



## Integrated Safeguards Data Sheet Restructuring Stage

Restructuring Stage | Date ISDS Prepared/Updated: 24-Jul-2020 | Report No: ISDSR30210

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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 P155229	Project Name Lesotho Transport Infrastructure and Connectivity Project (LTIC)
Task Team Leader(s) Nargis Ryskulova, Noor Ibrahim Mohamed	Country Lesotho
Approval Date 20-Nov-2017	Environmental Category Partial Assessment (B)
Managing Unit IAET2	

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

### 2. PROJECT INFORMATION

#### Current Program Development Objective

The proposed Project Development Objectives are to (a) improve access to social services and markets in targeted rural areas of Lesotho; (b) strengthen road safety management capacity; and (c) improve the Recipient's capacity to respond promptly and effectively to an Eligible Crisis or Emergency.

### 3. PROJECT DESCRIPTION

The Transport Infrastructure and Connectivity Project (TICP) is an US\$ 18.3 million IDA credit that was approved on November 20, 2017 and is expected to close on December 31, 2023. The Project Development Objectives (PDO) are to (a) improve access to social services and markets in targeted rural areas of Lesotho; (b) strengthen road safety management capacity; and (c) improve the Recipient's capacity to respond promptly and effectively to an Eligible Crisis or Emergency. The project has four components: (1) Improving Infrastructure Access (US\$9.20 million); (2) Improving Road Safety (US\$4.40 million); (3) Institutional Strengthening Support to the Transport Sector (US\$4.70 million) and (4) Contingency Emergency Response Component (US\$0).



The project is proposed to be restructured to reflect the following:

- (i) Changes to the implementation arrangements.
- (ii) Changes to Financing Agreement covenant on Road Traffic Bill.
- (iii) Changes to the scope of Component 1: Improving Infrastructure Access and Component 3: Institutional Strengthening Support to the Transport Sector.
- (iv) Reallocation of proceeds necessitated by the activation of the Contingent Emergency Response Component (CERC).
- (v) Changes to the Results Framework.

No changes are being introduced to environmental and social safeguards.

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

The civil works to be financed by the project will be located in selected rural areas so as to facilitate pedestrian access to social services (schools and hospitals) and markets. The construction of footbridges will be distributed in the highlands region of Lesotho. These locations are in landscapes that are disturbed, therefore, habitat losses will be minor due to small nature of works and the work site size (generally 0.25 ha), and the hand excavation causes will be limited to riparian habitat loss. There are not going to be any endemic or threatened flora at any of the footbridge sites. Most of the crossings are covered with grass and shrubs and infested with invasive aliens (acacia dealbata, acacia mearnsii, populus alba). Impacts on aquatic fauna will depend on water quality impacts. Small quantities of sediment over short periods are unlikely to cause significant impact, but with proper environmental management measures outlined in the Environmental and Social Management Plan (ESMP), the impacts will be of low significance. All civil works will take place at the points where land is already allocated to public non-productive use, and are small in nature. The potential environmental and social impacts are limited and the screening process will be used to ensure that any sites that might have a negative impact on protected areas or sensitive ecological habitats are not approved. The CERC and community based maintenance contracting activities will be implemented across the country.

**5. ENVIRONMENTAL AND SOCIAL SAFEGUARDS SPECIALISTS ON THE TEAM**

Mantsebo Moipone Amelia Ndlovu, Social Specialist  
 Ntaoleng Celestina Mochaba, Environmental Specialist

**6. SAFEGUARD POLICIES TRIGGERED**

Safeguard Policies	Triggered	Explanation
Environmental Assessment (OP) (BP 4.01)	Yes	The project restructuring will contribute to the project’s overall socio-economic benefits of improving local transport infrastructure, rural-



urban connectivity, rural accessibility to urban public services, pedestrian accessibility to social services and markets as well as creating more jobs in the project area. However, some adverse impacts on bio-physical environment are also likely to result from construction of new Lot4 footbridges, routine road maintenance works, as well as added works under the CERC.

Most of the adverse environmental impacts are related to construction and include impact on local rivers including possible effect on water quality during construction; slope stability issues; increased noise; dust generation; waste; erosion; occupational health and safety; traffic; and community health and risk of exposure to COVID 19. These environmental impacts have been identified and assessed to be limited, temporary, site-specific, and can be readily mitigated with proper mitigation measures and by incorporating environmental measures during design and construction of the proposed works.

The environmental assessment for the original project was carried out at two (2) different levels of analysis as follows:

(a) The Borrower prepared an ESMP for the construction of nineteen (19) footbridges, for which the locations were identified during preparation. The ESMP includes the principles and generic measures that will form part of each works contract with contractors who will then be required to prepare site-specific ESMPs based on the Project ESMF and World Bank Group (WBG) General EHS Guidelines. The ESMP for 19 footbridges was cleared by the Bank, consulted upon, and disclosed in the country on July 27, 2017, and on the Bank's external website on August 1, 2017;

(b) At the overall project level, the Borrower prepared an ESMF, which (i) describes the physical, biological and social baseline characteristics of the project areas, (ii) defines the eligibility criteria for the civil works, (iii) describes procedures for screening and scoping potential positive and adverse impacts for all proposed investments, and



mitigation and monitoring measures. The remaining 16 footbridges, for which precise locations were not known during preparation, were covered by the ESMF. The ESMF was cleared by the Bank, consulted upon, and disclosed in Lesotho on June 22, 2017, and on the Bank's external website on June 28, 2017.

The types of additional works to be supported under Component 1 and the CERC are similar in nature to those already covered by the TICP Environmental and Social Management Framework (ESMF), Environmental and Social Management Plan (ESMP) for footbridges. The Project remains a Category B and no new safeguards policies are expected to be triggered. The Ministry of Public Works has prepared the CERC ESMF which has been reviewed by the Bank's Regional Safeguards Advisor and authorized for public disclosure. The ESMF was disclosed through the Bank's website on June 8, 2021 and in-country on June 10, 2021. The PIU is preparing sub-project specific ESMPs which will be consulted, cleared by the Bank and disclosed prior to the start of construction. Ongoing construction contracts under the original project include procedures and protocols for the containment of COVID-19 in accordance with national requirements and the World Bank ESF/Safeguards interim note on COVID-19 considerations in construction/civil works projects.

c) The PIU engaged a GBV/SEA/SH NGO for Community sensitization and awareness raising covers labor issues, GBV (Gender Based Violence)/SEA (Sexual Exploitation and Abuse) prevention and GRM (Grievance Readiness Mechanism) reporting.

d) The contractors continue to engage local unskilled labor in order to minimize labor influx and associated impacts. Contractors are expected to adhere to all contractual requirements on social safeguards, including a Code of Conduct guiding the workers' engagement with communities.

e) The footbridges will be constructed at existing river crossing points where there are established



and already existing pathways and where land is already allocated to public non-productive use. In accordance with the screening of the footbridge sites carried out and as guided by the RPF, no physical relocation impacts were identified as per OP4.12. In the event that engineering design or location changes during project implementation, the sites will be re-screened. There is a likelihood of temporary land acquisition. All PAPs will be compensated following the project's RPF guidelines.

Performance Standards for Private Sector Activities OP/BP 4.03 No

Natural Habitats (OP) (BP 4.04) Yes

No works going through critical ecological habitats will be included in the additional works to be supported under the project restructuring. The original project ESMF provides guidance on screening and mitigation measures to ensure that physical works do not alter or cause destruction of any critical or sensitive natural habitats especially wetlands.

The environmental risk for OP 4.04 is therefore minimal and should there be a chance of encountering a wetland during the construction of footbridges, the risk is manageable through the application of known mitigation measures included in the ESMF.

Forests (OP) (BP 4.36) No

The project will not support civil works located within forested areas or plantations and there will be no new areas that are forested to be opened up. Therefore, the policy is not triggered.

Pest Management (OP 4.09) No

The project will not involve procurement of pesticides or fertilizers and does not have the potential to lead to increased use of pesticides or fertilizers. Therefore, OP 4.09 is not triggered.

Physical Cultural Resources (OP) (BP 4.11) Yes

OP 4.11 is triggered given the likelihood of chance finds in conjunction with earth works and excavations, or the encounter of graveyard sites. The ESMF includes Chance Find Procedures (CFP) as well as measures to screen for and manage potential impacts on cultural heritage. In addition, bidding/contract documents for all sub-projects will include measures for "Chance Finds" of archaeological or other cultural heritage.

Indigenous Peoples (OP) (BP 4.10) No

OP 4.10 is not triggered, as there are no indigenous people within the project area of influence.



Component 1 will improve infrastructure access through construction of footbridges. A RPF was prepared to provide procedures for assessing impact, as the project locations for 16 of the footbridges to be financed were yet to be identified and confirmed. The RPF was consulted upon, endorsed by the Ministry of Environment, approved by the Bank, and disclosed in Lesotho on June 22, 2017, and on the Bank's external website on June 28, 2017, in line with OP/BP

However, some adverse social impacts are also likely to result from construction of a new Lot4 footbridges, added CERC works as well as added Routine Maintenance Contractors through E3 contractors.

The 19 footbridges, for which locations are known, were constructed at existing river crossing points where land is already allocated to public non-productive use. In accordance with the screening of the 19 footbridge sites carried out as part of the ESMP and guided by the RPF, no resettlement impacts were identified as per OP4.12. In the event that engineering design or location changes during project implementation, the sites will be re-screened.

Client prepared a generic ESMP for the footbridges and prepared Land Acquisition Plans for each sub-project site. The Client will prepare and submit additional land acquisition plans for the proposed bridges.

Should the contractors need land for establishment of a site offices, they will obtain written approval (consent must be witnessed by the area chief and local councilor must) from the owners on whose property the office/camp is to be situated. Any compensation shall be paid in full following World Bank OP 4.12 guidelines and National Regulations stated in the RPF. The PIU has been preparing Land Acquisition Plans (LAPs) detailing how land at each project location has been acquired, all discussions, agreements, grievances and resolutions, annexing all signed documents and consents.

Involuntary Resettlement (OP) (BP 4.12)      Yes



Safety of Dams (OP) (BP 4.37)	No	OP 4.37 is not triggered as the project will not finance construction or rehabilitation of dams, nor will it rely on the performance of an existing dam or a dam under construction, as defined in the policy.
Projects on International Waterways (OP) (BP 7.50)	No	The project will not affect international waterways.
Projects in Disputed Areas (OP) (BP 7.60)	No	The project will not finance any activities located in any known areas under territorial dispute as defined in OP 7.60. Therefore, the 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.

#### Environmental

From an environmental safeguards perspective the project restructuring entails the following key changes: (i) changes in the scope of Component 1 through the addition of a new lot of footbridges (Lot4) in the highlands and added labor intensive routine maintenance works through small contractors, who will be hiring unskilled labor from nearby communities for maintenance contracts; and (ii) implementation of CERC activities including rehabilitation and restoration of damaged transport infrastructure involving 11 road sections and associated drainage structures to respond to floods of January 2021. These subprojects will contribute to the project’s overall environmental and socio-economic benefits of improving local transport infrastructure, rural-urban connectivity and rural accessibility to public services and markets in the project area.

The key potential environmental impacts of the proposed works will largely occur during the construction phase of the project. These impacts include an increase in sediment load into water bodies from soil erosion and runoff due to the dominant mountainous terrain in Lesotho, and other nuisances such as noise, dust and air pollution from road works. Other impacts are related to occupational as well as community health and safety issues due to the risk of exposure to COVID 19 during construction. The project will not generate any potential large scale, significant and/or irreversible impacts.

The types of additional works to be supported under Component 1 and the CERC are similar in nature to those already covered by the TICP Environmental and Social Management Framework (ESMF), Environmental and Social Management Plan (ESMP) for footbridges. The Project remains a Category B and no new safeguards policies are expected to be triggered. The Ministry of Public Works has prepared the CERC ESMF which has been reviewed by the Bank’s Regional Safeguards Advisor and authorized for public disclosure. The ESMF was disclosed through the Bank’s website on June 8, 2021 and in-country on June 10, 2021. The PIU is preparing sub-project specific ESMPs which will be consulted, cleared by the Bank and disclosed on the Bank’s website and in-country prior to the start of construction. Ongoing construction contracts under the original project include procedures and protocols for the containment of COVID-19 in accordance with national requirements and the World Bank ESF/Safeguards interim note on COVID-19 considerations in construction/civil works projects.





## Social

The Project remains a Category B project because the environmental and social risks and impacts are generic and entail small scale civil works for the footbridges and the proposed community routine maintenance. These impacts will be site-specific and can be mitigated through measures included in the TICP ESMF, RPF and the ESMP for footbridges. The Contractors shall furnish a technical proposal management of environment and social risks and impacts and carry out regular mandatory E&S training for all workers and sign a code of conduct including GBV/SEA/SH prevention.

In terms of social impacts and risks are associated with potential risk of increases in GBV and HIV/AIDS related to the creation of jobs in footbridge construction and in community routine maintenance activities. Most of the footbridges funded by the Project are relatively small and based on Lesotho standard designs. Each bridge construction requires less than 20 workers, and only 2-3 will be recruited outside the beneficiary community. For bridges using standard designs there will be no campsites for workers. Workers engaged under the project, are required to participate in HIV/AIDS and SEA/SH/GBV training, provided by Lesotho Network of AIDS Services Organizations (LENASO). LENASO is a local NGO that has been contracted to facilitate training on HIV/AIDS, SEA/SH, and GBV in project affected communities and with contractors and laborers. Contractors will not be permitted to have workers engaged in project activities without training and follow up discussions/trainings will be organized on a monthly basis.

The CLOs (Community Liaison Officers) conduct routine debriefing session (toolbox talks) on E&S issues for construction workers including GBV/SEA/SH issues. LENASO and the PIU E&S team will continue with community sensitization and awareness raising on GBV/SEA/SH and HIV/AIDS issues in project affected communities. Awareness raising covers labor issues, GBV (Gender Based Violence)/ SEA (Sexual Exploitation and Abuse) prevention and GRM (Grievance Readiness Mechanism) reporting. The PIU installs GRM boxes and log registers on each project side and sensitizes workers and communities on GRM existence. Beneficiary communities will continue to be invited to similar trainings and LENASO will provide special outreach depending on community context, e.g. to local clinics and secondary schools. Contractors will be expected to adhere to all contractual requirements on social safeguards, including a Code of Conduct guiding the workers' engagement with communities.

There have been minor social impacts, such as temporary and permanent land acquisition in the parent project. The resettlement impact, as defined by OP4.12, for the restructuring activities is expected to be minor and partially temporary related to construction activities, given that the footbridges will be constructed at existing river crossing points where land is already used as pathways and allocated to public non-productive use. Construction activities may lead to disturbances or reduced access to local resources such as water or destruction of cultural heritage sites. These issues have been identified in safeguards documents (ESMF, ESMP for footbridges, RPF); screening will detect challenges and avoidance/mitigation measures will be employed during implementation. Should the contractors need land for establishment of a site offices, they will obtain written approval (consent must be witnessed by the area chief and local councilor must) from the owners on whose property the office/camp is to be situated. Any compensation shall be paid in full following World Bank OP 4.12 guidelines and National Regulations stated in the RPF. The PIU has been preparing Land Acquisition Plans (LAPs) detailing how land at each project location has been acquired, all discussions, agreements, grievances and resolutions, annexing all signed documents and consents.

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



The influx of workers, although limited due to focus on hiring local, may lead to increased stock theft, social conflict, disease transmission and GBV/sexual exploitation and abuse/sexual harassment. These will be mitigated through additional clauses to be incorporated in the contracts with regards to WBG General EHS Guidelines, such as Code of Conduct, action plans and awareness raising activities and training on GBV/SEA/SH and HIV/AIDS prevention for the contractors workers and community residents, and Code of Conduct and action plan on child labor. The PIU is currently preparing a GBV/SEA/SH action plan for the parent project that will be applicable for the restructuring. In each beneficiary community, the RD's social specialist and the PIU's E&S officer will continue working with existing community leaders to establish gender-balanced monitoring committees. The committees serve as a contact point between the communities and the contractor to facilitate a friendly and supportive environment between community members and workers, provide updates during construction and report to the RD and the MoPWT any issues or complaints associated with the implementation of these works.

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

The newly established Ministry of Public Works, (MoPW) has introduced a policy change regarding footbridge construction that affects the original project scope, whereby the MoPW would no longer be supporting investments in footbridges in lowlands but only vehicular bridges. Consequently, the funds from cancelled lowlands footbridges will be repurposed for new Lot4 footbridges in the highlands and will also finance labor intensive routine maintenance works through small contractors, who would be hiring unskilled labor from nearby communities for maintenance contracts. Additionally, the CERC was activated to respond to floods of January 2021. Based on this, a 'no action alternative' was not considered so that the project's development objectives are achieved. The added Lot4 footbridges in the highlands, the added community based routine road maintenance under Component 1 as well as the as the restoration of damaged road transport post the floods of January 2021 are important to achieving the project's development objectives.

The original project ESMF, ESMP for footbridges as well as the CERC ESMF requires analyzing various alternatives for each sub-project. All civil works to be financed under the proposed project restructuring will follow guidance provided in these instruments. Further, during the engineering design process and as part of the environment impact assessments, alternatives to increase resilience and environmental sustainability will be considered in the design of infrastructure to be financed under the proposed project restructuring.

If the proposed designs for footbridges or the routine community road maintenance require physical displacement or result in permanent loss of more than 20 percent of individual household productive lands, alternative designs will be developed to minimize impact.

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

The Lesotho Roads Directorate (RD) is the implementing agency for the construction of the footbridges. The RD is an entity which currently has a permanent Environmental Manager who oversees the environmental and social assessments, implementation and monitoring of environmental and social management plans for all projects implemented by the RD. The PIU recruited an experienced and qualified Environment and Social Officer (E&S Officer) and Community Liaison Officers (CLOs) at each sub -project site to oversee implementation and monitoring of safeguards instruments and their compliance. Additionally, the RD has seconded a Social Specialist to oversee the proper implementation of social safeguards. The RD's Social Specialist will continue mainstreaming social and gender aspects, and serve as the interface between the Roads Directorate, local government officers, the local communities, and the contractors. The PIU E&S Officer and the RD Social Specialist undertake preliminary screening of social risks



and impacts in each sub-project site. The E&S Officer and the CLOs monitor compliance of environment and social safeguards and provide monthly E&S compliance reports using monthly ESMP compliance monitoring and evaluation checklist. Training of contractors on monitoring and management of environment and social was undertaken prior to commencement of construction activities.

Project restructuring, both MoT and MoPW have agreed to retain the E&S staff compliment of the existing PIU to implement the E&S mitigation measured for Project activities under both ministries. RD Environment Unit leads on ES&S issues across both ministries with support from the PIU E&S team. The Ministry of Public Works serve as the Coordinating Authority for the CERC and will be responsible for the implementation of the restructuring activities as well as CERC activities, including all aspects related to environment and social safeguards compliance. The Ministry of Public Works has adequate staff and resources to implement the restructuring and CERC activities.

The E&S safeguards performance of the Project was rated Satisfactorily in the last Implementation Status and Results Reports (ISR). To date, all the E&S measures have been carried out satisfactorily with regard to the management of E&S performance related to main activities of the parent project. The Project has: (i) Retained and maintained a full E&S staff complement; (ii) continuously organized E&S pre-construction induction sessions to provide contractors, consulting engineers and the Client (MoT & MoPW staff) with training on environmental and social requirements. Additionally, the PIU ensures that the Project ESMF and ESMP prepared for footbridges are widely distributed and made available to consultants engaged in designing projects and preparing safeguards instruments, as well as contractors. Reference to the ESMF, ESMP for footbridges and sub-project specific ESMPs is also be made during all implementation and training workshops; and (iii) All civil works contractor and supervising engineers for each identified roads/bridge sub-project have recruited full time E&S officers/staff to monitor sub-project specific ESMPs implementation. The bidding documents for works contract and supervising engineer(s) contain this requirement.

After the guidance note on Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works was issued, the project was retrofitted, and was assessed for GBV/SEA/SH risk. Currently, the project GBV/SEA/SH risk rating is moderate. The PIU is in the process of preparing an action plan for GBV/SEA/SH risk management, to be submitted to the Bank for review in February 2022. The action plan will include core risk mitigation measures regarding a CoC, GM, service-mapping, worker and PIU personnel trainings, community awareness-raising, and community consultations with women. The PIU has contracted a local NGO (LENASO) to facilitate training on HIV/AIDS, SEA, and GBV for the grievance redress committees (GRCs), project affected communities, contractors and laborers. The GRCs are trained on how to handle reported cases of SEA, the use of GRM box and how to use the GRM forms to report such cases. The Bank recommended that LENASO's contract needs to be updated to ensure that its team has a qualified and experienced SEA/SH expert in order to manage the SEA/SH risks.

GRM system has been functional and effective with frequent reports, resolution and scaling up of issues. The PIU installs GRM boxes and log registers on each project side and sensitizes workers and communities on GRM existence. The CLOs have been receiving, resolving (minor complaints) and reporting grievances. Local authorities have played a critical role in receiving and resolving issues in collaboration with the CLOs and the project's E&S Officer. Additionally, the Ministry of Transport's website is currently being upgraded to incorporate the project GRM. The GRM has been revised to incorporate SEA/SH complaints and the PIU is currently updating their website to include SEA/SH reporting. Furthermore, the Bank shared guidelines on how to integrate GBV/SEA reporting in the GRM and on the website.

The potential environmental and social impacts and proposed mitigation measures, as described in the Project ESMF will continue to be included in the bidding documents for each contract and will form the basis for preparing the site-



specific ESMPs by each contractor. Site-specific ESMPs guided by the ESMF will be developed, cleared by the Bank and disclosed before the start of proposed activities under the Project restructuring. The PIU’s E&S team will continue to screen all sub-projects, in case the screening results finds economic displacement or resettlement (OP 4.12) related impacts, land acquisition plans will be prepared and implemented to address those impacts.

Continuous safeguards training will be provided to the Roads Directorate and the PIU during implementation of the proposed Project with regards to the application of World Bank Safeguard Policies in mitigating risks and impacts, and in monitoring implementation of site-specific ESMPs. The costs for the implementation of safeguard policy measures have been incorporated within the Project. The mitigation measures outlined in the sub-project specific ESMPs will be incorporated in the bidding documents and each contract for the works. The associated costs for implementation of these measures will be included in the overall contract cost financed by the Project.

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

Community members within the project areas are considered the key stakeholders for the project. It is the RD's responsibility to ensure that communities are fully informed and have easy access to information that is understandable through coordination with local governments and contractors. Communities will be placed in a position to participate in any necessary resettlement planning and implementation through ongoing consultations. The RD's social specialist together with the PIU's E&S officer and the community liaison officers will ensure that the consultation processes are recorded and incorporated into the decision-making processes.

Thus the parent project's stakeholder consultation mechanisms will continue to remain central to the design and implementation of sub-projects. This includes procedures for dissemination of information and consultation with communities in particular through various stages of the sub-project cycle. Guidance on consultations has been laid out in the Environment and Social Management Framework (ESMF) and the RPF to ensure proper stakeholders consultation at all key stages of sub-project preparation and implementation.

The project established a functional and effective GRM with frequent reports, resolution and scaling up of issues to relevant departments, this will continue in the proposed project restructuring. The PIU installs GRM boxes and log registers on each project side and sensitizes workers and communities on GRM existence. The Community Liaison Officers (CLOs) have been receiving, resolving (minor complaints) and reporting grievances, additionally local authorities have played a critical role in receiving and resolving issues in collaboration with the CLOs and the project's E&S officer in the parent project.

**B. DISCLOSURE REQUIREMENTS**

**Environmental Assessment/Audit/Management Plan/Other**

Date of receipt by the Bank

18-Jul-2017

Date of submission for disclosure

01-Aug-2017

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



“In country” Disclosure

Country	Date of Disclosure
Lesotho	27-Jul-2017

Comments  
Disclosed in country on RD's website and on the government portal

**Resettlement Action Plan/Framework Policy Process**

Date of receipt by the Bank	Date of submission for disclosure
01-Apr-2017	28-Jun-2017

“In country” Disclosure

Country	Date of Disclosure
Lesotho	22-Jun-2017

Comments  
Disclosed in country on RD's website and on the government portal

**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?	Yes
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	Yes

**OP/BP 4.04 - Natural Habitats**

**OP/BP 4.11 - Physical Cultural Resources**

Does the EA include adequate measures related to cultural property?	Yes
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Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?	Yes
<b>OP/BP 4.12 - Involuntary Resettlement</b>	
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?	Yes
<b>The World Bank Policy on Disclosure of Information</b>	
Have relevant safeguard policies documents been sent to the World Bank for disclosure?	Yes
Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?	Yes
<b>All Safeguard Policies</b>	
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)	Nargis Ryskulova Noor Ibrahim Mohamed
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Approved By		
Safeguards Advisor	Ning Yang	18-Feb-2022
Practice Manager/Manager	Maria Marcela Silva	21-Feb-2022

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