project will affect about 341 hectares of farming and pasture land. The construction of access roads will also affect farmlands, perennial crops and trees located within the right-of-way. The construction of tower foundations will be located in areas where there are no existing buildings.

A household survey of the eight woredas transversed by the transmission line was initially carried out in June-August 2008. From July-August 2011, another socioeconomic survey was carried out of households in the same eight woredas who reside within the 65 meters of the RoW and whose properties and assets are likely to be affected by the construction of the transmission line. On the basis of this survey, current estimates indicate that the Project will affect approximately 5,743 (1,165 households), who will either lose housing structures and/or farmland, trees or perennial crops located within the RoW. It is also estimated that the Project will affect 256 housing structures and a small number of public and community institutions that will lose different types of assets and property due to construction works. About 20 hectares of communal grazing land needed for the construction of a substation at Wolyta Soda is also affected. Potential social impacts are likely to take place within the 65 meters width of the RoW for the transmission line. Most houses and structures will be shifted or "stepping back" from the alignment and within the existing village or farmland. People who lose part of their land will be able to continue farming activities in those areas where construction activities are not planned and once these activities are over, they will be able to continue to cultivate crops under the transmission line.

The alignment of the transmission line corridor has been determined, however, the precise routing of the RoW has not yet been finalized. While the GoE has taken a preliminary census of PAPs and their lands and assets, they will not finalize the specific compensation for land take and affected assets until shortly after they finalize the alignment of the RoW. The final alignment will take into consideration measures to minimize impacts on land and structures. In view of which a Resettlement Policy Framework (RPF) has been prepared to clarify land acquisition and resettlement principles together with organizational arrangements under the Project. The RPF consistent with the World Bank's Operational Policy 4.12 on Involuntary Resettlement will serve as a guide for the preparation of a Resettlement Action Plan when the routing of the RoW has been finalized. The key objective of the RPF is to ensure that all affected people will be compensated for their losses at replacement cost and provided with rehabilitation measures to assist them to improve, or at least maintain their pre-project standard of living and income earning capacity. Community participation and stakeholder consultation were an essential component in the preparation of the RPF. Consultation with project affected people and key stakeholders was carried out in five different woredas who will be affected by the project. The views and concerns of people, including the most vulnerable, expressed during these consultative meetings were taken into consideration in the preparation of the RPF.

There are no Indigenous Peoples in the project area in Ethiopia.

Environment

There are no potential adverse biophysical environmental issues likely to be associated with the construction of the project in Ethiopia. If any at all, these may be associated with health and safety issues related to workers' camp site activities which can be eliminated or reduced in a cost-effective manner through simple and appropriate preventive and mitigation measures on site. However, there was anticipation that the project could impact negatively on the Konso Cultural Landscape, which the transmission line was originally drawn to traverse at a section of its eastern border. There is a need also to avoid disturbing the historically and culturally important water wells and living religious and burial places in the Borena Administrative Zone in Ethiopia. The sensitive Konso areas are to be avoided by rerouting the line away from the disclosed paleontological and archaeological sites (at bends 34 and 35). ESIA and ESMP have been developed for use during the implementation phase of the project on how to prevent impacts from occurring and to mitigate if they should emanate.

Kenya

Social

Similar to Ethiopia, the construction of the transmission line is expected to result in change in land use, land acquisition, loss of livelihood and impact assets such as water tanks, gates, animal sheds, toilets, fences and business structures. Temporary and permanent land acquisition will be required for erection of towers and stringing of conductors. People who lose part of their land will be able to continue to farm and use the land for grazing purposes in those areas where construction activities are not planned or once construction activities are over. About 20 hectares of grazing land will also be required for the construction of the substation at Suswa.

Based on a socio-economic and census survey, the total affected population is 1,200 people (380 households) who are mainly residents of the Central and Rift Valley Regions. Of these, nine households (45 people) will need to relocate. The total land area traversed by the ROW is 39.39 km².

KETRACO has prepared a Resettlement Action Plan (RAP) for the Kenya portion of the Project in full consultation with the potentially affected people and the relevant Kenyan institutions and consistent with the policy provisions of OP 4.12. The RAP identifies the principles, measures and procedures to improve or at least restore the livelihoods of affected people.

In the initial screening of the project, OP 4.10 (Indigenous Peoples) was triggered to take account of the possible presence of groups in Kenya for whom the policy might be applicable. Based on subsequent further analysis, however, there are no groups in the area that meet the policy's applicability criteria as interpreted in the past by the Bank in the Kenya context. OP 4.10 is therefore not triggered for the project.

Environment

There are four key environmental concerns. The first concern, specific to the routing of the line, is the impact on natural plant, animal habitats, and bird migration routes as the selected route traverses the Marsabit National Reserve and the Losai National Reserve, and passes through an Important Bird Area (IBA) - Lake Ol Bolossat.

The second is the need to limit encroachment on natural habitats, and avoid ecological hot spots and wildlife corridors that may be affected as a result of construction of the pylons 4-6 km from the main road. The Bank has been informed that routing closer to the road is not possible because of (a) resettlement costs and disturbance to the marginalized communities who depend on road traffic for their livelihoods, and (b) town planning. Vision 2030 calls for an expansion of towns and villages along the route, so the transmission line must be sited some distance outside the proposed expansion. Nevertheless, the surveyors will take every precaution to align the route away from ecological hot spots, while at the same time avoiding populated areas to limit social impacts on local communities.

The third concern is the need to conserve water use, for construction and for workers, because much of the Project traverses severely water-constrained areas, where scarcity of water is a potential source of conflict.

The fourth concern is the need to pay careful attention to the presence of paleontological and archaeological remains during final siting of the transmission towers and construction activities and to consult with and involve authorities from the NMK because the project will traverse a region of known paleontological and archaeological significance, which has not been systematically studied.

To minimize the Project's impact on plant and animal habitats, KETRACO, in consultation with the Kenya Wildlife Service (KWS) and Kenya Forest Service (KFS) will implement measures to limit non-critical habitat loss and degradation, in particular during construction. Ecological hot spots (such as the habitats of the sand grouse within Losai Reserve) will be avoided, and construction will be scheduled to avoid wildlife migration sections along the three portions of the proposed route that traverse migratory corridors. Construction contracts will reflect this requirement. Guards will be posted at construction and campsites to ensure that wildlife are not poached and that precious woods such as

sandalwood are not chopped down for resale. KFS and KWS will continue to liaise with KETRACO in the implementation of the Environmental Management Plan, particularly along migration corridors and ecologically sensitive areas, periodically monitoring the impact on biodiversity attributed to construction and maintenance of the transmission line and substations. Care will be taken to disguise the pylons to limit aesthetic damage to the landscape.

To minimize bird collisions, KETRACO will take appropriate measures in the design and construction of the transmission lines to minimize the risk of electrocution of birds in Important Bird Areas. More information on any bird migratory routes that may pass the line has been provided in the ESIA, and appropriate bird warning devices (balls on the lines, platforms on the towers for raptors and nesting birds) will be used as necessary and will be budgeted for in Project costs. Nature Kenya, the Ornithology Department of the Museums of Kenya and KWS will provide guidance on which specific actions are appropriate.

Water use management plans will be incorporated in the EMP to ensure appropriate water use management practices are employed during construction, and at worker camps, or in areas where there will be a short-term significant increase in population. Guidance will be sought from the Water Resource Management Authority, as to whether permits for water use for construction purposes are required.

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

Provision of more jobs is likely to lead to less poaching, (although in the short term care will have to be taken to prevent poaching and tree cutting at temporary worker camps) and government development plans would need to include development of boreholes and local electricity provision, thereby limiting strains on existing sources of water supply that cause conflict, and may reduce the cutting of shrubs and grasses for fuel.

The Konso Cultural Landscape (KCL) and the paleontological and archaeological sites in the Borena Administrative Zone continue to attract tourists and paleontologists/archaeologists to the area. There is need for the ARCCH to develop a clear geo-referenced map of the areas including the prescribed buffers, particularly for the KCL. Per agreement with EEPCo, qualified authorities of the ARCCH will be present during final planning for positioning of the transmission towers and construction in the sensitive Konso area, and will be notified by the project owner of any "chance find" during excavation works along the line. Work will stop until ARCCH has carried out full inspection of the area of the "chance find" and provided its consent for work to continue.

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

Detailed line routing studies have been undertaken in 2009 and again in 2011, and the final line routing has been selected to avoid as much as possible, crossing environmentally sensitive areas (such as the Matthews Forest range, the Aberdares, and local conservancies in Kenya and to minimize resettlement in along the line). The ESIA's have been prepared based on the agreed route selection. A further rerouting at the Ethiopian side of the line has been considered and agreed in order to stay away from the Konso Cultural Landscape and the identified paleontological and archaeological sites in the Borena Administrative Zone.

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 responsibility in the two countries to implement and monitor the ESMP and RAP will be with EEPCo in Ethiopia and KETRACO in Kenya.

EEPCo has adequate institutional arrangements in place to ensure the implementation of the Environment and Social Management Plan for the Project components in Ethiopia. The implementation of the Resettlement Action Plan in Ethiopia will involve the Woredas (counties) along the transmission line route. Each affected Woreda Administration will establish a Committee for the purpose of verifying and valuing resettlement and compensation requirements in the presence of EEPCo staff. On the particular issue relating to the protection of physical cultural resources (i.e. Konso Cultural landscape and the archaeological and paleontological sites), EEPCo will be working closely with and under the guidance of the ARCCH. ARCCH will conduct an orientation and training session for relevant project participants and construction contractors to alert the latter to the cultural heritage aspects of the project's impact area and to the characteristics and management procedures for possible chance finds during construction.

EEPCo will liaise with ARCCH which will conduct an orientation and training session for relevant project participants and construction contractors to alert the latter to the cultural heritage aspects of the project's impact area and to the characteristics and management procedures for possible chance finds during construction.

KETRACO's Environment, Safety, Quality and Liaison Unit will implement the Environment and Social Management Plan for the Project components in Kenya. KETRACO will set up a separate Resettlement Implementation Committee. Under the leadership of the Senior Environmental Officer, the Committee will be in charge of the day-to-day implementation of the RAP. It will include District Commissioners from the Counties along the transmission line and from each of the affected villages, a village chairman, elder, and a representative of women and youth.

In addition, KETRACO will engage an Independent Evaluation Panel to monitor the progress of the RAP's implementation. This external party will conduct semi-annual audits and a close down audit. The Panel will consist of a firm or persons who have handled resettlement programs. They will review the reports prepared by KETRACO on resettlement and will make site visits to obtain information from project affected persons, and to verify the reports.

Under the ongoing IDA-supported Electricity Expansion Project (P103037), KETRACO is receiving capacity building in environmental management and monitoring. It is the implementing entity for the Mombasa-Nairobi 220 kV high voltage line (financed by AfDB, EIB, and AFD) and thus has experience in implementing environmental and social management activities. During project preparation, KETRACO's environmental and social management capacity was assessed and found to be adequate for its role as an implementing entity, although it is recommended that more staff be added to address the heavy workload, particularly in terms of RAPs. KETRACO's environmental and social staff will be included in training visits to utilities that have implemented Bank safeguards. Funding has been included in the financing plan.

KETRACO will liaise with NMK which will conduct an orientation and training session for relevant project participants and construction contractors to alert the latter to the cultural heritage aspects of the project's impact area and to the characteristics and management procedures for possible chance finds during construction.

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

The safeguards documents have been prepared in consultation with the PAPs. Public consultation was a key element in the preparation of the ESIA, the Kenya RAP and the Ethiopia RPF. The objectives of the consultation process were to inform the affected households, communities, local authorities and other interested stakeholders about the Project's potential impacts and proposed mitigation measures; collect their views to feed into the design of the project, if possible; and to enable the preparation of the environmental and social safeguard instruments. The preparation of the ESIA in Kenya and Ethiopia has included three sets of consultation with the project affected communities to ensure that they understand and agree to the potential disturbances and the mitigation measures recommended in the ESIA, RAP and RPF. In Kenya a total of 11 community consultation meetings were held in the project affected area on the RAP. A diversity of community stakeholders including Government administrators (chiefs, village headmen, etc), village elders, farmers, teachers, men and women were consulted in pre-arranged public meetings held in public institutions such as schools, markets and/or identified homesteads along the proposed line route. The stakeholders were mobilized by chiefs, teachers and school management committee members. Teachers sent pupils to inform their parents of the planned meetings. Chiefs deployed their assistants and village headmen to make announcements and post notices at market centres informing the public about planned meetings. Similarly, in Ethiopia, consultations were carried out with project affected people and key stakeholders on the preparation of the RPF in five different woredas which will be affected by the Project.

The ESIA have been disclosed in Kenya, Ethiopia on January 28 and 29, 2012 respectively and at the Bank's InfoShop in Washington on January 30, 2012. The Kenya RAP was disclosed in Kenya and at the Bank's InfoShop on March 26 and 27 respectively. The Ethiopia RPF was disclosed in Ethiopia on April 4, 2012 and at the Bank's InfoShop on April 5, 2012.

B. Disclosure Requirements Date

Environmental Assessment/Audit/Management Plan/Other	
Was the document disclosed prior to appraisal?	Yes
Date of receipt by the Bank	24-Jan-2012
Date of "in-country" disclosure	27-Jan-2012
Date of submission to InfoShop	30-Jan-2012
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	
Resettlement Action Plan/Framework/Policy Process	
Was the document disclosed prior to appraisal?	Yes
Date of receipt by the Bank	25-Jan-2012
Date of "in-country" disclosure	26-Mar-2012
Date of submission to InfoShop	27-Mar-2012
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			
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	Yes []	No [X]	NA []
OP/BP 4.04 - Natural Habitats			
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?	Yes []	No []	NA [X]
OP/BP 4.11 - Physical Cultural Resources			
Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?	Yes [X]	No []	NA []
OP/BP 4.12 - Involuntary Resettlement			
If yes, then did the Regional unit responsible for safeguards or Sector Manager review the plan?	Yes [X]	No []	NA []
The World Bank Policy on Disclosure of Information			
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	Yes [X]	No []	NA []
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 [X]	No []	NA []
All Safeguard Policies			
Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes [X]	No []	NA []
Have costs related to safeguard policy measures been included in the project cost?	Yes [X]	No []	NA []
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	Yes [X]	No []	NA []
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?	Yes [X]	No []	NA []

III. APPROVALS

Task Team Leader:	Paivi Koljonen	
Approved By:		
Regional Safeguards Coordinator:	Name: Alexandra C. Bezeredi (RSA)	Date: 25-Apr-2012
Sector Manager:	Name Lucio Monari (SM)	Date: 18-Apr-2012

Public Disclosure Copy

Public Disclosure Copy