



Project Information Document (PID)

Concept Stage | Date Prepared/Updated: 09-Oct-2023 | Report No: PID199

Nov 16, 2023



BASIC INFORMATION

A. Basic Project Data

Project Beneficiary(ies)	Operation ID	Operation Name	
Ethiopia	P181078	Integrated Land Management Project	
Region	Estimated Appraisal Date	Estimated Approval Date	Practice Area (Lead)
EASTERN AND SOUTHERN AFRICA	03-Jun-2024	19-Sep-2024	Urban, Resilience and Land
Financing Instrument	Borrower(s)	Implementing Agency	
Investment Project Financing (IPF)	Ministry of Finance	Ministry of Urban and Infrastructure	

Proposed Development Objective(s)

To expand legal rights regularization and systematic land registration in targeted cities.

PROJECT FINANCING DATA (US\$, Millions)

Maximizing Finance for Development

Is this an MFD-Enabling Project (MFD-EP)?

Is this project Private Capital Enabling (PCE)?

SUMMARY

Total Operation Cost	150.00
Total Financing	150.00
of which IBRD/IDA	100.00
Financing Gap	0.00

DETAILS

World Bank Group Financing	
International Development Association (IDA)	100.00
IDA Credit	100.00

Non-World Bank Group Financing



Counterpart Funding	50.00
Borrower/Recipient	50.00

Environmental and Social Risk Classification

Concept Review Decision

The review did authorize the preparation to continue

Other Decision (as needed)

B. Introduction and Context

Country Context

Substantial

- Ethiopia experienced strong and broad-based growth prior to the COVID-19 pandemic. The country's Gross Domestic Product (GDP) was US\$95.5 billion in 2019, and the economy growth averaged 9.4 percent a year from 2010/11 to 2019/20, making it one of the world's fastest growing economies. However, the COVID-19 pandemic slowed Ethiopia's growth and disrupted livelihoods. The crisis affected exports, remittances, and foreign direct investment (FDI), while containment measures and transport disruptions caused income losses, affecting private consumption and investment.
- 2. Economic growth is expected to remain relatively strong in the mid-term; however, it remains susceptible to economic shocks. The economy experienced a higher-than-expected GDP growth rate of 6.4 percent in 2021/2022¹, driven by strong agriculture and services output, while the industrial sector experienced a slowdown. The depletion of fiscal and external buffers is a risk to macroeconomic stability, with sharply reduced official foreign exchange reserves. Inflation rates have remained high at nearly 34 percent in January 2023². However, the medium-term outlook suggests that the fiscal pressures will ease due to the implementation of revenue reforms that aim to improve the collection of value-added tax and excise taxes. In addition, new tax sources, such as property taxes, will be introduced to support fiscal consolidation and reduce budget financing pressures.
- 3. Multiple overlapping fragility and crises continue to unfold in Ethiopia, with a mix of conflict and climate shocks. The prolonged drought in the southeast of the country, continued economic stresses, and the impact of conflict in northern Ethiopia and Oromia are all exacerbating already challenging conditions. Livelihoods are being decimated, and prices of food and commodities are rising, leading to stalled poverty reduction. The two-year-long conflict has caused estimated damages and losses of US\$28.7 billion³. An estimated 430,000 people fell into poverty in 2022⁴, and further shocks could push millions more into poverty and increase spatial inequality. The scale of internal displacement in Ethiopia is already high, with over 4.6 million internally displaced people (IDPs),

¹ World Bank. 2023. Sub-Saharan Africa Macro Poverty Outlook - Spring Meetings 2023

² Ibid.

³ World Bank. Unpublished. Ethiopia CIARP Conflict Assessment.

⁴ Ibid.



including over 510,000 people displaced due to droughts⁵. As the drought continues, further displacement is likely, resulting in longer-term displacement and accelerating rural-to-urban out-migration from the affected areas⁶.

Sectoral and Institutional Context

- 4. With less than 12 percent of parcels registered in the urban legal cadaster, Ethiopia has one of the lowest rates of urban land registration in Africa, undermining the sustainable and inclusive urban development that the country needs to harness in response to rapid urban population growth and to facilitate structural transformation. While the urbanization rate is still low at 24 percent in 2021,⁷ Ethiopian cities are growing rapidly at a rate of 5.2 percent since 2008,⁸ leading to increased demand for urban land for housing, infrastructure, and commercial purposes. Formal land markets based on registered land parcels are critical to help cities effectively utilize scarce urban land and create well-planned urban environments that support economic activities, job opportunities, and improved living standards for residents. Yet, only one half of demand for land is met by the formal land market⁹, with many developers and most low-income residents relying instead on informal land markets. This leads to the proliferation of slums, which account for an estimated 74 percent of urban areas, ¹⁰ especially on the periphery, far from jobs. Moreover, the bifurcation of rural and urban land administration complicates the conversion of rural to urban land rights and thus the orderly expansion of urban areas, and existing residence requirements discourage rural–urban migration. In the long run, this may hamper the effective redistribution of labor from farms to cities that Ethiopia needs to overcome the low-level equilibrium trap and develop a more diversified and climate-resilient economy¹¹.
- 5. Formal urban land markets and delivery systems are inaccessible to low-income residents and fails to meet its central objective of providing a sufficient supply of affordable urban land. While legally all land in Ethiopia is vested in the state ownership, the Constitution recognizes private land use rights, and in urban areas these can be transferred to individuals, groups, and corporate entities as leaseholds. Proclamation 721/2011 on Urban Land Lease Holding governs the formal urban land lease market and aimed to regularize all informal urban land within four years (by 2015). In practice, most land is distributed through administrative allocation for priority projects and only 5 -7 percent of urban land parcels are auctioned in most cities through the lease system¹². Complex lease pricing and conditions lead to a shortage and high cost of urban land, effectively excluding all but the wealthiest, and a preference for less expensive (and unregulated) informal markets. This is especially true in peri-urban areas, where farmers often sell land informally¹³ to secure higher prices than they would be offered as compensation for compulsory land acquisition (the primary formal mechanism for urban expansion). Formal land is often allocated

⁵ United Nations Office for the Coordination of Humanitarian Affairs (OCHA). 2023. Humanitarian Response Plan Ethiopia 6 Ezra and Kiros 2001. Rural Out-Migration in the Drought Prone Areas of Ethiopia: A Multilevel Analysis. The International Migration Review, Vol. 35.

⁷ Ministry of Urban Development and Infrastructure (MUDI). 2021. Urban Planning and Land Reform Project Feasibility Study. ⁸ World Bank. 2021. Policy Note, Unleashing Cities' Potential (draft, confidential).

⁹ World Bank. 2019. Ethiopia Urban Land Supply and Affordable Housing; Synthesis Report. Washington, DC.

¹⁰ MUDI. 2021. Urban Planning and Land Reform Project Feasibility Study.

¹¹ World Bank. 2016. Ethiopia Urbanization Review.

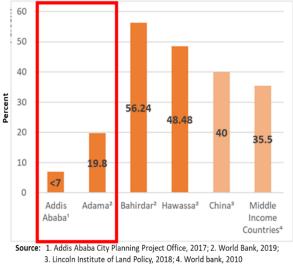
¹² Tom, L. 2023, Ethiopia's 'Developmental State' *Political Order and Distributive Crise*. University of Manchester. DOI: 10.1017/9781009428316

¹³ These informal transactions are by nature not transparent and often facilitated by private brokers and speculators.



administratively to private developers, making it inaccessible to low-income households. Most urban parcels are thus acquired informally, often through illegal transactions with peri-urban farmers, and built illegally. Moreover, Federal and city governments interpret Proclamation 721's target date for completing regularization as a "cut-off date", meaning that all parcels accessed informally after 2005¹⁴ are ineligible. Meant many informally acquired parcels are excluded from accessing formally recognized land rights due to legal and procedural barriers to land rights regularization. Proclamation 721/2011 and its implementing regulations also pose procedural barriers to regularization and became a source of deep grievances amongst both the urban and rural population annexed through urban boundary expansions. These barriers include: (i) the requirement that parcels be included in official urban land development plans (Structural Plans/Neighborhood





*Note: Land lease and building tax counted in Ethiopia

Development Plans) and comply with strict planning regulations that are not fit-for-purpose (e.g. parcels must be accessible via a paved road), (ii) a reliance on paper records organized by date, making them difficult to secure or search to identify overlaps, and (iii) in part this is financial problem since land development requires upfront city investment to provide minimal compensation to expropriated rural landholders and, more significantly, services such as roads, water, and electricity. Hence, urban administrations have been unable to achieve their primary objective: to supply sufficient urban land to priority projects and thereby making land affordable and limit speculation.

- 6. As a result, most urban residential holdings remain informal, and residents of informal settlements are unable to access municipal services and are highly susceptible to eviction. While no official statistics exist, the Ministry of Urban and Infrastructure estimates there are approximately 11 million urban land parcels in Ethiopia, of which only 12 percent are registered in the legal cadaster. Residents of informal settlements are unable to access municipal services, such as electricity and water, as proof of legal land rights is required¹⁵. Moreover, Proclamation 721/2011 empowers cities to take over land possessed informally ("illegally") with just seven days prior notice and without compensating evicted residents who lack legal rights (Article 26, sub-section 4). Cities across the country are actively using these provisions to evict informal residents and lease the vacated land to private developers, including as part of the Government's "urban renewal" policy, which aims to replace informal settlements with high-rise developments. While there are no official statistics on evictions of informal residents, media reports suggest these evictions—and related grievances/disputes—are widespread.
- 7. The lack of a comprehensive urban legal cadaster also hinders local revenue generation. Despite the existence of a municipal tax known variously as a "roof tax" or "building tax," Ethiopia lacks explicit laws or regulations governing property taxes, and most cities lack digital land information systems (LIS) to monitor or enforce collection of land-related fees (including annual lease payments), resulting in sub-optimal revenue generation (Figure 1). Only 1.8 percent of city expenditures in Ethiopia are financed by land revenues, compared to 30 percent

¹⁴ Some cities have established an even earlier cut-off date, apparently based on the imagery available at that time (e.g., 2005 in Addis Ababa). ¹⁵ Government of Ethiopia (Ministry of Urban Development and Construction). 2021. Draft Revised Urban Policy, June 2021.



in Nairobi¹⁶. To address this issue, the Federal government recently (February 2023) drafted a property tax proclamation that would empower local urban governments to collect property taxes. In anticipation of the adoption of this law, some cities have recently initiated campaigns to identify and assess property (building) values¹⁷.

- 8. Weak land administration also undermines cities' resilience to climate-related shocks and natural disasters. Unplanned urban development and the proliferation of informal settlements increase the disaster- and climaterisk challenges for Ethiopia.¹⁸ The expansion of built-up land and loss of green areas reinforce urban heat island effects, while the encroachment of informal settlements into flood-prone areas and wetlands heightens flood risks, especially for vulnerable populations, such as poor, migrant, and forcibly displaced people, who often occupy these areas due to the lack of affordable access to land through formal urban land markets.^{19,20} Moreover, the deterioration and destruction of green urban areas due to lack of clear rights to these areas reduces carbon sinks.
- 9. City land registration agencies face legal and institutional barriers to completing the legal cadaster. Although Proclamation 818/2014 on Urban Land Registration and its implementing regulations allow "systematic" registration, they lack clear procedures for registering many non-residential²¹ urban properties, and there is no clear legal provision on how to register disputed parcels. Proclamation 818/2014 also requires several pre-requisites for land registration that have been difficult for cities to achieve. These include the requirement to first regularize land rights, which as noted above is also hampered by legal and procedural barriers, and to use imagery not more than five years old for the cadastral base maps used to demarcate parcel boundaries. Many cities also lack a land registration agency with trained staff. Moreover, unlike in rural areas, urban land regularization is managed by a separate²² "rights creation institution" under Proclamation 721/2011, while the land registration agency is responsible for registering these rights and map parcel boundaries in the legal cadaster under Proclamation 818/2014. Collaboration between these two institutions is thus critical but is hampered by the lack of an integrated legal framework and procedures, the rights creation institution's organization of paper-based land records by date instead of by parcel, and the use of different data sources²³. Rural and urban lands are also governed separately²⁴, which as noted complicates the conversion of farmers' certified rural rights to urban rights.
- 10. Progress with urban land registration has also been hampered by outdated, costly, and manual tools and redundant procedures that are not fit-for-purpose and do not reflect the rural land registration innovations

¹⁶ "With a New Tax on the Horizon, Regions Envision Fiscal Independence." The Reporter, January 14, 2023. Accessed May 2023. https://www.thereporterethiopia.com/29754/

¹⁷ "City Admin launches building census for property taxation." The Reporter, March 4, 2023. https://www.thereporterethiopia.com/31743/

¹⁸ Abraha et al. 2022. Rapid Urbanization and the Growing Water Risk Challenges in Ethiopia: The Need for Water Sensitive Thinking.

¹⁹ World Bank. 2017. Safe and Resilient Cities in Ethiopia.

 ²⁰ In Addis Ababa 52 percent of settlements informally constructed. Informal settlements were also found in all the regional capital cities, with Jigjiga (14.4 percent), Adama (11.6 percent), and Harar (8 percent). (World Bank. 2019. Unlocking Ethiopia's Urban Land and Housing Markets)
²¹ E.g., government offices, *kebele* houses, open areas, roads, rivers, water bodies, green spaces, sporting facilities, "old possession," rural rights.
²² While Amhara and Oromia have recently integrated the land registration and rights creation institutions, this reform is not yet fully implemented.
²³ For example, the right creation institution in Addis Ababa relies on aerial imagery from 2004/2005, while the land registration institution uses imagery from 2018. (Chekole et al. 2021. Analyzing the Effects of Institutional Merger: Case of Cadastral Information Registration and Landholding

Right Providing Institutions in Ethiopia.)

²⁵ Including, in particular, the Korean Economic Development and Cooperation Fund (EDCF)-financed Land Information Management System (LIMS) Project, which will finance LIS development and build new CORS in four cities (Adama, Hawassa, Bahir Dar, and Wolaita Sodo). ILMP investments in these cities will thus focus on land regularization and registration of parcels not yet titled and ensure the sustainability and scaling up of the EDCFfinanced CORS stations and LIS, respectively.



Ethiopia has introduced that have enabled the registration of over 25 million rural parcels since 2014. Urban land registration still requires costly field surveys to verify parcel boundaries (instead of mapping parcel boundaries on ortho-imagery, as in rural areas); the development and maintenance of multiple separate registers and redundant procedures, including the requirement that landholders submit two different applications to adjudicate and then register their rights. Most cities also lack the digital tools that have enabled low-cost rural land registration, including digitized land records, a digital LIS that links the textual land records to parcels, and mobile-based field data collection applications. Moreover, the geodetic network, which is needed for accurate surveying, does not have enough control points, and most of the existing Continuously Operating Reference Stations (CORS) are not operational or maintained, resulting in inefficiencies and delays in the implementation of field surveys.

11. The Government of Ethiopia (GoE) recognizes that formal land administration is critical for urbanization and considers urban land registration a cornerstone of its transition to a market-oriented economy. The Second Growth and Transformation Plan and subsequent 10-year Perspective Plan recognize the significance of effective urban land management in driving urban development and fostering economic growth. The Ethiopian Cities Sustainable Prosperity Goals and the National Urban Development Spatial Plan provide the necessary frameworks for strategic engagement. While these plans and interventions outline the key principles for sustainable and integrated formal urban land administration in Ethiopia, achieving their objectives will require strengthening the legal, regulatory, and institutional frameworks and enhancing land administration technical capacity at all levels of Government, including to streamline land regularization and registration procedures and facilitate formal land rights recognition and land access for the poor and other vulnerable groups. To address these challenges, the GoE has requested World Bank support to expand urban land regularization and systematic land registration.

Relationship to CPF

12. The proposed Project is aligned with the World Bank Group (WBG) Country Partnership Framework (CPF) FY18-**22.** In particular, the proposed Project contributes to the achievement of outcomes under all three focus areas: Focus Area 1: Promote Structural and Economic Transformation through Increased Productivity (Objective Enhanced business and investment climate, notably access to land); Focus area 2: Building Resilience and Inclusiveness (Objective 2.7: Enhanced management of natural resources and climate risks); and Focus Area 3: Supporting institutional accountability and confronting corruption (Objective 3.1: Increased capacity and improved governance in service delivery). Under Focus Area 1, the Project will provide the foundation for formal urban land markets and facilitate access to land for private-sector led growth. Under Focus Area 2, the Project will support increased access to secure land tenure through the delivery of urban land certificates, which is expected to positively impact public and private investments in more sustainable urban development by increasing property tax revenues and enhancing homeowners' willingness to use their own resources to invest in upgrading their housing. Under Focus Area 3, the project will support increased social accountability, reduced corruption, and improved service delivery by bringing more parcels into the urban legal cadaster and digitizing land administration services to increase transparency and efficiency. In line with the CPF objectives, project investments will be designed to increase resilience to climate change and natural hazards, promote sustainable land use and enhance living conditions in slum areas.

C. Proposed Development Objective(s)



13. To expand legal rights regularization and systematic land registration in targeted cities.

Key Results (From PCN)

14. The proposed key results indicators for the Project are:

- a. PDO 1: City area eligible for formal land registration (Percent)
- b. PDO 2: Urban residents with informal rights legally recognized by the Project (Number, of which percent women)
- c. PDO 3: Number of people who received a landholding certificate under the Project (Number, of which percent of landholders that are women with sole or joint ownership rights)
- d. PDO 4: Proportion of parcels within declared Systematic Adjudication and Registration (SAR) areas registered by the Project (Percent)
- e. PDO 5: Beneficiary satisfaction with SAR as implemented under the Project (Percent, percent of females)

D. Concept Description

- 15. Component 1 Strengthen institutions, systems, and capacity for land administration: Component 1 will finance technical assistance (TA) and capacity building activities for land administration institutions at all levels of government. It includes the review and strengthening land administration policies/standards, including for IT system integration, the development of mechanisms for enhanced vertical/horizontal institutional coordination, business process reengineering, identification of key legal/regulatory bottlenecks and facilitate drafting of reforms needed to increase efficiency and equity, identification of gender gaps and advocacy for change, and training for land management/administration officials at all levels. It will also support the development of urban fiscal cadastre (property tax revenue) systems at all levels following the recent proposal of Proclamation 1/2023, which would for the first time empower Regions (Governors) and City Administrations to collect property taxes.
- 16. Component 2 Build the foundation for inclusive, integrated land management: Component 2 will support the targeted cities in regularizing urban residents' informal land use rights and completing the pre-requisites for SAR. Project investments will be tailored to the local context in each city and designed to complement existing and ongoing investments²⁵ to optimize synergies and avoid duplication. Any building renovation/construction will be on the government-owned lands, will not involve any new land acquisition of private land, and will adopt resilient/adaptive features and energy-efficient standards. The Project will not support any land banking/development activities or any other activities resulting in resettlement. Project activities will include procurement of hardware and software to upgrade existing digital LIS and develop new LIS modules where needed, including to facilitate revenue generation, procurement and management of surveying and office equipment, Operations and maintenance (O&M) of the geodetic network, development of spatial plans for unplanned (informal) areas, updating of city-wide base maps covering all parcels regardless of their tenure status ("OneMap"), regularization of land use rights within informal settlements, and development of property (building) data needed to build a fiscal cadaster alongside the legal cadaster.

²⁵ Including, in particular, the Korean Economic Development and Cooperation Fund (EDCF)-financed Land Information Management System (LIMS) Project, which will finance LIS development and build new CORS in four cities (Adama, Hawassa, Bahir Dar, and Wolaita Sodo). ILMP investments in these cities will thus focus on land regularization and registration of parcels not yet titled and ensure the sustainability and scaling up of the EDCFfinanced CORS stations and LIS, respectively.



- 17. Component 3 Implement participatory systematic urban land adjudication and registration (SAR): Component 3 will finance SAR implementation, following the prescribed sequence: the declaration of areas targeted for SAR, inclusive and gender-sensitive public awareness campaigns and support, surveying of parcel boundaries, adjudicating (verifying) land use rights and transparent public display including objections and corrections and dispute resolution and grievance redress mechanism, registration in a digital LIS, and delivery of formal land certificates to urban residents. Project investments will be tailored to the local context in each city and designed to complement existing and on-going investments to optimize synergies and avoid duplication.
- Component 4 Project management: Component 4 will finance activities of the Project Technical Committee (PTC) and Project Coordination Unit (PCU) in MUI for project management and coordination, including financial management and procurement, safeguards, communication, and monitoring and evaluation (M&E).
- Component 5 Contingent Emergency Response Component (US\$ 0): A no-cost Contingent Emergency Response Component (CERC) will be included in accordance with World Bank Policy on Investment Project Financing to enable rapid reallocation of funding between project components following an eligible emergency.
- 20. Land administration approach. Based on locally agreed practices and the World Bank's global experience with land regularization/registration, appropriate approaches will be adopted by ensuring that guiding principles include urban land-focused with harmonized urban-rural approach, fit-for-purpose, systematic coverage of all urban parcels, pilot innovations to strengthen evidence for reform, build on existing systems, fiscal and technical sustainability, and promote more resilient and sustainable land use that maximize inclusivity and efficiency.
- 21. **Proposed Geographic Scope.** The Government has tentatively identified 14 target cities, including all Regional capitals and the two chartered City Administrations (Addis Ababa and Dire Dawa).
- 22. **Project Financing.** The proposed Project will be implemented for five years (2025 2029) and financed through \$100 million of IDA resources and an estimated \$50 million of counterpart financing, including for Government staff salaries and ongoing O&M. The Project budget and financing will be further clarified during the preparation.
- 23. **Project Preparation Advance (PPA).** A PPA amounting to US\$1.7 million is needed to provide funds to MUI to prepare the required Environment and Social Framework (ESF) instruments, complete the baseline assessment, identify key legal/regulatory bottlenecks requiring reform for effective project implementation, review existing procedures and produce revised technical implementation manuals, prepare the project implementation manual (PIM), and hire PCU fiduciary and safeguards staff, amongst other activities, to ensure implementation readiness.
- 24. **Corporate requirements:** Under the associated Resilient Integrated Land Management (RILM) ASA, a methodology to assess the climate adaptation and mitigation co-benefits of potential Project activities is being developed. A draft Gender Assessment was completed and will be refined during the Project preparation. The Project Appraisal Document will include sections on climate co-benefits, Paris Alignment, gender mainstreaming, citizen engagement, and Grievance Redress Mechanisms.
- 25. **Gender:** Women's access to urban land is influenced by several factors, including legal and institutional frameworks, social and religious principles, education, wealth, and access to information. Across regions, there are large gender gaps between women's and men's abilities to access legal urban land rights. To close this gap, the project design will support the following actions: (i) targeted awareness creation sessions for women; (ii) establishment of city-level information desks to assist women and other vulnerable groups to regularize and register their rights; (iii) the project's multi-level grievance redress mechanism will be designed and implemented



in cooperation with existing institutions that support women's land rights, such as offices of women's affairs, women's forums, justice offices, and free legal aid centers. The project's Results Framework includes three PDO indicators to track the closure of the gap in women's access to legal land rights (PDO indicators 2, 3. and 5).

26. Climate Change: Effective land administration systems are a prerequisite for climate-smart and disaster-resilient cities. Land administration systems—including land use planning, land rights and transaction registration, and land revenue mobilization—are of fundamental importance to enable cities to adapt to climate change and reduce urban disaster risk. Firstly, land registration provides the basis for defining and securing public green/open land, such as parks, wetlands, or riparian areas, and protecting them against the encroachment of settlements to preserve their important climate functions (to mitigate heat island effects, support cooling corridors, preserve flood runoff areas, act as carbon sinks, etc.). Secondly, comprehensive, and up-to-date urban land cadasters are critical for disaster risk management (DRM) as they: (i) facilitate the identification of exposed private and public assets; (ii) inform risk reduction measures, risk zoning and risk-sensitive land use and infrastructure planning; and (iii) support post-disaster reconstruction and recovery, including compensation and insurance claims for disaster-related costs damages and costs. Thirdly, regularization of land use rights and the resulting increased tenure security will reduce the vulnerability of informal settlement residents in the event of disaster-induced displacement while incentivizing household-level investments in climate and disaster resilience. Finally, land administration systems that effectively link land use plans with cadasters and related regulatory frameworks are essential for managing the expansion of cities and the conversion of open to built-up land at the urban fringe.

Legal Operational Policies	Triggered?
Projects on International Waterways OP 7.50	No
Projects in Disputed Area OP 7.60	No

Summary of Screening of Environmental and Social Risks and Impacts

27. The project's overall environmental and social risk rating is substantial at the concept stage mainly considering (a) the FCV contextual risks of the country; (b) the potential environmental, social, health & safety (ESHS) risks specifically linked with investments in building renovation/construction in government-owned lands (which will not involve any new land acquisition), digital Land Information System (LIS) hardware and software upgrading/development, and surveying and office equipment including Global Navigation Satellite Systems – GNSS such as handheld GPS, electronic total stations, tablets, & computers under Component 2: Build the foundation for inclusive, integrated land management; (c) land-related conflicts may arise during the process of land rights recognition, adjudication, and registration; and (d) E&S management capacities of implementing entities. Accordingly, the main potential ESHS risks & impacts of building construction/renovation include vibration, pollution due to generation of dusts, solid & liquid wastes, and associated disposal issues which could result in air, soil & water pollution, inefficient use of natural resources (water, energy and raw materials), fire hazards and other hazards associated with buildings - natural and man-made, the existing buildings may have existing environmental liabilities (such as asbestos), and OHS aspects if they are not properly managed during the construction and operations phases. Construction activities could also cause an increase in noise level due to earth



moving and excavation equipment and the transportation of equipment, materials, and people. Operation of heavy construction equipment and machines could cause nuisance to the surrounding people. Construction activities could also affect traffic flow if routes for delivery of construction materials and temporary blockages during construction activities are not planned. Besides, there could be potential e-waste issues and associated pollution of soil, water and air linked with procurement and use of hardware and software upgrading/development, and surveying and office equipment. Further, there are potential social risks related to insufficient community and other stakeholder engagement due to capacity limitation specifically at city level There are potential OHS risks that can arise under all components of the project. Community health and safety risks can also arise associated with the building construction and operation phases (e.g., inefficient use of natural recourses, waste management, air quality, noise, traffic and road safety risks, communicable diseases, etc.); and hazardous waste including e-waste management risks. As civil work activities will be implemented in government-owned lands, no risk of new land acquisition, no adverse risks to biodiversity or habitats of significant conservation value are anticipated, but there may be some adverse risks to ESS6 due to sourcing of construction materials for building. Although no direct impacts on cultural heritage is anticipated because of the project activities, but chance finds procedure will be used to manage cultural heritage that may be discovered by chance. Also, TA and capacity building activities for land administration institutions including policy and legal reforms/development (e.g. land administration policies/standards) (Comp. 1) may have direct/indirect EHS risks and impacts on resource efficiency and pollution prevention and management, among others; thus, the ToRs for TA & capacity building activities (Comp. 1), systematic urban land adjudication and registration (comp. 3) and project management (Comp. 4) will need to integrate the objectives of relevant ESSs to ensure that activities and outputs are consistent with the WB ESF and the WB Advisory Note on TA throughout the project period. Social impacts associated with renovation/construction disrupting; insufficient stakeholder engagement, SEA /SH and impacts on informal land users and vulnerable groups, restricts their access to resources and/or adversely affects their livelihoods; minor economic displacement due to adjustments of property boundaries; displacement of people living in areas such as wetlands; and labor influx and associated risks including risks on community health and safety. Overall, the project's potential ESHS risks & impacts will be assessed in detail during preparation & reflected in the project's ESF documents (including ESMF, SA, SRA/SMP, LMP, GBV Action Plan, SEP) with appropriate mitigation measures in accordance with the WB ESF, WBG EHS Guidelines, and GoE's environmental and social policy and legal frameworks. Further, MUI and other implementing entities' institutional capacity constraints along with required capacity building plan for managing the ESHS risks & impacts will be assessed in detail during preparation & reflected in the ESF documents and capacity development plan will be developed .

CONTACT POINT

World Bank

Martin Onyach-Olaa Senior Urban Specialist

Nigel Ross Hughes Senior Natural Resources Management Specialist

Borrower/Client/Recipient



Ministry of Finance

Implementing Agencies

Ministry of Urban and Infrastructure

Bizualem Admassu, Land Development and Management Bureau Head, nesir6738@gmail.com

FOR MORE INFORMATION CONTACT

The World Bank 1818 H Street, NW Washington, D.C. 20433 Telephone: (202) 473-1000 Web: <u>http://www.worldbank.org/projects</u>

APPROVAL

Task Team Leader(s):	Martin Onyach-Olaa, Nigel Ross Hughes
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Approved By

Practice Manager/Manager:		
Country Director:	Ousmane Dione	16-Nov-2023