Integrated Safeguards Data Sheet
Restructuring Stage

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Regional Vice President:	Hafez M. H. Ghanem
Country Director:	Marie Francoise Marie-Nelly
Regional Director:	Catherine Signe Tovey
Practice Manager/Manager:	Maria Angelica Sotomayor Araujo
Task Team Leader(s):	Miguel Vargas-Ramirez, Palesa Selloane Mokorosi

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

I. BASIC INFORMATION

1. BASIC PROJECT DATA

Project ID	Project Name
P160672	Lesotho Lowlands Water Development Project - Phase II
Task Team Leader(s)	**Country**
Miguel Vargas-Ramirez, Palesa Selloane Mokorosi	Lesotho
Approval Date	**Environmental Category**
17-May-2019	Full Assessment (A)
Managing Unit	
SAEW2	

PROJECT FINANCING DATA (US$, Millions)

2. PROJECT INFORMATION

Current Program Development Objective

The Proposed Development Objectives are to: (a) increase water availability and access to improved water supply services in two priority zones; and (b) improve technical and financial performance of WASCO.

Proposed New PDO

The Proposed Development Objectives are to: (a) increase water availability and access to improved water supply services in two priority zones; and (b) improve technical and financial performance of WASCO; and (c) in case of an Eligible Crisis or Emergency, respond promptly and effectively to it.

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

3. PROJECT DESCRIPTION

The Project consists of the following four Components

Component 1. Water Supply Investments in Priority Zones 2 and 3. This component will finance a program of

activities designed to improve access to reliable domestic and industrial water supply services in Maputsoe and Hlotse towns, and selected settlements and villages in the priority zones. It will finance:

i. Construction of a bulk water supply scheme that abstract water from the Hlotse River to the Priority Zones, including a river intake structure, source protection measures, water treatment plant, reservoirs, and auxiliary facilities.
ii. Construction of transmission lines to take water from the Holtse River to the above-mentioned water supply scheme.
iii. Construction and rehabilitation of distribution water mains and networks in the Priority Zones and surrounding settlements, including installation of meters, household service connections, leakage reduction measures and standpipes.
iv. Rehabilitation of boreholes in Maputsoe area.
v. Provision of technical assistance for construction supervision and quality assurance of water supply investments, technical studies, and engineering designs under Parts A.1 and 2 of the Project.

Component 2. Capacity Building, Institutional Strengthening and Project Management. This component will strengthen sector institutions and sustainable management arrangements of the project investments, support project management, and develop a sector assessment and strategic studies and plans for the water and sanitations sector. It will finance:

i. Carrying out of Project management activities, including: (a) provision of support to Project Implementation Unit's management activities; (b) provision of technical assistance for the functioning of a dam safety experts; (c) provision of technical assistance for the design, implementation and monitoring of Safeguard Instruments; and (d) carrying out of Project communication activities.
ii. Strengthening of institutional capacities of selected water sector departments, including provision of operational and policy support to DRWS, water quality monitoring support to DWA, provision of technical assistance to support the establishment of the LBWSA, provision of technical assistance to support Local Governments in the project areas with the establishment of service delegation arrangements to rural service water providers, and capacity building and tariff structure support to, LEWA, and local governments, and rural service providers, technical data quality and auditing support to LEWA, and oversight implementation support to MODP.
iii. Provision of technical support to MOW to develop water and sanitation masterplan and implementation strategies, including preparation of action plans for select urban locations; feasibility studies, detailed designs, technical specifications and Safeguard Instruments for high priority works; sector diagnostics and actions plans for a targeted nutrition-sensitive water, sanitation and hygiene approach; and industrial wastewater management and regulation strategy.

Component 3. WASCO Operational Performance Improvements. This component will finance a program of investments and technical assistance to strengthen the technical and financial performance of WASCO. It will finance:

i. Provision of technical assistance for strengthening WASCO's senior management to improve its performance, including carrying out asset valuations, planning asset management and maintenance plans, improving data quality of WASCO's performance and statutory financial reporting subject to LEWA technical audits and external financial audits, preparing accurate NRW water balances, and carrying out customer surveys and engagement activities for the Project investments.
ii. A prioritized investments program aligned with WASCO's NRW Strategy and WASCO's Strategic Improvement Plan, including NRW reduction measures (*inter alia* creation of district metering areas, pressure management and leak detection equipment, bulk and retail metering programs, calibration equipment, pressure regulating valves, etc.) and modernization measures for billing and revenue collection (including *inter alia* georeferenced customer inventories and registries, commercial information and payment systems, customer response systems). The priority program will focus on Maseru, Hlotse and Maputsoe.

Component 4. Contingent Emergency Response Component (CERC). In the event of an Eligible Crisis or Emergency, this Component will provide immediate and effective response to said Eligible Crisis or Emergency, defined as "an event that has caused, or is likely to imminently cause a major adverse economic and/or social impact associated with natural or man-made crises or disasters."

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

The project activities, comprising of an intake for water abstraction from the Hlotse River, a water treatment plant, reservoirs, pumping stations and transmission pipelines and distribution network. They will be will be implemented in the northern part of lowlands area of Lesotho. The Lowlands region is characterized by hot humid summers and cold dry winter, with an annual precipitation of approximately 600mm. The yearly average maximum temperatures are 13.9ºC and the average yearly minimum temperatures are 1.7ºC. Zones 2 and 3 are predominantly cultivated, particularly in the flatter plateaus and plains. The project area is characterized by a mix of rural, peri-urban, urban and an industrial zone. The two major towns of Maputsoe and Hlotse are experiencing rapid urbanization with unplanned settlements and encroachment on the road reserve and arable land. Maputsoe has seen an increase in the growth of the garment industry that has stimulated an increase in urban migration and increased demand for water. Improvement of water infrastructure in Maputsoe and other urban settings in Lesotho represents part of the Government of Lesotho's (GoL) efforts to diversify the economy and improve the provision of essential services. To meet these increasing demands, the GoL has recognized the need to provide water to the growing garment industry and portable water for the fast-growing urban areas. The rural and peri-urban areas comprise of farming communities scattered across the landscape. Most of the farming activities are small scale subsistence farming. The general pipeline alignment will be directly outside the road reserve in some instances, intersecting grazing and arable lands and residential areas. Overall positive impacts associated with the project are expected to include: (a) improved reliability of water supply and resilience of the domestic and industrial sectors; (b) job creation during construction period. The water intake is located on the Hlotse river, which is a tributary of the Mohokare/Caledon River, an international waterway which is part of the Orange-Senqu river basin. As part of the project preparation process, the Government of Lesotho, in line with World Bank OP 7.50, through the Orasecom Secretariat, formally notified the other riparian of the river, South Africa, Botswana and Namibia, of the project. No objections were received from any of the countries.

5. ENVIRONMENTAL AND SOCIAL SAFEGUARDS SPECIALISTS ON THE TEAM

Aimonchok Tashieva, Social Specialist
Mark Doveton Wood, Environmental Specialist
Min Ji Sohn, Environmental Specialist

Johanna Martina Whitfield, Environmental Specialist

6. SAFEGUARD POLICIES TRIGGERED

Safeguard Policies	Triggered	Explanation
Environmental Assessment (OP) (BP 4.01)	Yes	The Project is classified as Category A due to (i) significant scope of physical infrastructure to be constructed and the associated earthworks that will take place within a sensitive ecosystem mainly the Hlotse River, (ii) complexity and inter-dependency of different water systems in augmenting the river capacity to ensure reliable supply of water to the water treatment plant, and (iii) reliance on water releases from the Katse Dam through a constructed tunnel located in Tsehlanyane National Park to augment the capacity of the Hlotse River during the dry season. Works to be carried out under Component 1 include (i) a river intake structure on the Hlotse River (ii) a water treatment plant (WTP), (iii) water reservoirs, (iv) pumping stations and water mains, and (v) associated infrastructure, such as power supply extension and control and telemetry equipment. This component will also include rehabilitation and construction of distribution networks in Maputsoe town and nearby settlements. The bulk water scheme is designed for 26,000 m3/day to provide sufficient capacity to meet future demands by abstracting water from the selected river, treating it, then pumping it to high level reservoirs with sufficient head to supply the population who live within the project area. Component 1 will rely on releases from the Katse Dam during the dry season to augment flows. Accordingly, it would rely on the performance of that dam in releasing agreed amounts. The releases are governed by the existing Lesotho Highlands Water Program (LWHP) Treaty and protocols which allow for storage and draw down of water by Lesotho from the LHWP system through the Hlotse Adit into Hlotse River. Annually the Government of Lesotho can draw down up to 5 MCM from the storage of which up to 75% (3.75 MCM) can be released into Hlotse River per annum, with the remaining 25% allocated to the environment flows of the Muela River. The treaty also allows accumulation or banking of unused annual allocation up to a maximum storage

		of 15MCM which can be drawn down when required. The draw down is through releases from Katse Dam via a tunnel connecting to Muela dam – Hlotse Adit. The project is expected to bring overall environmental benefits that will contribute to the improvement of public health and living environment in the targeted project areas. Some of the project activities serve as mitigation measures toward addressing the existing public health and environmental problems caused by lack of adequate water supply and sanitation facilities in the project area. The Government will ensure preparation of a livelihood restoration plan to address any training or changes in practice required by changed conditions among downstream water users and to compensate for losses and restore livelihoods through alternative means if necessary. This provision has been covered through a legal covenant in the Financing Agreement. Key social and environmental impacts associated with the project are discussed under Section A.1 on safeguards issues and impacts.
Performance Standards for Private Sector Activities OP/BP 4.03	No	
Natural Habitats (OP) (BP 4.04)	Yes	The construction of an intake structure will take place within the Hlotse Rivers As such, construction activities associated with the intake sites may cause temporary to long-term impacts on critical invertebrate biotopes and fish habitats during and after construction due to increased erosion, river bed and river bank modification, loss of connectivity and flow diversions. The level of suspended solids in the river downstream of the intake structures will likely increase due to disturbances of the river bed by excavation activities during the construction stage. Per the South Africa Biodiversity Institute, the project area is mainly covered by one dominant vegetation type, which falls under the group of “Grassland Biome”, and more specifically the “Mesic Highveld

		Grassland Bioregion" classified as Senqu Montane Shrubland which is the type of grassland dominated by evergreen shrubs, the dominating species being Rhus erosa, Olea europaea and Diospyros austro-africana. The riparian vegetation assessment undertaken for the Instream Flow Requirements confirms that the riparian vegetation zone has limited reliance on the river flows. However, at least some level of permanent flow in the river system will be required to ensure that the riparian vegetation continue to colonize the area and, thereby, improve the biodiversity of the area. A detailed EFR study was undertaken which informed the preparation of an eFlow management and monitoring plan. It findings of the EFR will be used to further develop operational procedures to inform the release requirements and protocol in the event that low flow volumes are detected, to ensure that minimum flow downstream flow and ecological function of the rivers are maintained in the Hlotse River.
Forests (OP) (BP 4.36)	No	The Project will not finance any forest restoration, development of plantations, charges in forest use or management or protection. There are also no forest areas within the project area of influence that could be affected by the project, and therefore OP/BP 4.36 is not triggered.
Pest Management (OP 4.09)	No	The Project will not procure nor will it lead to increased use of pesticides. Therefore, OP 4.09 is not triggered.
Physical Cultural Resources (OP) (BP 4.11)	Yes	An analysis of existing Physical Cultural Resources has been carried and Chance Find procedures for identification of Physical Cultural Resources will be included in contractor's contracts. A paleontological and archeological impact assessment were carried out. The findings of the impact assessments will inform the updating and finalization of the detailed designs of the pipeline and water intake and treatment plant under Component 1.
Indigenous Peoples (OP) (BP 4.10)	No	The policy is not triggered as there are no indigenous peoples in Lesotho meeting the criteria of OP 4.10.

Involuntary Resettlement (OP) (BP 4.12)	Yes	The project will require some permanent acquisition of land, as well as temporary easement of land. The Involuntary Resettlement Policy OP/BP 4.12 is therefore triggered due to project activities under Component 1. A Resettlement Framework has been prepared in line with Lesotho's regulations and in accordance with the World Bank's OP/BP 4.12. A RAP has been prepared for the activities relating to the water intake, water treatment plant and transmission mains. The RAP has identified 374 PAPs and these will be compensated based on the project entitlement matrix. Updates to the RAP will be required to validate the entitlement matrix prior to commencement of civil works and once the design is finalized. The Project will be guided by a Social Impact Assessment as part of the ESIA, and will develop a communications plan. Citizen engagement is a key element, and Component 2 on Capacity Building aims to, among others, support activities related to outreach. The PIU will oversee ongoing and meaningful consultation in communities. The communication plan will need to prioritize making GRM more proactive and accessible to PAPs. In the context of activities that would entail economic displacement, it would be especially important for the GRM to include a participatory and transparent process for PAPs to voice their preferences throughout compensation process. Vulnerable groups will need receive special attention. To date, all project feedback and complaints have been received in person; therefore, it is strongly recommended that the PIU installs suggestion boxes and log registers at each project site and WASCO branch-offices in all project areas. Additionally, with the project website now in place, it was recommended that it be customized to enable two-way communication and include a grievance log registry that allows for recording and closing the loop on grievances and inquiries. The website should include contact details of the social safeguards focal point for registering of grievances and for providing feedback. The PIU was urged to prioritize awareness raising among project affected

		communities on the existence of the GRM and its operations.
Safety of Dams (OP) (BP 4.37)	Yes	The viability of the bulk water supply system under Zones 2 and 3 will rely on water releases from the existing Katse Dam located in the upper reaches of the Hlotse River via an existing water diversion valve/tunnel. The structural and non-structural safety of the Katse Dam has been assessed including its monitoring reports, 10-year dam safety review report, emergency preparedness plan, etc. in line with OP 4.37 of the World Bank Safeguard Policies has been carried out, and found satisfactory.
Projects on International Waterways (OP) (BP 7.50)	Yes	Component 1 will finance an intake structure that will be constructed within the Hlotse River to abstract raw water which will then be delivered directly to an inlet of a new water treatment plant. The Hlotse River is a tributary of the Caledon River, a border river between South Africa and Lesotho. Both rivers fall within the greater Orange-Senqu basin which is an international waterway shared by four riparian countries–Botswana, Lesotho, Namibia and South Arica. OP 7.50 is triggered and notification to riparian countries was undertaken by the Government of Lesotho in a letter dated 17 September 2018. Confirmation of receipt was provided by the countries in the ORASECOM Council meeting of 22 October 2018. A no objection response from Botswana was received in writing in October 2018. The other two riparians, South Africa and Namibia did not provide any objection to the project by the expiry date for the notification based on the 6 month response period allowed for under the ORASECOM Agreement (March 17, 2019).
Projects in Disputed Areas (OP) (BP 7.60)	No	The project will not finance 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.

i) Impacts on water quantity and quality: The most significant environmental impacts likely to occur during the construction and operational phases of the project are associated with the alterations in the quantity and quality of water in the Hlotse River to meet the livelihoods requirement of the communities dependent on the river and maintenance of aquatic habitat. Both impacts on the water quality and quantity will occur during the construction state of the project and might likely persist during the operational phase, and are therefore, considered long-term as discussed below in more detail:

ii) Impact on aquatic ecosystems: The possible impacts of the proposed abstraction on the aquatic ecosystems of the Hlotse River will be most severe during the critical low flow periods (July to September) due to the following reasons,(a) Flow velocities will drop critically low during these dry periods such that velocities of above 0.6m/s and even 0.3m/s would most likely not be maintained, which would severely impact on populations of critically flow dependent aquatic invertebrate and fish indicator species, (b) During critical low flow periods connectivity might be lost between the upper and lower reaches of the Hlotse River which would have a severe impact on migrating fish species in the river, (c) Dilution factors of possible water pollutants will be maximally reduced during critical low flow periods' endangering water quality sensitive aquatic invertebrate and fish species, (d) Possible releases from the Katse Dam (through the constructed tunnel) to augment the flows in the Hlotse River during the critical low flow periods in order to ensure the continuation of water abstraction, might alter the water quality of the Hlotse Rivers.

iii) Water Quality: As part of water supply pipeline construction, the pipelines will be cleaned and flushed prior to the operational phase. This involves large volumes of water that typically contains chlorine solutions. The findings from the ESIA indicate that the potential impact of discharging large volumes of water containing elevated levels of chlorine will be site-specific, low-intensity, and of medium to low significance.

iv) Land use: A significant portion of the land is being actively cultivated, particularly across the flatter plateaus and plains, with the majority being used for subsistence farming using mainly oxen and ploughs as the farming equipment. The environmental assessment confirms that there are no large scale commercial farming activities in the project area. The pipeline routes will follow the existing road reserves for a large portion of its route. However, in some areas, the pipeline route will cross grazing and arable land or will cut across residential areas. The project area in which the water treatment plants will be located is currently used as a rangeland for livestock. The reservoirs will be located on an elevated, flat section of the land in proximity to the communities to which water will be supplied.

v) Soil: The project area is characterized by shallow soils which are sensitive to erosion as they overlie relatively impermeable hard or weathered rock. Heavy or prolonged rainfall events are likely to cause these soils to reach saturation point relatively quickly, resulting in surface runoff and subsequent erosion. In areas where the vegetative cover is either degraded through overgrazing and burning, these soils are likely to erode and particularly so on the steeper slopes.

vi) The social impacts primarily relate to temporary easement and permanent acquisition of land and restricted access to communal lands. A Resettlement Policy Framework (RPF) provides guidance for additional investments where the footprint is not currently known. The RPF guides all investments under the LLBWSS, including impact related to expansion of household connections. All households affected by the project will also become direct project beneficiaries as they will receive water supply by the LLBWSS which is expect to enable health and economic benefits.

A total of 374 households will be impacted by the project in the area covered by the RAP. The project will not have any physical displacement of people.

Other potentially negative impacts relate to the construction period. These impacts can be mitigated. During the construction phase, the main environmental risk will be associated with the management and control of temporary risks emanating from excavation works under Component 1. These risks include dust and noise emission from heavy construction machinery and equipment, handling and disposal of spoil from construction waste, erosion and sedimentation of water bodies, sludge management generated from the water treatment facilities and occupation/community health and safety issues.

The involvement of workers from other parts of the country, although limited due to focus on hiring local, may lead to increased stock theft, social conflict, disease transmission and GBV/sexual harassment. These will be mitigated through additional clauses to be incorporated in the contracts with regards to good practice note on addressing GBV in IPF involving major civil works, WBG General EHS Guidelines, such as Code of Conduct, action plans and awareness raising activities and training on GBV and HIV/AIDS prevention for the contractor's workers and community residents, and Code of Conduct and action plan on child labor. In each beneficiary community, the project's social specialist and community liaison officers will work with existing community leaders to establish gender-balanced monitoring committees.

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

The long term impacts of having access to a reliable supply of safe potable water supply resulting from the project are expected to be positive impacts that would significantly contribute to overall human development in the area, including aspects such as the health and productivity of the population in the service area. Specifically, the project is expected to contribute to reducing morbidity due to waterborne diseases among people that will gain access to improved water supply, and to broader economic development in the area due to increased productivity of households as people would need to invest less time in accessing water and focus on more productive use of their time. Improved health and productivity of the population is also expected to indirectly contribute to broader human development benefits such as for instance enrollment of children in educational institutions as households become more productive.

The project, however, may cause the drying up the Hlotse river that would result to the non-maintenance of the environmental flow. This would have adverse significant impacts on the aquatic ecosystems and downstream users. This is going to happen if the expansion of the system is not accompanied by a development of a new water source to augment the flow of the Hlotse river during low flows and dry season. It is important to take this impact into account when contemplating of expanding the water supply system.

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

The following project alternatives were analyzed:

- Water Supply: Different water supply options were considered – due to environmental, social and technical problems associated with abstraction of water from perennial rivers – Hlotse River was the preferred water supply option for the scheme.
Intake Sites: The suitability of each site was measured or evaluated against the following specifications: Suitability of the site for abstraction, proximity of a good water treatment works (WTW) site, water quality of the river, availability of a rock foundation, and access to the site for construction and maintenance. The preferred site for the Hlotse Intake was selected on the basis that: It was well located on the outside of the river bend, it had good rock foundation, there was scour channel erosion in the river bed which is a good indication of its suitability, and it was close to a good water treatment plant site.

- Pump Station: Two possible pump station technology alternatives were considered, wet well and dry well. Although the wet well pump station was found to be less desirable from a monitoring and maintenance perspective, its significantly lower cost outweighed the primary constraint, thus was selected as the best option. It was recommended that high-quality submersible pumps would have to be used with effective monitoring systems to give warning of any potential damage. The proposed submersible pumps in the intake were designed to deliver raw water directly to the inlet of the water treatment plant.

- Pipeline Route No alternatives were identified or proposed for the pipeline route, however the following technical, social and environmental factors were taken into account in the final decision of the pipeline route: Existing road servitudes – where practical and economically feasible the pipeline follows the route of existing roads, outside the boundary of the road reserve. This reduces the need for land appropriation and improves access to the pipeline during construction and for maintenance purposes, Topography – due to sharp relief in the study area and the fact that the proposed scheme relies on flow by gravity, the topographical aspects were taken into consideration in the selection of the pipeline alignment; Proximity to Water Treatment Works site – Ideally a treatment works must be located close to the raw water source where the water is pumped. Thus, this also influence the alignment of the pipeline. Ground conditions – excavation costs and requirements for bedding material and degree of compaction is dependent on the ground conditions and / or geotechnical properties of the soils. This factor was therefore one of
the key determining facts for the selected pipeline route. The design and alignment of the pipeline route is currently being assessed based on the outcomes of the paleontological and archaeological studies. Where required, a slight re-alignment of the pipeline may be needed. Significant re-alignment requirements will be assessed from an environmental and social impact and risk point of view before finalization.

- Reservoir Location The site selection for reservoirs was determined on the basis of the following criteria: Topography / slope; Future plans for the site; Geotechnical suitability; Available area for all infrastructure; Social sensitivity of the site; Environmental sensitivity of the site; Political sensitivity of the site; and Accessibility to the site.

- Without Project Alternative: The “Without Project” alternative will have no impacts on the biophysical environment, as it will remain unchanged if the proposed development does not go ahead. However, from a socio-economic perspective, this option would have a significant negative impact as the need to meet the water demands of Lowland settlements will not be achieved. Constrained water supply would not propagate health improvement

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 section sets out the instruments that have been prepared by the Borrower to address and manage social and environmental risks associated with the project and lessons learned during implementation to date that will be addressed during the continues implementation of the project:

a) ESIA and ESMP. The Borrower has prepared a stand-alone ESIA and associated ESMP for identified Components 1 activities, including the water intake and treatment works and the water transmission main. A standalone ESMP was prepared for the construction of the hydrometric stations and rehabilitation of the Maputsoe Boreholes. The implementation of these ESMPs were mostly satisfactory with only a minor areas requiring strengthening, namely ensuring contractors have a good grasp of the environmental requirements of the project, early on through conducting pre-construction meetings, including timeous preparation of contractor documentation inline with the project instruments and improving self monitoring of implementation. Contractors should be adequately staffed to ensure self monitoring of compliance with instruments. Regular supervision by the PIU assisted in ensuring improved compliance with the implementation and compliance of the instruments which will continue during the implementation of the remaining works.

b) ESMF. An ESMF has been prepared for activities that have not yet been fully identified or designed, including the water distribution network. Screening of sub-project activities have been satisfactory to date, with potential sub-project impacts being identified early on and addressed through the preparation of the necessary instruments (ESMPs).

c) CERC-ESMF. The Borrower has prepared a CERC-ESMF in response to the activation of Component 4. The CERC-ESMF guides the screening and mitigation of environmental and social risks and impacts associated with the CERC activities. Lessons learned from the implementation of the hydrometric stations that will be applied during the implementation of the CERC activities include the following: ensuring proper planning of the implementation activities to ensure contractor documentation is prepared and submitted prior to commencing of works and that instruments are adequately implemented on site by increasing supervision. Activities such as construction of hydrometric stations and installation of erosion control measures under the CERC should be planned during low flow seasons to protect construction works, as unpredictable and sudden flooding impacted on the hydrometric stations constructed thus far leading to delays in implementation.

d) Grievance Redress Mechanism: A grievance redress mechanism has been established to ensure that complaints regarding the Project's environmental and social performance by the affected people and other stakeholders are promptly addressed. The GRM needs improvement, especially in terms of providing training to local GRM focal points once the works commence along the proposed pipeline. Component 2 on Capacity Building will, among others, support activities aimed at strengthening of PIU's capacity in managing GRM. This includes outreach activities to raise awareness among PAPs and beneficiaries on existence of GRM, as well as making it more accessible to stakeholders. To date, all project feedback and complaints have been received in person; therefore, it is strongly recommended that the PIU installs suggestion boxes and log registers at each project site and WASCO branch-offices in all project areas. Additionally, with the project website now in place, it was recommended that it be customized to enable two-way communication and include a grievance log registry that allows for recording and closing the loop on grievances and inquiries. The website should include contact details of the social safeguards focal point for registering of grievances and for providing feedback. These actions were identified in the PIU's GRM Action Plan which was developed as a result of GRM workshop organized by the World Bank in January, 2022.

e) Social Assessment (Comprehensive Social Assessment as part of the ESIA). Given the prevalence of HIV/AIDS in Lesotho, relative high occurrence of gender-based violence and teenage pregnancies the project will engage communities and project workers, as part of the existing community engagement model, to provide appropriate guidance and education. In addition, as part of planning for activities under each component, the relative labor influx will be assessed and where needed, actionable labor influx management plans will be developed to mitigate any adverse impacts on the host communities.

f) A Resettlement Policy Framework (RPF) has been prepared for activities that have not been fully identified, including but not limited to the water distribution network. A Resettlement Action Plan (RAP) was also prepared for identified activities, including the water intake, treatment plant and transmission line. An update to the RAP will be prepared prior to commencement of the works and once the design is finalized to validate the entitlement framework for compensation of project affected persons before compensation payments are disbursed.

g) A Gender Based Violence Action Plan was prepared for the project.

The safeguard instruments provide guidance on mitigation, management and monitoring which will serve to identify potential impacts early and adjust management throughout the project implementation period. Key measures to address two main impacts identified in Section 1 above are as follows:

(i) Impacts on water quantity and quality as well as on aquatic ecosystems. These impacts will be addressed through measures relating to environmental flows necessary to maintain the hydrological integrity of the river. The detailed Environmental flow assessment that was completed will inform the preparation of operating rule that will restrict water abstractions during the periods of low flows especially during the drought seasons to ensure the minimum river flows are maintained.

Component 1 will rely on releases from the Katse Dam during the dry season to augment flows. Accordingly, it would rely on the performance of that dam in releasing agreed amounts. The releases are governed by the existing Lesotho Highlands water Program (LWHP) Treaty and protocols which allow for storage and draw down of water by Lesotho from the LHWP system through the Hlotse Adit into Hlotse River. Annually the Government of Lesotho can draw down up to 5 MCM from the storage of which up to 75% (3.75 MCM) can be released into Hlotse River, with the remaining 25% allocated to the environment flows of the Muela River. The treaty also allows accumulation or banking of unused annual allocation up to a maximum storage of 15MCM which can be drawn down when required. The draw down is through releases from Katse Dam via a tunnel connecting to Muela dam – Hlotse Adit.

ii) GBV risk assessment is low to moderate. The project will therefore support in implementation of citizen engagement (CE) mechanisms, GBV management and mitigation, and HIV/AIDS and gender-targeted activities. This will include the following, inter alia: (i) behavior change and awareness raising activities on HIV/AIDS prevention among beneficiary communities to address the limited knowledge on HIV/AIDS and reduce discrimination and stigma towards HIV affected people; (ii) awareness raising and behavior change training activities among female and male beneficiaries on GBV prevention, care and reporting mechanisms (iii) establishment of gender-balanced monitoring committees in each beneficiary community to facilitate continuous dialogue and collaboration between communities, COW and the contractor; and (iv) development of CE and grievance redress mechanisms to allow beneficiaries to report feedback and concerns associated with the implementation of proposed Project activities and collaborate toward its improvement.

Borrower Capacity to manage safeguards

A dedicated Project Implementing Unit (PIU) has been established within the Ministry of Water, under the office of the COW. There is a qualified Environmental Safeguards Specialist in the LLWSS who will also work on the new project as the Environmental Specialist. A qualified Social Safeguards Specialist with experience from the previous Metolong Project has also been selected. Further strengthening activities will be carried out through training during the implementation stages of the project to ensure that Bank Safeguards policies are properly applied, and the project activities are monitored in accordance with applicable World Bank Safeguards Policies. The Social team will also include citizen engagement officers, compensation and community liaison officers. Additional staff will be hired to

complement the core team of Safeguards staff in line with roles outlined in the ESIA Addendum. The Project Management Consulting Firm (PMC) has been appointed. The PMC has an environmental and social expertise who will be supporting the PIU Safeguards team to monitor the implementation of the safeguards instruments during construction.

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

As part of the preparation of the ESMF, ESIA, RPF and RAP, a broad spectrum of stakeholders were consulted, including local Government officials, traditional chiefs and local traditional authorities, local NGO's, including DPO's, women's groups, herders associations and project affected communities. The mechanisms for consultation included inception workshops, public gatherings, focus group discussions and key informant interviews. They key safeguards instruments i.e. the ESMF, CERC-ESMF, ESIA, RPF and RAP have been disclosed.

B. DISCLOSURE REQUIREMENTS

Environmental Assessment/Audit/Management Plan/Other

Date of receipt by the Bank	Date of submission for disclosure
07-Jan-2019	18-Mar-2019

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	06-Feb-2019

Comments

All instruments prepared for the project have been disclosed in country on the Lesotho Lowlands Water Project webpage.

Resettlement Action Plan/Framework Policy Process

Date of receipt by the Bank	Date of submission for disclosure
28-Sep-2018	18-Mar-2019

"In country" Disclosure

Country	Date of Disclosure
Lesotho	06-Feb-2019

Comments

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	
Would the project result in any significant conversion or degradation of critical natural habitats?	No
If the project would result in significant conversion or degradation of other (non-critical) natural habitats, does the project include mitigation measures acceptable to the Bank?	Yes

OP/BP 4.11 - Physical Cultural Resources	
Does the EA include adequate measures related to cultural property?	Yes
Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?	Yes

OP/BP 4.12 - Involuntary Resettlement	
Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?	Yes
If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?	Yes

OP/BP 4.37 - Safety of Dams

Have dam safety plans been prepared?	Yes
Have the TORs as well as composition for the independent Panel of Experts (POE) been reviewed and approved by the Bank?	Yes
Has an Emergency Preparedness Plan (EPP) been prepared and arrangements been made for public awareness and training?	Yes

OP 7.50 - Projects on International Waterways	
Have the other riparians been notified of the project?	Yes
If the project falls under one of the exceptions to the notification requirement, has this been cleared with the Legal Department, and the memo to the RVP prepared and sent?	NA
Has the RVP approved such an exception?	NA

The World Bank Policy on Disclosure of Information	
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

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

III. APPROVALS

Task Team Leader(s)	Miguel Vargas-Ramirez Palesa Selloane Mokorosi

Approved By		
Safeguards Advisor	Peter Leonard	23-Jun-2022
Practice Manager/Manager	Maria Angelica Sotomayor Araujo	23-Jun-2022

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Note to Task Teams: End of system generated content