Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 06/18/2019 | Report No: ESRSA00192
BASIC INFORMATION

A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Guinea</td>
<td>AFRICA</td>
<td>P168613</td>
<td></td>
</tr>
</tbody>
</table>

Project Name: Guinea Natural Resources and Environmental Management Project

<table>
<thead>
<tr>
<th>Practice Area (Lead)</th>
<th>Financing Instrument</th>
<th>Estimated Appraisal Date</th>
<th>Estimated Board Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environment &amp; Natural Resources</td>
<td>Investment Project Financing</td>
<td>8/15/2019</td>
<td>12/18/2019</td>
</tr>
</tbody>
</table>

Borrower(s): Ministry of Finance

Implementing Agency(ies): Ministry of Environment, Water and Forests

Proposed Development Objective(s)

The Development Objective is to strengthen the capacity of the Ministry of Environment, Water and Forests in natural resources and environmental management.

Financing (in USD Million)

<table>
<thead>
<tr>
<th>Amount</th>
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<tbody>
<tr>
<td>Total Project Cost</td>
</tr>
</tbody>
</table>

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

Guinea has an abundance of natural resources, and is planning for large scale economic development projects. This project will assist the Ministry of Environment, Water and Forests to work with the trade-offs between economic development and valuing natural resources for all the benefits of the latter for environmental and human services. The project will align with recent changes within the Ministry that have been undertaken following an institutional audit. Two key units are a focus of this project: one in charge of environmental audits and one in charge of national parks. This project is one of the first to use the Environment and Social Framework (ESF) overall, but will also use the ESF as the main guidance for strengthening capacity of environmental and social audits. In summary, there are three main components:
Component 1: Legal, institutional and logistical support to the Ministry of Environment, including examination of sustainable finance mechanisms for national parks and reserves;
Component 2: Natural resource management in selected areas with the Guinean Office for Parks and Reserves (Office Guinéen des Parcs et des Réserves, OGPR);
Component 3: Strengthening capacity to undertake environmental and social audits, with the Guinean Office of Audit and Environmental Compliance (Bureau Guinéen d'Audit et de la Conformité Environnementale, BGACE).

D. Environmental and Social Overview
D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]

Two project locations are relevant:
- Component 1: The building site in Conakry; and
- Component 2: Three protected areas (reserves, national parks), that include:
  o Kounounkan forest reserve
  o Haut Niger national park
  o Protected area around the Niger River source

Component 1 will finance the construction and furnishing of a new office building (land owned by the Government) to accommodate both OGPR (Office Guinéen des Parcs et des Réserves) and BGACE (Bureau Guinéen d'Audit et de la Conformité Environnementale) staff. The project site is located in Conakry and is on a site owned by the Ministry of Environment. Environmental and social issues will be addressed in section ESS1.

For Component 2, activities with a physical footprint will be limited in scale, limited to single-story building/rehabilitating infrastructure (e.g., offices, housing, monitoring stations and trails) in the three targeted protected areas. However, the specific sites within the protected areas for the building of the small-scale infrastructure have not yet been identified.

The three protected areas were selected in collaboration with the authorities during project preparation. These protected areas were selected as they do not have the appropriate infrastructure and equipment necessary for adequate surveillance and management. To improve this capacity, the project will finance the new construction or rehabilitation of existing field offices and surveillance posts. These include:
- in Kounounkan - construction and equipment of one field office and four surveillance posts (specific sites to be identified as part of the ESIA);
- in Upper Niger National Park - rehabilitation of field offices in Sidakoro (Mafou sector) and Tokonoun (Kouyah sector) and construction of six surveillance posts (five in Mafou and one in Kouyah);
- in Niger Source - construction and equipment of the field office of the Niger Source Natural Reserve and rehabilitation and equipping of the regional base office at Faranah; and
- Other facilities and protected areas management works that will be implemented with local communities and may include: physical delimitations of the three areas, construction and rehabilitation of existing tracks and roads, watchtowers, fire management facilities, wildlife development facilities, reforestation and river bank rehabilitation.

Potential project impacts related to the consolidation of these existing protected areas are expected to be minimal and localized. Positive impacts should result from the preparation and implementation of protected area
management plans, particularly for ensuring adequate use and conservation of ecosystems, although it is acknowledged that enforcement of these management plans may result in the restriction of access and use by local communities.

D. 2. Borrower’s Institutional Capacity

The Guinea environmental policy framework is rooted in the provisions of the Constitution through Art19 (3) that states: "the People has the right to the preservation of his heritage, culture and of its environment". The Environment code was published on May 28, 1987. In November 8, 1989 the government published a Decree regulating Impact Studies. In Guinea, the Environmental and Social Assessment (ESA) and the Environment and Social Impact Assessment (ESIA) review process is under the responsibility of the Ministry of the Environment through BGACE. In general, however, human and logistical resources within the Ministry of Environment remain limited.

BGACE implements its mandate through five main phases: (i) validation of terms of reference; (ii) the admissibility review; (iii) the receipt of the ESIA draft reports submitted to the Minister for the Environment; (iv) review and judgment on the environmental acceptability of the project by the BGACE; and (v) environmental monitoring of the project. Since March 2013, the Government adopted a General Environmental Assessment Guide that defines the methodology and procedure for conducting environmental and social impact assessments. This guide is currently under revision. Few other sectoral guidelines are under preparation and the current project will provide resources to prepare additional sectoral guidelines. As of July 2018, the BGACE staff number was 85 of which 32 were recruited during the last 12 months by the government. This new staff will need training to strengthen capacity of this institution. The BGACE is poorly equipped (one four-wheel vehicle, analysis kits for noise, air quality, water, soil, and four offices for 85 staff). Several technical trainings on ESIA review and Environment and Social Management Plan (ESMP) monitoring were provided to a limited number of staff. The Ministry of Environment which will host the PIU has never implemented World Bank-financed projects. The second implementing agency, OGPR, also has never implemented a World Bank-financed project.

An institutional assessment was carried out during preparation and found that the environmental and social management system and general procedures within the Ministry of Environment (including BGACE) will need to be enhanced in order to fully comply with ESF requirements. Financing has been provided under Component 3 to address these gaps. Capacity building activities relevant to the preparation and implementation of specific instruments for compliance with the WBG’s ESSs have been reflected in the Environmental and Social Commitment Plan (ESCP) prepared by the Government of Guinea.

A fundamental contribution this project should make is to build the capacity of the BGACE on ESF, that should be applicable and useable by other projects in future. It will build the borrower’s institutional capacity over time.

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

<table>
<thead>
<tr>
<th>Environmental Risk Rating</th>
<th>Moderate</th>
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Given the environmental conservation nature of the project, all impacts associated with improving biodiversity and living natural resources are expected to be positive. The potential adverse risks and impacts on the environment are related to:
the implementation and consolidation of protected area management plans, such as improvements to existing management or infrastructure, demarcation, improvement of surveillance trails, and provision of equipment (e.g. solar panel). These potential adverse impacts are not likely to be significant and are expected to be site-specific, predictable, temporary and/or reversible;

- the Ministry of Environment has never implemented World Bank financed projects and the human and logistical resources within the Ministry of Environment are limited. The two main beneficiary agencies, namely BGACE (previously BGEEE) and OGPR (previously OGUIIPAR), have also limited experience implementing environment and social standards.

As a result, the environmental risk is considered moderate.

**Social Risk Rating**

The proposed project activities do not require land acquisition although they will affect the access of local communities to natural resources in two of the three protected areas. To mitigate these risks and to ensure a strong engagement with the affected communities, the Borrower has prepared a process framework for each protected area that will guide the involvement of local communities in the management of the parks and ensure that they are participating in the livelihood restoration programs. The social impacts are therefore site specific and are not anticipated to be large scale. The ESCP will include actions to address social risks such as the immediate recruitment of a full-time social development specialist for the PIU throughout project implementation who will provide support to the PIU with ESS planning and implementation. In addition, continuous training on the new ESF will also facilitate more effective implementation and compliance with the ESF and the Stakeholder Engagement Plan (SEP) will ensure a much more comprehensive engagement with project beneficiaries. Furthermore, the Bank’s social development specialist will provide support and guidance to the PIU in addressing the social risks and impacts of the project. As a result, the social risk is considered moderate.

**B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered**

**B.1. General Assessment**

**ESS1 Assessment and Management of Environmental and Social Risks and Impacts**

*Overview of the relevance of the Standard for the Project:*

The overall environment and social risk level is Moderate largely because the proposed project activities under Components 1 and 2 are considered to be limited in scale, most of them will be site specific within the targeted protected areas and in most cases mitigation measures can be readily designed.

The potential environmental impacts caused by new construction/rehabilitation works and associated handling and storage of construction material will also include waste production, excessive noise and dust levels. These type of civil works may also generate environmental and social impacts such as construction related health and safety concerns for both laborers/workers and local communities. Depending on the scale of the rehabilitation works, there could be a limited amount of site clearing, site preparation and construction that could lead to loss of vegetation and associated fauna, soil disturbance and erosion. However, these potential environmental and social risks and impacts are predictable, expected to be temporary, low in magnitude, and site-specific. In addition, it is not anticipated that the project will require any land acquisition and no permanent physical displacement is expected.

The scope and specific sites of public works and livelihood activities are not precisely defined, therefore, a framework approach (ESMF, PF) has been adopted to provide guidance regarding the preparation of the appropriate instruments
such as Environmental and Social Impact Assessments/Environmental and Social Management Plans (ESIAs/ESMPs). The ESMF incorporated the general and sector-specific Environmental Health and Safety Guidelines (EHSG) for the identified sub-projects in relation to occupational and community health and safety.

The Environmental and Social Commitment Plan, drawn and agreed upon with the borrower, sets out the substantive measures and actions that will be required for the project to meet environmental and social requirements over a specified period of time. These measures shall be implemented within the specified timeframes and the status of implementation has been reviewed as part of project monitoring and reporting in the ESCP.

For ESS1, the Borrower has prepared the following instruments:

- To mitigate the risk under Component 2 “Natural capital management in selected areas” in three targeted areas, an environmental specialist has been hired to ensure the environmental and social standards compliance during the project lifetime. The specialist has prepared the ESMF which describes necessary screening measures and procedures for preparing site-specific ESIA/ESMPs;
  The specialist has also prepared a PF and a SEP.
- With regard to the construction of the Ministry's building under Component 1, an environmental and social management plan (ESMP) has been prepared.

These relevant environmental and social instruments have been prepared, reviewed and will be disclosed in the country and on the World Bank website prior to appraisal. The ESMF and ESMP will include the relevant requirements of the Environmental Health and Safety Guidelines for any construction or rehabilitation of infrastructure that will be financed under Components 1 and 2. Construction contractors will be required, as a condition of their contracts with the Project, to implement and comply with a Contractor ESMP consistent with ESS1 for the activities in the protected area. Construction contracts will include relevant provision on procedures for handling “chance finds” during implementation of project activities. Gender-based violence (GBV) relevant mitigation measures will be reflected in the bidding documents and are included in the ESMF. The Borrower will monitor the environmental and social performance in accordance with the ESCP and manage any requirements based on environmental and social assessments.

ESS10 Stakeholder Engagement and Information Disclosure

Stakeholder engagement is a critical tool for social and environmental risk management, project sustainability and success especially when the activities are focused on Protected Areas. A Draft Stakeholder Engagement Plan (SEP) was prepared and will be disclosed prior to Appraisal. During project implementation, the Borrower will seek stakeholder feedback and opportunities for proposed future engagement, ensuring that all consultations are inclusive and accessible (both in format and location) and through channels that are suitable in the local context. If major changes are made to the SEP, a revised SEP will be submitted to the Bank for no objection and then publicly disclosed. The Borrower will engage in meaningful consultations with all stakeholders throughout the project life cycle paying attention to the inclusion of vulnerable and disadvantaged groups (including the elderly, persons with disabilities, female headed households and orphans and vulnerable children). Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. The Borrower will
maintain, and disclose, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was considered, or the reasons why it was not incorporated.

The draft SEP includes guidance regarding establishing a Grievance Redress Mechanism (GRM). The GRM platform will seek to establish a continuous feedback and responsive platform between project-affected communities and implementing structures. It will be widely advertised in the project area and adjusted during project implementation if necessary. The project is considering using an existing and functional GRM mechanism that has been established through the “Projet d’Action Communautaire Villageois” (PACV) project, and subsequently taken over by ANAFIC (Agence Nationale de Financement des Collectivités en Guinée).

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

The project will involve most of the workers categories’ described under paragraph 3 of the ESS but it will not require a significant amount of labor as the civil works to be financed are limited in scale and scope. Most labor will be locally hired except for skilled workers that cannot be found in the project location; most of the protected areas remain in remote regions. The project will therefore work with the contractors to ensure that they hire local unskilled labor to the extent possible for construction/rehabilitation of infrastructures in order to minimize the influx of unskilled labor and reduce the potential for harm. Experience indicates that the influx of workers and followers into a project area can lead to adverse social impacts such as gender-based violence (GBV), sexual exploitation, communicable diseases including HIV/AIDS for local communities in remote areas. All civil works contracts will include industry standard Codes of Conduct that include measures to prevent GBV and Sexual Exploitation and Abuse (SEA). The LMP will also address terms and conditions of employment, nondiscrimination and equal opportunity, and workers’ organization. It will also set out restrictions regarding child and forced labor.

The risk of child / forced labor is considered to be limited but will be subject to rigorous monitoring. The ESMF and ESMP also include sections on Occupational Health & Safety (OHS) and Community Safety and Bidding Documents prepared for the project will include a Health, Safety and Environmental (HSE) plan in line with World Bank Group Environment, Health and Safety (EHS) Guidelines.

Contractors will prepare a Worker Health and Safety Plan to cover site-specific job hazards, provision of preventive and protective measures for all hazards; information about safe working methods; and safety measures. The plan will also include procedures on incident investigation and reporting, recording and reporting of non-conformances, emergency preparedness and response procedures and continuous training and awareness to workers. Locally based GRMs specifically for direct and contracted workers, respectively, will also be put in place, based on national laws and regulations. Civil works contracts will incorporate E&S mitigation measures.

ESS3 Resource Efficiency and Pollution Prevention and Management

It is not expected that project implementation would significantly contribute to the generation of pollution, however the project activity will imply consumption of energy, water and raw material as well as generation of waste. It is
anticipated that during the project implementation limited air emissions be generated due to transport vehicles, and fugitive dust generated by digging activities. Those most likely to be affected are workers and people living within the proximity of construction/rehabilitation sites. The implementation of mitigation measures such as dust suppression and vehicle maintenance will be applied to minimize the impact of air emissions during construction/rehabilitation, and residual impacts are expected to be limited in scope and duration. Noise might likely be generated from the use of construction machinery and vehicle movements. The relatively short-term and small-scale nature of the works suggest that noise levels will not be excessive or cause long-term nuisance. The construction works will however, present short-term nuisance to the neighbors to some of the project sites. For the construction of the Ministry’s building, the Environmental and Social Management Plan prepared includes mitigation measures to minimize and manage the noise levels such by applying standard restrictions to hours of site work.

Construction/rehabilitation activities will generate solid waste which will primarily include excavated soil and solid wastes. The waste generated by the construction/rehabilitation works will largely be disposed of at approved sites according with the national laws and regulations. The construction ESMP will comply with all relevant requirements. Although no significant hazardous wastes or pollution sources are expected, the ESMF consider risks and impacts potentially related to construction and wastes. Operational phase issues such as park visitor waste management, engine oil, among other pertinent issues are considered.

The activities of this project will follow guidance for the adoption, to the extent possible, of renewable energy and rainwater collection/water reuse solutions, as well as other solutions to reduce and recycle waste generated by any economic activity or infrastructure remodeling/construction supported under the project.

ESS4 Community Health and Safety

For the activities under Component 2, the Borrower will undertake an in-depth assessment of the risks and impacts on the health and safety of the affected communities that are living within or in the buffer zones of the selected protected areas. This will include adverse social impacts such as gender-based violence, sexual exploitation and Abuse (SEA) and communicable diseases such as HIV/AIDS on local communities as well as labor influx. The ESMF will include measures to address GBV/SEA.

For Component 1’s construction of the Ministry’s building in Conakry, the site is located adjacent to a residential area. However, the disturbance to local communities will be limited in scale and scope during the construction phase. In order to ensure the health and safety of workers during the construction and operational phases of the project, the PIU will develop and implement a Health, Safety and Environmental (HSE) plan in line with World Bank Group Environment, Health and Safety (EHS) Guidelines (for construction activities). The plan will include procedures for incident investigation and reporting, recording and reporting of any non-compliance, emergency preparedness and response procedures and continuous training and awareness to workers that will be proportionate with the project scope.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
Project activities are mostly TA with the exception of Component 1 which will finance the construction of an office building to accommodate both OGPR and BGACE staff and Component 2 which will finance the rehabilitation of park infrastructure such as housing for park wardens, offices and monitoring stations. All the project sites including the protected areas are already within the management of the Ministry of the Environment.

It is not anticipated that the project will require any land acquisition and no permanent physical displacement is expected. However, this ESS is relevant for para 4(c) "Restrictions on land use and access to natural resources” that cause a community or groups within a community to lose access to resource usage where they have traditional or customary tenure, or recognizable usage rights. This may include situations where legally designated protected areas, forests, biodiversity areas or buffer zones are established in connection with the project”.

To ensure ESS compliance, the borrower has prepared a draft process framework for each targeted protected area that describes participatory processes and guidance regarding how to minimize the impacts on local communities. These draft documents were prepared, reviewed and disclosed in country and on the Bank website prior appraisal. In addition, the ESCP includes a commitment to implement the process frameworks prepared during the project implementation.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

This ESS is relevant as the project activities will be mainly focused in the selected protected areas: Kounounkan, Upper Niger National Park (Mafou sector; Kouyah sector) and Niger source. Paragraph 6 of the ESS states that: "Based on the environmental and social assessment, the requirements of this ESS are applied to all projects that potentially affect biodiversity or habitats, either positively or negatively, directly or indirectly, or that depend upon biodiversity for their success." The Environmental and Social Assessment provide guidance on screening and mitigation measures to ensure that project activities do not alter or cause destruction of any critical or sensitive natural habitats. The clearance and loss of areas of vegetation and fauna habitat will be minimal. The project’s ESMF includes guidance to prevent and mitigate the possible small, localized and reversible impacts that may be expected from the necessary activities to achieve project outcomes, as described under ESS 1 above. Any additional assessment on biodiversity will be outlined in the ESCP.

Overall, the project will have positive impacts as it will promote the sustainable management of natural resources and support the livelihoods of local communities depending on those natural resources through practices that integrate conservation needs and development priorities.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

This ESS is not considered relevant as there are no Indigenous Peoples meeting the criteria outlined in para 8.

ESS8 Cultural Heritage

The ESS8 is relevant as the project activities will be implemented in protected areas that may be valued for their cultural heritage. The environmental and social assessment will confirm the existence of tangible or intangible cultural heritage. However, all construction contracts will include as described under ESS1, a “Chance Find” clause.
which will require contractors to stop construction in the event that cultural property sites are encountered during construction.

ESS9 Financial Intermediaries
With regard of the nature of the project activities, this ESS9 is not currently relevant.

C. Legal Operational Policies that Apply

| OP 7.50 Projects on International Waterways | Yes |
| Memo cleared by Legal and PM; to be sent to CMU (June 18) |

| OP 7.60 Projects in Disputed Areas | No |

III. BORROWER’S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

<table>
<thead>
<tr>
<th>DELIVERABLES against MEASURES AND ACTIONS IDENTIFIED</th>
<th>TIMELINE</th>
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<tbody>
<tr>
<td>ESS 1 Assessment and Management of Environmental and Social Risks and Impacts</td>
<td></td>
</tr>
<tr>
<td>ORGANIZATIONAL STRUCTURE: By 90 days after effectiveness, BGACE and OGPR will establish an organizational structure with qualified staff to support management of E&amp;S risks including environment and social specialists responsible for ensuring full compliance with the ESF and relevant instruments. Maintain Organizational Structure as necessary throughout Project implementation.</td>
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<td>06/2020</td>
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<tr>
<td>FINAL ESIA/ESMP – Construction of the Ministry’s building: The final ESIA/ESMP will be completed in conjunction with the final design of the building. The final ESIA/ESMP will be disclosed prior to issuing the bidding documents.</td>
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<tr>
<td>06/2020</td>
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<tr>
<td>As part of the ESMPs: PERMIT, CONSENTS AND AUTHORIZATIONS: Obtain or assist in obtaining, as appropriate, the permits, consents and authorizations that are applicable to the Project from relevant national authorities. Comply or cause to comply, as appropriate, with the conditions established in these permits, consents and authorizations throughout Project implementation.</td>
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<tr>
<td>12/2024</td>
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<tr>
<td>ESS 10 Stakeholder Engagement and Information Disclosure</td>
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<tr>
<td>As part of the ESMPs: PROJECT GRIEVANCE MECHANISM (GRM): The GRM should be fully operational prior to project effectiveness..</td>
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<tr>
<td>03/2020</td>
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<tr>
<td>CONSULTATION ON ESF INSTRUMENTS: Detailed stakeholder consultation on all ESF Instruments (ESMP, ESMF, SEP) conducted by completion of Project Appraisal.</td>
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<td>09/2019</td>
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<tr>
<td>ESS 2 Labor and Working Conditions</td>
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</table>
### ESS 3 Resource Efficiency and Pollution Prevention and Management

As part of the ESMF and the ESMPs: MANAGEMENT OF WASTE AND HAZARDOUS MATERIALS: Develop and implement measures and actions to manage waste and hazardous materials (e.g., construction materials, oil, paint, etc.). Ensure actions undertaken throughout Project implementation. **03/2024**

### ESS 4 Community Health and Safety

As part of the ESMF and the ESMPs: COMMUNITY HEALTH AND SAFETY: Develop and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities, including in relation to Project Workers and. **03/2020**

Community health and safety practices implemented and reported on throughout Project implementation. **03/2024**

As part of the ESMF and the ESMPs: GBV AND SEA RISKS: Develop, adopt and implement measures and actions to assess and manage the risks of GBV and SEA, including Code of Contact. **03/2020**

As part of the ESMF and the ESMPs: GBV AND SEA RISKS DURING PROJECT IMPLEMENTATION: Specify additional funds available to implement measures to address GBV and SEA risks and impacts that may arise during Project implementation. **12/2024**

As part of the ESMF and the ESMPs: EMERGENCY RESPONSE MEASURES: Develop and implement measures to address emergency events and ensure coordination with measures mentioned above. **03/2020**

### ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
<table>
<thead>
<tr>
<th>Topic</th>
<th>Details</th>
</tr>
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<tbody>
<tr>
<td><strong>Restriction of Access to Park Resources</strong></td>
<td>Finalize and disclose a Process Framework that provides for a participatory process that will be used to define access to the park and livelihood restoration programs</td>
</tr>
<tr>
<td><strong>ESS 6 Biodiversity Conservation and Sustainable Management</strong></td>
<td>ESMF summarizes biodiversity as well as criteria for when site-specific ESIAs/ESMPs require biodiversity assessments/mitigation measures</td>
</tr>
<tr>
<td><strong>ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities</strong></td>
<td></td>
</tr>
<tr>
<td><strong>ESS 8 Cultural Heritage</strong></td>
<td>As part of the ESMF and the ESMPs: CHANCE FINDS: Develop a chance finds procedure in the ESIAs and ESMFs and include as a requirement in site-specific ESIAs/ESMPs.</td>
</tr>
<tr>
<td><strong>ESS 9 Financial Intermediaries</strong></td>
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### B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

**Is this project being prepared for use of Borrower Framework?**  
No

**Areas where “Use of Borrower Framework” is being considered:**

The operation will not use the Borrower’s E&S Framework in the assessment, development and implementation of sub-projects. The project will comply with relevant national legal requirements.

### IV. CONTACT POINTS

**World Bank**

- **Contact:** Ellysar Baroudy  
  **Title:** Lead Natural Resources Management Specialist  
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  **Email:** ebaroudy@worldbank.org

**Borrower/Client/Recipient**

- **Borrower:** Ministry of Finance

**Implementing Agency(ies)**
Implementing Agency: Ministry of Environment, Water and Forests

V. FOR MORE INFORMATION CONTACT
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VI. APPROVAL
Task Team Leader(s): Ellysar Baroudy
Practice Manager (ENR/Social) Maria Sarraf Cleared on 18-Jun-2019 at 14:50:59 EDT