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# INTEGRATED SAFEGUARDS DATA SHEET APPRAISAL STAGE

**Report No.**: ISDSA9367

Date ISDS Prepared/Updated: 21-Jan-2015

Date ISDS Approved/Disclosed: 21-Jan-2015

### I. BASIC INFORMATION

### 1. Basic Project Data

			_				
Country:	India		Project ID:	P15039	P150395		
Project Name:	Tamil Nadu Sustainable Urban Development Program (P150395)						
Task Team	Raghu Kesavan						
Leader(s):							
Estimated	27-Jan-2015 <b>Estima</b>		Estimated	31-Mar	31-Mar-2015		
<b>Appraisal Date:</b>			Board Date	<b>:</b>			
<b>Managing Unit:</b>	GSUI	RR	Lending	Investn	Investment Project Financing		
			Instrument	:			
Sector(s):	l	ewater Treatment and Dis			_		
		nistration (30%), Water su					
Theme(s):		cipal finance (40%), Mur			tituti	on building (30%),	
	City-	wide Infrastructure and So	ervice Delivery	(30%)			
		sed under OP 8.50 (En	•	overy) or	OP	No	
8.00 (Rapid Resp	ponse	to Crises and Emerge	encies)?				
Financing (In US	SD M	illion)					
Total Project Cos	et: 600.00 Total Bank Financing: 400.00				00.00		
Financing Gap:		0.00					
Financing Sou	rce			Amount			
Borrower	200.0				200.00		
International Ba	Bank for Reconstruction and Development 400.00						
Total	600.00						
Environmental	A - F	ull Assessment	·				
Category:							
Is this a	No						
Repeater							
project?							

### 2. Project Development Objective(s)

To pilot improved urban management practices and improve urban services delivery in participating ULBs in a financially sustainable manner.

### 3. Project Description

The proposed TNSUDP will have three components: (i) Results Based Grants for Urban Governance Component; (ii) Urban Investments Component (comprising three sub-components); and (ii) Urban Sector Technical Assistance Component.

- 1. Component A: Results Based Grants for Urban Governance Component (Bank Loan: US\$ 56 million): The main objective of this component is to demonstrate new models of urban management with a focus on building strong governance and financial sustainability at the ULB level. This component will target three ULBs ('Model Cities') that have been identified, viz. Vellore, Erode municipal corporations and Hosur Municipality, which will be empowered and incentivized to improve urban management across a range of areas. Four such urban reform areas have been identified as follows: (i) ULB Empowerment and Organizational Capacity; (ii) Spatial /Development Planning; (iii) Sustainable Finances; and (iv) E-Governance and & Public Disclosure. The selected Model Cities will be provided an annual grant based on satisfactory performance in these urban governance / management areas aggregating US\$60 million in total over the period of TNSUDP. The disbursement decision will be based on achievement of pre-specified results / annual targets— a set of Disbursement Linked Indicators (DLIs) in these four areas. Further on achieving the DLIs, such disbursements will be against a set of "Eligible Expenditure Programs" (EEPs) that would comprise mainly the Operation and Maintenance (O&M) expenditures of the ULBs, excluding a 'negative' list of expenditures. The achievement of annual targets for disbursements against the pre-set DLIs will be individually assessed for each city every year by the GoTN, through independent assessment teams.
- 2. Component B: Urban Investments (Bank loan: US\$ 320 million) will comprise of the following three sub-components as follows:
- a) Sub-component B1: Urban Investments (Bank loan: US\$287 million): The main objective of this sub-component is to provide investment support to participating ULBs by way of sub-loans / sub-grants through TNUDF to improve a range of urban services, including water, sewerage, solid waste, urban transportation, storm water drainage etc. This would be a 'demand-driven' facility and there would be an emphasis on 'sustainability' or improvement of urban environments (not less than 40% by value under this sub-component) through interventions in waste-water collection and treatment / water reuse, storm water drains and restoration of water bodies in urban areas. The selection of participating ULBs will be based on existing TNUDF framework / criteria which assesses, inter alia, financial sustainability of the interventions in ULBs through mainly the following criteria ULB maintaining an operating surplus and aggregate debt service < 30% of revenues throughout the period of projections after loading the costs / revenues of the proposed sub-project or the proposed sub-project having stand-alone financial viability.

While all of the participating ULBs are not known at this point, as part of preparation, the first subproject, viz. Greater Chennai Storm Water Drainage (SWD) sub-project that accounts for 30% of the TNSUDP overall cost is part of the appraisal. This sub-project costing about US\$180 million envisages laying/restoration of storm water drains (329 km) in selected peri-urban areas / zones that were recently added to Chennai Corporation, which hitherto did not have a comprehensive drainage network. These include parts of Valasavakam, Ambattur and Alandur administrative zones of Chennai Corporation (sub-project area, total 54 sq. km), that drain into Adyar and Cooum rivers flowing through the city. An urban flood risk model is being developed for sub-project area, in order to be able to assess the flood risks in the sub-project area and in the downstream Chennai core city area and take appropriate mitigation measures, such as flood warning systems. This subproject is

expected to benefit over (0.8 million) city residents in the sub-project area, through reduced incidence of flooding and consequent reduction in damages / disruptions. Lastly, this sub-component will also include retroactive financing of some expenditure incurred in TNUDP-III.

- b) Sub-component B2: Credit Enhancement (Bank loan: US\$15 million): Tamil Nadu is a pioneer in mobilizing resources from financial markets for urban infrastructure through the issue of municipal bonds and other instruments. It has so far mobilized about US\$64 million for financing viable urban projects in the state through the issue of bonds. This sub-component will seek to further enhance these efforts through a capitalized facility held under a separate account within TNUDF and to be used as a cash collateral / debt service reserve fund to credit enhance municipal bonds and other market based financing instruments that ULBs in TN would seek to issue for mobilizing additional resources beyond budgetary sources. This too would be a 'demand-driven' facility potentially open to all ULBs in the state and would seek to leverage at least about 4 times, i.e. US\$80 million of this amount. Operating guidelines / access criteria for this facility and institutional structure have been agreed upon as part of project preparation.
- c) Sub-component B3: Project Development and TNUDF Technical Assistance (TA) (Bank loan: US\$19 million): This would be managed by TNUDF and would: (i) provide technical assistance to ULBs (excluding Chennai) for preparing and/or supervising sub-projects in ULBs, including environmental and social mitigation actions, contract supervision, Public Private Partnerships (PPPs), etc.; (ii) TA to ULBs for credit enhancement; and (iii) TA for institutional development of TNUDF itself. In addition, this sub-component will also include TA support to Corporation of Chennai (CoC) that would comprise: (i) TA for building institutional capacity of CoC in urban flood risk mitigation; (ii) preparation and supervision of urban investment sub-projects; (iii) TA for general urban management as well as accessing market based financing.
- 3. Component C: Urban Sector Technical Assistance (Bank loan: US\$ 23 million) ) is aimed at strengthening the capacity of ULBs and urban sector officials in the state in specific areas as well as supporting reforms in the area of urban finance and municipal governance. Hence this component would mainly comprise the following activities: (i) Support for next generation of municipal egovernance system & GIS systems covering a majority of ULBs in TN; reforms to strengthen public financial management, disclosure and oversight in ULB's (ii) Institutional Development and Capacity Building of ULBs and urban sector institutions in the state, including training, sector studies and measures for strengthening O&M at ULBs, etc. (iii) Project management, incremental operating costs, etc. at DMA.

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

The project will be implemented in participating Urban Local Bodies (ULBs) within the state based on the selection criteria. The state is broadly divided into natural divisions-the coastal plains and the hilly western areas and comprises of 20% of Scheduled castes and 1% of Scheduled Tribal population. The state has the third highest slum population with 507 out of 721 statutory towns reporting the slum population consisting of about 1.46 million households.

The state is also rich in environmental resources, with a long coast line of over 1000 km covering 12 districts of the state and has about 17.5% of the state under forest cover. The state is endowed with the Gulf of Mannar Marine Biosphere Reserve, Nilgiri Hill Biosphere Reserve, 3 National Parks, 8 Wild Life Sanctuaries and 12 Bird Sanctuaries. The water resources of the state consist of 16 seasonal rivers and over 39,000 water tanks / lakes. Depending on the location of the proposed

project interventions, these environmental sensitivities will be relevant to the project.

The first sub-project that has been identified and appraised is the Chennai Storm Water Drainage (SWD) sub-project for which ESA has been prepared. Chennai is the capital city of Tamil Nadu. Other tentative sub-projects in the pipeline include Tertiary Treatment and Reversed Osmosis Plant, Pedestrianization in T-Nagar, Upgradation of city roads in Chennai City and Underground Drainage System for Hosur City and restoration of water bodies around Chennai. These other sub-projects projects' ESAs will be prepared during the implementation phase as per the agreed ESMF of the project.

#### 5. Environmental and Social Safeguards Specialists

Harinath Sesha Appalarajugari (GENDR)

I. U. B. Reddy (GSURR)

6. Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	The project interventions are expected to cause impacts on urban environment. Depending on the nature and location of the urban investment activities, the project initiatives such as tertiary wastewater treatment plants, restoration of water bodies are likely to contribute to significant adverse environmental impacts on the project area during their construction phase. The project hence has been categorized as 'Category A'. The Environmental and Social Management Framework developed for the project is an updated version of the Safeguard Framework implemented in the recently closed TNUDP III, and incorporates policies and procedures relevant to the proposed project, compliance to the safeguard policies of The World Bank and Government of India.
Natural Habitats OP/BP 4.04	No	Based on the currently available information on sub- projects, no impacts are expected on the natural habitats. The policy hence has not been triggered. The ESMF prepared for the project will screen the respective sub- project with regard to these aspects and ensure that the project activities avoid impacts on natural habitats.
Forests OP/BP 4.36	No	Based on the current list of activities being considered, the project doesn't involve substantial conversion of forest areas and impacts on the forest resources. The ESMF prepared for the project will screen the respective sub-project with regard to these aspects and ensure that the project activities avoid impacts on forests.
Pest Management OP 4.09	No	Project activities, are not expected to trigger the requirements of OP 4.09. The ESMF prepared for the project will screen the respective sub-project with regard to these aspects and ensure that the project activities will not involve OP 4.09.

Physical Cultural Resources OP/BP 4.11	No	The project investments are not expected to cause impacts on cultural resources. The ESMF prepared for the project will screen the respective sub-project with regard to these aspects and ensure that the project activities avoid impacts on Physical Cultural Resources.
Indigenous Peoples OP/BP 4.10	No	The tribal population in urban areas of Tamil Nadu is only 0.40 % and scattered and the tribal population in urban areas does not exhibit typical characteristics such as living as group, speak separate population from dominant population and have separate institutions. Hence this policy is not triggered.
Involuntary Resettlement OP/BP 4.12	Yes	The project will have some adverse impacts related to displacement of people, especially the non-title holders and also involve some private land acquisition for the proposed infrastructure improvement interventions. Therefore, this policy is triggered and Environmental and social Management Framework (ESMF) has been adopted for this project consistent with the Bank's operational Policy on Involuntary Resettlement which will guide the preparation of sub-project specific RAPs as needed.
Safety of Dams OP/BP 4.37	No	Project activities do not involve construction of dams and / or dependent on dams.
Projects on International Waterways OP/BP 7.50	No	Project activities do not involve / located in international waterways.
Projects in Disputed Areas OP/BP 7.60	No	Project activities are not located in 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:

Environmental safeguard Issues: The project activities are aimed at sustainable urban development of the participating cities, thereby contributing to the environmental improvement in the urban areas. However, depending on the nature and location of the urban investment activities, the project initiatives such tertiary wastewater treatment plants, restoration of water bodies are also likely to cause significant adverse environmental impacts on the project area during their construction phase. The project hence has been categorized as 'Category A'. During the construction phase of the sub-projects concerns such as, construction safety to the workers and communities, air and noise impacts during construction phase, impacts on utilities and traffic movement etc. are also expected. Similar impacts were identified in the environmental assessment of Chennai Storm Water Drainage sub-project, which will be implemented in the first year of TNSUDP. The ESMF designed for TNSUDP provides a framework for identifying potential impacts of sub-projects, carrying appropriate environmental assessments and integrating mitigation measures in compliance with the operational policies of the Bank.

Social Safeguard Issue and Impacts. The key issues include displacement of people especially non-title holders occupying the public lands and Right of ways. For example, the Chennai Storm Water Drainage (SWD) sub-project, which is subject to appraisal involves displacement of substantial number of non-title holders living along the natural drains (canals), due to the proposed widening of the canals (about 320 families, most of them lose their full structures and are subject to physical displacement).

Since the sub-projects will be implemented in urban areas which are congested and present complex situations, there are bound to be temporary impacts during the execution of works. Social Impact Assessment (SIA) would be carried out as part of preparation of the sub-projects to determine the nature and magnitude of impacts. The anticipated issue will be timely resettlement of displaced families, resistance from slum leaders, availability of suitable alternative resettlement sites/houses, effective grievance mechanism and coordination with implementation agencies in dealing with social impacts. Therefore, the cost of land acquisition and resettlement will be issues in those sub-projects involving private land acquisition and displacement of people.

The restoration of water bodies may also have substantial impacts as the poor and vulnerable people are often found to be occupying the land around water bodies along the rivers and other vacant public places and are subject to displacement. In addition, some other sub-projects may trigger private land acquisition, though the extent may be small.

There is one outstanding action to be completed related to previous loan, which was closed in March, 2013. In case of Resettlement Implementation in Salem Town, the titles to allotted house owners need to be conferred on completion of payments of installments as per applicable local laws / procedures in Tamil Nadu. The borrower has now confirmed that the titles to 65 resettled families will issued by July, 2015 and this will be followed up until the PAPs receives the titles.

The project also involves Credit Enhancement sub-component where the Bank loan will act as collateral for raising the funds from the market through Bonds by some ULBs and the proceeds from this bond issue will be used for refinancing and green field projects. Thus, the provisions of ESMF will be applied for green field sub-project(s) transactions. For refinancing transactions, there would be screening and due diligence done to confirm that there are no outstanding issues from the then applicable environment and social policies at the time of its implementation. In case of Model City component, the provisions and process of ESMF will be taken into consideration for any physical activities to be undertaken under eligible expenditure and also factor safeguard dimensions in the preparation of development plans as would be applicable to TA activities.

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

The indirect impacts of the project are also expected to contribute positively to the urban environmental quality of the participating cities. However, the project could lead to indirect impacts of land use change and development, leading to deterioration of environmental quality.

There will be downstream impacts due to flooding of certain parts of Chennai because of the proposed storm water drainage since the improvements and widening of canals will not be designed for the maximum rain fall due to various design constraints. This issue will be addressed once the ongoing Flood Modeling study is completed and the recommendations will be taken into account while designing mitigation measures such as advance warning systems, community education, information dissemination etc. Another potential impact could be related to post

resettlement support in case of those resettled families which may pose a challenge as people who will be resettled will be brought into formal system. In addition, there may also be pressures from leaders for inclusion of additional families for project benefits and there may also be multiple claims from the affected people for additional benefits. Appropriate grievance redress mechanisms will be put in place to deal with these types of issues.

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

Alternatives will be analyzed individually for each sub-project during the design phase, to minimize adverse environmental impacts and these will be considered in the final design alternative of the respective sub-project. This will be carried out as part of thescreening exercise and environmental assessment that will be carried out for the sub-project as per the agreed ESMF of the project.

As part of social impact assessment of sub-projects, various options will be explored at the time of finalization of DPRs to minimize the impacts. In case of city roads type of sub-projects the improvements would be planned to be restricted to available corridor width to avoid or minimize the displacement of people. Similarly in case of restoration of water bodies sub-projects, the area already encroached will be excluded from restoration to avoid displacement of people.

## 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 is likely to finance some investments which will involve complex safeguard issues and will encounter category A sub-projects. For instance, the Chennai storm water Drainage project has some of the complex resettlement issues including both physical and economic displacement of more than 300 families. The respective implementing agencies will be responsible for implementation of the sub- projects and TNUIFSL will be the coordinating the safeguards application and will also monitor the implementation. The following measures have been taken by the borrower to address the safeguard issues.

ESMF: Though this project is implemented as an "Investment Project Financing", TNUIFSL will act has a Fund Manager and will play a role akin to that of a financial intermediary on safeguards. A project specific ESMF has been prepared to put in place a mechanism for screening, appraising and supervising the sub-projects by the Fund Manager. This ESMF has provisions to deal with adverse environmental and social impacts and selection of sites for new facilities to be proposed under various sub-projects and also a provision for independent annual environment and social Audit. All the costs related to land acquisition and R&R assistance paid in cash will be met out of counterpart funding. The ESMF has been now finalized incorporating RSA and Task Team's comments including the comments on entitlements and a Government Order is expected soon signifying the adoption of this EMF for the project. The issue of Government Order for ESMF is a pre-requisite for project negotiations which is now planned in middle of February, 2015. The draft ESMF has been disclosed by the borrower and the Bank in November, 2014 and the final version will be replaced once the Government order is issued.

India's new LARR Act, 2013. This new Act which replaced the previous anarchic Land Acquisition Act of 1894 seeks to balance out the interests of the land owners, project affected people and the acquirers and links land acquisition and the obligations of resettlement and rehabilitation. This law also provides that no one shall dispossess their land and assets until the payments are made and alternative resettlement sites have been prepared. This Act significantly reduces the differences between India's national standards for land acquisition and R&R and the

World Bank's operational policy requirements in relation to compensation, transitional support, resettlement sites, and support to vulnerable people, grievance mechanisms, consultations, disclosure, etc. The Task Team is working with the client to appropriately incorporate the provisions of the new Act in ESMF to be adopted for this project. There are still few gaps/differences which need to be agreed by close of appraisal with the client on the Entitlement matrix before it is made consistent with new Act LARR Act and the Bank's operational policy on Involuntary Resettlement.

Technical Assistance (TA): As part of TA, a separate allocation fund is earmarked for safeguard capacity building among ULBs and CMA and will manage the capacity building initiative. As per the agreed ESMF all TA studies will be prepared in line with ESMF provisions and will be reviewed by the Bank and approved and disclosed by the client. However, the Bank is not responsible for its implementation unless those projects are implemented through Bank financing under the project.

Resettlement Action Plan (RAP). The social Impact assessment and a draft RAP has been prepared for the first sub-project- ISWD and consultations with affected people has been completed, where about 50 shopkeepers have refused to the household surveys. The RAP has been finalized incorporating the comments from RSA office and Task Team and its approval by the appropriate official is expected soon. About 320 families including about 100 shopkeepers will be displaced due to this component and no private land acquisition is involved. The implementation of RAP will be a challenge as there will be issues related to selection of suitable sites, timing of shifting, resistance from the shopkeepers to move out of the area, pressure for multiple claims for additional houses, pressures for inclusion of ineligible people for benefits, resistance from slum leaders for loss of rental income from those to be resettled, loss of site related income earning opportunities, income restoration of those affected shopkeepers, grievance redress mechanisms, etc. The implementation capacity at Corporation of Chennai (CoC) for safeguards management is inadequate and the same is sought to be mitigated through a Project Management Consultant (PMC). The draft RAP has been disclosed in both borrower's web sites; and the Bank's Info shop in December, 2014 and the final version will be replaced once the RAP is approved by the Corporation of Chennai. In case of other sub-projects to be accepted for financing under the loan, the social Impact Assessment/ RAPs will be prepared as needed prior to acceptance of subprojects for financing the loan prior to approval bid documents by the Bank.

Borrower's Capacity Assessment: As part of the implementation of the previous TNUDP-III Project funded by the Bank, TNUIFSL was involved and h as been exposed and sensitized in addressing the issues related to environmental impacts, displacement and private land acquisition. Two Safeguard Specialists (Environment and Social) who are part of TNUIFSL are associated with the project for more than 5 years, have gained experience in safeguards issues and to assist the implementing agencies in preparation of monitoring of safeguards implementation of subprojects. As part of the overall safeguards implementation in the previous project under TNUDP-III, TNUIFSL has demonstrated willingness to implement the sound environmental and social safeguards practices. In the context of the current project, the safeguards capacity of participating local bodies and other implementing agencies will be strengthened.

In the current project, TNUIFSL in the capacity of a Fund Manager will provide safeguards support in preparation and implementation of sub-projects to the participating ULBs. The ESMF has been strengthened with the processes for screening, appraisal, supervision and reporting of preparation and implementation of sub-projects. Keeping the work load of TNUIFSL as they are

also involved with projects from other external aided partners, TNUIFSL will assign two full time staff for this project during implementation keeping the anticipated safeguards work load. However, there are capacity issues at the sub-borrower level and this is partly being addressed through the proposed capacity training programs. In case of Chennai Storm Water Drainage (SWD) sub-project to be implemented by Chennai Corporation, it will put in place adequate capacity through a Project Management Consultant (PMC) In addition, full time environmental and social specialists will be deployed to supervise the implementation of SWD and other sub-projects of CoC. The ESMF has proposed a role for Directorate of Municipal Administration (DMA), the concerned line department to have safeguard specialists to complement the supervision of sub-projects implementation and also provide support to ULBs in getting approvals and clearances from the Government on LA and R&R matters from the district administration. The team will seek confirmation on strengthening DMA with safeguard specialists during implementation.

Risks: The likely risks from environment safeguard point of view would be (i) inadequate sub-project assessments and EMPs (ii) non-integration of EMPs in the sub-project bid documents and (iii) improper implementation of EMP leading to environment and safety during construction and operation of the sub-projects. To address these issues the ESMF provides sample terms of references for carrying out EAs and Generic EMPs for typical sub-projects. In addition, integration of EMPs in sub-project bid documents will be reviewed by TNUIFSL safeguard team and regular monitoring of safeguards will be carried out during the construction phase of the sub-projects.

The likely risks from social safeguard points of view will be: (i) delays in payment of compensation and R&R assistance as State Government does not support this expense to ULBs and the expenditures above certain level require Government approvals; (ii) Selection of suitable sites for the proposed facilities with appropriate consultations with people living close to the sites and thus avoid changing of sites during implementation, which was an issue in the previous project; (iii) Inadequate safe guards capacity at sub-borrower level; (iv) safeguards readiness and coordination with procurement and civil works time table; (v) resistance from the shopkeepers to move out of the existing place; and, (vi) complex urban challenges in dealing with the squatters and encroachers and multiple claims and pressures to include additional people for project benefits and entitlements. To deal with the above risks, the Bank will factor procurement clearances in relation to safeguard readiness, ensure appropriate grievance mechanisms in place and strengthen safeguards implementation support and capacity at sub-borrower level.

## 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 stake holders for the project include the people of the participating cities, implementing agencies (Department of Municipal Administration, Urban Local Bodies, and Chennai Water Board), local NGOs and people directly / indirectly affected by the project. The draft ESMF has also been disclosed in the web site of TNUIFSL and DMA for feedback from the stakeholders. A meeting has been held with implementation agencies to seek feedback on the draft ESMF.

As part of social impact assessment for Chennai SWD sub-project which is subject to appraisal, household surveys among the affected families is completed and consultations and focus group meetings are in progress where the ESMF provisions, entitlements, resettlement process, grievance mechanism and other support to be provided will be explained to the affected people and their willingness to move to the pre-identified sites. The Executive summary along with Entitlement

Matrix and grievance mechanisms will be disseminated through brochures among the affected people.

Nine focus group consultations including two meetings exclusively among the women and three among the shopkeepers were held to explain about the process of resettlement and available entitlements/ R&R assistance. In each of these meetings about 20-30 people participated and women actively participated in these meetings. The key issues highlighted in these focus group meetings include most of them fear loss of locational advantages such close by schools, hospital and access to various basic amenities. The participants expressed their concerns that most of the women work as maids in the nearby houses and men work as wage labourers and masons in the nearby areas. People also expressed that they are very safe in the current locations and fear that fear that security may pose problems in the new areas.

As regards disclosures, Project specific ESMF and sub-project specific EIA/EMP and RAP for category A sub-projects will be disclosed through Info shop and for category B/C sub-projects, the documents will be filed in WB docs. All these documents will be disclosed by the borrower in their respective websites.

#### **B.** Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other				
26-Nov-2014				
Resettlement Action Plan/Framework/Policy Process				
12-Dec-2014				
ces policies, the tal Assessment/				
explain why:				
ces policio tal Assess				

#### C. Compliance Monitoring Indicators at the Corporate Level

OP/BP/GP 4.01 - Environment Assessment	
Does the project require a stand-alone EA (including EM report?	Yes [ × ] No [ ] NA [ ]
If yes, then did the Regional Environment Unit or Practic Manager (PM) 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 4.12 - Involuntary Resettlement					
Has a resettlement plan/abbreviated plan/policy framework/ process framework (as appropriate) been prepared?	Yes [×]	No [	]	NA [	]
If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?	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(s):	Name: Raghu Kesavan	
Approved By		
Regional Safeguards Advisor:	Name: Zia Al Jalaly (RSA)	Date: 21-Jan-2015
Practice Manager/ Manager:	Name: Ming Zhang (PMGR)	Date: 21-Jan-2015