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

Appraisal Stage | Date Prepared/Updated: 28-Jul-2017 | Report No: PIDISDSA20047



BASIC INFORMATION

A. Basic Project Data

Country Lebanon	Project ID P159692	Project Name Land Administration System Modernization	Parent Project ID (if any)
Region MIDDLE EAST AND NORTH AFRICA	Estimated Appraisal Date 01-Aug-2017	Estimated Board Date 26-Sep-2017	Practice Area (Lead) Social, Urban, Rural and Resilience Global Practice
Financing Instrument Investment Project Financing	Borrower(s) Ministry of Finance	Implementing Agency General Directorate of Land Registration and Cadastre	

Proposed Development Objective(s)

To improve access to land use and value data, property rights data, and geospatial information through the Land Registry and Cadastre system modernization.

Components

Modernization of the Digital Land Registry and Cadastre System
 National Spatial Data Infrastructure
 Property Valuation and Taxation
 State Land Inventory and Management
 Regulatory and Institutional Development, Capacity Building and Project Management

Financing (in USD Million)

Financing Source	Amount
International Bank for Reconstruction and Development	43.00
Total Project Cost	43.00

Environmental Assessment Category

B - Partial Assessment

Decision

The review did authorize the preparation to continue



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Other Decision (as needed)

None

B. Introduction and Context

Country Context

Lebanon is a small, culturally, politically and economically open, middle income country with 4.5 million people in 2013, with tourism and financial services being the backbone of the national economy. It lies at the epicenter of one of the most volatile regions in the world, and is continuously exposed to sizeable political and security shocks with elevated risks of violence and conflict as evidenced by the devastating civil war that lasted from 1975 to 1990, the more recent 2006 war and the on-going spillover into Lebanon of the Syria War. Currently, Lebanon hosts over 1 million Syrian refugees of whom over 70% are poor, and about half a million other refugees causing pressure to land use, and high demand for access to shelter, services and jobs. Frequent conflicts have fundamentally altered conditions across sectors—governance, infrastructure, and the macro-economy—compromising the country’s development path. For the past 25 years Lebanon has struggled to reduce widespread poverty (28% live below poverty line) and has been compromised by two (overarching) constraints: 1) a confessional system of governance that has increasingly led to paralysis of decision-making and (2) conflict and violence (stemming, in part, from the broader dynamics of conflict in the Middle East).

A series of reforms must be tackled with a sense of urgency, if Lebanon is to generate the number and quality of jobs it needs for its citizens and achieve progress towards the Twin Goals, to avoid further deterioration in the well-being of citizens and, importantly, to manage the added pressures stemming from regional conflicts. The key actions that could improve Lebanon’s development prospects are: a) reduce macro-fiscal vulnerabilities; b) improve governance and effectiveness of public institutions; c) address energy gaps to increase productivity of the private sector and reduce the macro-fiscal burden; d) strengthen ICT so Lebanon is fully connected to the global economy and can develop jobs improve the business climate to ease the burden on firm creation and operation; g) increase investments in transportation so people and products can move efficiently; and h) address environmental issues to protect Lebanon’s natural resources, including water .

Data availability and access to information has been identified as a foundational constraint that impacts governance and the effectiveness of public institutions, making evidence-based policy making difficult and standing in the way of an informed population and increased private sector investments. Major deficiencies exist in the timeliness of data, its reliability due to weak overall statistical capacity, and inadequate data coverage of poverty, income distribution, and economic measurements such as balance of payments. While some ministries have enhanced disclosure of data and reports published, the general public has limited access to information that is typically publicly available in other countries.

Improving the clarity over land and property rights will be important to prevent land-related conflicts from exacerbating other conflict dynamics and for promoting investment climate and access to credit. Similarly, increased access to reliable geospatial data will be foundational to the needed to boost for innovation, business development, job creation and growth, and informed decision making, and enhancing the revenue base and local governance. An accountable and transparent land administration and geospatial system will improve the management of public assets leading to a stronger social contract and trust between citizens and the government.



Sectoral and Institutional Context

Land tenure in Lebanon is based on the French Protectorate era Civil Law and private ownership of land and property. Investments in land and buildings are perceived as among the most attractive sources of profit in the country and there are visibly active property markets and a high-end construction boom. Still, there is commonly a lack of clarity on land ownership, incomplete overall registration of lands and properties, overly prescribed and complex land administration processes, and weak institutional arrangements and governance. State land management responsibilities are split between several government agencies and municipalities, and no comprehensive inventory of state and public lands and properties exists. These weaknesses in land administration have led to inefficient utilization of natural resources, land and property, also impacting the protection of environment by allowing overexploitation, encroachment and informal development.

The institution in charge of Land Administration in Lebanon is the General Directorate of Land Registration and Cadastre (GDLRC) which very positively operates a well maintained digital land register and cadastre system. However, when compared with similar agencies globally, the system underperforms in sharing digital geospatial data, record coverage, state land inventory and management, and property taxation valuation. For example, a) the Lebanese land register processes 800,000 manual information requests per year, while the Croatian Land Registry portal (covering roughly the same size population) processes 25 million online queries annually; b) while it is positive that the Lebanese digital land register and cadastre provide some electronic services to the public, the digital records are not recognized as legal records and the manual records are maintained in parallel based on a Registration Law from 1926; c) the Lebanese land register has a good coverage of private properties (land parcels and apartments), but the cadastre covers only 55% of land parcels; and d) no direct access to digital land registry and cadastre is provided beyond some technical departments of the Ministry of Finance (MOF) and GDLRC.

Also, while the Private State Lands are registered in the Land Registry their designation (i.e. the institution, which is recorded as the owner/custodian of the land) is not standardized and thus for example a query of list all State Lands vested to the Ministry of Education does not produce a reliable result. In addition, the Public State Lands are not registered in the Land Registry at all. Thus, the government does not have access to reliable information on its property assets. The State Property Department of GDLRC's controls and manages the registered state properties. In practice, the Department focuses in disposing state property via auctioned sales and leases. The unregistered state properties are administered by regional Cadastral Court Judges. Encroachment and unauthorized land use believed to be common on State Lands, but there is no data, resources or means for monitoring State Lands systematically.

The leading geospatial agency in Lebanon is the Directorate of Geographic Affairs of the Lebanese Army (GAD), which produces topographical mapping and geospatial data for both military and civil purposes. The Directorate's products can be purchased subject to case by case approval. In an attempt to open broader access through a National Spatial Data Infrastructure (NSDI) approach, the Ministry of Administrative Reforms (OMSAR) implemented a GIS portal few years ago, and created NSDI regulatory framework and coordination mechanism for access to geospatial data, but the implementation failed due to lack of funding or sustainable arrangements for coordination, access, sharing and dissemination of data. However, there was progress in standardization and for example the Lebanon-Syria coordinate reference system is used for all mapping in Lebanon and thus the most important key standard for NSDI is being applied.

There is wide sectoral consensus in Lebanon on the need of full employment of the digital land administration and geospatial infrastructure to public service and consumption. On this token, GDLRC launched the first three publicly accessible electronic land registry services for a) requesting title registry extracts, b) tracking transactions and c) fee simulation during the project preparation. The land registry and cadastre are public records by law, and regulations and restrictions on geospatial data date back to the era of printed maps and provide no clear guidance on online access to geospatial data and services. It is probable that recognition and access to digital land and geospatial records, and



geospatial data, requires mainly changes in the general mindset and dare to make rational changes within the current framework.

Finally, there is systemic a lack of access to land and property values in Lebanon, which has implications to revenues, land management and beyond. Specifically, the transaction (value) registration process (to the land registry) leaves room to subjectivity, is vulnerable to corruption, and results in registration of lower-than-market values, which impacts available market information and, together with non-harmonized valuation practices, equitability of property taxation and for example State property lease levels. Property tax revenues are also impacted by exemptions, such as on vacant properties. The key forward in the short term, which will allow quick return for investment, is to improve property value information that this used as the benchmark for property transaction registration and as the basis for recurrent property tax valuation.

Overall, Lebanese land administration has many basic elements and capacities in place, but the potential is not capitalized to modern digital land administration infrastructure and services.

C. Proposed Development Objective(s)

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Development Objective(s) (From PAD)

To improve access to land use and value data, property rights data, and geospatial information through the Land Registry and Cadastre system modernization.

Key Results

1. Increased access to digital real property registration services;
2. Average number of days to register a property transaction reduced);
3. User perception of quality of real property registration services improved;
4. Number of eServices launched by the Land Registry and Cadastre for governmental and non-governmental users i.e. line ministries, government agencies, commercial banks, notaries, private surveyors increased;
5. Key geospatial datasets accessible through National Spatial Data Infrastructure (NSDI);
6. State Land Registration Datasheets quality improved in the Digital Land Registry;
7. An integrated and equitable methodology for Rental Value valuations established;
8. Institutional sustainability of the Land Registry and Cadastre sector improved.

D. Project Description

The development objective of the proposed project would be achieved by: i) modernizing land administration solutions, technologies and networks; ii) implementing NSDI for public sharing of geospatial data and services; iii) developing a mass valuation system for property transaction verification and property taxation enhancement; iv) upgrading the state land registry content and the state land management system; v) encouraging land registry and cadastre sector/system sustainability and enhancing the implementation of institutional reforms and capacity building through better governance; and vi) over the longer term phasing out the overlapping and parallel (historical) land administration operations.

The beneficiaries of the project would be: a) the public who can own, lease, mortgage and use land and property under the protection of legal registration of rights; b) property tax payers and owners whose property could be subject to



expropriation, and who will benefit from more equitable and transparent land values; c) investors who can rely on the secure access to real estate and improved access to credit; d) government, municipalities, non-governmental organizations, the private sector and academia that can make use of online access to accurate geospatial information; and e) GDLRC in particular, that gains from more sustainable operations and institutional structures. Society overall will benefit from improved land governance supported by up-to-date and accessible spatial information on land and property and their transactions, which will increase accountability and informed decision making, as well as policy making concerning land, property and natural resources.

The project would have five components and tentatively 43 million USD loan cost:

The Project consists of five components: (A) Modernization of the Digital Land Registry and Cadastre system; (B) National Spatial Data Infrastructure; (C) Property Valuation and Taxation; (D) State Land Inventory and Management; and (E) Institutional Development, Capacity Building and Project Management.

Component A - Modernization of the Digital Land Registry and Cadastre system (USD 19 million)

The objective of this component is to implement an integrated ICT solution for Digital Land Registry and Cadastre System integrated/linked with other functions such as Property Valuation and State Land Management. The component will contribute to the country's Social Contract by increasing the quality of services provided by the government and trust in the sector through the practical promotion of transparency, equal access to information, electronic services and streamlined processes. Land and property markets, location based investments and land management will benefit from facilitated access to land records and electronic services. The project will 1) update MOF and GDLRC's ICT strategies (including a digital archive strategy), 2) establish a unified database for the integrated Land Registry and Cadastre system; 3) improve its ICT infrastructure and applications; 4) implement new e-services and integration with external systems; 5) establish a digital archives and a disaster recovery center; 6) scan and vectorize remaining paper cadastral index maps, 7) improve key technical and office premises and finally; 8) introduce an electronic mailing system and include solutions for digital signature and electronic conveyancing. The system will be developed based on a business processes analysis and re-engineering, and then piloted and rolled out with training of the operational staff.

Component B - National Spatial Data Infrastructure (USD 2.5 million)

The objective of this component is to enhance the identification, storage, use, sharing and exchanging of geospatial data and services in Lebanon. The component will facilitate provision of a unified geospatial database and access point for all planning and value adding services in the country having direct impact to jobs and growth. The focus lies in unblocking the wealth of information in the public geospatial datasets for the benefit of all development. While intangible also conflict monitoring and prevention activities will benefit from improved geospatial information and e-services. This is achieved by providing public access to Land Registry and Cadastre data and other public geospatial datasets through the NSDI. The NSDI will serve users and providers within all levels of government, non-governmental organizations, private sector, academia and public. The project will 1) support the development and implementation of a NSDI Strategy based on international best practices and open standards; 2) upgrade NSDI technologies and infrastructure; 3) create a seamless basemap (orthorectified satellite imagery and/or aerial photo) of the whole territory of Lebanon; 4) support the creation, collection, and harmonization of geospatial data (of GDLRC and GAD initially) for integration to NSDI; and 5) develop electronic services and link the NSDI to the eGovernance system of Lebanon. Expansion of NSDI through a common framework agreement and data access is planned to be supported during the second phase.



Component C – Property Valuation and Taxation, (US\$ 11 million)

The objective of this component is to establish a mass valuation system for all built property and undeveloped land in Lebanon initially covering the main urban areas of the country. This will increase market transparency, reduce banking sector/mortgage risk as well as improve infrastructure for the recurrent property tax. In the short term, the transfer tax revenue will increase due to the improved value benchmark data to support transaction price validation at the registration. In the longer term, the system will enable recurrent property tax and state land leasing enhancement through improved value information. Enhanced value based property taxation will have governance and distributional impacts that benefit the bottom 40%. The component will 1) develop mass appraisal methodologies; 2) undertake a data inventory of physical data on land and property in main urban areas of Lebanon; 3) develop a mass valuation system for Lebanon; and 4) improve the valuation education and facilitate the adherence to international valuation standards of the valuation profession in the country. During follow on project/second phase, the valuation system is expected to be extended to cover all urban and rural areas, and to develop a Land Value Map in association with real estate indices.

Component D - State Land Inventory and Management (USD 3 million)

The objective of this component will be to improve data quality on state lands in the Land Registry and Cadastre System and enhance State Land Management capacity of the GDLRC. The component invests in upgrading the existing State Land Management ICT system. Data content will be improved, and to an extent possible without regulatory changes, external information on state lands will be inserted and/or linked to the Land Registry and Cadastre System. The state land information compilation to one location will among others serve the conflict response readiness by improving information on public lands available for temporary shelter for refugees. The component will: 1) facilitate new strategy, inter-institutional agreements and inter-agency coordination for State Land Management; 2) improve state land data quality in the Land Registry and Cadastre System; 3) integrate external state and public land datasets to the Land Registry and Cadastre System; and 4) link spatial zoning plans to the Land Registry and Cadastre System.

Component E - Institutional Development, Capacity Building and Project Management, (USD 7.4 million)

The objective of this component is to improve the capacity and governance of GDLRC and ensure quality and timely implementation of the project. The component will 1) develop and implement an institutional vision, strategy, citizen service charter and roadmap for GDLRC improving among others citizen engagement in the sector; 2) provide an analysis and recommendations over the legal impediments to modernization; 3) implement structures to enhance the accountability of GDLRC to key stakeholders, including the development of an agency grievance redress mechanism; 4) enhance GDLRC's HR policies and procedures; 5) support public outreach activities to improve public perception of the GDLRC and its services, and inform the public on project activities; 6) monitor and evaluate project activities; 7) provide technical assistance to support project implementation; 8) develop and implement capacity development and knowledge transfer program (on ICT, NSDI, State Land Management, Property Valuation, Public Sector Governance, etc) based on annual training plans, 9) conduct social impact assessment that will analyze the direct and indirect impacts of the project activities on different social groups and develop recommendations for mitigating social risks; 10) maintain a Project Management Unit (PMU) through the project period; and 11) subject to remaining budget toward the end of the project pilot systematic data improvement methodologies for the follow on project (State Land Inventorying, Cadastral Map renewal, systematic first registration, 3D city model and processes and dispute resolution).



Cross-cutting areas

Citizens engagement. The Project will include several citizen engagement actions. First, the Project includes a focus on increasing information available to the public. Component B specifically aims at making spatial data (including Land Registry and Cadaster Data) from a broad range of actors (including non-governmental actors and the private sector) available to the public. In addition, the Project also includes public awareness campaigns that will increase citizen awareness of the activities of the GDLRC and promote use of services. The Project also includes customer satisfaction surveys that will be carried out throughout the life of the Project, providing citizens the opportunity to provide feedback on Project activities and GDLRC services more broadly. This will complement other activities building the capacity of the GDLRC to provide quality customer services. Finally, through the Project, the GDLRC will put in place a grievance redress mechanism that will be used primarily (but not solely) for people who wish to contest the valuation of properties carried out by systems put in place through Component C.

Gender. With the Project consisting largely of technical upgrades, data improvement, data access improvement and institutional reforms, it does not have a great deal of gender-differentiated impacts. However, all activities will be tailored for men and women when appropriate. This means, for example, that any information and communications campaigns carried out as part of the Project will be designed in such a way that they reach male and female beneficiaries, and in full understanding and acknowledgement of the different ways that men and women obtain information. Customer service staff will also be trained to understand gender dynamics and provide quality services equally to men and women. The social assessment that will be carried out for the Project may also identify gender issues that need to be considered, and Project activities will be modified in response to this information.

E. Implementation

Institutional and Implementation Arrangements

The implementing agency of the project will be GDLRC in close cooperation with the Directorate of Finance of MOF, institutions vested with State Land Management responsibilities, the National eGovernance Program, the National GIS Committee, GAD, the Center for Remote Sensing and other public and private sector institutions producing and managing Geospatial Data as well as municipalities. A Project Management Unit (PMU) responsible for project management and project's fiduciary functions and monitoring and evaluation will be established in GDLRC. The PMU will be led by a Project Director and tentatively include specialists in land registration, cadastre, ICT, law, valuation, capacity building, M&E, procurement and financial management, and be assisted by secretarial and translations staff. Fiduciary staff familiar with the Bank procedures will be recruited externally on a competitive basis following the Bank's Guidelines. GDLRC's experience in implementing past World Bank loan projects is over a decade old and there is no relevant institutional memory in place anymore. In terms of collaboration and synergies among external parties, UNDP will be natural partner as it provides support to the MOF in implementing public finance policy and reforms through policy advisory and technical support.

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

The project supports the development of national level systems for national coverage. The project supported investments would target central and regional government offices covering the whole country and providing services countrywide.

G. Environmental and Social Safeguards Specialists on the Team

Chaogang Wang, Social Safeguards Specialist
Shafick Houssein, Social Safeguards Specialist

SAFEGUARD POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	<p>OP 4.01 Environmental Assessment is triggered due to the renovation works for the office space planned under Component A of the project. The associated environmental impacts would typically include: dust, noise, on-site safety and waste management. Given that, an Environmental Management Plan (EMP) will be prepared. The EMP will provide the necessary environmental conditions, guidelines and measures to be taken by the small works contractors that would be contracted by the project to ensure that the minor renovation and installation works of the office space meet health, safety and environmental standards. To this end, the EMP encompassing the guidelines will be included as an integral part of the tender documents.</p> <p>A social assessment will be conducted under the Project. The assessment will aim to understand social impacts in all project components, with a focus on understanding impacts on poor and vulnerable populations. To address specifically any risks related to management of state lands, the assessment will assess comprehensively the legal framework and implementation of the Government’s approach to informality such as evictions and the institutional framework that could</p>



serve as entry points for mitigation measures. The social assessment will be government led, with the ToR reviewed by the World Bank. The social assessment will likely be conducted in Year 2 of project implementation, as the information gathered by the project itself, on state inventory, on valuation, and on geospatial data, will be necessary for the assessment to be carried out. In particular, for Component D, the state lands would need to be identified first to enable the social assessment to be adequately designed to understand the use of state lands. Mitigation/management measures for identified social risks will be designed together with the client once the social assessment is completed. The client has committed to ensuring that no negative social impacts, including evictions or resettlement, result from the identification of state lands.

Natural Habitats OP/BP 4.04	No
Forests OP/BP 4.36	No
Pest Management OP 4.09	No
Physical Cultural Resources OP/BP 4.11	No
Indigenous Peoples OP/BP 4.10	No

Involuntary Resettlement OP/BP 4.12	No	The project would not cause land acquisition or any restriction of land use. Although Component D would improve the quality of the state land inventory, no project activity would alter existing legal rights to property, land use or occupancy. Therefore, the Bank Policy on Involuntary Resettlement OP 4.12 will not be triggered. However, there is a risk that the improved information and the desire for better management of state assets could potentially lead to decision making on increased evictions. To manage such social risks, a social assessment will be conducted as part of the project as per the requirement of OP 4.01.
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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



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 associated environmental impacts for the proposed projects are minor and would typically include: dust, noise, on-site safety and waste management. There are no significant, large scale or irreversible environmental impacts envisaged for the proposed project. As for the social impact, the project is expected to have positive social impacts, as it would increase access to reliable property and other geospatial data. Project activities would not cause land acquisition or any restriction of land use.

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

There are no potential indirect or long-term impacts anticipated in the project area. However, there is a risk that the improved information and the desire for better management of state assets could potentially lead to decision making on increased evictions. To manage such social risks, the project's social assessment, conducted as per the requirement of OP 4.01, will include a comprehensive assessment of the legal framework and implementation of the Government's approach to informality such as evictions; the likely risks presented by Component D (with understanding on possible disproportionate impact on vulnerable populations); and the institutional framework that could serve as entry points for mitigation measures. The social assessment will be carried out in Year 2, once the state lands are identified under Component D, and it will be designed to understand the use of state lands and potential social impacts of the state taking control over these lands. Mitigation/management measures for identified social risks will be designed together with the client once the social assessment is completed. The client will ensure that there are no negative social impacts, including evictions or resettlement, that result from the identification of state lands. The social assessment will in fact cover social risks and potential for improving the social performance of all project activities. This will include understanding how activities that promote access to information and transparency can best be adjusted to be accessible to different social groups and how valuation of lands can be carried out in ways that protect the interests of the poor.

Several other activities are included in the project that improve the project's social impacts. In particular, the project will include a grievance redress mechanism that can be used to pose questions/feedback on valuation, on state lands identification, or on geospatial data. The project also includes a focus on public awareness of project activities, capacity building on customer service for the GDLRC, and a customer satisfaction survey. All of these activities will not only result in positive social impacts but can provide timely information on emerging risks.

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

The project is not expected to have any adverse impact.

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 borrower will develop an EMP which provides the necessary environmental conditions, guidelines and measures to be taken by the small works contractors that will be contracted by the project. The EMP encompassing the guidelines will be included as integral part of the tender documents. The PMU will supervise the implementation of the guidelines by the contractors. A social assessment will be carried as part of the project to assess potential social risks and impacts involved in the project. However, the PIU does not have any experience in conducting social assessment. Experienced consultant will be engaged to prepare the social assessment with support from the Bank



team.

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 essentially the PMU and the staff General Directorate of Land Registration and Cadastre (GDLRC). During project preparation consultations were held with a broad spectrum of stakeholders from public, private and non-governmental sectors. Those consultations include workshops held during the technical assistance project implemented two years prior to investment project preparation during which priority interventions in the land sector were identified and potential socio-economic impact of such interventions/reforms were discussed.

The safeguard documents are/will be prepared in a participatory manner by the PMU and the GDLRC staff. Subsequently, the safeguards documents are/ will be made available to the general public at GDLRC's website and the front office. Consultations with different stakeholders will be carried out in process of the social assessment conducted during project implementation.

B. Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other

Date of receipt by the Bank 21-Apr-2017	Date of submission for disclosure 30-Jun-2017	For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors
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"In country" Disclosure

Lebanon
16-Jun-2017

Comments

EMP was disclosed at the GDLRC website.
<http://www.lrc.gov.lb/sites/default/files/styles/EMP.pdf> Social Impact Assessment (SIA) will be prepared during Year 2 and will be disclosed.

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



The World Bank Policy on Disclosure of Information

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

Yes

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

Yes

All Safeguard Policies

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

Yes

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

Yes

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

Yes

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

Yes

CONTACT POINT

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APPROVAL

Task Team Leader(s):	Mika-Petteri Torhonen Olivera Jordanovic
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Country Director:	Claire Kfour	01-Aug-2017

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