The World BankStrengthening Foundations for Learning Project (P162297)

Project Information Document/ Integrated Safeguards Data Sheet (PID/ISDS)

Concept Stage | Date Prepared/Updated: 24-Oct-2017 | Report No: PIDISDSC22964

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BASIC INFORMATION

A. Basic Project Data

Country Tunisia	Project ID P162297	Parent Project ID (if any)	Project Name Strengthening Foundations for Learning Project (P162297)
Region MIDDLE EAST AND NORTH AFRICA	Estimated Appraisal Date Feb 26, 2018	Estimated Board Date May 22, 2018	Practice Area (Lead) Education
Financing Instrument Investment Project Financing	Borrower(s) Ministry of Development, Investment and International Cooperation	Implementing Agency Ministry of Education	

Proposed Development Objective(s)

The objective of the Project is to reduce inequality in access to preschool education and improve learning conditions in primary schools in selected regions.

Financing (in USD Million)

Financing Source	Amount
Borrower	0.00
International Bank for Reconstruction and Development	100.00
Total Project Cost	100.00
Environmental Assessment Category	Concept Review Decision
B-Partial Assessment	Track II-The review did authorize the preparation to continue

Other Decision (as needed)

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B. Introduction and Context

Country Context

- 1. Six years after the 2011 revolution, Tunisia has undergone a significant political transition, but economic performance remains weak. Following the 2011 revolution, Tunisia went through a political transition that led to the adoption of a new Constitution in early 2014, followed by orderly presidential and parliamentary elections in late 2014, and the establishment of a democratically elected government in 2015. These achievements were due in large part to the role of the country's robust civil society. Civil society organizations, including youth groups, have gained more voice and have pushed for less corruption and greater transparency and accountability in public services. However, economic growth has averaged only 1.4 percent annually since the revolution (compared to 4.4 percent annually during the five years before the revolution) because of delays in reform implementation, security-related incidents, social unrest, and regional instability.
- 2. Tunisia's medium-term economic outlook depends on the success of the implementation of reforms aimed at addressing macroeconomic imbalances and unlocking the country's economic potential. The World Bank Group (WBG) forecasts that gross domestic product (GDP) growth will rebound modestly to 2.3 percent in 2017 from a low base of 1.0 percent in 2016. This forecast assumes a positive scenario of accelerated reforms, reinforced security, movement controls across the borders with Libya and Algeria, and a moderate acceleration in external demand. To achieve this, Tunisia will need to reform its business environment and financial sector to support the creation of good quality private sector jobs. Furthermore, improving governance will be critical for achieving sustainable and inclusive growth in Tunisia.
- 3. **Despite a remarkable reduction in poverty, regional disparities increased and account for most of the inequality in Tunisia.** Poverty incidence in Tunisia halved between 2002 and 2010, from over 32 percent to 15 percent. Around 80 percent of the reduction in poverty from 2005 to 2010 was attributed to economic growth, and much less, around 18 percent, to redistribution. Although the Gini index declined from 0.375 to 0.358 between 2000 and 2010, interregional inequality increased substantially. Inequality between regions explained 62 percent of total inequality in Tunisia in 2010 compared to 50 percent in 2000. The poor are concentrated and overrepresented in the western regions, which are home to 70 percent of the extreme poor. Poverty incidence in rural areas is nearly twice as high as in urban areas. Poor individuals are more likely to be unemployed, work in the agriculture sector, or employed in low quality jobs.
- 4. In recent years, young, educated Tunisians have experienced growing unemployment rates and job insecurity. Unemployment rates ranged between 20 percent and 22 percent in interior regions compared to around 7–11 percent in coastal areas in 2013. Despite Tunisia being a regional pioneer in promoting gender equality, women are less likely to participate in the labor force than men (at 23 percent, compared to 72 percent for men based on data from the 2014 Labor Market Panel Survey) and those that do participate experience higher unemployment rates than men (at 28 percent compared to 15 percent for men). By 2012-13, more than one third young urban women completed a university education (36.2 percent), exceeding the proportion of young men (27.1 percent). Unemployment of youth holding tertiary degrees reached 69 percent for women and 54 percent for men in 2012 (Hanmer, Tebaldi and Verner 2017).
- 5. **Access to basic services is unevenly distributed.** The likelihood of finishing basic education on time or having access to other basic services, such as tap water or sanitation, is lower for poorer families. In 2010, rural children were almost twice as likely to be stunted (14 percent in rural areas versus 8 percent in urban areas). Fewer rural women received prenatal services or treatment for high-risk pregnancies (88 percent in urban compared to 79 percent in rural

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areas). Rural maternal mortality rates were higher than the national average (65 deaths per 100,000 live births in rural areas, compared to 48 deaths per 100,000 live births nationally). A least advantaged child¹ has a 4 percent chance of attending early childhood care and education (ECCE), a most advantaged child² has a 92 percent chance, more than twenty times greater (El-Kogali and Krafft 2015).

Sectoral and Institutional Context

- 6. **By and large, Tunisia has successfully addressed issues of access to schooling but challenges with quality and retention remain.** In 2015, there were 2 million children enrolled in the public education system from preschool (*Année Préparatroire*) at five years of age to the end of high school. Enrollment in preschool in 2013 reached 78.8 percent of all children five years of age (47,152) almost reaching gender parity (49.1 percent of girls). Enrollment increased by 12 percent between 2010 and 2014 (Ministry of Education of Tunisia 2016). With 1.1 million children, enrollment and completion rates in primary education for both boys and girls have been universal for over a decade.³ Ninety-one percent of students continue to secondary education. The enrollment rate of young people aged 12 to 18 is around 75 percent, and is higher for girls than boys (84 percent compared to 76 percent). At the secondary level, drop-out and repetition are significant issues. Between a quarter and a third of students have to repeat a grade or drop out each year.⁴ Internal efficiency, measured by grade repetition rate is low: 43 percent of 15-year-old Tunisian students have repeated a grade at some point, the second highest repetition rate of all countries participating in the Programme for International Student Assessment (PISA 2015) and three times higher than the Organization for Economic Cooperation and Development (OECD) average.
- 7. There are significant interregional disparities in education attainment. Nationwide 45 percent of primary schools offer the *Année Préparatoire*, but in the coastal region of Monastir, only 24 percent of primary schools include a preschool class. In primary education, the difference in passing rate at the end of primary varies from 85 percent in Kasserine to 97 percent in Tunis 2. The national average primary completion rate is slightly higher for girls (93 percent) compared to boys (90 percent) in 2014. Pass rates for the *baccalaureate* (the examination for secondary school leaving certificate) show similar inequality with at least a 30-percentage point difference between the best and lowest performing regions. These wide inequalities are holding back Tunisia's economic development and creating resentment and social frustration among youth.
- 8. International learning assessments point to low levels of learning in science, mathematics, and reading. A national system for assessing learning at different levels of the education system does not exist. However, scores on PISA show that learning in Tunisia has stagnated (See Annex C for details). In 2015, scores in science, mathematics, and reading were below the average for Middle East and North Africa (MENA) countries. The 75th percentile in Tunisia performs below the 25th percentile of the OECD average on PISA, placing Tunisian 15-year-olds at around three years of schooling below the OECD average (World Bank 2017). Boys perform better than girls in science and mathematics while girls perform better in reading. Results from the 2011 Trends in Mathematics and Science Study (TIMSS) results tell a similar story. Even on national measures of Grade 12 student achievement, such as the *baccalaureat*, success rates have declined in the last five years with only 43 percent of students passing in 2015. Females outperform males on the *baccalaureat*; in 2016, 63 percent of the *baccalaureat* graduates were girls. Beyond the *baccalaureat* and competitive exams (*concours*) that determine access to elite public middle and high schools, national assessments are not used to

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 $^{^{1}}$ A child who lives in the poorest 20 percent of households and with uneducated parents.

² A child who has parents with secondary or higher education and is from the richest 20 percent of households.

³ World Bank Edstats database. Data is for 2013.

⁴ The Ministry of Education (MOE) estimates that 130,000 students drop out or leave school each year without completing primary and/or secondary education cycles.

evaluate overall learning progress throughout the education system. To determine student progress, individual schools set their own tests, which are neither comparable nor used to diagnose and address gaps in learning.

9. Tunisia has heavily prioritized spending on its education sector, but the bulk of this spending is on salaries for teachers, personnel and administrators with little left for school inputs and other investments in teaching and learning. Budget allocations for education exceed averages for MENA countries and international benchmarks. In 2016, the education budget increased by more than 10 percent and represented 18 percent of the national budget and 5 percent of GDP. Between 2005 and 2016, the Ministry of Education's (MOE) budget grew at an annual rate of 3.5 percent (see figure 1). However, only three percent of the general education budget is available for spending on inputs such as school operating costs, learning materials, teacher professional development, and infrastructure. Sixty-two percent of the MOE's budget is allocated to secondary education (including lower and upper secondary education for children 12-18 years of age), while only 34 percent is allocated to preschool and primary education and 4 percent to general support services (Zaafrane 2017). Finally, the student-teacher ratio (STR) has consistently declined over the years (in primary education, the STR was 16.6 in 2016 versus 23.3 in 2000) and average nominal and real teacher salary has increased, while student achievements as measured by PISA and the *baccalaureat* have stagnated. These indicators point to a decline in efficiency of education spending in Tunisia.

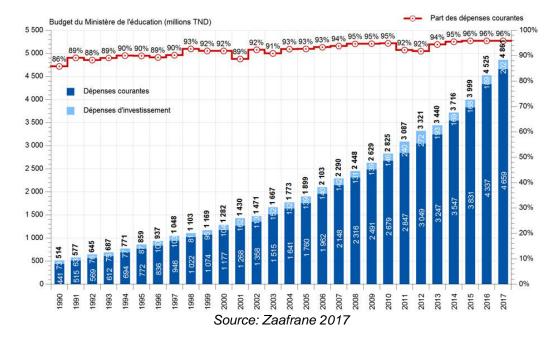


Figure 1. MOE Budget and Share of Current Expenditure

10. The MOE has prepared a *Livre Blanc*, presenting a diagnostic, vision and priorities for the education sector for 2016–2020, with the support of civil society organizations and the Executive Office of the Tunisian General Labor Union (*Union Générale Tunisienne du Travail* [UGTT]). The challenges facing the education sector in Tunisia are well recognized in the *Livre Blanc*, which sets out an ambitious agenda to reform the education system. While the sequencing of objectives, detailed costing and financing plan are still being finalized, the MOE has prioritized three main areas: (a) reducing inequality of opportunities in access, specifically to preschool and secondary education; (b) improving learning conditions at all levels; and, (c) improving governance of the education system.

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- 11. A first challenge relates to the lack of service provision at the preschool level in lagging regions⁵; this has been a constraint to reducing inequality in educational outcomes between income groups. MOE has identified the universalization of one year of preschool for children five years of age as a priority area. The demand for preschool has been rising steadily, but public supply in the most disadvantaged areas has been limited to date. The preschool enrollment rate varies widely across regions. In Tunis, around 96 percent of first graders have had some preschool education (based on MOE administrative data), while in Kasserine and Kairouan, this rate is 44 percent and 55 percent, respectively. In addition to being a government priority, global evidence shows that high-quality preschool education contributes to school readiness and later academic achievement through the development of a range of skills, such as skills in reading and mathematics, and in attention, effort, initiative and behavior. In Tunisia, a recent MOE-UNICEF study demonstrates that first graders who have attended quality preschools do better in language and mathematics than those who have not attended (after controlling for wealth). Data from UNICEF's Multiple Indicator Cluster Surveys confirm socioeconomic gaps in cognitive achievement before the official start of formal schooling. However, there is little information available in Tunisia on the quality of preschool services. Despite the existence of national standards for preschool, the MOE currently has little capacity to ensure that preschools comply and/or have the resources to meet the national standards. Moreover, the MOE does not systematically measure preschool quality, which is essential to positively impact Tunisian children's readiness to enter first grade.
- A second challenge relates to the quality of the primary education system where the learning environment is inadequate, particularly in disadvantaged regions. The causes of Tunisia's poor primary education performance are multidimensional. Many primary schools in lagging regions, but also in poor urban areas, are in dilapidated school buildings, some with limited access to water, unreliable electricity and/or limited connectivity. The quality of teaching and school leadership has been negatively affected by the recruitment of thousands of university graduates into the civil service as teachers without the required teaching qualifications, and school leaders without the necessary training. Professional development for all personnel is limited, and practicing teachers do not receive sufficient support and opportunities for development. Evaluations conducted by school pedagogical inspectors seem to have limited impact on teacher performance. School principals focus on compliance with administrative regulations, as opposed to instructional leadership. Access and use by teachers of diverse instructional materials including ICT is limited, despite continued investments over many years. Few, if any, pedagogical innovations to support learning and teaching have been introduced in primary schools in recent years. Schools have no financial resources at their disposal and depend entirely on the regional education *Commissariat* for all their needs. In short, the primary education system remains mostly driven by input-based policies, with weak accountability for achieving results.
- 13. A third challenge relates to the institutional capacity at the MOE, the weak governance structure and the availability of accurate systematic information for management of the education sector. Without accurate information on student learning, it is difficult for MOE to carry out an objective assessment of the quality of the education services, compare school- and region-level performance over time, and develop evidence-based policies and improvement plans. The creation of multiple administrative layers over the years has resulted in duplication of functions and conflicting responsibilities between the central and local levels, while the power structure within MOE remains overly centralized. A functional review of the MOE is underway and will shed more light on the overall capacity of the MOE and needs for institutional strengthening. Due to the influence of teacher unions, parents have largely been left out of education

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⁵ Lagging regions, or zones defavorisées, are defined using a regional development index (indice de développement regional) that contains 18 governorate-level variables. A simple average is taken based on these 18 variables and a threshold is established below which a governorate is considered a lagging region. Variables include education attainment levels, unemployment rate, percentage of households with piped water, child mortality and gender disparities, among others. According to recent development indices, the following governorates are considered zones defavorisées: Zaghouan, Kébili, Gabès, Mahdia, Medenine, Gafsa, Béja, Tataouine, Kef, Sidi Bouzid, Siliana, Kairouan, Kasserine, and Jendouba (Country Partnership Framework (2016–2020) for the Republic of Tunisia Report No. 104123-TN).

⁶ L'Evaluation et le renforcement de l'intégration des technologies de l'information et de la communication dans le système éducatif (CNIPRE/ITICE/RLM 2014)

debates and decision-making. This structure has reinforced low levels of accountability, and has contributed to inefficiencies in carrying out and monitoring education policies and projects. Examples of poor efficiency in the education system include the widespread phenomena of teacher absenteeism, and the lack of enforcement of existing rules and regulations. As described above, the MOE will need to make important technical and political decisions to improve the efficiency of education spending to ensure that public investments are leading to desired outcomes.

- 14. This Project will represent the first engagement with the MOE since the closure of the Bank-financed second phase of the Education Quality Improvement Program in 2010. Policies instituted during that period remain in place. These include the implementation of competency based approach to teaching, the elimination of the basic school leaving certificate, and the policy discouraging repetition in primary grades. The Project also established a national assessment for 4th grade, the results of which were never released. Lessons learned from previous Bank-financed projects include the need to pay close attention to procurement practices, which delayed implementation; the need to garner support from teacher unions and be sensitive to the political and cultural context, which limited adoption of school committees and the promotion of school autonomy, and the need to strengthen capacity for monitoring and implementation.
- 15. The Project activities and outcomes might be affected by extreme temperatures/wildfires and flooding resulting from climate changes. The Environmental and Social Management Framework and Environmental and Social Impact Assessment will consider these risks to avoid and mitigate their impacts on the proposed Project.

Relationship to CPF

- The proposed Project will support results from Pillar II: Reducing regional disparities and Pillar III: Promoting 16. increased social inclusion of the Country Partnership Framework (CPF) (2016-2020). The CPF underlines the strong links between education and poverty and vulnerability in Tunisia. The most vulnerable population groups are characterized by household heads with no or some primary education. Almost half of poor households in Tunisia are headed by individuals with no education. In contrast, the least vulnerable population groups have household heads with secondary or university education. Unsurprisingly, education, along with region and urban/rural location, explains around 75–90 percent of the observed gaps in access to public services, such as quality education, water and sanitation. The proposed Project would contribute to the CPF objectives: 2.1 Improved access to and quality of services in lagging regions, and 3.3 Improved and more equitable social programs by reducing the inequality of opportunities in access to education in the lagging regions. The proposed Project would foster social inclusion and shared prosperity through the improvement of human capital development, particularly through (a) the reduction of inequality of opportunities in access to preschool in lagging regions; (b) improved delivery of education services in primary schools supporting the acquisition of basic skills in early grades; (c) greater teacher effectiveness through teacher education, particularly through the provision of in-service training; (d) the assessment of student learning to benchmark progress in education quality; and (e) improved management of the education system.
- 17. In addition, the proposed Project will directly address the two foundational themes identified in the CPF: Governance. The proposed Project has been designed in collaboration with the Maghreb Governance and Political

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⁷ Students often resort to private tutoring to complete the full curriculum, despite a law prohibiting teachers from engaging in out-of-school tutoring of their own students. Although there is a policy that requires teachers to identify low performing students at the beginning of the school year, no systematic support or follow up is provided to remediate students at risk of repeating and/or dropping out. Furthermore, despite their limited workload requirements, teachers often do not deliver the entire official program in the allotted time, requiring students to pay for private tutoring. Seventy percent of 15-year-olds pay for private tutoring; 54 percent of all 15-year-olds took private lessons from teachers from their own schools. Modest teacher effectiveness is compounded by a lack of investment in complementary non-teaching inputs.

Economy Facility (MGPEF) to identify and address some of the underlying constraints and opportunities in the education sector. Specifically, the proposed Project would seek to improve governance and management of the education system through improved capacity of personnel, devolution and delegation of tasks and responsibilities to lower levels of the education administration when possible, and better information flow (including on learning outcomes to guide decision-making).

C. Proposed Development Objective(s)

The objective of the Project is to reduce inequality in access to preschool education and improve learning conditions in primary schools in selected regions.

Key Results

- 18. The main outcomes and intermediate results (see Annex B for a detailed results chain of the proposed Project) are:
 - a) Reduced percentage of children five years of age not enrolled in preschool in lagging regions.
 - b) Increased number of preschools in lagging regions meeting national standards
 - c) Primary schools in selected regions having improved learning conditions.
- 19. The expected beneficiaries of the Project would be children five years of age and children enrolled in primary education in selected regions; primary school directors; primary school teachers; pedagogical inspectors and civil servants within the MOE.

D. Concept Description

20. The Project would comprise three components.

Component 1: Improving Preschool Services in Selected Regions

- 21. The objective of Component 1 is to increase access to preschool in lagging regions and ensure that children five years of age have access to improved preschool learning environments so that they will be better prepared to learn upon entering first grade. The Project will focus on areas of greatest need and in which the private sector is unwilling or unable to provide services. This objective will be achieved through: (1.1) the construction and/or rehabilitation of preschool classrooms in existing primary schools in lagging regions; (1.2) the establishment of community-based preschool education on a pilot basis in cases where space is not available within schools, and through partnership with selected municipalities; (1.3) the improvement of learning conditions in preschools through a set of activities such as: (a) training or retraining of preprimary teachers and education inspectors, and training paraprofessionals in the case of community-based centers; and (b) the provision of high-quality instructional materials; and (1.4) the development of a quality assurance mechanism for preschools through the measurement of early learning and quality outcomes (MELQO) to monitor progress in improving learning environments.
- 22. A needs assessment to be conducted during the preparation phase will provide a more detailed understanding of constraints to expand the delivery of improved preschool services in lagging regions and propose new models. Issues to be assessed by the needs assessment will include (a) the quality of existing preschool classrooms/infrastructure; (b)

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the qualification (and/or professional certification) of preschool teachers; (c) the quality of the curriculum and learning materials available; (d) existing mechanisms to assess the quality of instruction; (e) governance, political economy, and accountability bottlenecks and mechanisms in relation to the above aspects; and, (f) cost/sustainability for the expansion of preschool service delivery.

Component 2: Improving the Quality of Learning Conditions in Selected Regions

- 23. The objective of Component 2 is to improve learning conditions in primary schools in selected regions. The driving principle is that only the school itself can deliver lasting improvement, and, therefore, the range of proposed interventions should be designed to support the school to do so efficiently and effectively. This objective will be achieved through (2.1) in-service training for school principals on management techniques focusing on leadership skills to support teachers and introduce change at the school level; (2.2) in-service training for primary school teachers to support learning, focusing on the content of the primary curriculum to be mastered by teachers and on effective pedagogies for core subjects. To align with the GOT's digital school plan, training will include effective ways of introducing digital instructional materials in the classroom where feasible; (2.3) the introduction of a teacher mentoring program led by school principals and pedagogical advisors to assess teacher practices, provide feedback, and develop personalized teacher professional development plans; (2.4) the provision of instructional materials for students and teachers, as needed; (2.5) improvements in infrastructure, focusing on access of educational facilities to water, electricity, and connectivity; and (2.6) equipping schools/classrooms with appropriate learning resources.
- 24. To ensure the adoption of changes and innovation related to school management and leadership and teacher inservice training, the next phase of preparation will further explore the desirability and feasibility of these changes with the unions, professional teachers' associations, and inspectors.

Component 3: Strengthening Management Practices in the Education Sector

25. The objective of Component 3 is to improve the planning and provision of education services in preschool and primary education to support implementation of components 1 and 2, through the adoption of more effective management practices at the national and regional levels. This objective will be achieved through (3.1) carrying out assessments to measure child development in preschool and learning outcomes in primary education. In addition, capacity would be strengthened as necessary to carry out early-grade reading and mathematics assessments, classroom observations, and teacher training on formative and summative student assessments; (3.2) providing technical assistance in selected management areas based on the results of the ongoing functional review⁸; (3.3) carrying out a study and proposing a set of measures to improve the efficiency of education spending; (3.4) undertaking an impact study to inform the implementation of the activities under components 1 and 2; and (3.5) supporting Project management and monitoring.

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⁸ A functional review of MOE currently underway will help identify other possible interventions supporting a "system approach" and expected results under this component. Moreover, further analytical work under the MGPEF will identify the governance and political economy problems associated with the above-mentioned measures and help identify solutions to these problems.

The list of activities above will be narrowed during project preparation.

SAFEGUARDS

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

The Project interventions for preschools will be in the lagging regions (not yet determined which ones) and selected regions for primary schools (list has not been finalized yet).

Project interventions might happen in rural and urban areas, but always within the premise of existing primary schools.

B. Borrower's Institutional Capacity for Safeguard Policies

Full institutional arrangements are not finalized yet. Limited institutional capacity is foreseen. The Bank team will need to use the preparation time to provide guidance to introduce Environment Safeguard Management Framework (ESMF) and build capacity.

C. Environmental and Social Safeguards Specialists on the Team

Antoine V. Lema, Social Safeguards Specialist Mohamed Adnene Bezzaouia, Environmental Safeguards Specialist

D. Policies that might apply

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	The project is categorized as a B. It is anticipated that the effects of the project will be limited, easily mitigated and manageable and not irreversible. The project with its Subcomponent 1.1 (construction and/or rehabilitation of preschool classrooms in existing primary schools in lagging regions) and its Subcomponent 2.5 (improvement in infrastructure focusing access to water, electricity and connectivity), entails the building of small civil works that have the potential to generate site-specific environmental impacts. These environmental impacts are essentially related to the management of non hazardous and hazardous solid wastes, generation of noise, fugitive dust and sanitary wastewater discharges. Other impacts are related to Occupational and Community Health and Safety. Since the geographic areas and exact activities to be financed under the Subcomponents 1.1 and 2.5 are not yet defined, an ESMF will be developed with safeguards screening mechanism. Category A-type activities will be excluded and all activities with major or irreversible impacts on the environment, students and the populations will be

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		excluded. The ESMF will be part of the Project Operations Manual (OM), and included in project management and regular project monitoring. All the stakeholders will be consulted on the ESMF. Provisions would be made to ensure access to physical copies of the safeguards instruments to PAPs in a format and location easily accessible and a GRM will be established. The final version of the ESMF will be disclosed at the national Project Implementation Agency Website level and the Bank's external Website.
Natural Habitats OP/BP 4.04	No	The project will not finance subprojects impacting critical habitats or protected areas.
Forests OP/BP 4.36	No	The project will not finance subprojects impacting forests areas and forest resources.
Pest Management OP 4.09	No	The project will not support the use or involve investments in Pesticides or other related products.
Physical Cultural Resources OP/BP 4.11	No	Physical and cultural resources, if located in the project areas, will not be impacted. All the small civil works will be carried out inside school grounds.
Indigenous Peoples OP/BP 4.10	No	There are no indigenous peoples in Tunisia.
Involuntary Resettlement OP/BP 4.12	Yes	The project might induce land acquisition. All individual project sites are yet to be identified and assessed. The project will therefore prepare a RPF.
Safety of Dams OP/BP 4.37	No	The project will not construct or rely on dams.
Projects on International Waterways OP/BP 7.50	No	The project will not affect international waterways.
Projects in Disputed Areas OP/BP 7.60	No	The project is not located in a disputed area.

E. Safeguard Preparation Plan

Tentative target date for preparing the Appraisal Stage PID/ISDS

Dec 01, 2017

Time frame for launching and completing the safeguard-related studies that may be needed. The specific studies and their timing should be specified in the Appraisal Stage PID/ISDS

The safeguards instruments to be prepared include an ESMF and RPF.

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APPROVAL

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