The World Bank

Manual for Safeguard Compliance in Demand-Driven and Community Development Projects in the Middle East and North Africa Region

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The World Bank

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# TABLE OF CONTENTS

## PREFACE

## 1 INTRODUCTION

1.1 Objectives of the Manual 1
1.2 Structure and Content 1

## 2 PROCESSING SAFEGUARD REQUIREMENTS FOR CDD PROJECTS

2.1 Mainstreaming Safeguard Policies into CDD 2
2.2 Project Concept 4
2.3 Project Preparation 5
2.4 Project Appraisal 17
2.5 Negotiations 18
2.6 Project Implementation 18
2.7 Budgeting for Safeguard Compliance 23

## 3 COMMUNITY PARTICIPATION AND CONSULTATION

3.1 Bank Policies for Public Consultation and Information Disclosure 24
3.2 Role of Communities in CDD 24
3.3 Levels of Consultation and Participation 25

## 4 CAPACITY BUILDING AND TECHNICAL ASSISTANCE

4.1 Building Capacity for Safeguard Compliance 30
4.2 Training 32

## ANNEXES

2. Guidance on Preparing an Integrated Safeguard Datasheet for CDD Projects
3. Matrix of Safeguard Requirements in CDD Projects
4. Guidelines for Addressing Resettlement Issues in CDD
5. Sample TOR for an RPF of the Yemen Power Sector Loan
7. Sample Format for an Environmental Management Plan (EMP)
8. Environmental and Social Appraisal Process for Subprojects
9. Screening Checklist for Subprojects
10. Construction and Operation Guidelines for Contractors
11. Sector Specific Impact Guidelines for Subprojects
12. General Guidelines for the Supervision of CDD Projects
13. Subproject Reporting Form
LIST OF TABLES

Table 2.1 World Bank Safeguard Policies
Table 2.2 Safeguard risks of CDD investments
Table 3.1 Types of public consultation techniques
Table 4.1 Targeting stakeholders in capacity building programs
Table 4.2 Proposed environmental training program

LIST OF BOXES

Box 2.1 Outline for a Safeguards Assessment
Box 2.2 Main development sectors targeted under CDD in MNA
Box 2.3 Qualifications and skills needed to carry out an EA for CDD projects
Box 2.4 Contents of an EA for a CDD subproject
Box 2.5 Activities and investments ineligible for investment
Box 2.6 Contents of a subproject EMP
Box 2.7 Contents of an abbreviated RAP for a CDD subproject
Box 2.8 Types of cumulative impacts associated with CDD projects
Box 2.9 Supervision of Environmental Management Plans
Box 2.10 Example of an audit for the Yemen Social Fund for Development
Box 2.11 Sample TOR for an Environmental and Social Audit
Box 3.1 Accessing in-country resources in Morocco and Yemen
Box 3.2 Identifying key issues during public consultation
Box 3.3 Indicators for monitoring public participation
PREFACE

The World Bank supports economic development through a variety of lending instruments, including financial intermediaries, community-driven development and social funds. Social funds are similar to community-driven development operations in terms of their socio-economic objectives but differ primarily in regards to their financial arrangements.

Community-driven development (CDD), a form of programmatic lending, aims to harness social capital and expand it by strengthening incentives for participatory development. CDD has the potential to increase the power of poor communities to negotiate with government, the private sector, and civil society. This involves more than strengthening community-based organizations and supporting their own initiatives. It also requires active measures to foster appropriate enabling environments. Large programs of support to CDD are not sustainable without the policies, laws, systems and governance processes that encourage effective collaboration between local governments, central governments, civil society, service providers, and CBOs (community-based organizations).

CDD has been seen to be an effective tool for development in the Middle East and North Africa (MNA) region of the World Bank, especially among the poorest population in countries like Yemen and Morocco. The “Community Driven Development Summary Strategy Note for the MNA Region” identified several factors that account for its effectiveness:

- Participatory approaches are an important part of MNA’s regional strategy;
- There is a general trend towards decentralization in the Region and a number of community-based activities are already underway; and
- The Region has already seen positive results through several operations with regard to the sustainability and efficiency of social services.

The Note also identified the Region’s three main priorities for CDD development. These are to:

a) Disseminate examples of successful CDD programs in the region to decision makers at both the central and regional levels. These could be projects/programs supported by the Bank, local or international NGOs, and/or other development agencies;
b) Encourage participation of local communities where none currently exists and move from participation to empowerment where participation has proven to be effective; and
c) Develop methodological approaches that help measure the impact of CDD activities in order to convince decision makers of their effectiveness and applicability.
To achieve these goals in a sustainable manner, the MNA region must ensure that the Bank’s environmental and social safeguard measures have been effectively integrated into CDD operations. This is synonymous with the World Bank’s Quality Assurance and Compliance Team’s (QACU) initiative for regional safeguard teams to assist Client countries in improving their capacity for compliance with safeguard policies.

The following Manual has been developed to facilitate this process and to provide the needed guidance for the MNA regional staff in mainstreaming safeguards into CDD. It outlines a step-by-step approach to processing safeguard requirements for CDD projects and provides resources and templates to support each Chapter in the manual. This document is a work in progress and should be treated as such.
1 INTRODUCTION

1.1 OBJECTIVES OF THE MANUAL

This manual is a process-oriented guide illustrating the key steps for mainstreaming World Bank environmental and social safeguard policies into Bank funded community driven development (CDD) projects. The manual closely follows the Bank’s operational life cycle for project preparation, design, implementation and supervision. The content of this manual is focused primarily on CDD operations in the Middle East and North Africa Region (MNA), building strongly on best practice examples of on-going CDD programs in the region.

The objective of the manual is to provide Sector Managers, Task Team Leaders, and client countries in the MNA region with adequate guidance for effectively addressing environmental and social safeguard requirements in the design and implementation of CDD projects. This will serve to facilitate the project appraisal process and improve safeguard compliance throughout the project’s lifespan.

This manual should act as a guidance tool and should not substitute for the text of the Bank’s Operational Policies (OPs) or Bank Procedures (BPs); but instead should be used to supplement information already provided in the Bank’s Environmental Assessment Sourcebooks and Updates, and in the ten safeguard policies. (1) In addition, it should not replace the case-by-case project evaluation to be carried out by the Regional Safeguard Team nor the input provided by the Environmental and Social Specialists assigned to the Project.

1.2 STRUCTURE AND CONTENT

The manual contains three subsequent chapters and thirteen annexes. Chapter 2 provides a detailed description of the steps for processing safeguard requirements in CDD projects. The chapter is divided into stages: project concept, preparation, appraisal, and implementation. Chapter 3 discusses the various methods for community participation and consultation in CDD as it relates to environmental and social safeguard policies. Chapter 4 discusses the role of the Bank in providing Client countries with technical assistance and capacity building for improving their safeguard compliance in CDD.

The attached annexes provide supporting information for each chapter including good practice examples for terms of reference for various safeguard requirements. Links are highlighted throughout the Manual to guide the reader to additional references relevant to the topic.

(1) www.worldbank.org/essd
2 PROCESSING SAFEGUARD REQUIREMENTS FOR CDD PROJECTS

2.1 MAINSTREAMING SAFEGUARD POLICIES INTO CDD

There are two distinct phases to all Bank projects: (a) the project development phase which consists of project concept, preparation, appraisal, and negotiation, and (b) the project implementation phase which consists of disbursement, supervision, monitoring and evaluation.

The key to effective mainstreaming in CDD projects is to ensure that environmental and social safeguard measures are taken into account during project design and implementation. This requires collaboration between the Task Team Leader (TTL), the Environmental and Social Specialists assigned to the project and the appropriate stakeholders in-country.

In addition, there needs to be adequate in-country institutional capacity at the national, regional and local levels for managing community development plans. An effective decentralized government administrative structure to support the community during subproject implementation is critical for ensuring that these types of projects are successful. More importantly, stakeholder consultation should be an integral part of project design and implementation to ensure that communities are driving the process.

2.1.1 Safeguard policies and procedures

Under the Bank’s operational policies, there are ten environmental and social policies referred to as the Bank’s “safeguard policies”. The full texts for these operational policies (OPs), along with the relevant Bank Policies (BPs), are available on the World Bank website: www.worldbank.org/safeguards. The “MNA Guidebook for the Preparation of Environmental Assessments (June 2000)” (1) and the World Bank EA Sourcebook Updates (2) are also good guidance references on safeguard compliance.

All Bank projects are also required to comply with the Bank’s Public Consultation and Information Disclosure Policy (OP 17.50), which defines the Bank’s requirements for giving the public access to project information and documentation. (3) This is discussed in more detail in Chapter 3.

Table 2.1 on the following page outlines the core requirements under each policy.

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(1) http://lnweb18.worldbank.org/mna/mena.nsf/Attachments/EIA+Eng/$File/Env_Assessment+eng1.doc
(2) http://lnweb18.worldbank.org/ESSD/envext.nsf/47ByDocName/ToolsEnvironmentalAssessmentSourcebookandUpdates
(3) There is no formal policy on the disclosure of safeguard documentation for CDD projects; however, as CDDs are similar to FIs in that they finance numerous smaller investments, then Par. of the Bank's Policy can be used as the appropriate guidance.
<table>
<thead>
<tr>
<th>Policy</th>
<th>Summary of Core Requirements</th>
<th>Public Consultation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental Assessment</td>
<td>• Screen early for potential impacts and select appropriate instruments to assess, minimize, and mitigate potentially adverse impacts.</td>
<td>• Consult affected groups and non-governmental organizations (NGOs) as early as possible (for Category A and B projects)</td>
</tr>
<tr>
<td>(OP/BP 4.01)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Natural Habitats</td>
<td>• Do not finance projects that degrade or convert critical habitats. Support projects that affect non-critical habitats only if no alternatives are available and if acceptable mitigation measures are in place.</td>
<td>• Consult local people in planning, designing, and monitoring projects.</td>
</tr>
<tr>
<td>(OP/BP 4.04)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pest Management</td>
<td>• Support integrated approaches to pest management. Identify pesticides that may be financed under the project and develop appropriate pest management plan to address risks.</td>
<td>• Consult local people in planning, designing, and monitoring projects.</td>
</tr>
<tr>
<td>(OP 4.09)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Involuntary Resettlement</td>
<td>• Assist displaced persons in their efforts to improve or at least restore their standards of living.</td>
<td>• Consult project affected persons and host community; incorporate expressed views in resettlement plans; list choices made by project affected persons.</td>
</tr>
<tr>
<td>(OP/BP 4.12)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Indigenous Peoples</td>
<td>• Identify adverse impacts and develop a plan to address them. Design benefits to reflect the cultural preferences of indigenous peoples.</td>
<td>• Consult indigenous people throughout the project cycle.</td>
</tr>
<tr>
<td>(OD 4.20)</td>
<td>(1)</td>
<td></td>
</tr>
<tr>
<td>Forests</td>
<td>• Support sustainable and conservation-oriented forestry.</td>
<td>• Consult local people, the private sector, and interest groups in the forest area.</td>
</tr>
<tr>
<td>(OP/BP 4.36)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Safety of Dams</td>
<td>• For large dams, technical review and periodic safety inspections by independent dam safety professionals.</td>
<td>• No public consultation required.</td>
</tr>
<tr>
<td>(OP/BP 4.37)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cultural Property</td>
<td>• Investigate and inventory cultural resources potentially affected. Include mitigation measures when there are adverse impacts on physical cultural resources.</td>
<td>• Consult appropriate agencies, NGOs, university departments and residents/stakeholder groups.</td>
</tr>
<tr>
<td>(OPN 11.03)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Projects in International</td>
<td>• Ascertain whether riparian agreements are in place, and ensure that riparian states are informed of and do not object to project interventions.</td>
<td>• No public consultation required. Riparian notification required.</td>
</tr>
<tr>
<td>Waterways</td>
<td>(OP/BP 7.50)</td>
<td></td>
</tr>
<tr>
<td>Projects in Disputed Areas</td>
<td>• Ensure that claimants to disputed areas have no objection to proposed project.</td>
<td>• No public consultation required. Claimants informed.</td>
</tr>
<tr>
<td>(OP/BP 7.60)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>


(1) The Indigenous Peoples Policy (OD 4.20) and the Cultural Property policy (OPN 11.03) are currently under revision.
2.2 **Project Concept**

At the project concept stage, the first step is for the TTL to determine the nature and scale of interventions in the proposed CDD project and identify the potential environmental and social issues related to these interventions. The team can then prepare a preliminary Integrated Safeguard Datasheet (ISDS) to identify which safeguard policies are triggered as a result of the project.

A one page step-by-step guidance for the preparation and implementation of safeguard requirements for CDD projects is provided in *Annex 1*. The following chapter provides a more detailed explanation of each step.

2.2.1 **Preparing the Integrated Safeguard Datasheet**

The objectives of the ISDS are to:
(a) help task teams and safeguard specialists identify and address potential adverse environmental and social impacts of Bank supported projects as early as possible in the project cycle;
(b) help borrowers plan for safeguard measures to be integrated into project design; and
(c) engage environmental, social and sectoral management in the planning and programming of safeguard policies measures.

**Assigning the EA Category**

Under OP 4.01 (Environmental Assessment), CDD projects are generally categorized as EA Category B, and screening mechanisms should ensure that any identified Category A subprojects are not funded under the project. As Category B projects, CDD projects require a limited, but appropriately scaled EA study, and development of clear due diligence environmental and social procedures (including the setting out of institutional responsibilities, timing and budget) for sub-projects. The study should take into consideration the applicable requirements under the Bank’s ten safeguard policies.

The responsibility of assigning the EA category rests with the safeguard group affiliated with the Region’s operational department. The EA category is assigned during project appraisal. The justification for classifying these types of projects as EA Category B lies in the fact that individual subprojects or works to be financed under a CDD project are generally small in scale; hence, any environmental and or social impacts which may occur are also small in scale and/or can be mitigated and managed with conventional measures.(1) In fact, in some cases, CDD projects can lead to major positive environmental benefits in the form of reduced deforestation, increased vegetation cover, reduced soil erosion, expansion of mangrove areas, reversal in the decline in fisheries catch, resulting from soundly-implemented community natural resource management subprojects financed under the project.

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(1) Where details of all subprojects to be financed are known, CDD projects are generally categorized as Category B. However, depending on the location of subprojects and their expected impacts, there may be justification for assigning a different EA category.
2.2.2 Processing of the ISDS

The Task Team Leader with the cooperation of the regional safeguard policy specialists is responsible for filling out the ISDS. If the Region cannot come to closure on critical aspects of the ISDS, to the point that signatories do not agree to endorse the content of the ISDS, then the Safeguards Management and Review Team (SMART), made up of regional and policy specialists, should be called upon to resolve differences.

The first version of the ISDS should be prepared as early as possible in the project cycle, preferably at PCD review stage, along with the Project Information Document (PID). The ISDS should be sent to regional management for approval (sector director – or equivalent – in charge of the safeguards and sector director – or equivalent – in charge of the sector). Upon receiving regional management’s approval, the TTL forwards the ISDS to the Info Shop and copies the Safeguards Director or equivalent and the sector director with the signed ISDS. The Info Shop needs to have received the ISDS before the project can move to the Project Appraisal Document (PAD) stage.

Annex 2 describes the proper approach to preparing an ISDS for CDD projects.

2.3 PROJECT PREPARATION

Early during project preparation, the Borrower should undertake a safeguards assessment to identify the typical impacts associated with the types of activities to be financed under the proposed project and the applicability of the safeguard policies. An outline of the suggested content for a safeguard assessment is listed in Box 2.1.

### Box 2.1 Outline for a Safeguards Assessment

The safeguards assessment should:
- Describe the types of subprojects that will be supported under the project and information on the locations in which they will occur;
- Analyse the main likely adverse impacts of a representative sample of subprojects with reference to the requirements of the safeguard policies and procedures;
- Analyse the potential cumulative impacts of all subprojects that will be funded under the project;
- Propose possible changes/modifications in project design to help prevent adverse impacts;
- Assess the existing institutional arrangements and organizational capacity to implement mitigation measures and monitor outcomes.


2.3.1 Triggering Safeguard Policies

Typically, safeguard policies are triggered in projects that finance infrastructure development activities; however, as CDD projects tend to cover multiple sectors (refer to Box 2.2), it may be difficult to assess those safeguard policies that will be triggered without knowing the specific activities to be financed.
Environmental Safeguards

The environmental safeguards are usually defined as the OP 4.01 (Environmental Assessment), OP 4.04 (Natural Habitats), OP 4.09 (Pest Management), OP 4.36 (Forests), OP 4.37 (Safety of Dams), OPN 11.03 (Cultural Property) and OP 7.50 (International Waterways). In almost all CDD projects, the OP 4.01 is triggered and generally requires the preparation of an EA and EMP. Annex 3 provides overall guidance on how to address requirements of these safeguard policies for CDD.

Social safeguards

Social safeguards, commonly known as the OP 4.12 (Involuntary Resettlement and OP 4.20 (Indigenous People), are usually triggered by CDD projects when there is an issue of involuntary resettlement associated with activities to be financed under the project or when there are anticipated negative impacts on indigenous or vulnerable groups such as tribal communities (e.g. Bedouins).

If the OP 4.12 is triggered, the Bank would typically require the elaboration of a Resettlement Policy Framework, which is explained in more detail in Annex 4. The RPF should detail the steps for preparing abbreviated Resettlement Action Plans (RAPs) for subprojects. An example Terms of Reference for an RPF is provide in Annex 5. If the OP 4.20 is triggered, the Bank requires an Indigenous People Development Plan (IPDP) to be submitted prior to appraisal. (2)

Box 2.2 Main development sectors targeted under CDD in MNA

In MNA, CDD subprojects tend to range between $50,000 (e.g. education investments under the Yemen Social Development Fund II) to $1 million (e.g. rural roads in the Egypt Matruh Resource Management Project II) and cover a wide range of development sectors including:

- Small and medium size enterprises (SMEs) and micro-credit
- Water supply and wastewater treatment
- Health and sanitation
- Solid waste management
- Irrigation and drainage
- Small scale agriculture
- Education
- Rural roads
- Electricity
- Capacity building and training

(1) OP 7.50 (International Waterways) and OP 7.60 (Projects in Disputed Areas) are also considered a safeguard policies but are usually dealt with by the Bank’s Legal Department.

(2) The OP 4.20 safeguard policy related to Indigenous People is not commonly triggered in the MNA region, and therefore it is uncommon for IPDPs to be prepared. Usually the issue of vulnerable groups and ethnic tribes is addressed in the design of the project.
It should be emphasized that safeguards, especially social safeguards, should be built into the design of CDD operations to protect indigenous or vulnerable groups; encourage their participation in the projects; minimize displacement of people in subproject areas, and where involuntary resettlement is unavoidable, ensure adequate compensation of affected persons. For this purpose, under some existing CDD operations in MNA (e.g. Yemen Rural Roads Sector Project), ethnic minorities action plans and resettlement and compensation policy guidelines, within the framework of the Bank’s OD 4.20 and OP 4.12, were specifically agreed with the Borrower and included in the PAD.

**Safeguards assessment findings**

Based on the findings of the Safeguards Assessment, the following information should be included in the Project’s Operational Manual (OM): (a) systems and procedures to screen subprojects for safeguard issues; (b) process to design and implement appropriate mitigation measures; and (c) arrangements to monitor subproject activities (refer to Section 2.3.1).

If the review of existing legislation and institutional arrangements at national, district and community levels indicates weak institutional linkages and capacities, a number of strategic actions may need to be taken to redress imbalances in the interests of mainstreaming environmental and social safeguards. These may include: strengthening linkages and coordination with existing management programs and institutions; encouraging the formation of committees at community levels and strengthening linkages with the environment ministry or agency. (1)

The OM should include an estimate of the costs of implementation of these measures. This cost, and its funding source, should be included in the project’s PAD.

In addition, the Borrower should undertake a limited EA study to identify the typical impacts associated with the types of activities to be financed under the proposed CDD project. The PAD should ultimately reflect the findings of the EA and should include coverage of safeguard policy issues in the terms of reference (TOR) for the mid-term review. In addition, an estimate of the costs of implementing safeguard measures should be incorporated into the project budget.

### 2.3.2 Requirements for an EA Study

The Borrower is responsible for preparing the Terms of Reference for the EA study. The EA study should be carried out by qualified consultants and should result in the following:

- An Environmental Management Plan (EMP) for the Project; and
- Detailed safeguard compliance procedures for subprojects in the form of an “Environmental and Social Guidelines Manual”.

The EA should aim to promote communication among local officials, developers, community leaders and NGOs about the nature of the proposal and potential impacts on the local environment. Public consultation is integral to the EA study. This topic is discussed in detail in *Chapter 3*.

*Box 2.3* outlines the recommended qualifications for environmental and social specialists needed to carry out this study.

An EA study for a CDD project should provide the following key outputs:

- Identify the types, nature and scale of interventions under the CDD components of the project;
- Determine based on knowledge of these interventions, whether the proposed investments may result in environmental or social impacts;
- Propose mitigation and monitoring measures in the form of a project-EMP (and/or subproject EMPs) and applicable safeguard documentation (IPDP, RAP/RPF) to address potential impacts;
- Evaluate the existing institutional capacity of the Borrower to manage the recommendations for implementing the measures outlined in the EMP;
- Provide recommendations to build capacity and strengthen environmental management;
- Develop procedures to identify and address potential environmental and social safeguard issues of CDD subprojects;
- Provide a detailed budget for mainstreaming environmental and social issues into the CDD project budget.

A good example of a Terms of Reference for an EA study for a CDD type operation is provided in *Annex 6*.

**Box 2.3 Qualifications and skills needed to carry out an EA for CDD projects**

1. The Consultant(s) should demonstrate:
   - General EA experience;
   - Familiarity with World Bank Safeguard Policies and Operational Procedures; and
   - General participatory (involving community, beneficiary groups and other stakeholders) social assessment experience.

2. The Consultant team should preferably be:
   - Environmental specialists;
   - Socio-economic specialists; and
   - Specialists in participatory and stakeholder consultations.

3. The Consultant(s) should have more specific expertise in the following areas:
   - Development and application of environmental and social management systems for screening and managing CDD sub-projects;
   - Knowledge of the environmental and social issues associated with the development sector(s) in which the CDD projects will be active;
   - Participatory interviews, focus groups and stakeholder consultation;
   - Capacity building and training at the community and local government level; and
   - Monitoring and evaluation of sub-projects.
National legislation and permitting licenses

An important aspect of the EA study should be to identify any provisions under national policies and legislation in the Client country used to address specific environmental and social concerns that may arise from construction/rehabilitation of proposed socio-economic infrastructure and describe their relevance to the CDD project being proposed. Provisions may include pollution control standards, natural resources management, wildlife protection laws, land tenure policies, property laws, cultural heritage, etc.

In addition, the EA study should identify any international conventions that may apply to the project, particularly in CDD projects funding small-scale irrigation and water supply investments. In the MNA region, international waterways is a sensitive issue particularly as concerns the Nile River and the Mediterranean Sea, and there are a number of conventions which apply to these water bodies.

The EA study should also identify any existing national requirements for obtaining environmental permits or licenses. Depending on the size and nature of the subproject, it is likely that the majority of subprojects funded under a CDD project will need the approval of the municipality in charge; however, a few sub-projects may require permits or approvals from line ministries.

2.3.3 Preparation of an EMP

The Borrower or sponsor is responsible for preparing the EMP. The objective of the EMP is to cater to the environmental and social needs of the project in a simple, responsive and cost effective manner that will not unnecessarily overload or impede the project cycle. The EMP should outline the measures needed to address the issues identified during the EA study. Moreover, a good EMP should demonstrate that proposed monitoring activities will encompass all major impacts and identify how they will be integrated into project supervision.

The EMP should be a simple two to four page document that outlines the following:

- Main environmental and social mitigation measures;
- Environmental training and capacity program; and
- Environmental and social monitoring program.

It important that the EMP identifies linkages to other safeguard policies (OPs) relating to the project, such as OPs dealing with resettlement or indigenous people issues. The EMP should also describe proposed mitigation measures to facilitate public consultation. An example of an EMP format (Project EMP and subproject EMP templates) is provided in Annex 7.

In addition, a brief implementation plan for the EMP including costs, timetable and assigned responsibilities should be included, as is outlined Annex C to OP 4.01. The PAD should summarize the main measures contained in the EMP, including environment-

related loan or grant conditionalities and covenants and the program and budget for environmental supervision. During negotiations, the TTL is responsible for translating the mitigation measures in the EMP into the project implementation/operation manual and financing agreements. The EMP should be suitable for public disclosure in country and at the Bank’s Infoshop.

When implemented effectively, the EMP will ensure that: (a) any environmental or social issues or concerns are addressed in the design phase of the subprojects; (b) mitigation measures minimizing environmental and social impacts are being implemented; and (c) monitoring for compliance and sound environmental and social performance is continued.

### 2.3.4 Subproject Screening Procedures

Another key output of the EA study and the safeguards assessment is to develop the procedures for screening and appraising proposed investments under the CDD program. Annex 8 illustrates the appraisal process for subprojects.

In some cases, the nature and scale of interventions might be known during project preparation, in which case, it is important to address any potential issues as early as possible. (1) In the majority of cases, the types of subprojects to be financed are not usually known during project preparation. Thus, there are two approaches to addressing subprojects:

**For subprojects that have been identified prior to appraisal:**
For subprojects such as a wastewater treatment plant or a solid waste landfill that may result in adverse negative impacts (i.e. high risk subproject, refer to Table 2.2), a subproject specific EA should be carried out. The subproject EA (10-15 pages) should follow the format provided in Box 2.4 below.

For all other subprojects with less significant impacts such as rural roads, drainage canals, sewage treatment plants, etc., a generic EMP can be prepared for the subproject type. These subproject EMPs must be disclosed in-country and at the Infoshop and receive clearance by the Bank. For those subprojects which may result in land acquisition or involuntary resettlement, an abbreviated Resettlement Action Plan (RAP) is usually required (refer to Box 2.6 for more detail).

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(1) The a priori knowledge of the environmental and social impacts of a typical CDD (usually more well known with social funds) is very limited. Hence, the future location, nature and sometimes sector of CDD activities are largely unknown during preparation and useful knowledge about the subprojects of the CDD can only be acquired once selection of subprojects has taken place, generally during project implementation.
For subprojects that have not been identified prior to appraisal:

The Borrower must agree to develop safeguard procedures for screening and appraising subprojects during implementation of the project. *Annex 9* provides an example of a screening checklist for subprojects. These procedures can be developed into an Environmental and Social Guidelines Manual or can be inserted as a section in the project’s Operational Manual. The Manual should also include a negative list of activities that the CDD project will not fund, as well as a list of goods and services that the CDD project will not procure.

An indicative list of subproject investments ineligible for investment is provided in *Box 2.5*.

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**Box 2.4  Contents of an EA for a CDD subproject**

- Description of the subproject (size, technical requirements, cost, etc)
- Description of the site and possible alternatives
- Brief description of the environmental and social baseline of the site
- Potential environmental and social impacts
- Proposed mitigation measures and remedial actions
- Monitoring of mitigation measures
- Subproject specific training needs
- Estimated costs of implementation

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**Box 2.5  Activities and investments ineligible for investment**

- Category A subprojects (1)
- Religious infrastructure;
- Headquarters for cooperatives, groups, or executing organizations;
- Acquisition of equipment for government services.
- Administrative buildings (except accommodations for health workers, and primary school teachers);
- Activities already covered by other sources of financing or are already included in other national, regional public development programs and where financing has been secured;
- Purchase of mechanical equipment (e.g. trucks, tractors);
- Growing or purchase of tobacco or drugs; and
- Investment in bars, nightclubs or related trades.

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1 This list will have to be made by each country in consultation with stakeholders and experts. The actual activities included in the list will vary according to the project and country context. It should also reflect the views of the major stakeholder groups. Examples of specific activities not financed by the World Bank Group include: salaries to any persons other than providers of frontline services; contributions to political parties, (1) Category A projects would include primary and secondary roads and highways greater than 1km; activities which may encroach on critical natural habitats, protected areas, or cultural property; or those that lead to the conversion of critical natural habitats, including protected areas; result in major resettlement; or lead to significant adverse environmental impacts that are sensitive, diverse or unprecedented.
trade unions or any other interest groups; projects with a religious color (building of mosques, cemeteries); projects that may lead to pollution, deforestation, or other environmental problems.

**Environmental and Social Guidelines Manual**

In addition to an EMP, the EA study should result in a defined process for subproject safeguard compliance, preferably in the form of an Environmental and Social Guidelines Manual, which includes the following contents:

- A description of the environmental policy and legal framework in the Client country relevant to the safeguard policies triggered in the Project;
- Identification of good practices for environmental and social mitigation;
- Safeguard screening procedures to review sub-projects;
- A description of appropriate public consultation/participation techniques to identify potential environmental and social impacts;
- Typical terms of reference for sub-projects that require site specific EMP and/or abbreviated RAP, as a result of the screening process;
- A training and capacity building program for various stakeholders (refer to Chapter 4); and
- Monitoring indicators for implementation of the EMP and subproject EMPS and/or RAPs.

It is recommended to include good practice examples in the manual pertaining to site selection, environmental design, public health regulations, safety standards, environmental regulations, etc. These should be short and concise (1-2 pages) per type of sub-project and can be appended to bidding documents. *Annex 10* presents a set of construction and operational guidelines for contractors.

**Subproject Environmental Management Plan (EMP)**

For subprojects that are anticipated to result in environmental or social impacts, a site specific EMP is required. The EMP should be short (1-2 pages) and include the contents listed in *Box 2.6*. A recommended format for a subproject EMP is provided in *Annex 7*.

**Box 2.6 Contents of a subproject EMP**

- Potential environmental and social impacts related to siting, construction and operation of the subproject
- Mitigation and monitoring measures to address potential impacts
- Responsibilities for monitoring EMP requirements
- Training and capacity building requirements for project officers and communities
- Estimated budget for implementation and training
Subproject Resettlement Action Plan

For subprojects that will result in involuntary resettlement, an abbreviated RAP should be prepared. An outline for a subproject RAP is provided in Box 2.7 below. Annex 4 provides more detailed guidance on addressing involuntary resettlement in CDD.

<table>
<thead>
<tr>
<th>Box 2.7</th>
<th>Contents of an abbreviated RAP for a CDD subproject</th>
</tr>
</thead>
<tbody>
<tr>
<td>o</td>
<td>Project description and location</td>
</tr>
<tr>
<td>o</td>
<td>Potential displacement due to project activities</td>
</tr>
<tr>
<td>o</td>
<td>Legal framework</td>
</tr>
<tr>
<td>o</td>
<td>Census and socio-economic survey of affected properties, families and/or businesses</td>
</tr>
<tr>
<td>o</td>
<td>Impacts caused by displacement</td>
</tr>
<tr>
<td>o</td>
<td>Main findings of socio-economic survey</td>
</tr>
<tr>
<td>o</td>
<td>Proposed assistance to resettled families</td>
</tr>
<tr>
<td>o</td>
<td>Responsible agency and/or entities (e.g. NGOs)</td>
</tr>
<tr>
<td>o</td>
<td>Source of budget and cost estimate</td>
</tr>
<tr>
<td>o</td>
<td>Resettlement schedule</td>
</tr>
<tr>
<td>o</td>
<td>Monitoring/follow up activities</td>
</tr>
<tr>
<td>o</td>
<td>Evaluation</td>
</tr>
</tbody>
</table>

2.3.5 Impact Analysis

CDD projects are not likely to result in significant adverse environmental or social impacts, as their main objective is to provide local communities with adequate financial and technical support for community development. However, if not carefully designed and implemented, these types of projects can lead to negative environmental and social impacts, particularly those which entail investments in infrastructure development and new construction (e.g. rural roads). Furthermore, weak or inadequate capacity for designing, managing and monitoring subprojects can lead to poor design and implementation and exacerbate adverse impacts.

Thus, it is important to identify potential risks early in project preparation and design, both in terms of the project’s overall design and of the program’s specific investment activities. Impacts can be divided as such:

- general environmental and social concerns during construction;
- general environmental and social concerns during operation;
- low risk impacts specific to certain types of small scale investments; and
- high risk impacts associated with small scale investments of a certain nature and scale.

General environmental and social concerns during construction

These concerns generally exist in many of the subproject categories (education, health, transportation, water supply, etc) during the construction phase. These concerns are usually minor and can be easily addressed using appropriate mitigation measures in the civil works contracts.
The most important issues include:
- Construction and demolition waste
- Risk of damage to archaeological or historical sites
- Risk of destruction of wildlife habitats

**General environmental and social concerns during operation**

These are concerns most typical in the operation of subprojects, primarily in the education and health sectors. General issues during operation include:

- Availability of functioning and maintained sanitation facilities (often not functioning due to a water shortage);
- Improper disposal of municipal wastewater; (e.g. establishments such as schools or healthcare units may dispose their wastewater in percolation pits without conducting an assessment of the surrounding environment, so it is important to identify its sensitivity and accordingly whether there are potential environmental and/or public health risks); and
- Improper management of municipal solid waste generated by the subproject (and other potential sources). This usually results in the accumulation of municipal waste on or around the subproject premises/area.

**Low and high safeguard risks associated with subprojects**

Certain types of small-scale projects can be considered high risk (e.g. new rural roads, waste treatment plants) while others can be considered low risk (rehabilitation of wells and boreholes, construction of classrooms). High-risk subprojects are those that require a site specific EA or detailed EMP because they present potential adverse environmental and social risks. Low-risk subprojects are those that have minimal to no impacts and can be managed through the insertion of clauses within the construction and supervision contracts. Some types of subprojects such as training and capacity building or dissemination of toolkits and school accessories do not present any risk and can be appraised without any safeguard measures.

The following Table 2.2 provides an illustration of these safeguard risks. **Annex 11** presents a more detailed representation of the types environmental and social impacts typically associated with CDD subprojects.
### Table 2.2 Safeguard risks of CDD investments

<table>
<thead>
<tr>
<th>Types of small scale investments</th>
<th>No risk</th>
<th>Low risk</th>
<th>High risk</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Education</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construction of classrooms</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Teacher housing</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Fencing</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Provision of classroom furnishings</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>School supplies and medical kits</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Laboratories</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Sports fields/recreation facilities</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Functional adult literacy activities</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td><strong>Water Supply</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Water point rehabilitation</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Tertiary distribution piping</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Hand dug wells</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Spring protection</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Earth dam rehabilitation</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Community reservoirs</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Retaining walls</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Dams with capacities over 500,000m³</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Drainage canals</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Water harvesting facility</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Water treatment plant</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Hand pumps and mechanized boreholes</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Gravity water schemes</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td><strong>Sanitation and Waste Management</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Washing facilities</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Public toilets/pit latrines</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Sewerage facilities and collection</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Sewage treatment lagoons</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Soak pits and septic tanks</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Composting sites</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Waste disposal facility</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Solid waste landfill</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Wastewater systems and treatment plants</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td><strong>Health</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construction of health centers</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Healthcare waste management</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Dispensaries</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Emergency rooms</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Maternity clinics</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>HIV/AIDS control centers</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Laboratories</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td><strong>Transportation, Communication and Energy</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tertiary and secondary level roads and bridges</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Primary level culverts and bridges</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Footpaths</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Rural telephone</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Rural electrical distribution</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Photovoltaic cells</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Biogas</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>Windmills</td>
<td></td>
<td></td>
<td>✗</td>
</tr>
</tbody>
</table>
Involving the community in impact identification

In analyzing the impacts of a CDD operation, it is important to involve the community during the EA study and during the subproject screening to effectively identify the environmental and social issues related to the subprojects. This will give the communities an opportunity to provide valuable input into the local planning and decision-making process and will ensure that subprojects are carefully designed to meet the communities’ needs without unnecessarily damaging the environment.

The following steps should be taken into consideration during the EA study:

- Evaluate both positive and negative impacts of the proposed development for each of the impact areas;
- Focus on significant impacts, not on the nominal effects of development;
- Give high priority to community values and long-term goals of the community when assessing impacts;
- Involve the community in evaluating impacts, especially during the socio-economic impact assessment process (including resettlement planning); and
- Consider direct impacts as well as cumulative impacts of the development.

Cumulative impacts

The cumulative impacts are often the most difficult to assess, yet may have the most significant consequences; therefore, these impacts should be carefully considered in the design and implementation of CDD projects. In CDD programs, there are likely to be many community subprojects, which if concentrated in a certain area (e.g. a small river basin) may cause cumulative impacts on natural resources.
Cumulative impacts can also result from the combined impact of more than one project or large scale program occurring within the same area of influence and/or timespan. In such cases, cumulative impacts will have to be assessed during the design of the CDD and its proposed investments; TTLs should take into consideration the potential combined affects of other ongoing projects in the borrowing country. Examples of cumulative impacts are illustrated in Box 2.8.

<table>
<thead>
<tr>
<th>Box 2.8</th>
<th>Types of cumulative impacts associated with CDD projects</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Deforestation</strong></td>
<td>due to the exploitation of forest resources, owing to the use of poles and timber in small-scale construction.</td>
</tr>
<tr>
<td><strong>Groundwater degradation</strong></td>
<td>owing to the construction of numerous wells and to the introduction of numerous small scale irrigation works and potential cumulative impacts on water users (especially downstream users of potential river and streams).</td>
</tr>
<tr>
<td><strong>Resettlement</strong></td>
<td>due to the acquisition of land for the construction of schools, health centers, roads, wells, etc; <strong>induced migration</strong> of people due to increased degradation of natural resources in an area and attraction of large migrant populations to communities that have successfully introduced improve social infrastructure (such as schools, health centers or water sources) resulting in pressures that lead to overcrowding, depletion or constraint of resources (e.g. space, supplies, water), etc.</td>
</tr>
<tr>
<td><strong>Waste production</strong></td>
<td>due to multiple waste and dumping sites from uncoordinated waste management.</td>
</tr>
<tr>
<td><strong>Encroachment into protected areas</strong></td>
<td>due to increased proximity and access to protected areas through construction of small access roads.</td>
</tr>
</tbody>
</table>

### 2.4 PROJECT APPRAISAL

A major responsibility of the Bank appraisal mission is to assess the adequacy of accommodating safeguard policies and confirm that all organizational, capacity building and financial arrangements are in place. It is particularly important that mechanisms for review and approval of funding applications for subprojects are clear and that the required selected sites visits will be undertaken by the appropriate environmental/social specialist(s).

A key condition of appraisal is to produce the applicable safeguard requirements as identified during the safeguards assessment, including the EA and EMP and proposed mechanisms to manage environmental/social safeguard issues.

#### 2.4.1 Project Operational Manual

The EA study, including the EMP and Environmental and Social Guidelines Manual, must be disclosed to concerned local communities and to the Infoshop prior to appraisal and will be included as part of the Project’s Operational Manual (OM).

The Project’s OM should be prepared project preparation and finalized by appraisal. The OM will describe the procedures to be used in preparing and implementing subprojects...
financed by the funding agency and should detail the process and the necessary requirements to manage safeguards throughout the project cycle, particularly where demand driven investments cannot be identified upfront. The OM should include an indicative list of activities that the CDD will not finance (e.g. exclusion list), along with an indicative list of goods and services that the CDD will not procure such as previously illustrated in Box 2.3.

Finally, the overall project budget should incorporate the cost of implementing safeguard (mitigation) measures – screening mechanisms and preparation of environmental and social assessments of subprojects, capacity building and institutional arrangements and monitoring and evaluation – as stipulated in the EMP (and RAP/RPF if applicable). The ISDS should be updated to reflect these measures.

2.5 NEGOTIATIONS

The Project’s Operational Manual should be agreed upon with the Borrower and reflected in specific legal agreements at negotiations. The Minutes of Meeting should reflect the Borrower’s approval of the EMP and applicable safeguard requirements (i.e. RPFs/RAPs). Where appropriate, such agreements should also acknowledge the likelihood of changes to the project’s design during implementation.

2.6 PROJECT IMPLEMENTATION

At the project launch workshop, the environmental and social requirements under the project should be clearly explained to stakeholders. The Borrower and the Bank are responsible for the supervision of project implementation and monitoring. However, support to communities throughout the implementation process can be provided by a number of actors including district technical teams and NGOs. It is important to define the institutional arrangements and capacity from the start. This is discussed in more detail in Chapter 4.

The Borrower should carry out regular supervision through their local project offices and work with communities in obtaining accurate information to be used in measuring the effectiveness of the safeguard procedures for subprojects. The Bank will carry out regular supervision missions and report of project implementation and performance, including specific performance on safeguard compliance, as discussed in more detail below.

2.6.1 Supervision

CDD operations require intensive and continuous Bank supervision, especially during the first two years after project launch when community social preparation and capacity building activities are at a maximum. Country-based supervision, using locally recruited staff, is the most cost-effective way to provide the required Bank support. In some cases, the formation of a core safeguard team to supervise all CDD operations in a country can contribute significantly towards improved safeguard compliance.
Good supervision practice should focus on ensuring that: (a) there is timely and efficient implementation of agreed safeguard measures; (b) communities have received adequate and appropriate training and technical support; (c) the process of selecting subprojects is genuinely participatory; (d) communities “own” the subprojects and are actively participating in or monitoring subproject implementation; and (e) channels for complaints and seeking redress are well-understood and are dealt with promptly and fairly in order.

The Environmental and/or Social Specialists carrying out the supervision should concentrate on the following:

- Effective implementation of the project EMP and subproject EMPs (refer to Box 2.9);
- Identification of possible cumulative impacts from subproject implementation; and
- Implementation of activities carried out under the training and capacity building program (number of staff assigned to PIU/PMU and local project offices, workshops, training of trainers, etc).

During field visits to communities and subprojects, Bank supervision teams together with counterparts should actively engage communities in a dialogue on these issues. General guidelines for the supervision of CDD projects are provided in Annex 12.

**Box 2.9 Supervision of Environmental Management Plans**

The TTL develops, and agrees with the Borrower, supervision of the EMP within the overall plan for the project. Accordingly, the supervision arrangements for the EMP should summarize key areas on which supervision will focus—critical risks to implementation of the EMP, how such risks will be monitored during implementation and agreements reached with the Borrower.

Supervision of the EMP, along with other aspects of the project, covers monitoring, evaluative review and reporting and is designed to:
- determine whether the Borrower is carrying out the project in conformity with environmental safeguards and legal agreements;
- identify problems as they arise during implementation and recommend to the Borrower means to resolve them;
- recommend changes in project concept/design, as appropriate, as the project evolves or circumstances change; and
- identify the key risks to project sustainability and recommend appropriate risk management strategies to the Borrower.

It is vital that an appropriate environmental supervision plan is developed with clear objectives to ensure the successful implementation of an EMP.

Supervision reporting

CDD supervision teams should communicate their findings and recommendations to external and internal audiences using the same reporting instruments (PSRs, aide-memoires, BTO reports) as other Bank operations. The aide-memoire prepared in country right at the end of field supervision, and in many cases a follow-up letter from the responsible Sector Director to the head of the implementing ministry, constitute the principal means for recording and conveying formally supervision findings and recommendations to the implementing ministry, core ministries such as finance and planning, project management units (PMUs) at central and lower levels and other agencies involved in project implementation.

The PSR should summarize key findings and recommendations of the aide-memoire and records ratings of various aspects of project performance (e.g., development outcome, implementation progress, risks, compliance with safeguard policies). The PSR is intended to serve as the basis for discussion between the supervision team and sector and country managers, as well as provide inputs for aggregate portfolio reviews. Since the audience for an aide-memoire is diverse and includes in-country stakeholders and Bank staff, it is recommended that the central PMU disseminate the document promptly not only to central level project entities but also to PMUs and implementing units at lower levels. The aide-memoire should be translated into Arabic and French where necessary.

2.6.2 Monitoring and Evaluation

Given the dispersed nature of CDD operations with hundreds if not thousands of subprojects, an effective monitoring and evaluation program is critical to tracking implementation progress and identifying problems. Monitoring and evaluation requires continuous follow up by the local authorities and would include independent process monitoring (e.g., to ascertain the nature and degree of participation of ethnic minorities and women in subproject planning and implementation), monitoring by NGOs, and independent annual audits to determine if mitigation measures have actually been carried out.

Monitoring should focus on two main areas: (a) compliance monitoring to measure the effectiveness of subproject EMPs, and (b) ensuring that measures have been taken to include public participation in the decision making process.

Compliance monitoring

Compliance monitoring comprises on-inspection of construction activities to verify that measures identified in the EMP and included in the clauses for contractors are being implemented. This type of monitoring is similar to the normal tasks of a supervising engineer whose task is to ensure that the Contractor is achieving the required standards and quality of work. Thus, in some cases, such as in the First Municipal Infrastructure Project in Lebanon, the project was arranged so that the supervising engineer was made responsible for monitoring the subprojects, and if required, an environmental specialist could be called upon on a part-time basis to inspect certain mitigation measures on-site.
Community involvement in monitoring

As CDD is designed to involve communities directly in the subproject appraisal and implementation, the Borrower must ensure that communities are also involved in the monitoring of their own projects. This would involve the following:

- The community should develop its own set of monitoring indicators and describe a monitoring and evaluation plan on the subproject application form;
- All subproject accounting documents should be available for inspection by the community;
- Communities should ensure that mitigation measures as outlined in the EMP and subproject EMPs are effectively implemented to address identified issues and concerns; and
- The Borrower should ensure that audits are performed, whereby the community’s role would be to engage in these audits (refer to Box 2.10).

The community should also be expected to report periodically to the Borrower. Annex 13 presents a sample reporting form. This report should include a description of the physical progress of the subproject, a financial review indicating how funds received have been used to address environmental and social issues via the mitigation plan, and problems encountered as well as solutions undertaken during the reporting month.

A project management committee (or a synonymous committee as agreed with the Borrower) must notify communities and the Borrower immediately if problems arise that will significantly delay subproject implementation.

Environmental and social performance audit

It is recommended that the Task Team carry out an annual environmental and social audit of the project (especially at the mid-term review). This will identify any weaknesses or gaps in the project’s EMP and subproject safeguard compliance measures and provide an opportunity to improve on them, as illustrated in the example below (refer to Box 2.10).

Box 2.10  Example of an audit for the Yemen Social Fund for Development

The Yemen Social Fund for Development (YSFD), which was established in 1997, is entering its third phase. The YSFD aims to support projects in three main areas: community development, micro enterprise development and capacity building for NGOs. The project was selected by the Bank’s CDD group to be one of four “best practice” projects.

As part of the safeguard preparation for phase III, an environmental compliance and performance audit was carried out. The audit identified key gaps and/or weaknesses in the Project’s existing EMP and recommended improvements to enhance the EMP. A recommendation in the YSDF’s phase III EMP was to recruit an environmental consultant to conduct an annual environmental compliance and performance audit. The consultant and the Environmental Coordinator (EC) to the SFD management jointly presented an audit report. Based on the findings of this report, the Managing Director forwarded an ‘Annual Environmental Report’ to the World Bank.
The outcome of the audit will be to recommend, based on the site investigation and consultations with communities and local project officers, improvements to the safeguard screening checklists in order to fine-tune the EMP and safeguard screening procedure. A copy of the annual audit report should be submitted to the PMU, the World Bank and to the implementing partner (Ministry of Environment or parallel agency).

*Box 2.11* illustrates the generic requirements for preparing an audit.

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**Box 2.11: Sample TOR for an Environmental and Social Audit**

**Tasks**

The Consultant(s) will have to undertake the following tasks:

- Review the paper trail of screening checklists and EMPs and RAPs;
- On the basis of this review, select a number of community subprojects (20% of all subprojects) for field visits to investigate compliance with proposed mitigation measures and to identify potential impacts that are not being adequately identified or dealt with by field appraisal teams, or communities, specifically those that present cumulative effects; and
- Recommend practical improvements to the Manual (e.g. administrative roles and responsibilities, screening checklist, function of extension teams)

**Outputs**

A report of the annual performance review will be delivered to the Central PIU or PMU, the Client country and the World Bank, setting out:

- Summary of the numbers of subprojects that have been: (i) carried out, (ii) screened for environmental and social impacts, (iii) provided with technical advice from extension teams; and (iv) prepared with an EMP, RAP etc;
- Description of the actual operation of the Manual as it has occurred in practice and whether there are any gaps or weaknesses which need to be corrected or strengthened;
- Identification of environmental and social risks that are not being fully addressed or mitigated, with a focus on cumulative impacts;
- Conclusions on whether the project is maximizing its positive contribution to natural resources and environmental management;
- Areas for improvement and practical recommendations on how to address weaknesses in the Manual’s implementation and how to manage cumulative impacts.

**Timing**

The audit will be carried out at the end of each fiscal year throughout the lifespan of the project. The Consultant(s) should spend at least 2 to 3 weeks in the field (differs from case to case) looking at a sample of subprojects and should submit an audit report within 2 weeks of completing the field trips.
2.7 **Budgeting for Safeguard Compliance**

The most common costs associated with safeguards in CDD projects are generally in:

- Safeguard preparation (developing of the project EMP, Resettlement Policy Framework if applicable and Environmental and Social Guidelines Manual);
- Implementation of safeguard measures, including supervision and monitoring;
- Training and awareness; and
- Capacity building.

Costs vary significantly from case to case depending on the nature and scale of environmental and social issues associated with the project and the safeguard requirements for each. Based on existing CDD operations in the MNA region, the average budget allocated to safeguards is approximately US 800,000 to US 1 million (refer to Egypt MRMP example in Annex 7).

Due to the intensive supervision needs of CDD projects, it is recommended that TTLs allocate an above average budget (ie. US$100 - 125 k), to support project launch, capacity building and project buildup during the initial two years of implementation. Increased budgets should be supported by three year rolling supervision plans which detail supervision priorities, schedule and skills composition of missions for the current year and are indicative for the two outer years. Financing for these activities could come from project funds or trust funds.
3 COMMUNITY PARTICIPATION AND CONSULTATION

3.1 BANK POLICIES FOR PUBLIC CONSULTATION AND INFORMATION DISCLOSURE

The Bank’s OP 4.01 for Environmental Assessment requires public consultation and information disclosure for all Category A projects, and Category B projects where appropriate.

For Category B projects, the OP 4.01 requires during the EA process for the Borrower to consult with project-affected groups and local NGOs about the project’s environmental and social aspects and take their views into account. Consultation should be initiated as early as possible, and should be an ongoing process throughout the design and implementation of the project. Consultation should also be compliant with all other applicable safeguard policies (refer to Table 2.1).

In addition to the consultation process, the Bank requires that the project comply with the Public Consultation and Information Disclosure Policy (OP 17.50). The policy requires the Borrower to make accessible, in a timely manner, any relevant material such as the EA study, social assessments, RPFs/RAPs and IPDPs, in a form and language understandable to the groups being consulted.

3.2 ROLE OF COMMUNITIES IN CDD

In order to ensure the effective implementation of a CDD project, communities must be sufficiently self-organized to be able to access and make sense of information, make choices and determine priorities, mobilize resources, leverage financing or other assistance, and implement and manage subproject activities.

Community mobilization and capacity building techniques often need to be employed to assist communities in this process, particularly in terms of safeguarding their investments.

In addition, communities tend to be heterogeneous and explicit measures often need to be taken to assure that programs are socially inclusive of all groups – giving voice and decision making responsibility to women, the elderly, youth, religious and cultural minorities, indigenous and other ethnic groups, the HIV/AIDS-infected, and the disabled.

When community-driven development does not pay attention to issues of social inclusion, vulnerable groups may be excluded, investment choices may not reflect the true needs of the poor, and positive impacts may be significantly compromised. The community will have lower capacity to implement the project as intended, hence reducing the success of the project.
3.3 **Levels of Consultation and Participation**

As CDD is designed to be a demand-driven process, communities have to build ownership of their subprojects and accept responsibility to ensure that these investments meet all the Bank and Borrower requirements including safeguard measures. Therefore, it is important to ensure that the key stakeholders, particularly project affected persons residing near the project site (“communities”), are involved throughout the project in identifying environmental and social concerns, addressing them through appropriate mitigation measures, and participating in monitoring these measures. The EA Sourcebook Update “Public Consultation in the EA Process: A Strategic Approach” (May 1999) is a good reference guide and may be used to supplement this chapter. (1)

There are two main levels of participation and consultation as pertains to safeguards in CDD: (a) during the EA study, and (b) in implementation of the Project, particularly when using the subproject screening checklists and preparing the subproject EMPs/RAPs.

### 3.3.1 Consultation during the EA study

As part of the EA study, the EA Consultant is responsible for ensuring that the relevant stakeholders and community members are consulted. Identifying and consulting with stakeholder representatives, especially community leaders, is an efficient means for the Bank and Borrower to disseminate information to large numbers of stakeholders and receive feedback from them.

**Identifying stakeholders**

Once the government and the Bank jointly agree to work in a participatory stance, they begin the process of identifying the appropriate stakeholders. Typically, TTLs (and the EA consultant) collaborate with the government to identify relevant stakeholders by asking questions and seeking answers from both in country and Bank sources. (2)

The following is not an exhaustive list but rather suggests preliminary questions to guide TTLs:

- Who are the vulnerable groups in society?
- What are the groups likely to be directly impacted by the project (e.g. those living on or near the project site)?
- What are the groups likely to be indirectly impacted by the project (e.g. those living downstream from the site)?
- Who are the representatives of those likely to be directly and/or indirectly affected?
- Who in the community will represent the community and take responsibility for carrying out community commitments?
- What are the major obstacles to the project? Which stakeholder groups oppose the project and for what reason?

(2) World Bank Participation Sourcebook.
Often, the objective itself will help define the relevant actors. Sometimes, firsthand observation or accessing available in-country information can be used to identify appropriate stakeholders (refer to Box 3.1). In other cases, disseminating information about the proposed activity will enable interested stakeholders to make themselves known to project personnel.

**Box 3.1: Accessing in-country resources in Morocco and Yemen**

Many of the Bank’s borrowers have national institutes or centers with information demographic, cultural practices, and socioeconomic situation of the countries’ stakeholder groups. Local social scientists, academics, NGOs, government officials, and resident mission staff can also help identify appropriate stakeholders.

In the Egypt MRMP, for example, the designers created a small library of basic reference material about the Matruh Governorate and the Bedouins who reside therein. A consulting team provided social scientists and other skilled people to work with the project design team to identify the local stakeholders and their relationships to one another and the government. Local authorities assisted the task manager in identifying Bedouin representatives to serve on a joint task force.

In the Morocco Women in Development project, local consultants from the university drew up lists of potential stakeholders from the NGO and academic communities to invite to an initial planning workshop.


It is important to keep in mind that public involvement is a dialogue; a two-way communication that involves both getting information out to the public and receiving information from them in the form of ideas, issues and concerns. There is no single public participation method that will fulfill all needs, and a combination of methods is generally appropriate depending on the scope of the EA study, the objectives to be achieved, and the audience to be reached. (1)

**Public participation techniques**

Once the public is informed about the project, the next step is to provide for mechanisms by which the public can express their views. This can be carried out through one or more of the following consultation techniques illustrated in Table 3.1.

---

<table>
<thead>
<tr>
<th>Consultation technique</th>
<th>Process</th>
<th>Objectives</th>
<th>Representatives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Targeted meetings with key stakeholders</td>
<td>Identify key stakeholders and set up formal meetings and interviews with them One-on-one interviews</td>
<td>To inform stakeholders about the project and ascertain their views about the overall project and specific components of the project; With experts, review design options and solicit stakeholder feedback; In-depth interviews are useful when it is important to ascertain perceptions and learn more about how decisions are made within the cultural context.</td>
<td>Elected public representatives of regional, local, and villages councils; traditional representatives such as village headmen, tribal or religious leaders; and leaders of local cooperatives, other community based organizations, local NGOs and local women’s groups</td>
</tr>
<tr>
<td>Focus groups</td>
<td>Set up small focus groups or discussion groups selected either at random or to approximate demographics of the community. Should be conducted by a trained moderator and someone fluent in the local language(s) and dialect(s). 10 – 15 people per focus group</td>
<td>To learn through a process of discussion and debate, dissenting and consenting decisions among participants from the same stakeholder group.</td>
<td>Local disadvantaged groups such as the poor and women; indigenous or tribal peoples with special ties to the land, or who have land, resource and cultural rights that may be protected by national or international law; landowners; and squatters already on-site</td>
</tr>
<tr>
<td>Consultation technique</td>
<td>Process</td>
<td>Objectives</td>
<td>Representatives</td>
</tr>
<tr>
<td>------------------------</td>
<td>---------</td>
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<td>----------------</td>
</tr>
<tr>
<td>Public meetings</td>
<td>Schedule a public meeting in a venue accessible to the communities you are targeting. Identify community needs and potential list of subprojects, in order to understand the types of environmental and social issues to expect. A trained moderator and someone fluent in the local language(s) and dialect(s) should facilitate the meeting. 20 – 30 people per meeting</td>
<td>To disclose general information about the project to a wide diverse audience and receive feedback from individual participants through the use of bulletins, hotlines, and newspaper announcements; word of mouth: for illiterate populations.</td>
<td>Community representatives and larger groups of community stakeholders</td>
</tr>
</tbody>
</table>

The EA Consultant should pursue the consultation process during the EA study as an opportunity to identify and discuss options for mitigation and compensation (refer to Box 3.2). More importantly, by consulting with project affected persons, the Bank and Borrower can ensure that selected mitigation measures will be locally acceptable and cultural appropriate.

**Box 3.2: Identifying key issues during public consultation**

The EA Consultant should focus on identifying any existing environmental concerns of issues that communities are facing and should attempt to understand the types of investments that communities want to make. By asking questions such as those listed below, the EA Consultant will have a much better understanding of the issues associated with the project.

For example:

- Are there any prevailing and/or significant environmental, natural resource management or socio-economic issues which may affect the implementation of the Project?
- Are there any conflicts between traditional laws and practices and existing national regulations and legislation for environment and/or natural resource protection and use?
- Are there any traditional laws or practices for land ownership and tenure that need to be accounted for in the project design?
- Are there any key issues such as cultural heritage sites, natural protected areas, or water sources, which are not clearly indicated in available documentation, and should be considered in the project design?

These questions will facilitate in the design of a more project specific EMP and subproject screening guidelines.
3.3.2 Consultation during subproject screening

The second level of community consultation will be during subproject identification and screening. Depending on the arrangements of the project, NGOs or technical service providers (local government staff/local consultants) will be responsible for assisting communities in filling out the subproject screening checklist. Community concerns and in particular, community knowledge, will be important factors in completing the screening checklist. For example, in Jordan, women in Wadi Seer are known to play a traditional role in cultivating "medicinal herbs" gardens. Thyme and sage are planted in unexploited plots of land or between rows of olive trees in orchards. This is an important factor to consider in the siting of subprojects, especially if it involves land being donated by the community.

Communities should be involved in the decision making process; this includes reaching consensus about the subproject site; identifying environmental and social issues of concern; agreeing on the measures that should be taken to address these issues and mitigate against negative impacts; and participating in the monitoring of EMPs and RAPs for subprojects. Some key indicators for monitoring this level of participation are illustrated in Box 3.3 below. These should be applied during the annual supervision and monitoring of the project.

<table>
<thead>
<tr>
<th>Box 3.3: Indicators for monitoring public participation</th>
</tr>
</thead>
<tbody>
<tr>
<td>o Number and percentage of affected households consulted during the planning stage;</td>
</tr>
<tr>
<td>o Levels of decision-making of affected people;</td>
</tr>
<tr>
<td>o Level of understanding of project impacts and mitigation;</td>
</tr>
<tr>
<td>o Effectiveness of local authorities in making decisions;</td>
</tr>
<tr>
<td>o Frequency and quality of public meetings and other fora; and</td>
</tr>
<tr>
<td>o Degree of involvement of women or disadvantaged groups in discussions and follow on tasks.</td>
</tr>
</tbody>
</table>
4  CAPACITY BUILDING AND TECHNICAL ASSISTANCE

4.1 BUILDING CAPACITY FOR SAFEGUARD COMPLIANCE

For community-driven development to function well, communities must have the capacity to effectively manage their own projects. Capacity building is needed to (a) screen sub-projects executed by communities and local governments, (b) assist with the preparation of EAs, EMPs and RAPs where needed, and (c) create skills needed to review these documents and to translate them into simple executable plans.

Therefore, it is vital that a project allocate sufficient resources to training, capacity building and technical assistance for communities and local and national authorities, especially in the early years, to carry out the associated design, planning, approval and implementation work for the project. These efforts will not only benefit the Bank project, but will also build local capacity to undertake other development initiatives funded locally or by other donors.

In terms of safeguard compliance, CDD subprojects should begin with an assessment of the prospective community's ability to undertake safeguard related work. This can be done as part of the safeguards assessment during project preparation (refer to Section 2.3).

**Capacity building and institutional assessment**

One aspect of the safeguards assessment is to evaluate the Borrower’s institutional capacity to implement the safeguard requirements under the project.

The focus of this assessment should be to measure the adequacy of:
- national institutional structure, and its authorities at all relevant levels, to address environmental and social safeguard issues applicable to the project;
- existing laws, policies and regulations for environmental management, including those for administering permits and licenses;
- the number and qualifications of staff (civil servants, community organizations, external consultants) to carry out their responsibilities as outlined in the project’s OM;
- budgetary resources to support staff in their work; and
- knowledge and experience relevant to carrying out subproject EAs and designing mitigation measures for small-scale infrastructure.

If these areas are found to be weak, training or other capacity building activities should be undertaken.
4.1.2 Building capacity at various stakeholder levels

Specific capacities will need to be developed for all stakeholders in order to successfully implement the project, as outlined below:

Table 4.1: Targeting stakeholders in capacity building programs

<table>
<thead>
<tr>
<th>Category</th>
<th>Objective</th>
</tr>
</thead>
</table>
| Communities | o Training in how to use screening checklists to identify environmental and social issues associated with subprojects  
| | o Building skills in preparing and implementing EMPs and RAPs  
| | o Building technical know-how required to oversee contractors (environmental supervision)  
| | o Training for sustained use and maintenance of subprojects (e.g. hygiene education for rural water supply and operation and maintenance)  
| Local governments | o Ensure that local government officials have the capacity to assist communities in preparing their subproject proposals, and to appraise, approve and supervise the implementation of subprojects; Local government leaders should be involved in subproject selection and monitoring to build on-the-job capacity.  
| Private intermediary Providers (NGOs, small contractors, firms) | o Private intermediaries often play a key role in strengthening the capacity of community organizations. However, they also often require some capacity building in areas like monitoring of EMPs and RAPs.  
| | o Small contractors will also need to become familiar with good practice mitigation measures and environmentally sound construction techniques.  
| Project Management Unit | o Training in appraising, funding and monitoring subprojects (with a focus on the environmental and social safeguard requirements) - refer to the section below.  
| World Bank | o Funds and time for project preparation: It is critical to invest resources and time up front to adequately assess community needs (contractors, laborers, inputs, etc) and to design capacity building accordingly.  
| | o Legal issues: Legal specialists should be involved in some types of CDD projects where issues related to international waterways and land ownership are raised early during project preparation.  
| | o Knowledge transfer: The Environment and Social Department in MNA should focus on knowledge transfer across the regions.  

In-house capacity building

Normally, it is expected that a Project Management Unit, selected in accordance with specific criteria, will be in charge of the environmental and social requirements of the project, and that local municipalities or governorates will be working with communities to implement safeguard measures. However, there tends to be a limitation in available in-house resources to undertake safeguard related work, and this lack of resources may hinder effective implementation of the EMPs and RAPs.
If the PMU lacks the appropriate specialist(s), it is recommended that a qualified consultant be hired to undertake the following duties:

- Promote an understanding of the environmental and social requirements and guidelines of the CDD among the communities, NGOs and contractors and consultants;
- Ensure that the screening checklists are used effectively and regularly;
- Conduct site-specific review to examine the current environmental and social conditions and assess the potential environmental and social impacts associated with the sub-project(s);
- Determine mitigation measures for construction and operation phases of the sub-project(s) and develop an EMP (and/or RAP); and
- Monitor and supervise the plans.

As for the local implementing agencies such as municipalities, the selected government staff will be required to attend a comprehensive training program that will provide them with the necessary guidance to address the project’s safeguard requirements.

4.2 Training

A training program focused on environmental and social safeguard concerns should be part of the broader implementation of the project and should be included in the project’s overall training schedule. An example of a training program is provided in Table 4.2 below.

Table 4.2: Proposed environmental training program

<table>
<thead>
<tr>
<th>Group</th>
<th>Content</th>
<th>Format</th>
<th>Input</th>
</tr>
</thead>
<tbody>
<tr>
<td>PMU staff</td>
<td>Environmental awareness and the importance of effective mitigation</td>
<td>Half day seminar</td>
<td>0.5 days</td>
</tr>
<tr>
<td>Project appraisal engineers (PAEs)</td>
<td>Completion and assessment of subproject screening checklists, the circumstances under which clarification should be sought, and when an EA should be requested for a subproject</td>
<td>As with PMU staff, plus a one day seminar and one day workshop</td>
<td>2.5 days</td>
</tr>
<tr>
<td>Project implementation engineers (PIEs)</td>
<td>The interpretation of EA reports, methods of impact mitigation, the implementation and monitoring of EMPS/RAPs, environmental management and contractual implications</td>
<td>As for PAEs, plus a half day seminar and half day workshop</td>
<td>3.5 days</td>
</tr>
<tr>
<td>Project consultants</td>
<td>The importance of impact identification and mitigation in the approval of subproject funding, the implementation and monitoring of EMPS/RAPs</td>
<td>Half day seminar</td>
<td>0.5 days</td>
</tr>
<tr>
<td>Municipality staff</td>
<td>Environmental awareness, the importance of environmental issues in the approval of subproject funding, the requirements of screening checklists and EA reports and the implementation of EMPS/RAPs</td>
<td>Half day seminar</td>
<td>0.5 days</td>
</tr>
</tbody>
</table>

It is recommended that the training be held at regional centers and repeated at intervals as new personnel are likely to replace those in listed above.

As undertaken in the Lebanon First Municipal Infrastructure Project, the PMU and the EA consultants can carry out an initial training during the preparation of the project’s EMP and Environmental and Social Guidelines Manual; and then subsequent training of new staff can be performed through less formal in-house seminars and workshops run by previously trained staff.
Annexes
Annex 1

Step-by-Step Guidance of Safeguard Process for CDD Projects
Table 1: Step-by-Step Guidance of Safeguard Process for CDD Projects

<table>
<thead>
<tr>
<th>Bank requirements</th>
<th>Safeguard Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Step 1: Project concept</strong></td>
<td></td>
</tr>
<tr>
<td>o Ensure that PCN is consistent with CAS</td>
<td>o Environmental and social safeguards in CAS (if any)</td>
</tr>
<tr>
<td>o Preliminary project description</td>
<td>o Preliminary information on scale, nature and size of intervention for determining environmental and social impacts</td>
</tr>
<tr>
<td>o Identify risks (institutional, design and implementation) and mitigation</td>
<td>o Identify country and sector environmental and social risks and design risks</td>
</tr>
<tr>
<td>o Identify project preparation constraints</td>
<td>o Identify environmental and social specialists for Task Team</td>
</tr>
<tr>
<td>o Guidance on issues</td>
<td>o Identify preliminary implementing partners</td>
</tr>
<tr>
<td>o Proposed team composition and schedule</td>
<td>o Preliminary ISDS</td>
</tr>
<tr>
<td></td>
<td></td>
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<tr>
<td><strong>Step 2: Project preparation (from PCN to QER)</strong></td>
<td></td>
</tr>
<tr>
<td>o Carry out appropriate studies (technical, financial, economic, institutional, environmental and social)</td>
<td>o Carry out safeguards assessment and determine capacity</td>
</tr>
<tr>
<td></td>
<td>o Identification of local implementing agency for screening, EMP subproject preparation and supervision (template)</td>
</tr>
<tr>
<td></td>
<td>o CDD project EMP consists of:</td>
</tr>
<tr>
<td></td>
<td>o Safeguard screening criteria and process in the form of an Environmental and Social Guidelines Manual</td>
</tr>
<tr>
<td></td>
<td>o Negative list for subprojects</td>
</tr>
<tr>
<td></td>
<td>o Subproject EMPS (and RAPs if applicable)</td>
</tr>
<tr>
<td></td>
<td>o Budget for capacity building, training, and implementation of manual &amp; staffing needs</td>
</tr>
<tr>
<td></td>
<td>o Process/output environmental and social indicators</td>
</tr>
<tr>
<td>o Objectives and components fully appraised</td>
<td>o EA and EMP fully disclosed in country and at Info Shop</td>
</tr>
<tr>
<td>o Environmental and social sections fully described</td>
<td>o Option for incorporating Manual into Project Implementation Plan</td>
</tr>
<tr>
<td>o Appropriate safeguard policies triggered</td>
<td>o PIU should identify Environmental and Social specialists in country</td>
</tr>
<tr>
<td>o EMP (and if applicable RAP) budget included as separate line item in Project budget</td>
<td>o Update ISDS and disclose</td>
</tr>
<tr>
<td>o Disclose PAD and Operational Manual</td>
<td></td>
</tr>
<tr>
<td><strong>Step 3: Project appraisal (QER to Decision meeting)</strong></td>
<td></td>
</tr>
<tr>
<td>o Loan/credit agreements</td>
<td>o Include EMP and other applicable safeguard documentation (RPF/RAP, IPDP) as part of project description and PIP</td>
</tr>
<tr>
<td>o Project agreement</td>
<td>o Dated covenant, if necessary</td>
</tr>
<tr>
<td></td>
<td>o Minutes of Negotiation will reflect Borrower’s agreement on EMP</td>
</tr>
<tr>
<td><strong>Step 4: Negotiations</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Step 5: Project implementation</strong></td>
<td></td>
</tr>
<tr>
<td>o Project launch workshop</td>
<td>o Workshop on environmental and social requirements and safeguard screening procedures for subprojects</td>
</tr>
<tr>
<td>o Regular supervision</td>
<td>o Regular supervision reporting on status of EMP (and if applicable RAP) implementation in PSR and Aide Memoire</td>
</tr>
<tr>
<td>o Mid-term review</td>
<td>o WB thematic supervision on environmental and social aspects for sample of subprojects</td>
</tr>
<tr>
<td></td>
<td>o Re-assessment/modification of subproject screening criteria</td>
</tr>
<tr>
<td></td>
<td>o Assess progress towards environmental and social (process or outputs) indicators</td>
</tr>
</tbody>
</table>
Annex 2

Guidance on Preparing an Integrated Safeguard Datasheet (ISDS) for CDD Projects
Guidance for Preparing an Integrated Safeguard Datasheet (ISDS)

Section I of the ISDS addresses safeguard issues that were previously partially covered in the Environmental Datasheet, and provides a vehicle for information on all the ten safeguard policies. Project statistics are downloaded automatically from SAP. Users who want to change project statistics need to do so through SAP.

A. Basic Project Data
Project objectives and description are drawn automatically from the Project Concept Document (PCD). Project location should be completed and describe in some detail the social and geographical context in which the project will be implemented. Maps can be very useful and the task team is encouraged to have good maps developed, showing socially and environmentally sensitive areas.

B. Environmental Assessment
The EA category (as required by OP/BP 4.01) is imported from the SAP. When project design changes justify a change in EA category, the task team leader should make the corresponding changes directly in the SAP.

C. Safeguard policies
Relevant safeguard policies should be checked. The policies and guidance from the safeguard matrix for each policy can be obtained online by clicking on the title of the policy (e.g. “natural habitats”) in the ISDS.

Section II of the ISDS is new compared to the EDS, and users should keep the whole set of safeguard policies in mind when filling out this section.

D. Summary of Key Safeguard Issues
This set of questions requires users to focus on likely impacts of the project without safeguard measures, on the extent to which alternatives have been considered (for all safeguard policies, not just EA) and the strategy in place to (i) determine the safeguard measures to be implemented, and (ii) consult with the stakeholders and disseminate the results of the safeguards related work to be conducted.

Particular attention should be paid to the treatment of alternatives. For complex projects, the following categories of alternatives may be useful.

- Project Concept Alternatives: alternatives considered with respect to the scope, size and complexity of the project and of and major project components (sometimes called project scenarios)
- Project Location Alternatives: alternatives as to sites, routes and other locations for the entire project and its various components
- Project Technical Design and Technological Alternatives: alternatives as to the technologies, engineering designs, architectural, landscaping and visual aspects
- Project Implementation Alternatives: alternatives as to the timetable, scheduling, construction methods and techniques, choice of implementing agency, choice of project management/PIU/PMU, alternative monitoring indicators, alternative supervision reporting mechanisms
- No Project Alternative: base case to which all alternatives are compared.
E. Summary of Key Safeguard Issues

The authors of the ISDS should select one of the four safeguard classifications available, and all safeguards should be considered when making the selection. The text of the ISDS contains broad guidance to help the TTL select the proper safeguard classification. If the text of the ISDS is not sufficient, the following additional guidelines should be used to determine the safeguard category:

- **S1** should be chosen for projects with potential severe safeguard impacts, either because of the number of safeguard policies triggered, or because of the high potential impact associated with one or more policies.
- **S2** should be chosen for projects with less severe potential safeguard impacts, either because of a very small number of safeguard policies triggered, with none of them having major impacts, or because of medium potential impact associated with a single policy.
- **S3** should be chosen for projects with no safeguard issues.
- **SF** should be chosen for financial intermediaries, social development funds, community-driven development (CDDs) or any other projects involving on-lending or passing grants to local communities. Adjustment programs should not be classified as SF.

If significant project design changes during project preparation justify it, any change in safeguard classification should be reported through the SAP.

F. Disclosure Requirements

All efforts should be made to provide responses to the disclosure questions on the basis of known dates. At the PCD review level, some of the responses may not be available, but these dates should be entered in the ISDS prepared for the PAD stage.

Sign off Section

The task team leader checks the accuracy of the information provided in the ISDS, provides comments as needed, in particular related to positive environmental and social impacts of the project, and signs the ISDS, along with the safeguards specialists (as many as have been involved) who have collaborated in the preparation of the ISDS. Before moving to the PAD stage, the TTL sends the ISDS to the Sectoral Manager, then the Regional Safeguards Coordinator for counter signature.

Annex 3

Matrix of Safeguard Requirements for CDD Projects
<table>
<thead>
<tr>
<th>Operational Policies</th>
<th>Trigger Avoidance Tools</th>
<th>Approach if policy is triggered</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Environmental Assessment (OP/BP 4.01)</td>
<td>* Usually always triggered in CDD projects</td>
<td><strong>If triggered at outset:</strong> 1. Prepare a tightly scoped out EA during project preparation 2. Prepare the following supporting documents: o Environmental Management Plan (EMP) o Subproject Screening Procedures o Community consultation guidelines 3. Implement the EMP</td>
</tr>
<tr>
<td>2 Natural Habitats (OP/BP 4.04)</td>
<td>o Non-eligibility of subprojects that have the potential to cause significant conversion (loss) or degradation of natural habitats, whether directly or indirectly. Natural habitats cover both critical (legally protected) officially proposed for protection, and unprotected but of known high conservation value. o Include specific questions in the screening procedures which capture aspects of OP 4.04.</td>
<td><strong>If triggered at outset:</strong> 1. Ensure coverage of natural habitats in the EA study 2. Develop an EMP and subproject screening procedures which include: o Screening procedure to (i) determine whether the subproject is in a critical or non-critical natural habitat, and (ii) avoid any significant conversion or degradation of any critical natural habitat. o Guidelines to develop mitigation measures to minimize or avoid damage to natural habitats. 3. Implement the EMP</td>
</tr>
<tr>
<td>3 Pest Management (OP 4.09)</td>
<td>o Non-eligibility of subprojects that will lead to procurement of pesticides or pesticide application equipment (use negative list). o Non-eligibility of subprojects that may lead to increased pesticide use or present pest management practices (use negative list) o Include specific questions in screening procedures which capture key aspects of OP 4.09.</td>
<td><strong>If triggered at outset:</strong> 1. Ensure coverage of pest management in the EA study 2. Develop a pest management plan during preparation. The plan should include: o Criteria to ensure that the pesticides used (i) have negligible adverse impacts, (ii) are effective against target species, (iii) have minimal effect on non-target species, and (iv) take into account the need to prevent the development of resistance to pests; o Procedure to ensure that the pesticides to be used in subprojects are manufactured, labeled, handled, stored and disposed in a manner acceptable to the Bank;</td>
</tr>
<tr>
<td>Operational Policies</td>
<td>Trigger Avoidance Tools</td>
<td>Approach if policy is triggered</td>
</tr>
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<td>Procedure to ensure that the pesticides used in subprojects do not include formulated products that fall under WHO Classes IA and IB or Class IIA.</td>
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<td>3. Implement the pest management plan</td>
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</tbody>
</table>
| 4 Involuntary Resettlement (OP/BP 4.12) |  | **If triggered at outset:** 1. Prepare a Resettlement Policy Framework (RPF). The RPF should include:  
|                      | o Non-eligibility of subprojects which require acquisition of land or result in displacement of over 200 people (use negative list) | o Subproject screening procedures to determine whether a Resettlement Action Plan (RAP) or Land Acquisition Plan is required;  
|                      |                         | o Community consultation procedures |
|                      |                         | 2. Implement RAPs prepared during project implementation. |
| 5 Indigenous Peoples (OD 4.20) |  | **If triggered at outset:** 1. Ensure coverage of indigenous people in the EA study during preparation.  
|                      | o Non-eligibility of all subprojects that can have potential adverse impact on indigenous people or vulnerable groups. | 2. Develop an Indigenous People Development Plan (IPDP), which includes:  
|                      |                         | o Subproject screening procedures to determine the indigenous groups and their coverage under the Bank policy;  
|                      |                         | o Community consultation procedures to collect data so as to prepare the IPDP;  
|                      |                         | o Guidelines for implementation of IPDP recommendations.  
|                      |                         | 3. Implement the IPDP. |

(1) The Indigenous Peoples Policy (OD 4.20) and Cultural Property (OPN L.03) are both currently under revision.
<table>
<thead>
<tr>
<th>Operational Policies</th>
<th>Trigger Avoidance Tools</th>
<th>Approach if policy is triggered</th>
</tr>
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</table>
| **6**  
Forests  
(OP/BP 4.36) | o  Non-eligibility of forest sector activities and other interventions that have the potential to impact upon forested areas (use negative list)  
o  Periodic checks to ensure that no subprojects have direct or indirect impact on forested areas  
o  Include specific questions in screening procedures which capture key aspects of OP 4.36.  | **If triggered at outset:**  
1. Ensure coverage of forestry in the EA study during preparation. This should include:  
o  Inclusion of criteria in subproject screening procedures to determine whether a forest management plan is required;  
o  Guidelines for addressing forest protection and management.  
2. Insert appropriate mitigation and monitoring measures into EMP  
3. Implement EMP |
| **7**  
Safety of Dams  
(OP/BP 4.37) | [As an eligibility issue, CDD projects should generally not involve construction or rehabilitation of dams]  
o  Non-eligibility of dams that are 15m or higher in any of the subprojects (use negative list)  
o  Non-eligibility of dams considered high hazard dams  
o  Periodic checks during implementation to ensure that dams are not above 15m;  
o  Include specific questions in screening procedures to capture key aspects of OP 4.37.  | **If triggered at outset:**  
1. For small dams or other water storage structures, develop generic dam safety measures.  
2. For new/rehabilitation of existing large or high hazard dams, the following should be carried out:  
o  Reviews by an independent panel or experts throughout the preparation, design, construction and operation of project;  
o  Preparation and implementation of detailed plans including emergency preparedness plan;  
o  Pre-qualification of bidders;  
o  Periodic safety inspections after the dam is completed. |
| **8**  
Cultural Property  
(OPN 11.03) | o  Non-eligibility of subprojects that have a potential direct or indirect impact on cultural property  
o  Periodic checks to ensure that no subprojects have direct or indirect impact on cultural property  
o  Include specific questions in screening procedures which capture key aspects of OP 4.11.  
o  Include clear instructions to subproject proponent for safeguarding of cultural property.  | **If triggered at outset:**  
1. Ensure coverage of cultural property in the EA study during preparation. This should include:  
o  An investigation and inventory of cultural property likely to be affected;  
o  Documentation of the characteristics and significance of these resources;  
o  Assessment of the nature and extent of potential direct and indirect impacts. |
### Operational Policies

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<tr>
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<th>Trigger Avoidance Tools</th>
<th>Approach if policy is triggered</th>
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<tr>
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<td>2. Include in the Project’s EMP the following:</td>
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<td>o Actions to mitigate adverse impacts including chance find procedures;</td>
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<td>o Provisions for treatment of cultural properties discovered during implementation and operation;</td>
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<td>o Measures for strengthening institutional capacity; and</td>
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<td>o Monitoring system to track progress during implementation.</td>
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<tr>
<td>9</td>
<td>Projects in International Waterways (OP/BP 7.50)</td>
<td>3. Implement the EMP</td>
</tr>
<tr>
<td>10</td>
<td>Projects in Disputed Areas (OP/BP 7.60)</td>
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Annex 4

Guidelines for Addressing Resettlement Issues in CDD
1. **INTRODUCTION**

CDD programs vary in the nature and types of investments they finance; hence it is not always clear during project preparation whether the Project will result in involuntary resettlement or physical and/or economic displacement of people. Thus, as part of the safeguards assessment, it is important to determine whether there is a need to develop a Resettlement Policy Framework (RPF).

1.1 **Bank principles for resettlement planning**

The underlying principle of the Bank in CDD projects is to ensure, to the maximum extent possible, that the OD 4.12 does not apply and that the project is kept simple. This simplification can be achieved by ensuring that, if land acquisition is inevitable, it is, wherever and whenever possible, done through community donation or government (including local government, municipal) donation of vacant land that does not involve any dispossession of property or rights. In order to demonstrate this, it is important to provide evidence such as: a) a documented act of donation by acceptable community representatives, and b) appropriate verification that no individual is being dispossessed or victimized. This will provide sufficient detail as to why the OD 4.12 does not apply.

Where it is unavoidable, all people affected should be compensated fully and fairly for any lost assets. In some cases, it might be necessary to apply screening criteria in the project design not to finance any activities or subprojects that will result in involuntary resettlement. This should be considered on a case-by-case basis, as it may not always be advisable to exclude projects that require expropriation as certain types of projects are highly needed (sewerage and landfills) and others can be very beneficial (small dams, for example, which in Tunisia have transformed poor rural economies for the better, or rural roads).

Moreover, all people affected by involuntary resettlement should be consulted and involved in resettlement planning to ensure that the mitigation of adverse effects as well as the benefits of resettlement are both appropriate and sustainable (refer to Box 1).

**Box 1: Consultation and Participation in Resettlement Planning**

Projects resulting in physical or economic displacement have special consultation responsibilities in addition to the Bank’s regular public disclosure and consultation requirements. In order to achieve effective resettlement planning, the Borrower has to carry out regular consultation with a wide range of project stakeholders, primarily the communities. These stakeholders include any individual or group that is affected by, or believes it is affected by, the project; and any individual or group that can play a significant role in shaping or affecting the project, either positively or negatively, including the host community.

Early consultation will help to manage public expectations concerning the impact of a project or subproject, and its expected benefits. These consultations will have to be followed by a series of meetings to negotiate compensation packages and eligibility requirements, provide resettlement assistance, and agree on the timing of resettlement activities.

2. **PREPARING A RESETTLEMENT POLICY FRAMEWORK**

An RPF is usually required for projects with subprojects or multiple components that cannot be identified before project approval. It is also applied when there are valid reasons for delaying the implementation of resettlement, provided that the implementing party provides an appropriate and concrete commitment for its future implementation.

In such cases the RPF is prepared, as a condition of the loan, with the purpose of clarifying resettlement principles, organisational arrangements and design criteria to be applied to the project during its implementation. The RPF has to be disclosed in country and at the Infoshop and must be adopted by the Borrower as the guiding framework for resettlement planning for all activities financed under the proposed CDD project. **Box 1** illustrates the contents of an RPF.

**Box 1: Table of contents for a Resettlement Policy Framework**

1. Project description
2. Guiding principle for resettlement
3. Process for developing subsequent resettlement action plans
4. Overview of potentially affected population
   - Number of potentially affected people
   - Demographic and socio-economic profile
   - Income sources and livelihood practices in the subproject area
5. Eligibility criteria
   - People to be affected
   - Grievance redress, if required for people already affected
6. Legal framework
   - Host country legal requirements
   - World Bank policies and procedures
7. Methodology for valuation of assets and potential loss of all other income, opportunities and assets
8. Alternative income generating opportunities
9. Income restoration plans for specific subprojects
10. Organisational responsibilities
11. Implementation process
12. Grievance redress mechanisms
13. Funding and costs of resettlement
14. Consultative mechanisms
15. Monitoring of resettlement

3. **PREPARING A RESETTLEMENT ACTION PLAN**

Using the screening checklist in Annex 9, subprojects determined to result in displacement or involuntary resettlement of people, will require an abbreviated Resettlement Action Plan (RAP) prior to appraisal.

The general rules for determining whether a subproject will require a Resettlement Action Plan (RAP) or an abbreviated RAP is as follows:
o For micro-projects that are determined to result in minor impacts, defined under the OP 4.12, when “the affected people are not physically displaced and less than 10% of their productive assets are lost”, then an abbreviated RAP is required.

o For projects that may result in more significant impacts, i.e., physical displacement of people, and more than 10% of their productive assets are lost, then a RAP will be prepared.

o For projects not anticipated to result in displacement, and where loss of assets are anticipated to be negligible, then this information shall also be indicated in the micro-project application form along with a request to waive the requirement for an abbreviated RAP.

The abbreviated RAP should be prepared by the Borrower (usually through a consultant working with the community) and should include, at a minimum, the elements listed below:

- Description of the subproject (size, location, cost, etc)
- Census and socio-economic survey of displaced households and/or businesses (refer to Table 1, 2 and 3);
- Impacts caused by displacement (use Table 4a and 4b);
- Legal framework for land acquisition and compensation;
- Valuation of assets;
- Description of compensation and other resettlement assistance to be provided (use Table 5 and 6);
- Consultations with displaced people about acceptable alternatives;
- Timetable (use Table 7) and budget;
- Institutional responsibility for implementation and procedures for grievance redress; and
- Arrangements for monitoring and implementation.

With the assistance of the PMU social scientist and input from the Bank social specialist, communities should identify the issues related to a subproject and use the forms attached to prepare a subproject RAP. These forms should supplement (not replace) appropriate qualitative and interpretive information (i.e. first find out what is the impact, then find out what needs to be counted.)

The abbreviated RAP could be a very short and simple document depending on the size and complexity of the project (i.e. a typical local clinic, classroom, access road, market place, should not need more than a page or two at the outside to comply). Even better, a one-page participatory rural appraisal map with annotations could work in many instances. The subproject RAP once complete will be submitted alongside the EA, if required, as part of the subproject application for approval.

2.1 Bank Specialist input and in-country capacity

In order to implement the requirements of the RPF, it is important to have adequate in-country capacity and staff to interpret and implement the policy without unnecessarily delaying the project cycle or denying communities certain types of subprojects. The Bank should ensure that any CDD projects include a regional Bank social scientist in the safeguard team, particularly in projects, which have triggered the OD 4.12 or the OD 4.20. It is important for the Borrower to receive the appropriate support from a regional Bank social specialist in complying with the safeguard requirements.
The Regional social scientist should work with the Borrower and implementing agency(ies) in identifying where the gaps are between the Bank’s OD 4.12 and the country’s legal requirements for land acquisition and resettlement. This will ensure that there is a firm but clear interpretation of the policy and that practical measures can be outlined in the RPF for the project. This will also encourage building of in-country capacity for safeguard implementation.

For projects with highly sensitive social and/or involuntary resettlement issues, a social scientist should be assigned to the PMU in country to work with communities, NGOs and local government agencies in addressing the project’s needs and concerns. The social scientist should be included in the safeguard training programs and should work closely with the regional Bank specialist on implementing the RPF measures and implementing and supervising RAPs prepared for subprojects.
Table 1: Property (Goods and Assets Affected)

<table>
<thead>
<tr>
<th>Household number¹</th>
<th>Business number²</th>
<th>Name of household head or business owner</th>
<th>Plot area</th>
<th>Description of houses and constructions</th>
<th>Uses of the property (housing, economic activity, other)</th>
<th>Level of effect (total, partial, minimum)³</th>
<th>Tenure status (titled owner, owner without documents, tenant, sharecropper, etc.)</th>
<th>Employment status of all adults</th>
<th>Comments</th>
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¹ Households should be defined as commensal units i.e. people who eat out of the same pot.
² Business should be defined as any economic activity.
³ “Partial” in cases where family/business can develop activities involving listed goods and assets; “Total” where activities cannot be developed as a result of displacement.
⁴ If they are not owners, include the name and address of the owner.

Table 2: Socio-economic Characteristics of Families

<table>
<thead>
<tr>
<th>Household number⁴</th>
<th>Name of household head</th>
<th>No. of persons in household</th>
<th>No. of children &lt;13 years of age</th>
<th>No. of adults +60 years of age</th>
<th>No. of students</th>
<th>Sources of income</th>
<th>Place of work or study and distances</th>
<th>Means of transport to place of study/workplace</th>
<th>Comments</th>
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</table>

Table 3: Socio-economic Characteristics of Business

<table>
<thead>
<tr>
<th>Business number</th>
<th>Name of business owner</th>
<th>Age of business owner</th>
<th>Type of activity</th>
<th>No. of employees</th>
<th>Monthly income average</th>
<th>Destination of production</th>
<th>Place of selling</th>
<th>Duration of existence of business in affected location</th>
<th>Comments</th>
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¹ Households should be defined as commensal units i.e. people who eat out of the same pot.
² Business should be defined as any economic activity.
³ “Partial” in cases where family/business can develop activities involving listed goods and assets; “Total” where activities cannot be developed as a result of displacement.
⁴ If they are not owners, include the name and address of the owner.
Table 4a: Impacts Caused by Displacement (Households)

<table>
<thead>
<tr>
<th>Household Number</th>
<th>Loss of land</th>
<th>Loss of house</th>
<th>Loss or decrease of income</th>
<th>Loss or difficulty of access to educational services</th>
<th>Loss of access to health services</th>
<th>Loss of access to public services</th>
<th>Loss of access to social networks</th>
<th>Comments</th>
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Table 4b: Impacts Caused by Displacement (Businesses)

<table>
<thead>
<tr>
<th>Business Number</th>
<th>Loss of land</th>
<th>Loss of Business place</th>
<th>Loss or decrease of income</th>
<th>Loss of economic networks</th>
<th>Comments</th>
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</table>

Table 5: Agreed Solutions

<table>
<thead>
<tr>
<th>Household or business number</th>
<th>Resettlement Solution</th>
<th>Comments</th>
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</table>

Table 6: Example of a Resettlement Entitlement Matrix

<table>
<thead>
<tr>
<th>Type of Loss</th>
<th>Application</th>
<th>Definition of Entitled Person</th>
<th>Compensation Policy</th>
<th>Implementation issues</th>
</tr>
</thead>
</table>
| Loss of arable and grazing land   | Arable and grazing land located in the site for the infrastructure, and the infrastructure easement areas | Farmers or land owners who own, cultivate the land for crops or use land for livestock grazing. | a) Provide equivalent land nearby.  
  b) If land is available elsewhere, provide assistance to farmer or land owner for intensification and diversification on that land.  
  c) If land is not available elsewhere then provide full compensation.  
  d) Farmer or land owner may opt for payment of full compensation. | a) A list of available arable and grazing land in each affected commune is required  
  b) Assistance to farmers to develop new crops and intensify production for both crops and livestock.  
  c) A list of affected and entitled persons.  
  d) If agreements have been reached on mode of compensation settlement, provide evidence. |
| Loss of non-arable land           | Non-arable land located in the site for the infrastructure, and the infrastructure easement areas | a) Persons who own land  
  b) Persons with no formal legal right or claim to the land  
  c) Squatters and persons in ownership dispute | a) Provide equivalent land nearby  
  b) If land is not available elsewhere then provide full compensation.  
  c) If land owner opts for payment of full compensation obliged | a) A list of available non-arable land in each affected commune is required  
  b) Compensations provided  
  c) If agreements have been reached on mode of compensation settlement, provide evidence. |
| Loss of non-residential land      | Residential land located in the site for the infrastructure, and the infrastructure easement areas | a) Persons who own land  
  b) Persons with no formal legal right or claim to the land  
  c) Squatters and persons in ownership dispute | a) Provide equivalent land nearby  
  b) If land is not available elsewhere then provide full compensation.  
  c) If land owner opts for payment of full compensation. | a) A list of available residential land in each affected commune is required  
  b) Compensations provided  
  c) If agreements have been reached on mode of compensation settlement, provide evidence. |
| Loss of commercial, businesses and industrial activities | Loss of commercial, and industrial activities located or operated in the site of the infrastructure, | Owner and workers of the commercial, business and industrial activities or whoever operates the business at the site of the infrastructure. | a) Full compensation payment to the owner, workers and operators  
  b) Relocate business, or commercial and industrial activity to site acceptable to the affected persons. | a) A list of available commercial, business or industrial activity land in each affected commune is required  
  b) Compensations provided.  
  c) If agreements have been reached on mode of compensation settlement, provide evidence. |
| **Loss of structures** | Structures located in the site of the infrastructure, and the infrastructure easement areas | a) Persons who own structure  
  b) Persons with no formal legal right or claim to the structure  
  c) Squatters and persons in ownership dispute | a) Full compensation payment to cover the loss of the structure and loss of income during the period the affected person could not reap any income.  
  b) Relocate structure to site acceptable to the affected persons. | a) A list of available structure in each affected commune is required  
  b) Compensations provided.  
  c) If agreements have been reached on mode of compensation settlement, provide evidence. |
| --- | --- | --- | --- | --- |
| **Loss of standing crops and livestock** | Crops and livestock located on the land for the infrastructure, and the infrastructure easement areas | Farmers who cultivate or use the land for livestock grazing | Full compensation payment. | a) Prices of agricultural products in local markets have to be checked for comparison.  
  b) Affected persons will be given notice several months in advance regarding evacuation.  
  c) The construction work schedule has to take into account the cropping patterns and seasons so as to avoid destruction. |
| **Loss of trees and other plant species** | Trees and other plant species located on the land for the infrastructure, and the infrastructure easement areas | Land owner, concession holders, tenants, squatters, communities who utilize the land where trees and other plant species are located. | a) Full compensation payment based on type, age and diameter of trees.  
  b) Provide equivalent land nearby for replanting | a) Make inventory of the tree and plant species list.  
  b) Determine individual need or compensation volumes.  
  c) An assessment for maintaining that kind of vegetation  
  d) If agreements have been reached on mode of compensation settlement, provide evidence. |
Table 7: Resettlement Schedule

<table>
<thead>
<tr>
<th>Activities</th>
<th>Dates</th>
<th>Budget</th>
<th>Comments</th>
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</thead>
<tbody>
<tr>
<td>Planning of census and surveys</td>
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<tr>
<td>Information to people affected</td>
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</tr>
<tr>
<td>Conduct census and socio-economic survey</td>
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<tr>
<td>Analysis of data and identification of impacts</td>
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<td></td>
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<tr>
<td>Definition of assistance measures</td>
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<tr>
<td>Relocation/assistance</td>
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<tr>
<td>Follow-up Visit by Responsible Agency</td>
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Annex 5

Sample TOR for a Resettlement Policy Framework (RPF) of the Yemen Power Sector Loan
Terms of Reference for the Preparation of a Resettlement Policy Framework for the Yemen Power Sector Loan

A. Project Description and Objectives
The objective of the Power Sector Project is to improve the efficiency and quality of electricity supply through: (i) financing of critical investments for the rehabilitation of existing power stations; de-bottlenecking of the transmission system; loss reduction programs and strengthening of the distribution systems and (ii) assisting with the implementation of sector reforms and capacity building and training. The expected outcomes would include: (i) the further improvements in the efficiency of operations and financial position of the PEC; and (ii) the enactment of a new electricity law which would improve the industry structure, the regulatory framework and facilitate private sector participation by encouraging local communities and private companies to engage in the provision of electricity supply.

The specific component proposed for support from IDA are still to be determined, but could include:

**Investment component**
- The 60MW expansion of the Al Hiswa power station in Aden using the excess capacity of the current steam boilers.
- The rehabilitation of Ras-Kathib, Al Mukta and Al Hiswa steam power stations and a number of other existing diesel stations
- The Mareb-Sana’a 400KV transmission line and associated substations
- A number of transmission system reinforcements to de-bottleneck and expand the system to ensure that additional generating capacity can be absorbed in the system
- Continuation of critical loss reduction and rehabilitation programs in major load centers
- Expansion of the distribution system to meet growing demand
- Rural electrification schemes (both grid connected and off grid systems)

**Technical Assistance**
- Engineering services related to the implementation of the investment components
- Assistance with the implementation of the reform program (including setting the regulatory body)
- Capacity building and training

These proposed investments form part of PEC’s least cost investment program.
B. Description and Objectives of the Resettlement Policy Framework (RPF)

The Bank’s social safeguards policy, Operation Policy 4.12, applies to all projects which may displace people from the land they occupy or which limits their economic activities. (The Arabic and English versions of this policy are attached). Examples are the loss of places of residence, loss of property (e.g. walls, trees etc) or loss of means of production (e.g. agricultural land). The policy applies even when people are not displaced and is still referred to as “resettlement.” When a project may include sub-projects which may involve expropriation where the sites are not known at the time of project preparation, the Bank requires the preparation of a Resettlement Policy Framework (RPF) which serves as a procedural manual for implementing OP 4.12. The RPF is part of the loan agreement and is a condition for project appraisal.

The objective of OP 4.12 is to ensure that throughout its life the project fully complies with the principle that any involuntary loss of assets or relocation of economic activities or residence are minimized and fully compensated, and that adequate procedures exist for prior consultation of all affected persons, assessment of losses and entitlements, handling complaints and disputes, and monitoring the outcomes. In particular it provides that the outcomes conform to the principles of full and prior compensation for any lost assets and full restoration of standards of living that are directly and adversely affected. The policy also applies to those who lack legal or formal ownership of affected assets and are entitled to fair compensation and all other forms of assistance (housing, social services etc).

The construction of proposed transmission lines and sub-stations as well as the construction of new grid and off grid rural electricity schemes suggest that PEC may need to acquire land for these infrastructure investments.

C. Contents of the Resettlement Policy Framework

The following presents the table of contents of the RPF and explains the contents of the document.

1. **Project Description, including the localities**, this should focus on expropriation and resettlement of people or their economic activities. If known, estimated number of project affect people should be included.

2. **Principles and Objectives of the RPF**: Describe the resettlement principles based, on OP 4.12 and current PEC practice. This should include the following: (i) explanation of the general principle that each sub-project will minimize expropriation, damage their property or displacing their economic activities. (ii) the importance of consulting with project affected people to a significant extent; (iii) full compensation of project affected people in a just and fair manner.

3. **Legal and Institutional Framework**: provide an analysis of Yemeni laws concerning expropriation, resettlement, accompanying measures and their application. If there are any, incompatibilities between Yemeni laws and the Bank’s policies with regard to resettlement and describe how these differences will be resolved. This section needs to explicitly mention that the requirements of the Bank will be fully incorporated in the RPF.

4. **The Preparation of Land Acquisition Plan, Resettlement Action Plan (RAP), Review and Approval Process**: OP 4.12 requires the preparation of different types of instruments, depending on the anticipated impacts on the population. The
procedure as well as model Terms of Reference for preparing each type of instrument should be described in the RPF.

a. *A Land Acquisition Plan* is prepared when expropriation of a relatively small square meters of land. The plan should (i) inventory all the sites that are to be acquired, with a description of each parcel that is to be acquired, showing its exact location, surface area, land use (commercial space either formal or informal, residential, farming etc) (ii) a census of the parcels, with the numbers concerned (iii) an estimation of the land value of each parcel. An inventory of the parcels should be done as part of the land survey of the preparation (planning for the transmission lines). (iv) Define who will be responsible for the preparation of the Land Acquisition Plan, who will approve them, timing for Bank approval. (v) The building of small substations for local networks may also involve land donation. Describe how this will be formalized.

b. *Resettlement Action Plan*: When people or their economic activities need to be removed or damage to property is expected a Resettlement Action Plan (RAP) is prepared. The plan is based on up-to-date and reliable information about (a) the proposed resettlement and its impacts on the displaced persons and other adversely affected groups, and (b) the legal issues involved in resettlement. Refer to the OP for details.

c. *Abbreviated RAP*: if fewer than 200 people are affected, then an abbreviated RAP may be prepared which includes the following (i) a detailed census and a valuation of their assets (ii) description of assets and other assistance to be provided (iii) consultation with displaced people about their alternatives (iv) grievance mechanisms and institutional accountability for redressing them (v) arrangements for monitoring and evaluation and (vi) timetable and budget.

d. The terms of reference would of course need to be adapted to the specific type of sub-project, as appropriate. These TORs should include a systematic description of tasks which describes a step by step process by which the procedures for identifying the affected persons will be identified, informed and compensated. The TORs are to be included in an annex of the RPF.

5. **Eligibility criteria** (i) identify the eligibility criteria (ii) describe how the population will be identified; define the methods for determining the eligibility timetable (for example, new squatters or claimants may appear hoping for compensation) (iii) define the criteria for compensation measures of all people affected by the project, if the loss is total or partial, if the affected people are owners, renters or squatters. Certain types of impacts may be described as not eligible for compensation (such as a few meters for expansion of access roads to lay transmission lines). These criteria should be simple and easy to understand by all stakeholders. Describe how difficult cases (such as non-registered land) will be valued and compensated (e.g. through a fair and legitimate consultation process with recognized figures, cheiks, aquis, elders etc but a process that ensures equity). This should be as precise as possible.

6. **Methods for the valuation of losses**: Present the existing national (and PEC’s) procedures and laws for estimating losses) for compensation enabling project affected persons to replace losses. Identify how those losses not described in the national law but may be identified in OP 4.12 will be compensated.
7. **Organizational Responsibilities**: Who is responsible for what (preparation of the Land Acquisition Plan, RAP etc)? Who within the project is responsible for all aspects related to resettlement? Who will compensate the project affected persons? How will they be compensated? (That is, will their compensation be deposited in a bank? by check to be collected from PEC etc) Provide as much precise information as is possible at this stage. Explain PEC’s past experience and its capacity in matters related to land acquisition and resettlement.

8. **Monitoring and Evaluation**: Describe the mechanisms by which the PEC will monitor the implementation of all resettlement/land acquisition related aspects. How will the implementation be monitored? By whom? How can it be ensured that the resettlement will not cause undue hardship to project affected people? If necessary prepare a check list.

9. **Grievance Procedures**: Describe the current grievance mechanisms available to project affected persons, including traditional and other conflict resolution mechanisms that will be integrated. What are the arbitration procedures defined in the law and to what extent are they operational?

10. **Consultation with project affected people** and mechanisms for their participation:
    Describe how the project affected people will be consulted and how they can participate in the plans for their resettlement or acquisition of land.

**D. Task Responsibilities**
The PEC Planning Division and the PEC Legal Department will prepare the RPF in-house based on the above outline of contents. The PEC will submit a draft RPF for approval by the Bank. This approved version will be publicly disclosed through PEC's website and the Bank’s Info Shop prior to project appraisal in May 2004.

**E. Deliverables**
In addition to the main text of the RPF, the following annexes are also to be included:

- Annex 1: list of all laws related to expropriation, land acquisition, resettlement related matters and their application;
- Annex 2: terms of reference for a « Land Acquisition Plan. »

**F. Time table**
- PEC submits first complete draft to the Bank: March 30, 2004
- Bank provides comments on draft to PEC: April 15, 2004
- PEC submits final version to the Bank for disclosure: May 5, 2004

**G. Attachments to serve as reference in preparing the RPF:**
- Attachment 1: OP 4.12 and its annex (in Arabic and English)
- Attachment 2: Legal Analysis of Yemeni Laws, decrees, related to expropriation, resettlement etc
- Attachment 3: Summary notes on the Banks social safeguards policy
Annex 6

Sample TOR for the preparation of an Environmental Assessment (EA) for the Matrouh Resource Management Project II (MRMP II)
Terms of Reference

Background:
The on-going MRMP I project is expected to close by the end of 2002. This project emphasized natural resource management and improved agricultural and livestock production using a participatory approach involving local communities. The Government of Egypt (GoE) has requested the World Bank, in partnership with IFAD, to assist in the design and funding of a follow-on project (Second Matrouh Resource Management Project (MRMP II). The development objective of this follow-on project is to contribute to rural poverty reduction in the North West Coastal Zone (NWCZ) of Egypt through community-driven development. Naturally, this second project would build on the success of the MRMP and on the core of experienced professionals and infrastructure established.

The proposed Mathrouh Resource Management Project II (MRMP II) will also contribute to capacity building of various stakeholders, through community-based rural development and natural resource management.

The purpose of this project is consistent with the Bank Group’s assistance strategy to Egypt which is focused around poverty alleviation and providing gainful employment to an increasingly large labor force. The alleviation of rural poverty is cited in the CAS as the most relevant target for the coming years.

The Ministry of Agriculture and Land Reclamation (MALR) will have the overall responsibility for the execution of the project, which would be entrusted to the Project Coordination Unit (PCU) in Marsa Matruh, which was established to implement the current MRMP. Coordination with EEAA will be established for the GEF component.

Scope:
The project will particularly take place in the region of Matrouh in the north west coastal zone and will be implemented over a period of 5 years.

To achieve its objectives, the project will support capacity building of local communities, focusing in particular on the needs of women, and demand-driven activities in the following areas: (i) watershed management and water harvesting; (ii) range management and sustainable agricultural and livestock development; (iii) rural roads; (iv) marketing and agro-processing; (v) women off-farm income-generating activities. With regard to natural resource management, in addition to watershed and range management, the project will address biodiversity conservation and measure carbon sequestration under different land uses, with the support of a GEF grant.

Project Description.
The proposed MRMP II will be constituted of the following components:

Component 1. Local Community Capacity Building. The project is to be implemented through a community-driven development process. This approach requires the strengthening of the capacity of local communities to: (i) analyze their constraints, identify their objectives and priorities; (ii) decide on the allocation of limited resources according to their priorities, and prepare their own development plans (Community Action Plans - CAPs); (iii) monitor the implementation and evaluate the results. The project will provide support to the local communities to acquire those skills, through a learning-by-doing process.
In addition to capacity-building through the process of designing, implementing and evaluating the CAPs, support will also be provided upon request, as part of the CAPs for: (i) literacy and numeracy, especially for women and girls; (ii) nutrition and health sensitization programs and environmental awareness programs targeting women, (iii) community affairs (organization and management); (iv) information and communication.

Component 2. Watershed Management, Water Harvesting and Soil Management using integrated watershed management approach. Based upon the present project team interactions with the communities, it is estimated that approximately 60% of the investments requested by the communities will be for watershed management and water harvesting. Watershed management may require the involvement of several communities having right over the watershed, for the design and implementation of sustainable watershed management plans taking into consideration the land use system, the communities' diverse needs for water and the need to reduce potential conflicts among users. Implementation will be carried out using the successful water harvesting and storage techniques and infrastructure (underground cisterns/reservoirs and various types of dikes for water retention at the field level and in the wadi) integrated within an overall strategy of watershed management.

Component 3. Improved Agricultural and Livestock Production and Range Management. A number of technologies have already been tested and adapted under the on-going project. An evaluation of these technologies with the communities is taking place as part of the preparation of the follow-on project. Under the follow-on project, the technologies which the communities will have evaluated as relevant for their needs will be further disseminated using the extension system in place and mass media communication. Communities will be able to include improved agricultural and livestock production and range management activities in their action plans and obtain advisory services and start up funds from the project to initiate activities in this domain. For those constraints that are still unresolved, for example in rangeland management, adaptive research may still be required in collaboration with the communities. Potential areas for productivity improvements or initiation of new activities are vegetable and fruit (targeting quality), livestock, range management, feed and forage, small livestock (poultry and rabbits) as well as new crops such as medicinal plants. The component includes therefore advisory activities, start up fund for communities testing innovations, and research adaptation. Women will be specifically targeted for some of the innovations or new activities proposed under this component (such as vegetable production, medicinal plant production, small livestock raising).

Component 4. Marketing and Agro-Processing. This component will be of particular relevance to enable farmers and herders to increase their income from agriculture. The project will help local communities to identify market outlets and better respond to consumer demands (product quality and type, period of the year), as well as identify new products or new market niches for traditional products. It will also help the communities to get organized for marketing purposes, in particular negotiate with wholesalers and traders and access valuable market outlets. The project will also help set up a communication and information system to enable local communities to have access to information on economic opportunities, market niches, prices and relevant economic actors. Finally, the project will identify areas for support in agro-processing.

Component 5. Women Off-Farm Income-Generating Activities. The follow-on project will identify areas for support in order to make rug-weaving and other handicraft production more profitable, in particular addressing the marketing issue, both domestically and perhaps internationally.
Component 6. Biodiversity enrichment and environmental conservation and protection. This component is linked to component 2, in particular the rangeland management and component 1, soil and water management. In addition to the objective of natural resource management already included in these components, it will have the following specific objectives: (i) conserve biodiversity of the unique dry land plants and animals: some of the local species identified as endangered could be used for rangeland improvements; (ii) develop a coherent framework and national capacity to quantify and monitor carbon sequestration in different dry land ecosystems and under different land uses; (iii) build a public awareness and capacity for a replication strategy which would enable extension of project activities to other parts of Egypt and the Middle East and North Africa and West Asia Regions with similar ecology.

Component 7. Rural roads. As part of improved market access, rural roads may be requested by some communities (up to a total of 100 km of rural roads).

Component 8. Project Management and Coordination. The MALR has established a separate entity under MALR for the purpose of project implementation, monitoring and evaluation since the MALR services in the Matrouh governorate do not have such capacity. The entity is already equipped with computers, telecommunication and GIS equipment, office furniture and some vehicles. MRMP II would continue support to this entity with operating funds (incentive payments, operating and maintenance costs, training and short term assistance) and replacement of some of the vehicles. However, the follow-on project will also seek to upgrade the entity to become an integral part of a established long-lasting institution (see section 2, Key policy issues).

Institutional/Implementation Arrangements:

The project management will be carried out by the PCU, situated at Marsa Matrouh with the Matrouh Applied Research Center (MARC) and its associated Training Center and the five subregional support centers. The PCU is appropriately staffed to ensure effective coordination of project components. The PCU is headed by a Project Director General and a Deputy Director General who are responsible for project planning and monitoring and have acquired considerable experience with the implementation of a Bank group funded project. The PCU has full administrative and financial autonomy, including for the disbursement of project funds. The PCU would operate through existing government organizations in the Governorate. The PCU would coordinate its activities through the National Coordinator in the MALR who would chair a National Coordination Committee (NCC) in Cairo. Representatives of the Ministry of Planning and International Cooperation, Egyptian Environmental Affairs Agency (EEAA) the General Manager of PBDAC, the secretary General of Matrouh Governorate and where appropriate, representatives of bi/multi-lateral projects being executed in the project area, and the Project Director General and the Deputy Director General Project coordination Committee in Marsa Matrouh. The NCC would meet at least once a year or as often as necessary.

At the regional level a Project Coordination Committee (PCC), which has been established under the MRMP would continue to function. The PCC includes the project Director General (Chairperson) and the Deputy Director General and representatives of the project's executing agencies, a representative from the Governorate, Matrouh Development and Reconstruction Sector (MDRS), Sub Regional Service Center chiefs and elected representatives of the participating communities. The PCC would coordinate the project implementation among the participating executing agencies, review and approve annual work programs with budgetary allocations based upon the Community Action Plans. It would also facilitate cooperation between the project and other projects and government agencies in the project area, in particular regarding health sensitization programs and women and girl literacy programs. PCC would initially meet once a month.
or as required initially and subsequently once every quarter. The PCU would seek the services of local and foreign technical assistance and further training for its staff and beneficiaries. The Project Implementation Plan will include detailed arrangements for project and financial management, procurement and accounting procedures.

**Safeguards Considerations:**

An initial safeguards screening for the this project shows that two safeguards policies of the Bank may be triggered:

- Operational Policy (O.P.) 4.01 – Environmental Assessment
- Operational Policy (O.P.) 4.04 – Natural Habitats

As most of the “demand-driven” sub-projects will involve civil construction works, small scale environmental impacts are anticipated. For example, rural roads, small civil works for watershed management, possible agro-processing facilities are all sub-projects with potential impacts. In addition the indirect impacts of rangeland management and unforeseen impacts of the use agro-chemicals should be assessed at the sub-project level. At the Project Concept Document (PCD) stage of project processing, the environmental category of “B” was assigned to the project.

Also at the PCD stage, the Natural Habitat Policy O.P. 4.04 was deemed as applicable because of the biodiversity of the unique dry land plants and animals. Some of the local species identified as endangered could be used for rangeland improvements without undermining the fragile natural habitats. To avoid any potential impacts, the sub-projects on biodiversity will be screened for potential impacts.

Under the World Bank’s new integrated approach to Safeguards, the new Safeguards Category is S2, and is further described on the Integrated Safeguards Data Sheet (ISDS).

**Objectives for the Assignment:**

The main objectives of the Assignment are to prepare:

1. **Environmental Management Plan (EMP)** – A simple 2 page EMP for public disclosure and for inclusion as an annex in the Project Appraisal Document (PAD).

The sub-objectives for the Environmental and Social Guidelines Manual are:

- description of the environmental policy and legal framework in Egypt relevant to the two Bank safeguard policies triggered in this project
- identification of good practices for environmental and social mitigation based on the previous MRMP I
- safeguard screening procedures to review sub-projects
- description of appropriate public consultation/participation techniques to identify potential environmental and social impacts
- typical terms of reference for sub-projects that require site specific EMP, as a result of the screening process
- training and capacity building program for various stakeholders
- monitoring indicators on implementation of the Environmental and Social Guidelines.
Scope of Work:

The Consultant will carry out the following tasks:

(i) Environmental Management Plan. Prepare a simple 2 page Environmental Management Plan that will summarize the major objectives and findings that are incorporated into the Environmental Guidelines Manual. The EMP should be formatted with three major chapters (a) Main Environmental Mitigation Measures (b) Environmental Training and Capacity Program (c) Environmental Monitoring Program. In additional a brief implementation plan for the EMP including costs, timetable and assigned responsibilities should be included, as is outlined Annex C to OP4.01. The EMP should be suitable for public disclosure in Egypt and at the Bank’s Info Shop, and for inclusion as an appendix to the PAD.

(ii) Environmental Sub-Project Screening Checklists. For each type of sub-project, the manual should contain a simple environmental screening checklist which poses a series of questions designed to identify risks to the environment (including the 5 Bank safeguard policies related to environment that include OP/BP/GP4.01 Environmental Assessment, OD4.04 Natural Habitats, OP4.09 Pest Management, OP4.36 Forestry) based on the identified site chosen for the sub-project. The goal of the checklist (also called a screening or environmental data sheet) is to identify which sub-projects require more environmental information in the form of a site-specific EMP EA Report and which can proceed without any special mitigation measures. Additional guidance on screening may be obtained from “Environmental Assessment Sourcebook Update No. 2: Environmental Screening” or through discussion with safeguard specialists from the Bank’s unit MNSRE. Another reference document is: Latin America and Caribbean Region Sustainable Development Technical Paper No. 1, Environmental Guidelines for Social Funds (December 1998). A final reference is the World Bank MNA Region, Guide for the Preparation of Environmental Assessments, (October 2000).

(iii) Sub-Project Safeguard Review Procedures. Provide a brief description of how the checklist / environmental data sheet should be used by the community organizations when preparing their application forms for sub-projects. Integrate these review procedures with the participatory rural assessment procedures under the MRMP, whereby representatives of the local stakeholders will take part the preparation exercise. Ensure that any identified environmental issues discussed with the local community representatives during the preparation stage are included during the screening reviews. Provide a brief description of how the PCU should use the checklist /environmental datasheet as well issues identified by communities to screen sub-projects at the desk review stage and at the final field appraisal stage. Give examples of cases where a site specific EMP should be requested from the community groups by the PCU. These procedures will detail the steps to be followed at each stage of the project/subproject cycles in order to ensure compliance with Safeguard policies triggered in the context of the project. These procedures will in particular define how to conduct proper screening, supervision and monitoring and specify the reporting format. These procedures are to be included in the operational manual.
(iv) Overview Description of Relevant Egyptian Safeguard Legislation and Institutions. Provide an overview of the existing institutional and legal framework for environmental protection as it relates to the types of sub-projects included in the project. A source of relevant information that should be consulted is: *Evaluation and future development of the EIA system in Egypt*, A Report Prepared under the METAP EIA Institutional Strengthening Project, (December 2000). Prepare a table to identify environmental permits and approvals required in Egypt the identified sub-projects. Identify when approvals are given e.g. on engineering design drawings, during construction, or acceptance of completed works.

(v) Good Practice Mitigation Measures. Prepare a compendium of good/best practice examples typical types of sub-project activities based on experience gained under the previous project, or similar projects in Egypt. The purpose of this task is to describe the key environmental mitigation measures that must be included with engineering designs for the detailed technical project description used in the procurement bidding documents. This good practice examples should be in a short concise format of about 1-2 pages per type of sub-project that could be appended to bidding documents. Include in the good practice section a list of key reference documents for use by community organizations in Egypt for the types of sub-projects included in the project; e.g., environmental design manuals, public health regulations, safety standards, environmental regulations, etc.

(vi) Capacity Assessment and Institutional Strengthening Program. Assess the environment and social safeguards capacity of the concerned project institutions, and major community groups and evaluate their acceptability relative to the recommended Environmental Guidelines Manual. Focus on the assessment of the capacity of the implementing agency to carry out in an efficient and sustainable manner the environmental procedures covering screening of sub-projects, supervision and monitoring. Prepare an required for implementation during the project. Conduct a pilot training workshop sessions to assist the PCU in implementing the procedures described in the Environmental Guidelines. Describe the key field procedures that contractors should carry out to ensure meeting the environmental mitigation measures included in typical contracts. Set the objectives for the PCU to accept the final hand-over of a sub-project that includes a site-specific EMP.

(vii) Terms of Reference for a Site-Specific EMP. Review and adapt existing Terms of Reference (ToRs) for environmental assessments and EMPs, and the requirements of the Egyptian legislation so as to develop ToRs appropriate to community projects, and then prepare concise 1-2 page ToRs for site-specific EMPs.

(viii) Environmental Monitoring. Described the impact measurement of all project components and activities will be monitored and reported in the PCU's bi-annual progress reports and reviewed by Bank supervision missions environmental assessments. Described how sub-selected sub-projects will be selected for post-audit style desk review and for field reviews, and how the data on screening will be summarized. Indicate the issues that will require special monitoring attention. Recommend monitoring concise criteria that will indicate ‘satisfactory implementation progress’ to be used with the Bank reporting system (PSRs-Project Supervision Reports).

(ix) Assistance with Bank Missions. Participate in relevant meetings during the pre-appraisal, appraisal and loan negotiations missions.
Reports

The reports should follow the following outlines:

1. **Environmental Management Plan (EMP)** – A simple 2 page EMP with the following chapters:
   - Main Environmental Mitigation Measures
   - Environmental Training and Capacity Program
   - Environmental Monitoring Program

   - Manual Objectives
   - Policy, Legal, and Administrative Framework
   - Summary of Good Practice Mitigation Measures
   - Safeguard Screening Procedures
   - Environmental Training and Capacity Program
   - Environmental Monitoring Program
   - Annexes:
     - Extracts From Most Relevant Legislation
     - Environmental Sub-Project Screening Checklists
     - good practice examples should be in a short concise format of about 1-2 pages per type of sub-project
     - Terms of Reference for a Site-Specific EMP
     - outline for the training materials

Planning

- **DRAFT EMP TO BE DELIVERED PRIOR TO APPRAISAL MISSION AND FINAL EMP TO BE FINALIZED DURING APPRAISAL**
- **DRAFT ENVIRONMENTAL GUIDELINES TO BE DELIVERED PRIOR TO APPRAISAL AND THAT FINAL TO BE DELIVERED 30 DAYS AFTER APPRAISAL**

Schedule of Payments

- **[SPECIFY THE TYPE OF CONTRACT]**
- **[SPECIFY THE SCHEDULE OF PAYMENTS AND TOTAL BUDGET]**
Annex 7

Sample Project-EMP and Sample Templates for Subproject EMP Preparation, Implementation and Monitoring
SAMPLE PROJECT EMP
ARAB REPUBLIC OF EGYPT: Second Matruh Resource Management Project
Environmental Management Plan

I. OBJECTIVE

The objective of this Environmental Management Plan (EMP) is to identify the environmental mitigation measures, screening process, capacity-building and monitoring activities that will be undertaken, as well as the institutional arrangements that will be set up, during implementation of the MRMP II to ensure that any potential adverse environmental impacts are either eliminated or minimized. The EMP also proposes an implementation schedule for undertaking these activities and indicates their costs included in the project budget.

II. MAIN ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

The overall environmental impacts of the MRMP II are expected to be positive, including increased environmental awareness (particularly among women), improved range and watershed management, sustainable agricultural practices, enhanced biodiversity conservation, and expanded protected area management. The project will not negatively alter the ecosystem nor cause significant environmental harm during the undertaking of water harvesting and road construction works. The inclusion of the Global Environment Facility (GEF) component will ensure that environmental considerations are mainstreamed in the MRMP II by seconding Egyptian Environmental Affairs Agency (EEAA) staff to the MRMP II Project Coordination Unit (PCU) and strengthening the capacity of environmental staff in the Matruh Governorate’s Environmental Management Unit (EMU). Furthermore, the GEF component will finance, among other activities, the establishment and management of two protected areas at Saloum and El Qasr within the project area.

A. ANTICIPATED ENVIRONMENTAL IMPACTS AND RECOMMENDED MITIGATION MEASURES

Overall, activities financed under the MRMP II will have positive environmental impacts. The environmental benefits from project activities in MRMP I are noticeable and will continue to be so in MRMP II – indeed the very fabric of the project is to improve the natural resource base in order to alleviate poverty. The Environmental Assessment (EA) process identified the following issues, addressed below, for which potential impacts and mitigation measures are detailed:

1. Drinking Water Quality: In discussions with PCU technical staff the EA identified drinking water quality as the primary potential issue related to the water harvesting activities of the MRMP II. A 1994 GTZ water analysis of selected cisterns in the North West Coastal Zone concluded that concentrations of E. coli (indicator enterobacterium for bacteriological contamination) in water collected from cisterns were 1,000-10,000 times WHO guidelines. (E. Coli are a particular type of coliform bacteria whose presence in drinking water is more serious than other coliform bacteria because they are disease-causing. They indicate that water has been contaminated by sewage or animal wastes that contain other disease-causing microorganisms which can cause severe diarrhoea, cramps, and nausea.) Unfortunately, no more recent water quality data are available. While discussions with the local population on the most prevalent diseases indicated that the above water-related diseases were not perceived as the highest importance (diseases related to malnutrition and eye infections were the most frequently quoted), it is recommended as a matter of prudence to implement proper mitigation measures to minimize any potential risks.
Source Mitigation Measures. Mitigation measures at the source include improved water management practices and water quality monitoring:

- Cisterns will be dredged approximately every three years to restore the dead storage capacity taken up by sedimentation. (Silt loads captured thanks to silt traps, while minimal in quantity, may be re-utilized as organic fertilizer in agricultural areas, as they may contain a certain level of nutrient washed away from topsoil by wind and water erosion.)

- Ideally, animals would be kept away from the cisterns used for drinking water, or at least away from the part that serves as the catchment area. In addition, wherever possible, separate cisterns should be built for human and animal purposes, instead of cisterns that provide for both uses contemporaneously. However, since most of the smaller families with limited income levels would have difficulties in drawing such a distinction (since they will only have one cistern for use by the family, for supplementary irrigation and for stock watering), water management practices that could be adopted by lower-income families will require that animal drinking troughs be kept away from human-purpose cisterns, and use project-supplied hand pumps and hose to convey water to the animals at a distance of about 30 meters away.

- Cisterns specifically used as potable water sources for humans should be closed during the first rainfall and re-opened at the second. It is also recommended that cisterns be closed during the first 10-15 minutes of every rainfall. Although these recommendations may be difficult to implement given the extreme shortage of water in the region, project beneficiaries should regardless be advised of this option.

- A new drinking water quality analysis will be undertaken by the MRMP II in collaboration with the Ministry of Health, and periodic water quality monitoring will be incorporated into the project monitoring program.

Water Treatment Mitigation Measures. Treatment mitigation measures involve the sterilization of water. This will require further work in the context of MRMP II, in addressing the various alternatives to water sterilization. Some options to obtaining sterilized drinking water are suggested in Annex 1.

- The MRMP II will undertake awareness-raising with respect to improving drinking water quality (promoting filtering, Solar Water Disinfection (SODIS), chlorination, or boiling water, as appropriate) in the local communities, primarily among women.

- The MRMP II will study appropriate alternative renewable energy sources for power generation for water treatment. Alternative energy sources will also be sought to power micro-enterprises in the remote rural communities of the project area, and consider the provision of various types of stoves (using renewable energy) for cooking and boiling water. Solar and wind energy options will be explored and demonstration units established at each community, with cost-benefit analyses conducted.

2. Planning and Implementation of Range Rehabilitation Units: The EA also identified potential environmental impacts related to the range rehabilitation activities of the MRMP II. The location/spacing of “biodiversity islands” (range protected areas) should be planned, and a map of proposed areas developed, to incorporate possible corridors (e.g. for wildlife), but also to maintain a connectivity between the areas for habitat (such as habitat for pollinators). Minimum tillage should be practiced, as excessive tillage promotes wind and water erosion. Nutrient management also needs to be optimized. Silt captured from silt traps, animal waste, and human excrement collected from latrines are rich in nutrients and could be used as organic fertilizer. A more detailed description of the proposed mitigation measures is given in the Environmental Guidelines Manual.

3. Construction of Small LC activities (community centres, latrines and cisterns): Finally, the EA identified potential environmental impacts from the small-scale LC infrastructure activities and rural roads financed by the MRMP II. Planning the location of these sub-projects should be done through a participatory approach and addressed in the Community Action Plans. Construction and operation of the structures should
follow the good practices/mitigation measures outlined in the Environmental Guidelines Manual. The construction of cisterns must: (i) incorporate a silt trap, sediment basin and sieve on the inlet side of the cistern to reduce the sediment load; (ii) separate cisterns for drinking water from those for animal and irrigation purposes; and (iii) avoid collecting water from the first rainfall as this carries the highest level of pathogenic micro-organisms. Contamination by animal waste should be avoided, and training should be provided on the long-term maintenance of these structures.

4. Rural Roads: Roads should be selected through a participatory approach and designed to interrupt cross-drainage as little as possible. Where the road interrupts natural drainage, culverts and siphons will be installed. Road design should ensure that roads will not significantly impede the passage of wildlife. Road construction will ensure, to the degree possible, non-susceptibility to erosion from floods by planting trees along the road to act as wind breaks and soil fixators. Construction and maintenance should follow the guidance provided in the Environmental Guidelines Manual.

B. ENVIRONMENTAL SCREENING OF ACTIVITIES

To ensure that activities financed under the MRMP II are in compliance with Egyptian environmental requirements (and consistent with World Bank safeguard policies), the Biodiversity Unit will screen each Local Community Annual Work Program and Budget for activities for potential adverse environmental impacts, following the procedures presented in the Environmental Guidelines Manual. The WB team will give a "no objection" to the Local Community Annual Work Program and Budget, and will review a sample of activities during supervision missions to ensure that proper environmental review and mitigation have been implemented. In summary, the review process will involve the use of environmental screening checklists (prepared with and reviewed by staff from the Biodiversity Unit) to ensure environmental safeguard compliance and to determine whether sub-projects require formal review in accordance with procedures established by the EEAA in its Guidelines for Environmental Impact Assessment (EIA Guidelines). The EIA Guidelines implement the EIA requirements of Environmental Law No. 4/1994 and its Executive Regulations and establish the procedures for environmental screening and approval of projects with potential environmental impacts by EEAA. The MRMP II will utilize the checklist screening process and EEAA EIA Guidelines to meet the environmental assessment safeguard requirements of World Bank OP 4.01.2

Other safeguards that have been addressed by the EA are:

**OP 4.20 (Indigenous Peoples).** The objective at the center of OD 4.20 is to ensure that indigenous peoples do not suffer adverse effects during the development process. In the case of MRMP II, the Bedouin people comprise the entire population living in the target area, and therefore OP 4.20 is triggered. However, since: (i) the Bedouins are the sole project beneficiaries; (ii) MRMP II was prepared using a participatory approach; and, (iii) all project interventions have been designed to improve the status of the Bedouins (poverty alleviation, access to water, access to health and education, improved rangeland management, etc.) while taking into account and building upon their cultural specificities, there is no need for the preparation of an Indigenous Peoples Development Plan.

**OP 4.12 (Involuntary Resettlement).** The Project will undertake the identification and declaration of two protected areas (PAs) in the project zone. These will be defined, based on their biodiversity significance, status of degradation and potentials for conservation and alternative economic activities that can be built on the new conservation status. The process will be undertaken with the full participation of the local communities in the identification of the PAs and the design and implementation of the PA management plans, as is the case in other similar established PAs in Egypt. The issue of possible loss of income or means of livelihoods resulting from the loss of access to resources triggers OP 4.12 (para 36 on access to natural resources). These losses will be assessed when the boundaries of the PAs will have been established. If it is established that the PAs will result in loss of income or means of livelihood, the Project will provide compensation through supporting alternative economic activities. The preparatory and consultation work with the stakeholders and local communities to determine the boundaries is expected to take two years. The GOE prepared a Process Framework outlining the steps and participatory process to: (i) determine the boundaries of the PA; (ii) design the Protected Area Management Plan; (iii) define the criteria of eligibility for vulnerable and affected persons and the means to
assist the affected persons, if any, in their efforts to improve their livelihoods or at least restore them; (iv) identify the potential conflict resolution mechanisms and the monitoring and follow-up arrangements (see Annex 15).

No other activities financed under the Project trigger OP 4.12. In particular, works financed under the Project do not entail any involuntary resettlement or involuntary land acquisition issues.
Under the EIA Guidelines, projects with potential negative environmental impacts are classified into three categories (similar to WB coding, but in opposite sequence) according to the severity of environmental impacts:

- **A list** projects for those with minor environmental impacts
- **B list** projects for those that may result in substantial environmental impacts
- **C list** projects for those that may require complete EIA due to potential severity of impacts

The EA determined that the vast majority of MRMP II sub-projects with potential adverse environmental impacts are small in scale with minimal impact and thus are not expected to require formal EEAA review. A few sub-projects, e.g., rural roads, may be **A list** projects and thus require EEAA or Matruh EMU review. No MRMP II sub-projects are expected to be **B list** or **C list** projects. The EIA Guidelines set out the procedures for complying with the EIA requirements. The level of environmental screening and procedures for review and approval by EEAA vary by category and are detailed in the Environmental Guidelines Manual. The BDCU/PCU will ensure that MRMP II sub-projects comply with these screening procedures.

### III. ENVIRONMENTAL TRAINING AND CAPACITY PROGRAM

In order to ensure proper implementation of environmental screening and mitigation measures, as well as effective watershed and range management, biodiversity conservation, and protected area preparation and management, the MRMP II will undertake an intensive program of environmental training and institutional capacity building.

#### A. ENVIRONMENTAL TRAINING FOR PCU/EEAA/EMU STAFF AND LOCAL COMMUNITIES

The MRMP II will provide national and international experts to deliver training to PCU management and staff, EEAA field staff, and Matruh EMU personnel designed to build capacity for effective environmental management under the project, including environmental review, assessment, and mitigation of all significant project-financed activities and implementation of the integrated ecosystem management approaches supported by the project. Such training will cover environmental policy and regulations, range resource inventory and evaluation, carbon sequestration and biomass inventory, socio-economic surveying, species monitoring and evaluation, protected area management, land use zoning and participatory training on the specific environmental issues and mitigation measures identified by the EA. It will also include training trainers and providing refresher courses in all of the topics identified.

As part of the Community Development component, the MRMP II will provide basic training to local community representatives and members of the wider community in integrated environmental management/protection and environmental screening/impact assessment, and biodiversity/range management practices. Also, to strengthen development capacity among women in the communities, the MRMP II will promote environmental awareness programs to assist women in effective management of potable water resources and in sustainable utilization and management of the natural resource base. The GEF activities will promote formal and informal environmental education, including the design of curricula and preparation of educational materials, in the schools and at the community centres in the project area.
B. CAPACITY BUILDING FOR THE PCU, EEAA, AND MATRUH GOVERNORATE EMU

The MRMP II will build environmental management capacity within the PCU by establishing a new Natural Resource Management Department comprising units for Land and Watershed Management, Range Management, and Biodiversity Conservation. The latter unit will require additional PCU environmental management staff and will include three staff and a manager appointed from the Nature Conservation Sector (NCS) of EEAA (financed by the project) to work with the PCU for the life of the project. These EEAA/NCS field staff will be responsible for implementing the activities related to Protected Areas designation and management, including species conservation, community participation in biodiversity conservation, and training in Protected Areas management. Vehicles and equipment also will be provided in order to support the implementation of the new activities related to biodiversity conservation under the project.

In addition, the MRMP II will provide the Matruh Governorate’s EMU with two part-time environmental experts, i.e., an environmental screening/impact assessment expert and an environmental monitoring expert, for the five-year life of the project. These experts will work closely with EMU environmental staff, Matruh Governorate officials (particularly in land-use planning and coastal development) and project staff to provide training in environmental screening and impact assessment, integrated environmental and resource management planning, and environmental monitoring and evaluation. They will train trainers and assist with course compilation of training material for the project. As needed by the Matruh Governorate, these experts will also perform duties outside the project to ensure the implementation of an integrated ecosystem approach to the region, regarding development and compliance with environmental laws in urban areas and in coastal tourism centres.

IV. ENVIRONMENTAL MONITORING PROGRAM

Although the MRMP I established a Monitoring and Evaluation Unit (M&E Unit) to perform regular monitoring and evaluation of project activities, the M&E Unit did only limited environmental monitoring. Thus the MRMP II will have to build capacity within the M&E Unit, as well as in the new Natural Resource Management Department, to perform specific environmental monitoring and evaluation functions for the project.

A. MONITORING ENVIRONMENTAL SCREENING AND IMPLEMENTATION OF MITIGATION MEASURES

The Biodiversity Conservation Unit, in coordination with the M&E Unit, will assume responsibility for monitoring compliance with environmental screening requirements and implementation of any mitigation measures for activities required, either by EEAA or the Matruh EMU, as a result of environmental screening. Furthermore, the M&E Unit will periodically monitor specified indicators of environmental impacts of the MRMP II (e.g., drinking water quality, incidence of water-borne diseases, terrestrial biodiversity, rangeland regenerative capacity). This environmental monitoring will be incorporated into the overall MRMP II monitoring plan required as part of project performance by the World Bank. The results of such monitoring will be recorded and reported in the PCU’s bi-annual progress reports to the Bank and will be reviewed by Bank supervision missions. In the context of the GEF program, the Biodiversity Conservation Unit will develop a specific monitoring program, with verifiable indicators (e.g., changes from baseline conditions in diversity of flora and fauna, area devoted to community conservation efforts, area devoted to cultivation of medicinal herbs), to monitor and evaluate progress in achieving and sustaining expected global environmental benefits. A set of performance indicators for the implementation of the EMP has been included in the Environmental Guidelines Manual.
B. MONITORING ENVIRONMENTAL DATA

Where the Natural Resource Management Department, through its technical units, undertakes specialized studies, surveys or research efforts, it will assume responsibility for monitoring the results and evaluating the impacts. For example, under the GEF component, the Biodiversity Conservation Unit (BCU) will test the regenerative capacity of rangeland plants under various management regimes in order to assist in estimating the carrying capacity of the rangelands. Environmental monitoring of this sort will be used to evaluate and support the biodiversity conservation and integrated ecosystem management approaches promoted by the project. A set of monitoring indicators for the biodiversity and ecosystem has been included in the Environmental Guidelines Manual (Table 4).

V. IMPLEMENTATION PLAN

A. INSTITUTIONAL ARRANGEMENTS FOR IMPLEMENTATION

Implementation of the EMP will be shared among the PCU, EEAA, and the Matruh EMU. The PCU has overall responsibility for implementation of the MRMP II and will ensure that the EMP is fully integrated into implementation of the project. The BCU will ensure that sub-projects with potential adverse environmental impacts undergo environmental screening and monitor their implementation of required mitigation measures. The PCU will also work closely with the EEAA/NCS staff seconded to the PCU in carrying out their training programs and other activities related to biodiversity conservation and protected area management.

The EEAA/NCS staff appointed to the PCU will be responsible for implementation of the activities related to Protected Areas management and biodiversity conservation and will work from within the PCU in carrying out these activities. The EEAA/NCS will also manage the national and international consultants contracted to provide training to the PCU, EEAA/NCS field staff, and EMU staff on integrated ecosystem management issues.

The Matruh EMU will ensure that MRMP II sub-projects directed to it for review are screened and approved in a timely manner under the EEAA EIA Guidelines. The EMU will also manage the environmental experts contracted to support it in its environmental responsibilities and ensure that they coordinate closely with the PCU and the EEAA/NCS field staff.

B. PROPOSED IMPLEMENTATION SCHEDULE

Implementation of this EMP will begin with review and refinement of the Environmental Guidelines Manual in the first quarter after project effectiveness. The PCU then will undertake implementation of the main mitigation measures recommended and begin the screening process for sub-projects, continuing these activities throughout the life of the project.

Training programs will take place throughout the life of the project, on the basis of identified needs, with scheduled training for PCU and EMU staff occurring early in project implementation, followed by training programs in the local communities. Such training would be revisited, updated, and delivered on an annual basis, as needed. EEAA/NCS staff will be seconded full-time to the PCU for the life of the project, while the environmental experts financed for the EMU will be part-time for the life of the project.
The monitoring program for environmental screening will run continuously for the life of the project, while periodic monitoring will be used to evaluate the impacts of mitigation measures and track baseline environmental conditions in the project area.

The proposed schedule for implementing the various components of the EMP is shown in Table 1.

Table 1: EMP Implementation Schedule

<table>
<thead>
<tr>
<th>Major EMP Activities</th>
<th>1stQ</th>
<th>2n</th>
<th>3r</th>
<th>4t</th>
<th>1stQ</th>
<th>2n</th>
<th>3r</th>
<th>4t</th>
<th>1stQ</th>
<th>2n</th>
<th>3r</th>
<th>4t</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental Mitigation Measures</td>
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<td>-- Env. Guidelines Manual</td>
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<td>-- Main Mitigation Measures</td>
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<td>-- PCU management/staff</td>
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<td>-- Matruh EMU</td>
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<td>-- EEAA/NCS seconded staff</td>
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<td>-- EMU environment experts</td>
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<td>Environmental Monitoring Program</td>
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<td>-- Environmental Screening</td>
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<td>-- Mitigation Measure Impacts</td>
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<tr>
<td>-- Baseline Changes</td>
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</tbody>
</table>
C. ESTIMATED IMPLEMENTATION COSTS

The estimated costs of implementing the various components of this EMP are displayed in Table 2. These costs are included in the total costs of the MRMP II and are financed with funds from the World Bank/IFAD loan or from the GEF grant. No additional costs are envisaged as a result of the EMP.

### Table 2: Estimated Costs per EMP Component

<table>
<thead>
<tr>
<th>EMP Activity (MRMP II Component)</th>
<th>Quantity</th>
<th>Costs in US$</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Local</td>
<td>Foreign</td>
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</tr>
<tr>
<td><strong>Training &amp; Capacity Building</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- community capacity building</td>
<td>Lump sum</td>
<td>50,000</td>
<td>15,000</td>
</tr>
<tr>
<td>- watershed/rangeland management</td>
<td>Lump sum</td>
<td>120,000</td>
<td>50,000</td>
</tr>
<tr>
<td>- biodiversity conservation &amp; environmental management (loc/ int’l)</td>
<td>23 s/m</td>
<td>11,500</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>11 s/m</td>
<td>0</td>
<td>11,000</td>
</tr>
<tr>
<td><strong>Environmental Monitoring Program</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Biodiversity Monitoring (loc)</td>
<td>144 s/m</td>
<td>42,000</td>
<td>0</td>
</tr>
<tr>
<td><strong>Biodiversity and EMP Implementation</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>EEAA/NCS staff (4 national) seconded to PCU for 6 years</td>
<td>288 s/m</td>
<td>345,600</td>
<td>0</td>
</tr>
<tr>
<td>Environmental experts (2 national/ 1 int’l)</td>
<td>72 s/m</td>
<td>108,000</td>
<td>0</td>
</tr>
<tr>
<td>for Matruh EMU for 5 years (part-time)</td>
<td>3 s/m</td>
<td>0</td>
<td>10,500</td>
</tr>
<tr>
<td>Vehicles (BDU/ EMU)</td>
<td>3</td>
<td>0</td>
<td>60,000</td>
</tr>
<tr>
<td><strong>Support for all activities</strong></td>
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</tr>
<tr>
<td>Office equipment (computers, printers, etc.) (BDU/EMU)</td>
<td>Lump sum</td>
<td>25,000</td>
<td>15,000</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
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<td>702,100</td>
<td>161,500</td>
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</table>
## Environmental Management Plan
### A. Mitigation

<table>
<thead>
<tr>
<th>Subproject Activity (refer to Table 2.2 in the Manual)</th>
<th>Potential Environmental and Social Impacts</th>
<th>Proposed Mitigation Measure(s) (Incl. legislation &amp; regulations)</th>
<th>Institutional Responsibilities (Incl. enforcement &amp; coordination)</th>
<th>Cost Estimates</th>
<th>Comments (e.g. secondary impacts)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pre-Construction Phase</td>
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<tr>
<td>Construction Phase</td>
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<tr>
<td>Operation and Maintenance Phase</td>
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</tbody>
</table>
# Environmental Management Plan
## B. Monitoring

<table>
<thead>
<tr>
<th>Proposed Mitigation Measure</th>
<th>Parameters To be Monitored</th>
<th>Location</th>
<th>Measurements (Incl. methods &amp; equipment)</th>
<th>Frequency of Measurement</th>
<th>Responsibilities (Incl. review and reporting)</th>
<th>Cost (equipment &amp; individuals)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pre-Construction Phase</td>
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<tr>
<td>Construction Phase</td>
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<tr>
<td>Operation and Maintenance Phase</td>
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<tr>
<td>Total Cost for all Phases</td>
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</tbody>
</table>
### Environmental Management Plan

#### C. Institutional Strengthening and Training for Implementation

<table>
<thead>
<tr>
<th>I. Institutional Strengthening Activity</th>
<th>Position(s) (Institutions, PIUs, contractors, construction supervision consultants)</th>
<th>Scheduling</th>
<th>Responsibilit(ies)</th>
<th>Cost Estimates</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mitigation Measures</td>
<td></td>
<td></td>
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<tr>
<td>Monitoring Requirements (incl. compliance)</td>
<td></td>
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<tr>
<td>II. Training Activity</td>
<td>Participants</td>
<td>Types of Training</td>
<td>Content (modules, etc.)</td>
<td>Scheduling</td>
</tr>
<tr>
<td>EMP Implementation, Re-design, Conflict Resolution, etc.</td>
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<tr>
<td>Environmental Processes, Methods &amp; Equipment</td>
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<tr>
<td>Environmental Policies &amp; Programs</td>
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</table>

Note: The table above outlines the institutional strengthening and training activities, including position roles, scheduling, responsibilities, and cost estimates.
## Environmental Management Plan
### D. Scheduling and Reporting

<table>
<thead>
<tr>
<th>Activity</th>
<th>Year 1</th>
<th>Year 2</th>
<th>Year 3</th>
<th>Etc.</th>
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</thead>
<tbody>
<tr>
<td>Mitigation Measures</td>
<td>Q1</td>
<td>Q2</td>
<td>Q3</td>
<td>Q4</td>
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<tr>
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<td>Q1</td>
<td>Q2</td>
<td>Q3</td>
<td>Q4</td>
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<td>Q1</td>
<td>Q2</td>
<td>Q3</td>
<td>Q4</td>
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<td>Etc.</td>
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<tr>
<td>Monitoring</td>
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<td>Institutional Strengthening</td>
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Annex 8

Environmental and Social Appraisal Process for Subprojects
ENGLISH ENVIRONMENTAL RESOURCES MANAGEMENT MNA – CDD TRAINING MANUAL

SUBPROJECT APPRAISAL PROCESS FOR CDD SUBPROJECTS

Subproject Appraisal Process

Application for subproject by community

Subproject Appraisal

Subproject Approval (local government)

Subproject Implementation

Subproject Monitoring

Corresponding Safeguard Requirements

**Step 1:** Subproject Screening
- Identification of subproject
- Reject requests based on exclusion list (Box 2.4)

**Step 2:** Impact assessment
- Low risk
  - Develop generic mitigation and monitoring measures for subproject sectors (e.g. wastewater, rural roads, irrigation, etc)
  - Apply environmental conditions in contract agreements (construction and supervision)

- High risk
  - Carry out a subproject specific EA study
  - Develop subproject specific EMPs (and RAPs if applicable)
  - Apply environmental conditions in contract agreements (construction and supervision)

**Step 3:** Environmental and social review
- EMPs (and RAPs) reviewed by local Environmental and Social Specialists (or technical service providers e.g. NGOs)
- Subproject approved on the basis of environmental and social review findings

**Step 4:** Subproject implementation
- Implement mitigation measures under the EMP (and RAP) for subprojects
- Training of project staff, local govt officers, and communities in EMP (and RAP) implementation

**Step 5:** Environmental and social monitoring
- Monitor environmental and social compliance, pollution abatement, and EMP (and RAP) implementation
- Carry out annual environmental and social audits for subprojects
Annex 9

Subproject Screening Checklist
### Location

<table>
<thead>
<tr>
<th></th>
<th>Environmental and Social Impacts</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Are there environmentally sensitive areas (forests, rivers or wetlands) or threatened species that could be adversely affected by the project?</td>
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<tr>
<td>2</td>
<td>Does the project area (or components of the project) occur within or adjacent to any protected areas designated by government (national park, national reserve, world heritage site, etc.)?</td>
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<tr>
<td>3</td>
<td>If the project is outside of, but close to, any protected area, is it likely to adversely affect the ecology within the protected area areas (e.g., interference with the migration routes of mammals or birds)?</td>
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</tr>
<tr>
<td>4</td>
<td>Will the project reduce people’s access (due to roads, location etc) to the pasture, water, public services or other resources that they depend on?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Might the project alter any historical, archaeological or cultural heritage site or require excavation near such a site?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Physical and biological environment

<table>
<thead>
<tr>
<th></th>
<th>Environmental and Social Impacts</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>6</td>
<td>Will project require large volumes of construction materials (eg gravel, stones, water, timber, firewood)?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Might the project lead to soil degradation or erosion in the area?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>Might the project affect soil salinity?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Will the project create solid or liquid waste that could adversely affect local soils, vegetation, rivers, streams or groundwater?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Might river or stream ecology be adversely affected due to the installation of structures such as weirs and by-passes for micro-hydro projects?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Attention should be paid to water quality and quantity; the nature, productivity and use of aquatic habitats, and variations of these over time.**

<table>
<thead>
<tr>
<th></th>
<th>Environmental and Social Impacts</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>Will the project have adverse impacts on natural habitats that will not have acceptable mitigation measures?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>Does the project have human health and safety risks, during construction or later?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>13</td>
<td>Will the project lead to changes in the distribution of people or of livestock?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>14</td>
<td>Might the project lead to migration into the area?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Alternatives

<table>
<thead>
<tr>
<th></th>
<th>Environmental and Social Impacts</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>15</td>
<td>Is it possible to achieve the objectives above in a different way, with fewer environmental and social impacts?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Circle one of the following screening conclusions for Part A:**

A1. All answers to the checklist questions are “No”. There is no need for further action.

A2. For all issues indicated by “Yes” answers, adequate mitigation measures should be included in the project design. No further planning action is required. Implementation of the mitigation measures will require supervision by the applicant and the appropriate local authority (refer to Annex 11).

A3. For the following issues indicated by “Yes” answers (specify questions numbers):

   * the applicant has not provided adequate mitigation measures.

The applicant must revise the proposed project plan to provide adequate mitigation. Specialist advice may be required in the following areas:

A4. For the following issues indicated by “Yes” answers (specify questions numbers):

   * the applicant has not provided adequate mitigation measures.

The applicant must prepare an environmental assessment of the proposed project, and revise the project plan according to the results of that assessment. Specialist advice will be required in the following areas:
### Resettlement and Land Acquisition

<table>
<thead>
<tr>
<th></th>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Will the project require the acquisition of land (public or private, temporarily or permanently) for its development?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Will anyone be prevented from using economic resources (e.g. pasture, fishing locations, forests) to which they have had regular access?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Will the project result in the involuntary resettlement of individuals or families?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Will the project result in the temporary or permanent loss of crops, fruit trees and household infra-structure (such as granaries, outside toilets and kitchens, etc)?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Circle one of the following screening conclusions for Part B:**

- **B1.** All answers to the checklist questions are “No”. There is no need for further action.
- **B2.** There is at least one “Yes” answer. Consult the Resettlement Policy Framework and prepare a Resettlement Action Plan as appropriate *(refer to Annex 4 and 5).*

### Indigenous Peoples

<table>
<thead>
<tr>
<th></th>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Might the project adversely affect tribal communities or vulnerable people living in the area?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Are there members of these groups in the area who could benefit from this project?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Circle one of the following screening conclusions for Part C:**

- **C1.** All answers to the checklist questions are “No”. There is no need for further action.
- **C2.** There is at least one “Yes” answer, so an Indigenous Peoples Development Plan must be prepared. Consult **OP 4.20 on Indigenous Peoples** for further guidance.

### Pesticides and Waste Materials

<table>
<thead>
<tr>
<th></th>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Will the project result in the introduction of pesticides or an increase of pesticide use if use of such products currently exists?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Will the project result in the production of solid or liquid waste (e.g. water, medical, domestic or construction waste), or result in an increase in waste production, during construction or operation?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Circle screening conclusion D1, or circle D2 and/or D3, for Part D:**

- **D1.** All answers to the checklist questions are “No”. There is no need for further action.
- **D2.** Question 1 was answered “Yes”. Consult **OP 4.09 on Pest Management** for assistance in addressing issues of pest management.
- **D3.** Question 2 was answered “Yes”. Refer to the waste management and monitoring measures illustrated in **Table 4 of Annex 11.**

**TITLE OF SUBPROJECT:**

**LOCATION OF COMMUNITY:**

**SIGNATURE**

**DATE**
Annex 10

Construction and Operational Guidelines for Contractors
1 ENVIRONMENTAL MANAGEMENT OF CONSTRUCTION ACTIVITIES

Proper environmental management of construction projects can be achieved only with adequate site selection and project design. As such, the EA for projects involving any new construction, or any rehabilitation or reconstruction for existing projects, should provide information as to screening criteria for site selection and design including the following:

1.1 SITE SELECTION

Sites should be chosen based on community needs for additional projects, with specific lots chosen based on geographic and topographic characteristics. The site selection process involves site visits and studies to analyze: (i) the site’s urban, suburban, or rural characteristics; (ii) national, state, or municipal regulations affecting the proposed lot; (iii) accessibility and distance from inhabited areas; (iv) land ownership, including verification of absence of squatters and/or other potential legal problems with land acquisition; (v) determination of site vulnerability to natural hazards, (i.e. intensity and frequency of floods, earthquakes, landslides, hurricanes, volcanic eruptions); (vi) suitability of soils and subsoils for construction; (vii) site contamination by lead or other pollutants; (viii) flora and fauna characteristics; (ix) presence or absence of natural habitats (as defined by OP 4.04) and/or ecologically important habitats on site or in vicinity (e.g. forests, wetlands, coral reefs, rare or endangered species); and (ix) historic and community characteristics.

1.2 PROJECT DESIGN

Project design criteria include, but are not limited to, the consideration of aspects such as heating, ventilation, natural and artificial light energy efficiency, floor space (ft²) per bed/ward, requirements for x-ray rooms, adequacy of corridors for wheel chair/bed access, adequate water supply and sanitation systems, historical and cultural considerations, security and handicapped access.

1.3 CONSTRUCTION ACTIVITIES AND ENVIRONMENTAL RULES FOR CONTRACTORS

The following information is intended solely as broad guidance to be used in conjunction with local and national regulations. Based on this information, environmental rules for contractors should be developed for each project, taking into account the project size, site characteristics, and location (rural vs. urban).

After choosing an appropriate site and design, construction activities can proceed. As these construction activities could cause significant impacts on and nuisances to surrounding areas, careful planning of construction activities is critical. Therefore the following rules (including specific prohibitions and construction management measures) should be incorporated into all relevant bidding documents, contracts, and work orders.
1.3.1 Prohibitions

The following activities are prohibited on or near the project site:

- Cutting of trees for any reason outside the approved construction area;
- Hunting, fishing, wildlife capture, or plant collection;
- Use of unapproved toxic materials, including lead-based paints, asbestos, etc.
- Disturbance to anything with architectural or historical value;
- Building of fires;
- Use of firearms (except authorized security guards);
- Use of alcohol by workers.

1.3.2 Construction Management Measures

Waste Management and Erosion:

Solid, sanitation, and, hazardous wastes must be properly controlled, through the implementation of the following measures:

Waste Management:

- Minimize the production of waste that must be treated or eliminated.
- Identify and classify the type of waste generated. If hazardous wastes (including health care wastes) are generated, proper procedures must be taken regarding their storage, collection, transportation and disposal.
- Identify and demarcate disposal areas clearly indicating the specific materials that can be deposited in each.
- Control placement of all construction waste (including earth cuts) to approved disposal sites (>300 m from rivers, streams, lakes, or wetlands). Dispose in authorized areas all of garbage, metals, used oils, and excess material generated during construction, incorporating recycling systems and the separation of materials.

Maintenance:

- Identify and demarcate equipment maintenance areas (>15m from rivers, streams, lakes or wetlands).
- Ensure that all equipment maintenance activities, including oil changes, are conducted within demarcated maintenance areas; never dispose spent oils on the ground, in water courses, drainage canals or in sewer systems.
- Identify, demarcate and enforce the use of within-site access routes to limit impact to site vegetation.
- Install and maintain an adequate drainage system to prevent erosion on the site during and after construction.
Erosion Control

- Erect erosion control barriers around perimeter of cuts, disposal pits, and roadways.
- Spray water on dirt roads, cuts, fill material and stockpiled soil to reduce wind-induced erosion, as needed.
- Maintain vehicle speeds at or below 10mph within work area at all times.

Stockpiles and Borrow Pits

- Identify and demarcate locations for stockpiles and borrow pits, ensuring that they are 15 meters away from critical areas such as steep slopes, erosion-prone soils, and areas that drain directly into sensitive waterbodies.
- Limit extraction of material to approved and demarcated borrow pits.

Site Cleanup

- Establish and enforce daily site clean-up procedures, including maintenance of adequate disposal facilities for construction debris.

1.3.3 Safety During Construction

The Contractor’s responsibilities include the protection of every person and nearby property from construction accidents. The Contractor shall be responsible for complying with all national and local safety requirements and any other measures necessary to avoid accidents, including the following:

- Carefully and clearly mark pedestrian-safe access routes.
- If school children are in the vicinity, include traffic safety personnel to direct traffic during school hours.
- Maintain supply of supplies for traffic signs (including paint, easel, sign material, etc.), road marking, and guard rails to maintain pedestrian safety during construction.
- Conduct safety training for construction workers prior to beginning work.
- Provide personal protective equipment and clothing (goggles, gloves, respirators, dust masks, hard hats, steel-toed and –shanked boots, etc.) for construction workers and enforce their use.
- Post Material Safety Data Sheets for each chemical present on the worksite.
- Require that all workers read, or are read, all Material Safety Data Sheets. Clearly explain the risks to them and their partners, especially when pregnant or planning to start a family. Encourage workers to share the information with their physicians, when relevant.
- Ensure that the removal of asbestos-containing materials or other toxic substances be performed and disposed of by specially trained workers.
- During heavy rains or emergencies of any kind, suspend all work.
- Brace electrical and mechanical equipment to withstand seismic events during the construction.
1.3.4 Nuisance and dust control

To control nuisance and dust the Contractor should:

- Maintain all construction-related traffic at or below 15 mph on streets within 200 m of the site.
- Maintain all on-site vehicle speeds at or below 10 mph.
- To the extent possible, maintain noise levels associated with all machinery and equipment at or below 90 db.
- In sensitive areas (including residential neighborhoods, hospitals, rest homes, etc.) more strict measures may need to be implemented to prevent undesirable noise levels.
- Minimize production of dust and particulate materials at all times, to avoid impacts on surrounding families and businesses, and especially to vulnerable people (children, elders).
- Phase removal of vegetation to prevent large areas from becoming exposed to wind.
- Place dust screens around construction areas, paying particular attention to areas close to housing, commercial areas, and recreational areas.
- Spray water as needed on dirt roads, cut areas and soil stockpiles or fill material.
- Apply proper measures to minimize disruptions from vibration or noise coming from construction activities.

1.3.5 Community Relations

To enhance adequate community relations the Contractor should:

- Following the country and EA requirements, inform the population about construction and work schedules, interruption of services, traffic detour routes and provisional bus routes, as appropriate.
- Limit construction activities at night. When necessary ensure that night work is carefully scheduled and the community is properly informed so they can take necessary measures.
- At least five days in advance of any service interruption (including water, electricity, telephone, bus routes) the community must be advised through postings at the project site, at bus stops, and in affected homes/businesses.

3.1.6 Chance Find Procedures for Culturally Significant Artifacts

The Contractor is responsible for familiarizing themselves with the following “Chance Finds Procedures”, in case culturally valuable materials are uncovered during excavation, including:

- Stop work immediately following the discovery of any materials with possible archeological, historical, paleontological, or other cultural value, announce findings to project manager and notify relevant authorities;
- Protect artifacts as well as possible using plastic covers, and implement measures to stabilize the area, if necessary, to properly protect artifacts
- Prevent and penalize any unauthorized access to the artifacts
- Restart construction works only upon the authorization of the relevant authorities.
1.4 ENVIRONMENTAL SUPERVISION DURING CONSTRUCTION

The bidding documents should indicate how compliance with environmental rules and design specifications would be supervised, along with the penalties for non-compliance by contractors or workers. Construction supervision requires oversight of compliance with the manual and environmental specifications by the contractor or his designated environmental supervisor. Contractors are also required to comply with national and municipal regulations governing the environment, public health and safety.

Annex 11

Sector Specific Impact
Guidelines for Subprojects
<table>
<thead>
<tr>
<th>Type of Activity</th>
<th>Potential Impacts</th>
<th>Generic Mitigation Measures</th>
<th>Monitoring Indicators</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Construction</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| Negative social and economic effects on local people and communities, such as: | • Unplanned commercial development  
• Demand for local public infrastructure and services increases beyond existing capacities  
• Disruption of traditional lifestyles  
• Induced population movements and natural resource exploitation activities, due to improved access (e.g. conversion of forest to pasture, or of sustainable land use to unsustainable, short-cycle cropping; illegal or unsustainable hunting) | • Work with affected communities to anticipate and plan for enhanced access to and demand on local public infrastructure and services  
• Provide project funds to strengthen local public infrastructure and services (e.g. health clinics, markets, schools)  
• Avoid creating congested and unsafe road conditions at intersections, and in villages and towns | Participation of communities in local planning | NGO/Government |
| Displacement of housing or farms or involuntary resettlement | • Purchase of replacement land and resettlement of affected people  
• Monetary compensation | Number of project affected people adequately compensated and resettled | Local government |
| Loss of natural areas, important habitats, biodiversity | Avoid infringing on:  
• Critical habitats or areas with significant biodiversity (e.g. wetlands)  
• Protected natural sites and wilderness areas | • Degree of biodiversity (number of species) in road vicinities  
• Extent of critical habitats | Ministry of Environment /local government |
| Damage valuable historic, religious, cultural, and archaeological resources | Avoid areas of cultural, historical, or religious significance  
Apply chance find procedures in construction clauses | Participation of communities in local planning | NGO/Local government |
| Social disruption during construction (e.g. enhanced transmission of STDs and TB) | • Comprehensive community participation in construction planning and management  
• Education on avoiding communicable diseases/hygiene  
• Use regional labour where possible | Occurrence of illness or disease | NGO/ Local government |
| Creation of stagnant water in construction borrow pits and quarries, and on road sides, that breed disease carriers | Assess ecology of disease carriers in road corridor, and employ suitable mitigation measures (e.g. proper drainage of construction areas and road sides, effective road maintenance) | • Occurrence of illness or disease  
• Drive roads after moderate rains to identify areas that collect or gully water | Local government/ Ministry of Transport or Public Works/ Community |
<p>| Impact of road noise on village | Plant 30 meter tree buffer strips between road and village | Number of community complaints to local authorities about noise | Transport Ministry |</p>
<table>
<thead>
<tr>
<th>Type of Activity</th>
<th>Potential Impacts</th>
<th>Generic Mitigation Measures</th>
<th>Monitoring Indicators</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dust</td>
<td>Dust</td>
<td>• Stabilize the road surface with gravel and other rocky surfacing materials</td>
<td>Number of community complaints to local authorities about dust</td>
<td>Transport Ministry</td>
</tr>
<tr>
<td></td>
<td>Contaminate surface water and generate trash due to lack of solid waste management</td>
<td>• Provide temporary sanitation (e.g. latrine), where this is not possible, instruct crews to employ soil mining (digging a pit for human waste and covering with soil immediately after use) • Collect all solid waste from all site areas and dispose of either in local landfill or well-screened waste pits</td>
<td>Local complaints of excessive waste and odours</td>
<td>Transport and Public Works Ministry/local government</td>
</tr>
<tr>
<td></td>
<td>Increased soil erosion leading to sediment in runoff and, possibly, gully formation from: • Construction activities such as grading, excavations, and borrowing/quarrying • Inadequate design of culverts and drainage controls</td>
<td>• Design: o Use surface drainage controls and mulch on vulnerable surfaces and slopes o Line receiving surfaces with stones or concrete o Locate and design borrow/quarry sites for erosion control during road construction and future maintenance operations o Identify the most environmentally sound source of materials within budget • Construction: o Limit earth movement and soil exposure to the dry season o Balance cut and fill for minimum deposition of earth o Provide sedimentation basins o Resurface and re-vegetate exposed surfaces</td>
<td>• Quality of soil/productivity • Integrity of road structures • Accidents due to erosion of road</td>
<td>Transport and Public Works Ministry</td>
</tr>
<tr>
<td>Post-Construction and Operation</td>
<td>Landslides, slumps and slips</td>
<td>• Avoid areas of soil, slope or geological instability and unstable river crossing sites • Stabilize slopes by planting vegetation • Minimize vertical road cuts • Install drainage ditches to diver water away from road</td>
<td>• Quality of road • Degree of erosion</td>
<td>Transport and Public Works Ministry</td>
</tr>
<tr>
<td></td>
<td>Accidents and safety risks</td>
<td>Construct basic speed bumps and employ traffic signs where possible</td>
<td>Number of accidents reported per month to local government</td>
<td>Transport and Public Works Ministry/local government</td>
</tr>
<tr>
<td>Type of Activity</td>
<td>Potential Impacts</td>
<td>Generic Mitigation Measures</td>
<td>Monitoring Indicators</td>
<td>Responsibility</td>
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</tbody>
</table>
|                  | Increased soil erosion leading to sediment in runoff and, possibly, gully formation from inadequate maintenance of road surface, ditches, borrow/quarry sites, and drainage and erosion control measures                                                                                                                                                                                                                         | • Ensure proper and timely maintenance of erosion control and drainage measures along the road and at borrow/quarry sites  
• Clean out culverts and side channels/runout when they begin to fill with sediment  
• Fill mud holes and pot holes with quality gravel  
• Use water from settling basins and retention ponds for road maintenance | • Quality of soil/productivity  
• Integrity of road structures  
• Accidents due to erosion of road  
• Collection of water in drainage system | Transport and Public Works Ministry |
|                  | Quarry used for construction may become a health hazard                                                                                                                                                                                                                                                                                                                                                         | • Discuss with local community the usefulness of using pits as water collection pits for cattle, irrigation  
• Highlight issues of disease transmission and the need to prohibit its use for drinking, bathing, and clothes washing | Occurrence of disease or illness | Community |
|                  | Impact of road noise on village                                                                                                                                                                                                                                                                                                                                                                              | Plant 30 meter tree buffer strips between road and village | Number of community complaints to local authorities about noise | Transport and Public Works Ministry |
|                  | Dust due to traffic                                                                                                                                                                                                                                                                                                                                                                                             | • Implement agreed dust control measures such as wetting dirt roads, truck washing for trucks exiting site, and monitoring dust emissions | Number of community complaints to local authorities about dust | Transport and Public Works Ministry |
### Table 2: Small-scale Irrigation and Drainage

<table>
<thead>
<tr>
<th>Potential Impacts</th>
<th>Generic Mitigation Measures</th>
<th>Monitoring Indicators</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Loss of vegetative cover, decrease in soil fertility</td>
<td>Avoid infringing on protected areas, critical habitats or areas with significant biodiversity (e.g. wetlands)</td>
<td>Decreased productivity</td>
<td>Community/NGO</td>
</tr>
<tr>
<td>Reduction in soil and groundwater quality, declines in plant growth and reduced harvests</td>
<td>Use the right fertilizers at correct time (e.g. before field crops are planted), and in correct amounts for the specific crop and soil type</td>
<td>Decreased productivity</td>
<td>Community/NGO</td>
</tr>
</tbody>
</table>
| Fertilizer runoff leading to degradation of aquatic environments in nearby ponds, streams and other water bodies | • Use manure to help fertilize crops and build soil quality  
• Do not apply agro-chemicals too close to streams, ponds and drinking water sources  
• Do no wash fertilizer bags in streams or ponds | • Quality of liquid effluent and receiving waters  
• Decreased productivity | Community/NGO               |
| Illness or disease due to pollution of water sources from food processing wastes | • Ensure thorough training in safe storage, handling, use and disposal of agro-chemicals  
• Do not apply agro-chemicals too close to streams, ponds and drinking water sources  
• Do no wash fertilizer bags in streams or ponds | Occurrence of human (or livestock) illness or disease | Ministry of Agriculture/ NGO/ Community |
| Health effects on workers                                                     | • Ensure thorough training in safe storage, handling, use and disposal of pesticides  
• Wear protective clothing  
• Consider training and use of integrated pest management (IPM) | Incidence of worker disease or illness | Ministry of Agriculture/ NGO/ Community |
| Degradation of groundwater, streams, and rivers from solid and liquid wastes, and consequent | • Locate waste disposal sites away from surface and groundwater sources, watercourses, housing and town centers  
• Install grease traps and skim tanks  
• Ensure receiving waters for liquid wastes are able to absorb and naturally decompose the effluent  
• Screen waste liquids to remove coarse solids  
• Ensure waste that is stored before transport to treatment facility or landfill cannot leak into the ground | • Occurrence of illness in livestock or community  
• Surface water flows and ground table levels in project area | Ministry of Agriculture/ NGO/ Community |
| Upsetting existing social and economic community management relationships, land tenure systems, security of livelihoods, and gender division labour | Avoid sites that require:  
• Resettlement  
• Displacement of other important land uses  
• Encroachment on historical, cultural, or traditional use areas | • Number of people displaced and compensated  
• Encroachment onto historical, cultural or protected areas | Ministry of Agriculture/ NGO/ Community |
| Conflicting demands on surface or groundwater supplies                        | Locate and size irrigation schemes:  
• Where water supplies are adequate and the scheme will not conflict with existing human, livestock, wildlife or aquatic water uses, especially during dry seasons  
• Withdrawals should not exceed “safe yield” from groundwater resources | • Involve community in local planning  
• Complaints from community about water use | Ministry of Agriculture/ NGO/ Community |
<table>
<thead>
<tr>
<th>Potential Impacts</th>
<th>Generic Mitigation Measures</th>
<th>Monitoring Indicators</th>
<th>Responsibility</th>
</tr>
</thead>
</table>
| Creating habitats in canals and ditches for disease carriers such as mosquitoes and snails | Assess ecology of disease carriers in the project area, and employ suitable prevention and mitigation measures, e.g.:  
• Site and orient water works, fields and furrows to ensure adequate natural drainage of surface water  
• Avoid unsuitable gradients, and creating stagnant or slowly moving water  
• Construct straight or only slightly curved canals  
• Install gates at canal ends to allow complete flushing  
• Ensure adequate sub-surface drainage of fields  
• Avoid over-irrigation  
• Maintain water works, and clear sediment and weeds, regularly | Occurrence of higher numbers of disease carriers such as mosquitoes and snails, as documented by community survey/complaints | Ministry of Agriculture/ NGO/ Community |
| Spreading infection and disease through the inappropriate use of irrigation canals for water supply, bathing or human waste disposal | Provide/ensure alternate facilities for domestic water supply, bathing and human waste disposal                                                                                                                                                    | • Involve community in local planning  
• Periodic survey of community about which facilities they use for which activity | Community/ NGO |
| Health effects from improper storage, handling, use or disposal of agro-chemicals (pesticides, herbicides) | • Training/supervision of farm workers on use of agro-chemicals to protect worker health and safety along with the environment  
• Training of Integrated Pest Management (IPM) scouts for early recognition of pest outbreaks and the most environmentally sound methods to combat outbreaks | • Pest outbreaks  
• Occurrence of illness or disease among workers | Community/ NGO |
| Waterlogging | • Thoroughly assess project soils and their management needs under irrigated agriculture  
• Apply water efficiently (consider drip or dawn/evening sprinkler system)  
• Install and maintain adequate surface and subsurface draining  
• Use lined canals or pipes to prevent seepage | • Incidences of gathering water from improper drainage  
• Soil erosion  
• Dampening of surrounding area due to seepage | Community/NGO |
| Salinization | • Avoid waterlogging (above)  
• Mulch exposed soil surfaces to reduce evaporation  
• Flush irrigated land regularly  
• Cultivate crops having high tolerance to salinity | Maintain log of hours/water used for irrigation  
•预防地面排水进入附近水体（溪流、池塘等） | Community/local government |
| Erosion | • Design and layout of furrows appropriately  
• Avoid unsuitable gradients  
• Avoid over-irrigation  
• Install sediment traps in fields and canals to capture sediment for return to fields  
• Minimum tillage, contour cropping, terracing and other methods of conserving soil moisture | Involve community in local planning of sites | Agriculture Ministry/ Community |
| Reduced quality of surface and groundwater receiving excess irrigation water or drainage (nutrients, agro-chemicals, salts and minerals) | • Minimize risks of waterlogging and salinization (see above)  
• Use agro-chemicals appropriately (see above)  
• Prevent surface drainage of fields into nearby water bodies (streams, ponds, etc.) | • Involve community in local planning of sites  
• Training/practices of local farmers | Community |
| Overgrazing | • Development of range management specialists in Agricultural Ministry  
• Training/supervision of herders in range management | • Involve community is local planning of range management  
• Practices of local herders | Agricultural Ministry/ Community/ NGO |
### Table 3: Water Supply and Sanitation

<table>
<thead>
<tr>
<th>Potential Impacts</th>
<th>Generic Mitigation Measures</th>
<th>Monitoring Indicators</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cross contamination sewage and water lines due to pressure differentials and leaks</td>
<td>Employ suitable prevention and mitigation measures (e.g. good drainage around water supply points)</td>
<td>• Complaint from community</td>
<td>Government</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Occurrence of disease or illness</td>
<td></td>
</tr>
</tbody>
</table>
| Negative social and economic effects on existing community water management practices and relationships | Consider water conservation measures instead of or in addition to a new water supply project, for example:  
• Upgrade or renovate existing systems (e.g. deepen and clean existing wells, reduce leakage, evaporation and seepage loss)  
• Introduce water recycling and reuse | • Level of community participation (number of individuals involved and allocated responsibilities) in management of water supply structures  
• Level and quantity of water recycling and reuse carried out per community | Community/NGO                                                                                                    |
| Potential land use conflicts                                                     | Avoid locating project works that require:  
• Resettlement  
• Displacement of other important land uses  
• Encroachment on historical, cultural, traditional use areas, or protected areas | • Number of people displaced and compensated  
• Encroachment onto historical, cultural or protected areas | Local government/Community                                                                                      |
| Conflicting demands on surface or groundwater supplies                           | • Ensure sufficient community participation and organization for effective planning and management of water supply system, and for equitable water distribution  
• Develop water supply sources:  
  o Where water quantities are adequate and the project will not conflict with existing human, livestock, wildlife or aquatic water uses, especially during dry seasons  
  o So that withdrawals do not exceed “safe yield” from groundwater resources | • Level of community participation (number of individuals involved and allocated responsibilities) in management of water supply structures | Local government/Community                                                                                      |
| Illness or disease related to poor source water quality or from contaminants entering water supply system | • Ensure that water is fit for drinking (make regular testing a part of the project if possible)  
• Ensure planning, design, and maintenance of supply, sanitation, and wastewater works is appropriate to local needs, and to soil and water table conditions | • Occurrence of illness or disease  
• Regular testing (if possible)  
• Involve community in local planning process | Local government/Community                                                                                      |
<p>| Contaminated soils from disposal of inadequately decomposed wastewaters           | Ensure planning, design, and maintenance of supply, sanitation, and wastewater works is appropriate to local needs, and to soil and water table conditions | Involve community in local planning process | Local government/Community                                                                                      |</p>
<table>
<thead>
<tr>
<th>Potential Impacts</th>
<th>Generic Mitigation Measures</th>
<th>Monitoring Indicators</th>
<th>Responsibility</th>
</tr>
</thead>
</table>
| Contamination of water source supply   | • Protect groundwater sources from surface runoff (e.g. rainwater, spillage around wells, wastewater from latrines or homes) that may enter as drainage from above or as seepage from below  
  • Locate source well away from latrines, septic systems, traditional defecating areas, and animal pens  
  • Protect surface water sources from contamination from:  
    o Runoff from nearby agricultural areas (e.g. silt, agro-chemicals, animal waste)  
    o Other uses such as bathing, laundering, and animal watering  
    o Garbage and vegetative debris | • Occurrence of illness or disease  
  • Decrease in production due to water contamination (e.g. stunted growth, no growth)  
  • Complaints/problems documented from local community | Local government/Community |
| Groundwater contamination              | • Ensure adequate design, installation, and maintenance of latrines, holding tanks, septic systems and wastewater soak-aways  
  • Ensure adequate spacing between latrines and soak-aways                                                                                                           | • Occurrence of illness or disease  
  • Decrease in production due to water contamination (e.g. stunted growth, no growth)                                                                             | Local government/Community |
| Surface water contamination            | • Ensure proper maintenance of latrines, holding tanks, septic systems and wastewater soak-aways  
  • Locate latrines, septic systems and soak-aways at least 30 meters from any waterbody (e.g. stream, lake, river)                                                                                               | • Occurrence of illness or disease  
  • Decrease in production due to water contamination (e.g. stunted growth, no growth)                                                                             | Local government/Community |
**Table 4: Waste Management**

<table>
<thead>
<tr>
<th>Potential Impacts</th>
<th>Generic Mitigation Measures</th>
<th>Monitoring Indicators</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Displaced land uses</td>
<td>Involve community in locating project sites and access routes as well as developing practices and responsibilities for managing project activities and sites</td>
<td>Survey of local population regarding land uses</td>
<td>Local government/Community</td>
</tr>
<tr>
<td>Disruption or destruction of sites of cultural, religious or historical importance</td>
<td>Involve community in locating appropriate project sites and access routes that avoid such resources</td>
<td>Survey of local population regarding problems with culturally sensitive areas</td>
<td>Local government/Community</td>
</tr>
<tr>
<td>Human settlements and land uses near landfill and composting sites</td>
<td>Involve community in locating project sites and access routes</td>
<td>Survey of local population regarding siting of facility</td>
<td>Local government</td>
</tr>
<tr>
<td>Wind-blown garbage, dust and smoke</td>
<td>Spread and compact incoming refuse, and cover with soil, daily</td>
<td>Complaints from community</td>
<td>Local government</td>
</tr>
<tr>
<td>Increased traffic to/from the sites</td>
<td>Pave access roads, or use water spraying to reduce dust</td>
<td>Complaints from community</td>
<td>Local government</td>
</tr>
</tbody>
</table>
| Odors | • Provide for safe ventilation of decomposition gases  
• Spread and compact refuse, and cover with soil daily | • Incidences of illness or disease  
• Decrease in agricultural production | Local government |
| Containment of water sources | • Ensure site layout and management practices, including working training, are adequate  
• Install adequate surface drainage control measures  
• Maintain erosion and surface drainage control measures during operations | Periodic check for pooling water due to inadequate drainage | Local government |
| Creation of stagnant water sources | • Ensure site layout is adequate for drainage  
• Install adequate surface drainage control measures  
• Maintain erosion and surface drainage control measures during operations | • Increase in disease carriers  
• Occurrence of illness or disease | Local government/Community |
| Creation of stagnant water in project sites that breed disease carriers | Assess ecology of disease carriers in project area and employ suitable mitigation measures (e.g. proper drainage) | Survey land area and community for environmentally sensitive areas/habitats | Local government/Community |
| Loss of natural area, important habitats, biodiversity | Avoid infringing on:  
• Protected natural areas and wilderness areas  
• Critical habitats or areas with significant biodiversity (e.g. wetlands) | | |
| Soil erosion | • Minimize time of exposure of areas cleared, graded or excavated  
• Stabilize and revegetate disturbed areas  
• Install adequate surface drainage control measures  
• Maintain erosion and surface drainage control measures during operations | • Degree of erosion | Local government/Community |
<table>
<thead>
<tr>
<th>Potential Impacts</th>
<th>Generic Mitigation Measures</th>
<th>Monitoring Indicators</th>
<th>Responsibility</th>
</tr>
</thead>
</table>
| Contamination of surface and groundwaters with landfill runoff and leachate | • Protect water resources by locating landfills:  
  o Where the underlying soils are relatively impermeable, and have a high capability for containing chemical contaminants (e.g. clays)  
  o So that the bottom of the landfill is above the water table  
  o Away and down gradient from surface waters, and groundwater recharge areas sources, whose use could be affected by contamination unless the distance to the receiving water is adequate to dilute and disperse potential contamination  
  • Use a landfill liner (e.g. clay, synthetic)  
  • Collect surface runoff and discharge to safe area  
  • Install test wells at landfill perimeter, and monitor water quality during operations, for early identification and mitigation of emerging adverse effects | • Complaints from community  
• Lower agricultural productivity  
• Increased instances of illness or disease | Local government / Community |
Table 5: Health and Sanitation

<table>
<thead>
<tr>
<th>Types of Activities</th>
<th>Potential Impacts</th>
<th>Generic Mitigation Measures</th>
<th>Monitoring Indicators</th>
<th>Responsibilities</th>
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</thead>
<tbody>
<tr>
<td>Management of health care wastes at facilities (health centers, laboratories,</td>
<td>• Disease transmission through infectious waste, sharps, and contaminated water</td>
<td>• Community waste management plan</td>
<td>Schedule for periodic review of compliance to and effectiveness of plan</td>
<td>Government/ NGO/ Community</td>
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<tr>
<td>maternity clinics)</td>
<td>• Chemical and toxic threats through chemical and pharmaceutical exposure</td>
<td>• Clearly assigned staff responsibilities</td>
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<td>• Community guidelines for generation, handling, storage, treatment and disposal</td>
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<td>• Staff trained in handling, storage, treatment, and disposal</td>
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<td>• Protective clothing available (provide thick gloves and aprons for staff handling healthcare waste)</td>
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<td>• Good hygiene practices (soap and water readily available)</td>
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<td>• Vaccinated workers</td>
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<td>• Temporary storage containers in designated locations</td>
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<td>• Minimization, reuse, and recycling procedures</td>
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<td>• Segregate waste</td>
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<td>• Treatment methods for hazardous or highly hazardous waste (open-air burning or incineration of healthcare waste on site)</td>
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<td>• Designate a final disposal site (bury waste on site in clay-lined pit)</td>
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<tr>
<td>Planning a new facility</td>
<td>• Spread of disease</td>
<td>• Select a location with easy access to safe drinking water (source should be dedicated exclusively to the facility, if possible, to reduce spreading disease)</td>
<td>Involve community in siting facility and other planning measures</td>
<td>Government/ NGO/ Community</td>
</tr>
<tr>
<td></td>
<td>• Environmental impact</td>
<td>• Install adequate sanitation facilities to prevent the spread of disease from infected patients</td>
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<td>• Avoid locations adjacent to schools to minimize children’s risk of exposure</td>
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<td>• Pick a location where waste can be safety buried (e.g. above the water table and protected from scavenging) or easily shipped off site for safe disposal in a sanitary landfill</td>
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Annex 12

General guidelines for the supervision of CDD projects
**Part I: Planning the supervision mission**

1. Pre-mission work is absolutely essential for making the supervision of CDD projects effective. Telephone/email discussions with the Client’s Environment team should be undertaken in planning the supervision mission.

2. Planning the site visits to subproject locations should be done as pre-mission work. It should be noted that it will be impossible to cover each and every subproject in a CDD project during supervision missions. The Bank’s Environmental and/or Social Specialist should select project sites based on the following criteria:
   - The importance of environmental and social issues in the subprojects;
   - The amount of project funding/investment being made in the subproject type;
   - The subprojects that have been covered in the previous supervision missions;
   - New regions/districts should be preferred;
   - Regions/districts that are within or near natural habitats or known to have environmental constraints/problems;
   - The subprojects that were visited during the previous supervision mission and require a follow-up visit due to the importance or critical nature of the environmental and/or social issues;
   - The subprojects that have the potential to become risk issues in the context of the safeguard policies.

3. In planning the supervision mission, the Bank’s Environmental and/or Social Specialist should make sure that the environmental/social supervision mission overlaps with the overall mission for a couple of days.

4. Site visit plans should not be too tight and packed with the motive to cover as many subprojects as possible. It is generally preferable to study a subproject in greater depth when compared to studying several subprojects in a broader manner.

5. Site visits should not be seen as meant only for the Bank team. During the pre-mission discussions with the Client, the Bank should advise the Client’s Environment team to use the site visits to collect inputs for their ongoing work. These site visits should not be done only for the sake of the supervision mission. These should be made part-and-parcel of the Client’s ongoing work. This way, the Bank’s Environmental and/or Social Specialist will also witness the nature of the work being done by the Client’s Environmental and Social Team with their District teams and field level officers.

**Part II: Pre-mission documentation review**

6. As part of the pre-mission preparation, the Bank’s Environmental Specialist should review the following documents:
   - Project Appraisal Document (PAD)
   - Updated Project Implementation Plan (PIP)
   - Quarterly Progress Reports
   - Previous Aide Memoires
   - Other monitoring reports, if any
   - Audit reports, if any.
Preparing focused statement of objectives

7. Based on the review of these reports and telephone/email discussions, the Bank’s Environmental Specialist should prepare a list of points that will be the focus of the supervision mission. This could also be the basis of the Statement of Mission Objectives to be sent by the Bank’s Environmental Specialist.

Preparatory Research

8. The Bank’s Environmental Specialist should carry out quick research of other Bank projects, particularly similar projects or those in the same State, to determine whether any cross-project learning can be facilitated. If possible, the Bank’s Environmental Specialist should also review other non-Bank initiatives so as to update himself/herself about current happenings in the State. This is important for the Environmental Specialist to provide value-addition to the work done by the client’s Environmental team.

Undertaking site visits

9. Generally, the supervision mission will consist of two parts: (i) site visit and associated discussions, and (ii) meetings/discussions at the client’s office, which is generally in the State capital. Considering the numerous tasks that need to be accomplished, the Bank’s Environmental Specialist should use the two parts of the mission efficiently. Travel time should also be effectively used. Discussions with the client’s Environment team regarding the follow-up to the previous aide-memoire should be done during travel to the site/subproject locations. Preliminary discussions on the key problems/constraints faced by the Client’s Environment team should be held during travel to the site/subproject locations.

10. For the subprojects selected for site visits, the Bank’s Environmental and/or Social Specialist(s) should focus on the following:

   o Organizational arrangements that have ensure the consideration of environmental and social issues;
   o Physical implementation of the mitigation measures (if any);
   o Subproject documents that demonstrate that a management framework has ensured environmental considerations in the design, implementation and operation;
   o Awareness levels of the subproject proponents on environmental and social issues;
   o Verifying whether safeguard policies have been or likely to be an issue during subproject implementation.

11. For the site visit, the Bank’s Environmental Specialist should be accompanied by a representative from the Client’s Environment team. During the site visit, the Environmental Specialist should meet the mainstream operational staff at the district and village levels to determine how they have included or are including environmental and social considerations into the subprojects.

12. During the site visit, the Bank’s Environmental Specialist should undertake selected direct interactions with those implementing the subprojects in order to understand and appreciate their perspectives on environmental management. Through these interactions, the Bank’s Environmental Specialist should assess
how the management framework, the training and the information dissemination and other efforts are being put to practice at the subproject implementation level.

13. Upon returning from the site, the Bank’s Environmental Specialist should give verbal feedback to the Client’s senior management on environmental issues.

Drafting and discussing the Aide Memoire

14. Drafting of the aide-memoire is best done during the mission itself when the issues are still fresh. If prepared during the mission, there is the advantage of being able to seek clarifications from the Client on any aspect related to the project.

15. In writing the aide-memoire, the Environmental and/or Social Specialist(s) should clearly distinguish what is being posed as essential requirements and suggestions for improvement. The essential requirements include:

- Modifying the design the framework in order to ensure that safeguard issues are effectively captured;
- Organisational concerns in terms of staff available to address safeguard issues;
- Training focus areas to ensure that safeguard policies are understood and continue to be addressed in a manner integral to project implementation;
- Strengthening of the Client’s monitoring or supervision and reporting in order to ensure that safeguard concerns are being identified at the subproject level.

16. The Bank’s Environmental and/or Social Specialist(s) should preferably discuss the aide-memoire with the client’s Environment team. During discussions, commitments on the timelines for agreed actions should be obtained.

These guidelines derive from a research study carried out in August 2003 by the Bank’s East Asia and Pacific (EAP) Region titled: “Rahill, B. and Vaideeswaran, S. Environmental Management Mechanisms in CDD and Other Decentralized Implementation Frameworks: A Review of the India Portfolio. Volume 1. Final Report and Annexes 1 – 6.”
Annex 13

Community Subproject Reporting Form
Community Subproject Monthly Report

**Instructions:** This form must be sent to the Project Officer for your project every month without fail. Attach additional information as needed should the form below not provide enough space.

Progress report for the month of: ______________________

Project name: ____________________________   Project number: ____________________

Village/area: ____________________________   District: ____________________________

**PHYSICAL PROGRESS:** (List all the project components and the progress to date, e.g. school one – completed construction of walls; school two – cement poured).

<table>
<thead>
<tr>
<th>Component</th>
<th>Description of project to date</th>
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<tbody>
<tr>
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<td>4.</td>
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<td>etc.</td>
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</tbody>
</table>

**COMMENTS ON PROJECT PROGRESS:** (Report if there have been any problems that require the attention and assistance of the Regional or Project officer).

<table>
<thead>
<tr>
<th>Problem/Issue</th>
<th>Comments</th>
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