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# INTEGRATED SAFEGUARDS DATA SHEET APPRAISAL STAGE

**Report No.**: ISDSA3258

**Date ISDS Prepared/Updated:** 12-Nov-2013

Date ISDS Approved/Disclosed: 18-Nov-2013

### I. BASIC INFORMATION

# 1. Basic Project Data

<b>Country:</b>	Argentina		<b>Project ID:</b>	P133195		
Project Name:	Argentina Second Rural Education Improvement Project - PROMER-II (P133195)					
Task Team Leader:	Peter Anthon	y Holland				
Estimated Appraisal Date:			Estimated Board Date:	20-Mar-2	014	
Managing Unit:	LCSHE		Lending Instrument:	Investme	nt Project Financing	
Sector(s):	•	lucation (40%), Pr Public administra	•		General education	
Theme(s):	Education for the knowledge economy (20%), Rural services and infrastructure (35%), Education for all (20%), Administrative and civi I service reform (10%), Indigenous peoples (15%)					
8.00 (Rapid Resp	Is this project processed under OP 8.50 (Emergency Recovery) or OP No 8.00 (Rapid Response to Crises and Emergencies)?					
Financing (In US		00	T-4-1 D1-E		250.50	
Total Project Cos					250.50	
Financing Gap:		.00				
Financing Sou	rce				Amount	
Borrower	24.50					
	ank for Reconstruction and Development 250.50					
Total	D D 4 1 4				275.00	
Environmental	B - Partial As	ssessment				
Category:	NT -					
Is this a	No					
Repeater project?						

# 2. Project Development Objective(s)

The proposed Project Development Objective is to support national Government policy to i) reduce

repetition in primary education; and ii) increase enrollment and completion in secondary education, in Argentina's rural areas.

### 3. Project Description

The Project would be comprised of three components. The first, covering pre-primary, primary and secondary education, would aim to reduce repetition rates in rural classrooms, through improvements in teaching and school directors' management practices and strengthening the school-family linkages. The second component would focus on increasing enrollment and completion of secondary education, through expanding coverage of services. The third component consists of activities related to Project management, monitoring, and evaluation. Given Argentina's federalist nature, the precise implementation arrangements for components would need to be adapted to the specific conditions of each province, given that similar programs may already be underway in certain areas, in which case PROMER II could support those interventions granted they fulfill certain criteria defined by the National Ministry of Education.

### Component 1: Reduce Repetition Rates in Rural Classrooms (US\$59 million)

This Component would consist of two parts: 1.1 Improving teaching and school management; and 1.2 strengthening the link between schools and families. Under PROMER I, much progress was made in reaching out of school preschool-aged children, helping to reduce the number of six year olds in grade one that had never attended preschool by more than half. Still, the school readiness of children entering grade one can be improved upon, as evidenced by the persistently high repetition rate in rural areas throughout primary. Although the teacher training financed under PROMER I helped this effort in part, the chosen training model was to provide intense, long-term training to a select few teachers (postítulo), with insufficient focus on pedagogy. The in-service training provided under PROMER I did not include school directors and supervisors hence excluding, among other things, school-level tools for identifying students at risk of repetition and interventions to remediate the problem. Under component 1.1 of the Project, a new training strategy for in-service teachers, principals and supervisors would be designed and implemented, in accordance with the recently approved National Plan for Teacher Training (Plan Nacional de Formacion Docente). PROMER I also fostered greater links between schools and communities, and established the mechanisms for transferring small resources for schools to manage independently with the condition of developing an improvement plan. Component 1.2 of the Project seeks to support the further development of this approach, with a view toward fostering greater participation from parents and communities, so as to better engage them in the learning of their children, thereby enhancing their children's schooling performance (including reducing repetition and dropouts).

#### Component 1.1: Improving teaching and school management

This Component would support Argentina's recently approved National Plan for Teacher Training, through efforts to improve teaching and school management, including designing and implementing an in-service training strategy for all pre-primary, primary and secondary rural schools for teachers, school directors and supervisors. Among the activities to be financed would be the definition of minimum standards for rural teachers, directors and supervisors, design of the training courses to ensure that all rural teachers, directors and supervisors reach minimum standards, design of the training's rollout strategy to prioritize among those most in need, stipends for trainers, transportation costs, training costs, the development of new teaching and training materials, and the printing and distribution of existing materials. Special consideration would also be given to designing training/teacher support systems that work with indigenous schools, working to address challenges identified

in the diagnostics and corresponding school improvement plans (see Component 1.2).

Training courses for teachers would be organized per level of education, focusing on both the particular needs of that level, as well as the linkages with previous and subsequent levels of education. For school directors and supervisors, training activities would be developed in order to better ensure institutional support for the improved teaching practices, implementation of the learned pedagogic approaches/tools for rural schools and the development and implementation of tools for identifying students at risk of repetition. As such, selection for participation in training would be at the school level, allowing for school teams to develop school-specific projects to address identified challenges. The training would also include instructions for directors in carrying out diagnostics of school problems, developing corresponding school improvement plans, and strengthening the outreach activities with families and communities(Component 1.2). Including teachers, school directors and supervisors in the National Training Plan and defining the school as the level of intervention, has the advantage of triggering synergies and potential interaction effects among the three interventions.

#### Component 1.2 Strengthening the link between schools and families

This Component would build on the activities fostering local and social participation under PROMER I. With the view of fostering greater participation of parents and other community members in the learning of children, the Component would strengthen the links between schools and local community. In general, small funds would be co-managed by school management committees consisting of school administrators/representatives, parents association, and community representatives, in order to carry out the activities such as: i) sharing of experiences at the level of the agrupamiento (including financing transportation costs where needed); ii) simple preventive maintenance of schools, such as fixing broken windows; or iii) purchasing needed equipment (e.g. a refrigerator for the kitchen). Access to the small funds would be subject to a school improvement plan developed by the school management committee and the fulfillment of the teacher, principal and supervisor training plan for selected schools as described in Component 1.1. The school improvement plan must include a diagnostic of the school with basic performance indicators like repetition, dropout and efficiency rates. The school improvement plan should make explicit how the additional funds will be used in any of the three activities listed above (or a combination of them). School improvement plans will be followed by an end-of-year report, developed by the school management committee, describing how the funds were used.

#### Component 2: Increasing Enrollment and Completion of Rural Secondary School (US\$180 million)

This Component would consist of expanding the supply of secondary education services in rural areas including infrastructure for new schools, increasing capacity for existing schools, school maintenance, learning material and the supply of qualified teachers. The focus under PROMER I has thus far been at the primary and lower secondary level, since that is where demand has been highest. As discussed in the sectoral background, the remaining coverage gap is mainly in upper secondary, hence this Component would focus on expanding supply at that level while still contributing to the expansion of lower secondary, as well as investments in other levels of education where needed, which serve as important pull factors for increasing coverage at higher levels.

This Component would strive to increase enrollment in secondary education in rural areas through the expansion of education supply at upper and lower secondary levels, as well as other levels where needed. Among the activities to be financed would be infrastructure and equipment, technical assistance to identify the areas or regions with an infrastructure shortage, didactic materials and the provision or qualified teachers.

To address the infrastructure shortage, a map of underserved areas would be developed to locate demand and help determine the best service delivery models for each selected area. Wherever possible, the unit of analysis for the maps, and the subsequent areas for prioritization, would be the agrupamientos.

The pedagogic and institutional approaches to be supported under this Component would strive to address the two main bottlenecks to expanding secondary education supply: the dearth of qualified teachers, and insufficient infrastructure. To address the shortage of qualified teachers, the expansion of the Horizontes program would be the main activity for increasing supply in lower secondary, since it offers a sustainable alternative that relies less on subject area teachers. Launched in 2006, the program organizes teaching around six areas: Spanish, math, social sciences, natural sciences, art, and English. The backbone of the program is especially designed resource manuals featuring concepts for each area, containing individual and group work activities, organized by self-standing units that have parameters for evaluation, and allow students to advance through the material progressively, once the previous unit has been passed. This allows students to move at their own pace, all the while protecting a certain group dynamic.

Component 3: Strengthening Project Management, Monitoring, and Evaluation (US\$11.5 million)

This Component would consist of two parts: 3.1 Project management and 3.2 Monitoring and evaluation.

### Component 3.1: Project anagement

As per the first phase of PROMER, Project management entails: (i) the technical coordination within the MEN across technical departments; (ii) the planning, monitoring, and evaluation of province-level activities; and (iii) the fiduciary oversight for all Project activities, including financial management, procurement, and all legal aspects of the Project, including safeguards. The Project Management structure is based on existing structures within the national and provincial education ministries. To assure quality implementation of Project activities, the Project would support technical departments through financing just-in-time consultancies and other technical support as required.

Two specific technical assistance projects will be developed under this Component: (1) best international practices and other inputs needed for the design of the training strategy for teachers, principals and supervisors, including the definition of standards; and (2) a map of underserved areas to locate demand for secondary education and help determine the best service delivery models for each selected area.

#### Component 3.2: Monitoring and evaluation

Working closely with the National Directorate of Information and Evaluation of Educational Quality (Dirección Nacional de Información y Evaluación de la Calidad Educativa – DiNIECE), the Project management team would be responsible for the monitoring and evaluation of Project activities. The Project would finance the Project's monitoring of indicators and the development of a system to track the implementation of activities and trends in basic education indicators, for Provinces and the

general public to track progress of PROMER II.

Sound impact evaluations in selected Provinces would estimate and quantify the effect of interventions support by the Project. The final design, scope and identification strategy of the proposed evaluations will depend on the agreements reached with the Ministries of Education of the selected Provinces.

- a. The effects of the teacher training in a selected province. The evaluation would include classroom observations and the development and application of a standardized test as part of the instruments to measure the impact.
- b. Measuring management practices in a selected province. To measure the impact of training to principals and supervisors, an instrument measuring management practices would be developed and implemented in the Province.
- c. The effects of strengthening the link between schools and families on dropout and repetition rates in Salta. In an ongoing evaluation, a small fund or grant like the one described in Component 1.2 has been assigned randomly to schools in Salta. The baseline information has been collected and by the end of 2014 the results from the first follow up will be ready. These results will inform on the impact of Component 1.2 of the Project.

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

Target areas for the envisioned Project's physical interventions are rural zones. Specific sub-project locations have not been identified; they will be selected during Project implementation.

### 5. Environmental and Social Safeguards Specialists

Lilian Pedersen (LCSSO)

Elba Lydia Gaggero (LCSEN)

6. Safeguard Policies	Triggered?	<b>Explanation (Optional)</b>
Environmental Assessment OP/BP 4.01	Yes	Potential physical interventions are foreseen under Component 2 of the Project. They refer to to i) construction of new schools; and ii) the rehabilitation and refurbishment of schools. The rest of the Project's components would essentially involve institutional development, training, and capacity-building activities. Based on the nature of the works, this Project is classified as Category B, requiring a partial environmental assessment in accordance with the Bank's Safeguards Policies. No major adverse environmental impacts are anticipated for the Project. Expected potential negative impacts would be primarily during the construction phase of small to medium-scale civil works and will be mitigated through specific measures included in the Environmental and Social Management Framework (ESMF) of the Project.

		Considering that sub-projects would be entirely defined during Project implementation, the Ministry of Education (MEN) has developed an ESMF according to OP/BP 4.01(Environmental Assessment), that: (i) ensures compliance with pertinent legislation and Bank policies for works of the type considered under the Project; (ii) identifies potential environmental and social impacts based on the scope of physical interventions and site characteristics; (iii) establishes appropriate procedures for sub-project screening as well as mitigation, management, and monitoring measures; and (iv) defines procedures and responsibilities for the environmental and social management of the Project. This also considers specific safety and building standards needed for schools, including structural measures for disaster risk reduction, access for people with disabilities, indoor comfort, etc.  As the envisioned works are similar to those that have been executed during the ongoing operation, the proven procedures and measures that are currently being applied, as well as specific improvements, have been incorporated into the ESMF of this new Project.  MEN conducted a focus group consultation on this instrument. The views of consultation
Natural Habitats OP/BP 4.04	Yes	participants were incorporated into the ESMF final document.  Sub-project specific locations would be selected during Project implementation. However, since rural areas are targeted, and moreover, the Project would prioritize locations in dispersed or remote rural areas, it is possible for works to be located in natural habitat zones. Therefore, the environmental Bank's policy OP/BP 4.04 (Natural Habitats) is triggered for the Project. The corresponding considerations have been included in the ESMF.
Forests OP/BP 4.36	No	The Project will not support management of forests.
Pest Management OP 4.09	No	This safeguard does not apply as the Project does not require the purchase, application or storage of pesticides and will not lead to an increased use of pesticides. While the Policy is

		not triggered, schools may use pesticides during their operational phase to control pests. This aspect would be considered within any efforts to improve or strengthen MEN's protocols for school infrastructure management.
Physical Cultural Resources OP/BP 4.11	Yes	Sub-project specific locations would be selected during Project implementation. However, since rural areas are targeted, and moreover, the Project would prioritize locations in dispersed or remote rural areas, it is possible for works to be located areas with cultural values (outstanding landscapes, indigenous territories, historic or archaeological heritage sites, etc.). Some school buildings to be rehabilitated may also have cultural values. Then, OP/BP 4.11 is triggered for the Project. The corresponding considerations have been included in the ESMF.
Indigenous Peoples OP/BP 4.10	Yes	The targeted Project areas are primarily rural, many of which have indigenous communities. Considering that these communities are among the most marginalized in Argentina, OP 4.10 (Indigenous Peoples) is triggered. Based on the results and performance of the first PROMER Project's Indigenous Peoples Plan (IPP) and its responsible institutional parties, a comprehensive social assessment has been carried out and an Indigenous People Planning Framework (IPPF) has been prepared by the MEN, and consulted with organizations representative of indigenous peoples in order to receive and incorporate their advice and gauge their level of support, to ensure that indigenous peoples are benefiting optimally from the Government education interventions supported by the Project.
Involuntary Resettlement OP/BP 4.12	No	Activities under the Project will avoid any potential involuntary resettlement impacts and will ensure that if land acquisition is necessary, it will be carried out in a fully voluntary nature. Given that the risk of involuntary resettlement is low, the ESMF willinclude land acquisition screening criteria in order to ensure that any potential involuntary resettlement impacts will be avoided.
Safety of Dams OP/BP 4.37	No	he Project will not support the construction or rehabilitation of dams nor will it support other

		investments which rely on the services of existing dams. Therefore, the Policy is not triggered.
Projects on International Waterways OP/BP 7.50	No	The Project will not affect international waterways as defined in the Policy. Therefore, this Policy is not triggered.
Projects in Disputed Areas OP/BP 7.60	No	The Policy is not triggered because the Project will not be implemented in areas known to involve disputed areas.

## 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:

The Project's physical interventions are foreseen under Component 2, whereby the construction, rehabilitation and refurbishment of schools would be financed. These interventions are of small to medium-sized scale. Thus, no potential large scale, significant and/or irreversible impacts are expected. Anticipated potential adverse environmental impacts would be primarily during the construction phase of civil works (e.g. construction staging, construction activities while school is underway, debris generation, dust emission, noise, safety, and other standard impacts of construction). During the operational stage, potential negative impacts would be related to potential misuse or maintenance problems of the school infrastructure. The prevention, reduction and mitigation of these impacts are mainly based on the adoption of school building design, construction and management good practices, such as the specific measures included in the Environmental and Social Management Framework of the Project.

In addition, the Project will support activities linked to providing consistent and sustainable energy (such as stoves in kitchens that do not rely on wood, hereby stalling desertification, especially in arid climates), harvesting and conserving drinking water, and other rural schools' infrastructure needs. Off-grid renewable energy for isolated rural areas systems/devices will also be considered, articulating activities with other programs like the PERMER (Secretariat of Energy of Argentina – IBRD).

The Project will bring a number of positive social development outcomes and impacts. It will improve basic social services, reduce inequality of opportunity, and enhance human capital accumulation in Argentina's marginalized rural areas. Specially, the Project will allow increased access to education opportunities for indigenous peoples (teachers and students); greater visibility of indigenous peoples in Project schools; increased access to development opportunities through the local development works; increased access to learning materials for indigenous peoples in their main language; and strengthened social integration through training for indigenous as well as non-indigenous teachers working in rural schools that have indigenous students.

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

No adverse potential indirect and/or long term impacts due to anticipated future activities in the Project area have been identified. The Project will contribute to improving quality of education in Argentina, and facilitating the transition to the labor market for rural Argentine youth.

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

N/A

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's institutional and implementation arrangements will build on the arrangements currently in place for the implementation of the Rural Education Improvement Project (PROMER I). The implementing agency is the National Ministry of Education (Ministerio Nacional de Educación, MEN), through its Directorate General for the Unit of International Finance (Dirección General para la Unidad de Financiamiento Internacional, DGUFI). At the national level, the DGUFI would be responsible for coordinating the various activities of the Project, including overseeing execution of activities within each of the participating provinces. Among the key participating entities at the national level are the Infrastructure Directorate (Dirección General de Infraestructura, DI) and, regarding Indigenous People, the Bilingual Intercultural Education Modality (Modalidad de Educación Intercultural Bilingüe, MEIB). At the provincial level, each province has a coordinator responsible for overseeing the implementation of activities.

Given that the specific sub-projects will be entirely defined during Project implementation, the MEN has developed an Environmental and Social Management Framework (ESMF), according to OP/BP 4.01 (Environmental Assessment), that: (i) ensures compliance with pertinent legislation and Bank policies for works of the type considered under the Project; (ii) identifies potential environmental and social impacts based on the scope of physical interventions and site characteristics; (iii) establishes appropriate procedures for sub-project screening as well as mitigation, management, and monitoring measures; and (iv) defines procedures and responsibilities for the environmental and social management of the Project. As the envisioned works are similar to those that have been executed during the ongoing operation, the proven procedures and measures that are currently being applied, as well as specific improvements, have been incorporated into the ESMF of this new Project.

Following the ESMF provisions, environmental criteria will be applied along the sub-project cycle. All the works will be screened, designed and implemented in observance of the specific building and safety standards needed for schools, including structural measures for disaster risk reduction, access for people with disabilities, indoor comfort, etc. The ESMF also includes land acquisition screening criteria in order to ensure that any potential involuntary resettlement impacts will be avoided. During works execution, contractors will be required to implement Environmental Technical Specifications established in accordance with the applicable regulatory framework and Bank guidelines, which also cover safety aspects for the school community and construction workers. Upon the completion of works, a Use and Maintenance Manual will be provided to school authorities. Monitoring and reporting procedures are part of the ESMF.

The ESMF will be used and implemented by the MEN and the provincial coordination agencies. Activities will be articulated among the different responsible bodies: at the national level DGUFI through the DI; and at the provincial level, the provincial directorates, coordination areas, etc. of the provincial Ministries or its equivalents, designated by the main provincial educational authority. Supervision of works execution would be mainly a responsibility of the provincial level. Specialists of the DI will provide support to provincial teams and perform field audits in the construction work sites and the operational schools.

The application of the IPPF will be the responsibility of DGUFI through the Bilingual Intercultural Education Modality (Modalidad de Educación Intercultural Bilingüe – MEIB).

An assessment of the institutional capacity of the implementation agency was carried out during Project preparation. In general, it was found that the teams of specialists within the DI and MEIB are competent to manage safeguards issues. However, some activities are carried out at the provincial level and the improvement of certain mechanisms was identified. In response, the MEN have developed an ESMF that would allow: i) the consolidation of socio-environmental management processes, including articulation among the different levels; and ii) the systematization of monitoring activities and result documentation. In addition, the Project will fund socio-environmental management strengthening activities under its component 3.

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

Key stakeholders are education community representatives, public and private entities that may have interests on rural targeted activities and the Autonomous Educational Indigenous Peoples Council (Consejo Educativo Autónomo de Pueblos Indígenas, CEAPI).

The final draft ESMF was disclosed on the MEN website on November 4, 2013. MEN conducted a focus consultation on this instrument with education community representatives (infrastructure areas of all the Provincial Ministries of Education), national environmental authorities/agencies (Directorate of Forest of the Secretariat of Environment and Sustainable Development and the Environmental Unit of the Roads National Directorate), and the NGO Rural Community Network, Red de Comunidades Rurales. The views of consultation participants were incorporated into the final ESMF document, which was disclosed on the MEN website on November 8, 2013 and on the Bank's Infoshop on November 12, 2013.

Based on the principle of free, prior, and informed consultation, Project preparation documents (including Project objectives, approach, activities, mechanisms, and a draft of the Indigenous People Planning Framework – IPPF were presented to organizations representative of indigenous peoples: the Autonomous Educational Indigenous Peoples Council (Consejo Educativo Autónomo de Pueblos Indígenas, CEAPI). A process of consultations with the organization in order to receive and incorporate their advice and gauge their level of support has been underway, and will continue under implementation. The first consultation took place in September 2013, and the second is scheduled for November 28, 2013. A version of the IPPF incorporating feedback from CEAPI and the Bank was published on the MEN website on November 8, 2013 and on the Bank's Infoshop on November 12, 2013.

### **B.** Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other				
Date of receipt by the Bank	08-Nov-2013			
Date of submission to InfoShop	11-Nov-2013			
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors				
"In country" Disclosure				
Argentina 08-Nov-2013				
Comments: http://portales.educacion.gov.ar/dgufi/promer/normativa/				
Indigenous Peoples Development Plan/Framework				

in country and country of the above accuments is not exp	preuse emplain why.			
If in-country disclosure of any of the above documents is not expected, please explain why:				
respective issues are to be addressed and disclosed as part of the Audit/or EMP.	Environmental Assessment/			
If the project triggers the Pest Management and/or Physical Cul	<u> </u>			
Comments: http://portales.educacion.gov.ar/dgufi/promer/normativa/				
Argentina	08-Nov-2013			
"In country" Disclosure				
Date of submission to InfoShop	08-Nov-2013			
Date of receipt by the Bank	08-Nov-2013			

# C. Compliance Monitoring Indicators at the Corporate Level

OP/BP/GP 4.01 - Environment Assessment				
Does the project require a stand-alone EA (including EMP) report?	Yes [×]	No [ ]	NA [	]
If yes, then did the Regional Environment Unit or Sector Manager (SM) review and approve the EA report?	Yes [×]	No [ ]	NA [	]
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	Yes [×]	No [ ]	NA [	]
OP/BP 4.04 - Natural Habitats				
Would the project result in any significant conversion or degradation of critical natural habitats?	Yes [ ]	No [×]	NA [	]
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 [	]
OP/BP 4.11 - Physical Cultural Resources				
Does the EA include adequate measures related to cultural property?	Yes [×]	No [ ]	NA [	]
Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?	Yes [×]	No [ ]	NA [	]
OP/BP 4.10 - Indigenous Peoples	1			
Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?	Yes [×]	No [ ]	NA [	]
If yes, then did the Regional unit responsible for safeguards or Sector Manager review the plan?	Yes [×]	No [ ]	NA [	]
If the whole project is designed to benefit IP, has the design been reviewed and approved by the Regional Social Development Unit or Sector Manager?	Yes [×]	No [ ]	NA [	]
The World Bank Policy on Disclosure of Information				
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	Yes [×]	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 [×]	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 [×]	No [	]	NA [	]
Have costs related to safeguard policy measures been included in the project cost?	Yes [×]	No [	]	NA [	]
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	Yes [×]	No [	]	NA [	]
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?	Yes [×]	No [	]	NA [	]

# III. APPROVALS

Task Team Leader:	sk Team Leader: Name: Peter Anthony Holland				
Approved By					
Sector Manager:	Name: Janet K. Entwistle (SM)	Date: 18-Nov-2013			