



## Integrated Safeguards Data Sheet Restructuring Stage

Restructuring Stage | Date ISDS Prepared/Updated: 09-May-2023 | Report No: ISDSR30028

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**Note to Task Teams:** The following sections are system generated and can only be edited online in the Portal.

## I. BASIC INFORMATION

### 1. BASIC PROJECT DATA

Project ID	Project Name
P165649	Rwanda Housing Finance Project
Task Team Leader(s)	Country
Brice Gakombe, Leyla V. Castillo	Rwanda
Approval Date	Environmental Category
29-Nov-2018	Financial Intermediary Assessment (F)
Managing Unit	
EAEF1	

### PROJECT FINANCING DATA (US\$, Millions)

#### SUMMARY

<b>Total Project Cost</b>	150.00
<b>Total Financing</b>	150.00
<b>Financing Gap</b>	0.00

#### DETAILS

##### World Bank Group Financing

International Development Association (IDA)	150.00
IDA Credit	150.00

### 2. PROJECT INFORMATION



### Current Program Development Objective

To expand access to housing finance to households and to support capital market development in Rwanda.

**Note to Task Teams:** End of system generated content, document is editable from here.

## 3. PROJECT DESCRIPTION

### A. Project Summary

1. **The Rwanda Housing Finance Project (RHFP) is a US\$150 million five-year project aiming at *expanding access to housing finance to households and to support capital market development in Rwanda*.** The IDA Scale-up Facility (SUF) credit was approved by the Board on November 29, 2018 and became effective on April 10, 2019. The project is implemented by the Rwanda Development Bank (BRD) and includes three components: (1) Provision of Long-term Finance to Expand Housing Finance through a line of credit (LoC) extended to financial institutions (US\$117 million equivalent); (2) Technical Assistance and Implementation Support (US\$3 million equivalent) to (i) enhance the housing demand-side and (ii) support reform agenda to improve the enabling environment for the supply of affordable housing; and (3) Provision of Infrastructure for Affordable Housing Development Projects (US\$30 million equivalent) to increase the availability of affordable housing with the provision of infrastructure to eligible affordable housing development projects. Component three was introduced through a project restructuring approved in November 2020. The project closing date is December 31, 2023.

### B. Project Status

2. **After initial years of slow progress, the project recently recorded substantial progress and is now on the path to achieving the project development objective (PDO).** Significant progress has been made in project's implementation with disbursement reaching US\$97.3 million, up from US\$42.7 million in June 2022. The project also made substantial progress towards achieving the development objectives, especially from the continued implementation momentum experienced under component one. The PDO and Implementation Progress (IP) ratings are Moderately Satisfactory. The implementation progress under the different components is summarized below:

- a. **Component 1 - Provision of Long-term Finance to Expand Housing Finance.** The performance of this component has improved considerably with the number of housing loans financed through the project increasing from 356 in June 2022 to 4,631, a strong progress compared to the project's overall target of 6000. In addition, the average maturity of housing loans financed through the project rose from 12 to 15 years, which reflects the impact of the long-term funding provided through the project on the mortgage market. The positive change in the pace of implementation has been a result of the changes introduced following the Mid-Term Review, including in the eligibility criteria for project beneficiaries through (i) expanding the income bracket of eligible beneficiaries of mortgage financing that allowed low income earners to benefit from the project; and (ii) removing criteria that refinancing can only be applied to new construction which allowed financing of partially built housing and self-construction. Following the official delegation of capital market development objective to BRD by MINECOFIN, BRD is in the process of



launching a bond issuance program which will help meet the project development objective and allow for increased sustainability of long-term financing for housing.

- b. Component 2 - Technical Assistance and Implementation Support. The performance of this component is satisfactory, with BRD conducting several high-quality analytical and advisory work to build the housing demand-side capacity and promote the supply side reform agenda. Some of the activities supported under this component include: (i) a study on the housing market and low-cost, efficient housing materials and technologies, which provides detailed socio-economic characteristics of urban residents in Rwanda through a thorough analysis of recent census and survey data and presents locally-acceptable and innovative housing typologies and technologies; (ii) assessment of the efficiency and sustainability of the government infrastructure support scheme, which consolidates the affordable housing project data collected in the government review and approval process for the first time and analyzes them in detail to identify gaps and areas of improvement in the current scheme; and (iii) the ongoing public awareness for the project, which aims to increase the uptake of the mortgages and enhance the overall awareness of the government's affordable housing schemes on both demand and supply sides. The consultancy work to review the Condominium Law and develop supporting implementation tools is ongoing.
- c. Component 3 - Provision of Infrastructure for Affordable Housing Development Projects. This component has experienced delays in achieving performance-based conditions (PBCs) and delivering affordable housing units. To date, two out of four PBCs have been achieved, unlocking US\$13 million in total. The revised regulatory framework for the operation of the government infrastructure support scheme for affordable housing (PBC1) comprises Prime Minister's Instructions and Ministerial Instructions and was approved and gazetted on October 21, 2022, and December 30, 2022, respectively. The Rwanda Housing Authority (RHA) Operational Procedure for infrastructure support (PBC2) was already approved by the RHA Board on July 6, 2021 but is being updated following the approval of the higher-level regulations under PBC1 and will be finalized by July 31, 2023. Guidelines on Public-Private Partnership (PPP) in affordable housing development (PBC3) went through several iterations and at the recent workshop in March 2023, the government concluded that the version with three PPP models (the current infrastructure support scheme, a Special Purpose Vehicle (SPV) model for ownership and a SPV model for rental) will best serve the government's internal coordination needs first. The PPP guideline is undergoing the final approval process and will unlock another US\$2 million once approved. PBC4 pertains to the delivery of affordable housing units, unlocking US\$1 million per 200 units. The process of review, approval and contract processing for eligible affordable housing has been slow, with only one project (Bwiza Riverside Homes) fully onboard, while others are still at contract signing. The slow progress and lower number of units to be delivered than estimated raises the need to restructure this component to manage it within a feasible scope and yield concrete outcomes.

### C. Rationale for Restructuring

3. **This proposed Level II restructuring has been prepared in response to a request from the Government of Rwanda (GoR) to maximize project impact and achieve the project's development objective.** By letter dated June 27, 2023, the Ministry of Finance and Economic Planning (MINECOFIN) requested to (i) extend the project's closing date by 22 months to October 31, 2025 (from December 31, 2023) to allow sufficient time for the completion of ongoing key project activities that will not be completed within the initial project duration; (ii) assign the bond issuance role initially under Rwanda Mortgage Refinancing Company (RMRC) to BRD; (iii) reallocate US\$10 million from component three to component one (US\$9 million) and component two (US\$1 million); and (iv) recalibrate component 3 activities through amendment and adjustment of PBC3 and PBC4 respectively.



4. The proposed time extension will further support the implementation momentum evidenced over the last 12 months, particularly since the changes introduced following the June 2022 Mid-Term Review. An extension of the project's closing date until October 31, 2025 will allow BRD and Rwanda Housing Authority (RHA) to fully utilize the funding available under the project for issuing the bond, achieving all PBCs, particularly delivery of affordable housing units under PBC4, and scaling up the provision of infrastructure support to eligible housing development projects through a dedicated TA to conduct a feasibility study of the SPV model for rental, building on the PPP guideline and other impactful studies done under the project.

5. To support the capital market development objective, it was envisaged that GoR would facilitate the creation of an RMRC as a strategic institutional vehicle which would leverage long-term funds through capital markets by issuing corporate bonds to investors. Due to delays in growing the primary mortgage lending market, a decision was made to put back the creation of RMRC for the time being and allow BRD to intermediate the line of credit. To help achieve the project development objective of supporting the capital market development in Rwanda, GoR delegated BRD to take on the role of capital market intermediation by issuing a corporate bond. The proposed assignment of the bond issuance responsibilities to BRD will allow achievement of the capital market development objective of the project. BRD will begin a sustainability-linked bond (SLB) issuance program in the second half of 2023. The SLB will include a Key Performance Indicator (KPI) linked to housing finance. Furthermore, BRD will ringfence US\$10 million to refinance or prefinance mortgages. Raising capital market resources will mark a key milestone towards creating a sustainable market driven approach for growing Rwanda's housing sector. The development and launch of the SLB issuance program will allow BRD to tap into new sources of long-term funding to support their operation and strategic objectives, including housing finance. Moreover, it will contribute to the development of capital markets in Rwanda, a key RHFP development objective.

6. The proposed revision of component three includes: (i) to make the PPP guideline an internal government document by removing the condition of gazetting or publishing it under PBC3 and enable the achievement of PBC3 once the guideline is approved by the Ministry of Infrastructure (MININFRA) Senior management; (ii) to adjust the base infrastructure cost per affordable housing unit from US\$5,000 to US\$11,000, given the market reality which has been severely impacted by the global supply chain disruptions due to the COVID-19 pandemic and global macro turmoil which has seen significant rises in prices of building materials, but in consideration of only essential infrastructure to be supported per the recommendation of the assessment of the infrastructure scheme done under Component 2; and (iii) to support four affordable housing projects under RHFP, which are expected to deliver around 455 units by the extended closing date. This will increase the implementation feasibility while enabling the project to yield tangible outcomes as well as lessons that can inform the next phase of the government's infrastructure support scheme.

7. The task team, in discussion with the World Bank's Country Management Unit (CMU), has determined that the proposed time extension, recalibration of component one and three activities, and reallocation of unutilized funds from component three to component one and two will be adequate to maximize project impact and achieve the project development objective.

#### **4. DESCRIPTION OF CHANGES**

8. Extension of the project closing date. The proposed extension of project closing date from December 31, 2023, to October 31, 2025, will allow time for the completion of all project activities, thereby facilitating the achievement of the project's development objectives. This will be the second restructuring, however the first extension of the project closing date. The first restructuring, completed in November 2020, was to introduce a new component (Component 3 - Provision of Infrastructure for Affordable Housing Development Projects). By providing substantial funding to the government's infrastructure support scheme, the project enabled the government to engage various affordable housing projects and made a significant contribution to the supply side reform through PBCs and associated TA work.



9. Assignment of the bond issuance responsibilities from RMRC to BRD. The proposed assignment of the bond issuance responsibilities to BRD will help to achieve the project development objective of supporting the capital market development in Rwanda. To measure achievement of this objective, it is proposed to update the description of two PDO results indicators (Number of bonds issued by RMRC & Volume of bonds issued by RMRC) to reflect the fact that the bonds will be issued by BRD. The targets remain unchanged. Similarly, one intermediate results indicator (Number of Participating Financial Institutions - Shareholders of RMRC) is no longer relevant for the achievement of the PDO and is therefore recommended for deletion.

10. Revision of component three activities. Execution of the government infrastructure support scheme and delivery of affordable housing units experienced bottlenecks and delays. Through strong TA work, the project captured and turned these challenges into a deeper diagnosis of the housing market in Rwanda, which raises the need to refine the government scheme further to properly incentivize developers to deliver decent housing and improve the execution capacity of the implementing agency. This will be a long-term process that goes beyond the project scope. The proposed revision of the component three activities is to better manage the implementation challenges and achieve tangible outcomes, by focusing on housing projects at an advanced stage, which are expected to deliver around 455 affordable housing units by the extended closing date. This will unlock additional US\$5 million with the adjustment of the unit cost under PBC4 from US\$5,000 to US\$11,000. Although the target achievement has decreased significantly from 6,000 units to 1800 units, it is important to note this is based on the concrete data and reflects the market reality; and the lessons learned from component three activities can move the sector forward further. PBC1 and PBC2 remain unchanged.

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## 5. PROJECT LOCATION AND SALIENT PHYSICAL CHARACTERISTICS RELEVANT TO THE SAFEGUARD ANALYSIS (IF KNOWN)

The project supports affordable housing projects in urban and peri-urban areas of Kigali city and secondary cities. The original project design has focused on ensuring scale-up on affordable mortgage finance in Rwanda, thus focusing on the demand side of the market. As retail finance, the E&S risks and impacts normally occur prior to downstream financial exposure of the mortgage lenders financed by the WB project via refinancing from BRD, and thus the mitigation approach is based largely on ex-post exclusions of properties with potentially high reputational (e.g. prior resettlement or destruction of critical habitats) or physical risks (e.g. located in disaster-prone zones). The environmental risk was therefore rated moderate. The restructuring involves provision of Infrastructure for Affordable Housing Development Projects, and is expected to contribute to increasing the availability of affordable housing. The financing instrument for the new component is an IPF with Performance-Based Conditions (PBCs), hence disbursements will be determined by both the achievement and verification of the PBCs, as well as provision of eligible expenditures agreed with the World Bank. Eligible expenditures for the PBCs will include GoR expenditures to support provision of infrastructure (i.e. roads and storm water drainage, water supply and sanitation services, electricity and street lighting, communication, and social amenities) for eligible and approved affordable housing development projects. The projects to be supported are all located in urban and peri-urban areas of Kigali city and will be identified after the restructuring is completed. The new project component added due to project restructuring will, therefore, focus on the supply side of the market, that is on financing of physical infrastructure that will support private developers with construction of new affordable housing developments. This will add new E&S risk aspects that the primary lender - BRD - will be



exposed to as a result of being involved in upstream construction activities. Examples include labor and EHS issues, noise and air pollution, community health and safety. The environmental risk profile is therefore raised to substantial and current E&S risk mitigation measures in place for the project will need to be strengthened.

## 6. ENVIRONMENTAL AND SOCIAL SAFEGUARDS SPECIALISTS ON THE TEAM

Tito Joel Kodiaga, Environmental Specialist  
Ximena Rosio Herbas Ramirez, Environmental Specialist  
Yacob Wondimkun Endaylalu, Environmental Specialist  
Chantal Umuhoza, Social Specialist

## 7. SAFEGUARD POLICIES TRIGGERED

Safeguard Policies	Triggered	Explanation
Environmental Assessment (OP) (BP 4.01)	Yes	This is an FI category project, however the risk profile has been elevated due to the new component focus on upstream construction and physical infrastructure. This necessitates a different type of E&S due diligence as compared to the mortgage finance facility supported by the original project.
Performance Standards for Private Sector Activities OP/BP 4.03	No	No
Natural Habitats (OP) (BP 4.04)	No	The envisaged project activities are not anticipated to affect natural habitats. The policy is not triggered.
Forests (OP) (BP 4.36)	No	The project activities are not envisioned to have potential for significant forest degradation or loss. The policy is not triggered.
Pest Management (OP 4.09)	No	The project is not envisaged to procure pesticides or pesticide equipment or lead to substantial increase in pesticide use. The policy is not triggered.
Physical Cultural Resources (OP) (BP 4.11)	No	The project activities are not expected to affect Physical Cultural Resources(PCR). The policy is not triggered.
Indigenous Peoples (OP) (BP 4.10)	No	The project does not envisage to finance projects in indigenous people's territories. The policy is not triggered.
Involuntary Resettlement (OP) (BP 4.12)	Yes	The project activities may involve resettlement.
Safety of Dams (OP) (BP 4.37)	No	The project activities do not involve the construction or rehabilitation of any dams; and are



not dependent on existing dams. The policy is not triggered.

Projects on International Waterways (OP) (BP 7.50) No

The project does not negatively affect the use and protection of international waterways. None of the investments or project financed activities will be located on international waterways thus this policy is not triggered.

Projects in Disputed Areas (OP) (BP 7.60) No

None of the investments, project financed activities or operations will be located in disputed areas so this policy is not triggered.

## II. KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

### A. SUMMARY OF KEY SAFEGUARD ISSUES

1. Describe any safeguard issues and impacts associated with the Restructured project. Identify and describe any potential large scale, significant and/or irreversible impacts.

In the original project design, BRD's portfolio supported by the World Bank financing consists of housing loan tranches presented by Participating Financing Institutions (PFIs) for refinancing. These tranches consist of eligible mortgage/housing loans originated by primary lenders to individuals/households in Rwanda, who may be employed or self-employed. Loans are those intended for the refinancing of acquisition of residential housing. The addition of the new component brings about new risks and potential impacts that need to be considered. Key issues may include:

- (i) Building safety. Key risks involve health and safety issues linked to improper techniques during construction of mortgaged properties (e.g. use of hazardous materials, inadequate life and fire safety, weak structural integrity etc.). This can affect both quality of collateral and personal health and safety of end borrowers
- (ii) Construction-related risks such as air and noise pollution, OHS issues, GBV issues, Sexual Exploitation and Abuse (SEA), Workers and community grievances, community health and safety issues
- (iii) Locations of the housing/ properties to be refinanced. The locations are expected to be predominantly in urban areas that can be often densely populated. Locational characteristics may include sites in poorly managed areas with limited or no basic services such as water supply and sanitation, which could sometimes lead to health risks and impacts for end borrowers or impact property values. Risks should also be minimized by avoiding locations which are prone to disasters and/or cause adverse impact on natural environment and/or human health (e.g. locations near waste dump sites, high tension cables, canals etc.). Such locations have a potential to reduce value of the properties, thus leading to deterioration in the value of the collateral.
- iv) Resettlement/ displacement/ adverse impacts on vulnerable communities. The additional component to the current project poses a limited land acquisition potential related to required land to connect utilities for example access roads to the sites, water and electricity distributions networks. These activities will potentially contribute to minimum land acquisition or displacement issues that could arise within the scope of this component of the project. The sub-type activity is a category B and the client will prepare a RPF to guide the implementation under this new component. Loans would only be provided to people with evidence of tenure (right to occupy their dwellings).

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





N/A

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

Lack of support for robust infrastructure in affordable housing can potentially exacerbate E&S risks and health impacts on communities and residents of affordable housing developments. Specifically, lack of basic services can undermine the positive impacts. Therefore, the project aims to support more sustainable construction of housing in Rwanda.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.

At the higher level, BRD has its institutional Environmental and Social Management System (ESMS) that covers its core operations and is largely focused on project finance transactions which shows commitment of BRD to manage E&S risks of its investments financed. Currently, ESMS is a comprehensive, well-documented E&S risk management approach that is mostly complete and include all key components expected of such a system by international good practice:

- E&S policy with clearly specified applicable E&S requirements and standards. The policy specifies the following requirements: (i) relevant national laws and regulations; (ii) application of List of Excluded Activities; (iii) Environmental and Social Screening Criteria; (iv) project categorization.
- E&S risk management procedures for screening, identification, assessment, mitigation, monitoring and reporting of E&S risks; the procedures include due diligence process.
- Reporting requirements for internal and external stakeholders on implementation.
- Roles and responsibilities within the organizational structure for managing and monitoring E&S risks.
- Management commitment by BRD to implement policies and procedures through formal disclosure of the E&S policy and provision of adequate support and resources for implementation, including to capacity building.
- Grievance Redress Policy that articulates the commitment to addressing complaints related to its operations.

Some of the shortcomings in the existing ESMS are (i) Currently, the policy does not provide for fulltime Environmental and Social staff to oversee/provide needed expertise in the implementation of the ESMS; ensuring that the E&S procedures are well integrated with BRD's business processes for screening and evaluating investment risks and monitoring implementation of Environmental, Social, Health and Safety (ESHS) requirements for activities financed by BRD; (ii) The procedures for identification, assessment and management of the environmental and Social risks and impacts of other FIs' subprojects financed by BRD are not spelt out in the current ESMS. The ESMS should clearly differentiate the arrangements for retail and wholesale lending/guarantees; (iii) A section on Monitoring E&S performance in financed investments to ensure compliance to E&S covenants needs to be included in the ESMS; (iv)

ESMS provisions on excluded activities could be expanded to include aspects adverse risks/impacts on marginalized groups, significant risks/impacts on community health and safety, biodiversity, cultural heritage, resettlement etc.

Currently, BRD does not have full-time staff responsible for implementation of the ESMS, however these responsibilities are clearly included in the work of the risk department and investment staff also received training that enables them to play their part in the process. BRD is prepared and keen to strengthen its E&S capacity as it relates not only to this project but at the overall institutional level, which would ensure more consistent implementation of E&S risk assessment and management measures across the portfolio. This will be beneficial for this and other World Bank projects that BRD is currently implementing and those under preparation.



Within the original project design, where BRD acts as wholesale financial intermediary, a distinct process within BRD's Environmental and Social Management System developed by BRD to cover this very specific type of lending activities (retail mortgage refinancing) was developed. It focuses on the following core aspects: (1) establishing, through its E&S risk management policy, a clear set of requirements for primary housing lending institutions that would seek refinancing from BRD and will be RMRC's shareholders; (2) procedures for due diligence and supervision of E&S risk management (ESRM) processes aimed to meet BRD's requirements, including a list of excluded activities and establishing an adequate screening procedures at the Primary Mortgage Lenders (PMLs) level; (3) appropriate disclosure and reporting; (4) adequate grievance management policies and processes; (5) capacity building among retail mortgage lenders.

With the addition of the new component that focuses on physical infrastructure/construction activities, while the risk profile is elevated as compared to the original project, BRD's institutional ESMS would be suitable for assessing and managing E&S risks (as this component focuses on project finance). In addition, Rwandan housing authority will be involved in the project as a secondary agency that will receive funding from BRD. It is, therefore, prudent to ensure that this agency has adequate process and capacity in place to support BRD in the efforts of E&S risk management.

Based on the above analysis, the proposed measures and instruments to strengthen E&S risk management approach as part of restructuring are as follows:

(a) BRD already has an institutional ESMS that covers all its lending activities, including infrastructure project finance. Nevertheless BRD will be required to strengthen it where we see gaps pertinent to the risks under the new component;

(b) In addition, the Rwanda Housing Authority (RHA) will play a role in the project's new component for the provision of infrastructure. RHA will be coordinating project activities with BRD, the implementing agency, through a MOU. BRD will retain primary responsibility for E&S and the instrument to be prepared by BRD would be a project-specific ESMF which would be very concise and focus on key aspects of the project, primarily on the respective roles and responsibilities of BRD and RHA in the E&S screening and assessment process, stakeholder engagement, and other important aspects, as well as monitoring and reporting during implementation.

(c) BRD will prepare the RPF due to the new component added to the parent project that includes support for infrastructure development, before disbursement.

(d) BRD also has staff responsible for E&S, but they are currently not performing those roles full-time, therefore BRD will be required to hire full-time specialists; the engagement with BRD on this matter had already commenced during project preparation and the client is very supportive and committed on this issue;

Timelines: The above measures (b) and (c) will be disbursement conditions for the funds allocated under the new component, and the update of the corporate ESMS (a) as well as hiring of the additional E&S capacity (d) will be required to be completed within a certain timeframe following disbursement, which will be reflected as a covenant in the financing agreement. The two instruments under (b) and (c) must be satisfactory to the Bank in order for the disbursement and overall financing conditions to be fulfilled.

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



The key stakeholders include Rwanda Housing Authority (RHA), Private Sector Federation (PSF), Financial Intermediaries and Community members in areas where potential subprojects will be located. The client (BRD) through workshops or virtual meetings will engage all the key stakeholders and disclose all the safeguards instruments related to this operation. In line with the COVID-19 Ministry of Health guidelines, BRD will also engage the community members at the four identified subproject sites in collaboration with RHA. The community will be informed of the proposed projects, the environment and social risk management arrangements, including the GRM for the community and workers.

## B. DISCLOSURE REQUIREMENTS

### Environmental Assessment/Audit/Management Plan/Other

Date of receipt by the Bank

30-Nov-2020

Date of submission for disclosure

18-Dec-2020

For Category 'A' projects, date of distributing the Executive Summary of the EA to the Executive Directors

"In country" Disclosure

### Resettlement Action Plan/Framework Policy Process

Date of receipt by the Bank

30-Nov-2020

Date of submission for disclosure

18-Dec-2020

"In country" Disclosure

## C. COMPLIANCE MONITORING INDICATORS AT THE CORPORATE LEVEL

### OP/BP/GP 4.01 - Environment Assessment

Does the project require a stand-alone EA (including EMP) report?	Yes
If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report?	No
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	Yes

### OP/BP 4.12 - Involuntary Resettlement



Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?	Yes
If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?	No

#### The World Bank Policy on Disclosure of Information

Have relevant safeguard policies documents been sent to the World Bank for disclosure?	No
Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?	No

#### All Safeguard Policies

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes
Have costs related to safeguard policy measures been included in the project cost?	Yes
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	Yes
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?	Yes

### III. APPROVALS

Task Team Leader(s)	Brice Gakombe Leyla V. Castillo
<b>Approved By</b>	
Practice Manager/Manager	Alwaleed Fareed Alatabani
	29-Jun-2023

**Note to Task Teams:** End of system generated content