

**INTEGRATED SAFEGUARDS DATASHEET  
APPRAISAL STAGE**

**I. Basic Information**

Date prepared/updated: 10/03/2011

Report No.: AC6531

**1. Basic Project Data**

Country: Niger	Project ID: P125669
Project Name: Niger Community Action Project for Climate Resilience	
Task Team Leader: Taoufiq Bennouna	
Estimated Appraisal Date: November 14, 2011	Estimated Board Date: December 15, 2011
Managing Unit: AFTEN	Lending Instrument: Technical Assistance Loan
Sector: General agriculture, fishing and forestry sector (70%);Sub-national government administration (30%)	
Theme: Climate change (40%);Other environment and natural resources management (40%);Land administration and management (20%)	
SPF Amount (US\$m):	0.00
GEF Amount (US\$m.):	0.00
PCF Amount (US\$m.):	0.00
Other financing amounts by source:	
Borrower	0.00
<u>Climate Investment Funds</u>	<u>63.00</u>
	63.00
Environmental Category: B - Partial Assessment	
Repeater <input type="checkbox"/>	
Is this project processed under OP 8.50 (Emergency Recovery) or OP 8.00 (Rapid Response to Crises and Emergencies)	
	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

**2. Project Objectives**

The project development objective (PDO) is to improve the resilience of the populations and of production systems to climate change and variability, in order to increase national food security.

**3. Project Description**

The Project has three components with a total investment cost estimated at US\$63 million, of which US\$35 million as a grant and US\$ 28 million as a loan. Each component is described below (see Annex I for a more detailed project description).

Component 1: Mainstreaming climate resilience into sectoral policies (US\$ 5 million).

Two sub-components will be implemented to achieve the specific objectives of the component: (i) Mainstreaming climate variability and change into sectoral policies (US\$ 3 million); (ii) Communication strategy and knowledge management (US\$ 2 million).

Activities will essentially aim at making social and economic development policies more

responsive to climate change and defining and implementing a comprehensive communication strategy and a system of effective knowledge management.

# Sectoral policies. As other institutions, namely the NAPA and the African Adaptation Programme (AAP), are already working on mainstreaming climate issues into SDR and SDRP strategies respectively, the proposed project will focus on three key sectoral policies: (i) Health, (ii) Water, and (iii) Road infrastructure. During the CAPCR preparatory phase, a document outlining methodology principles concerning the integration of climate issues into sectoral policies has already been prepared. At the level of each of the participating ministerial departments, the creation of a multidisciplinary #Task force# (comité ministériel) will be established (by ministerial decree) and supported in order to fully participate in the policy formulation process. The effects of climate change and variability on each sector will be assessed through a variety of in-depth studies and assessments of biophysics, climate, meteorological and socio-economic determinants, in order to identify potential climate scenarios over the next decades and establish major tools for planning, monitoring and evaluation of climate-sensitive investment (with the support of mapping tools). Adequate procedures will characterize the specific sensitivity of each sector to climate change, identify the effects of potential climate risks (according to different climate scenarios) and ultimately define adequate strategies and measures for addressing climate change. Large public consultations will be organized along the different steps of the formulation of the policy papers and/or its incremental implementation and take into account local perceptions and coping strategies. Adequate initiatives will help the dissemination of the policy papers to key stakeholders.

# Climate and local planning. In terms of decentralization policy, in collaboration with the Direction of Territorial Management and Community Development (Direction générale de l'Aménagement du Territoire et du Développement communautaire), the project will support the validation of a revised guide for the preparation of local development plans (PDCs) and the incorporation of climate issues into the guide (in line with a preliminary document already produced during the CAPCR preparatory phase). The project will closely assist local governments/ Collectivités communales in the preparation or revision of their development plans and annual investment plans, in order to better integrate adaptation to climate risks into their investments. In order to formulate climate-sensitive PDCs and annual investment plans (AIPs), local stakeholders will be provided with basic information concerning historic evolution of climate in their respective areas and local meteorological parameters, and will receive adequate assistance in order to assess the pertinence and effectiveness of local actual adaptation measures and coping strategies.

# Communication strategy. A key activity of this component is the definition and the implementation of a comprehensive communication strategy. The strategy will include the organization of general sensitization, social mobilization and information initiatives, as well as specialized training sessions addressed to key stakeholders (decision-makers, lawmakers, parliamentarians, elected officials of local governments as well as research centers and university structures, the media, private sector

representatives, officials of non-governmental organizations and civil society organizations, grass-roots associations and traditional rulers). Given the pilot approach to development adopted under the SPCR, this triptych sensitization-information-training aims at enhanced awareness of climate change and its implications, adaptation and mitigation options, need for change of mindset for pooling financial resources, and better integrating poverty reduction programmes and climate. It goes without saying that this will be based both on improved linkages between comprehensive assessments and generation and dissemination of knowledge products. A strategic partnership will be established between the CAPCR and Africa Adaptation Programme (AAP), which, in collaboration with the National Council of Environment for a Sustainable Development (CNEDD), has carried out a study on communication strategy on climate change and variability, whose major objective are the following: (i) Collect and share knowledge about issues related to climate variability and change as well adaptation to climate risks; and (ii) Inform and sensitize lawmakers, planners and development practitioners in order to take into consideration climate-related issues and highlight key challenges.

Component 2: Improving resilience of agro-sylvo-pastoral systems and local populations to climate variability and change (US\$ 53 million)

This component also comprises two subcomponents: (i) Improving the resilience of agro-sylvo-pastoral systems (US\$ 45 million); (ii) Integrating innovative measures for protecting the most poor and vulnerable households: Adaptive Social Protection (ASP) actions (US\$ 8 million).

Sustainable water and land management. Activities of this component aim at increasing the resilience of agro-sylvo-pastoral systems to climate risks. The objective is to incorporate sustainable land and water management and climate risk reduction into local planning and service delivery processes, and to implement these approaches to scale. Given the importance of the traditional participation of Nigerien women in natural resource management, activities will explicitly support a gender-sensitive approach through gender-specific measures. Investment will concern initiatives related to agriculture, agro-forestry, agro-pastoralism and pastoralism, by scaling up sustainable water and land management (SWLM) practices (including, among others, soil/moisture conservation methods, water harvesting, reduced tillage, agro-forestry, nutrient-enhancing rotation systems, animal health and nutrition, and the like). In the Sahelian area in West Africa, in general, and in Niger, in particular, there are already numerous good practices and techniques that the CAPCR will contribute to scale up and disseminate. These investments comprise the majority of the planned investments, not only of the CAPCR, but also of the SPCR as a whole, and will have the greatest direct impact on reducing the vulnerability of Nigerien citizens to climate change. Funds will be used in the following manner: (i) 40% for measures aimed at improving agricultural productivity, (ii) 30% for measures aimed at improving sustainable management of forest resources, (iii) 30% for measures aimed at improving the productivity of grazing areas.

# Agricultural productivity : Major initiatives are the following: (i) improvement of users' access to water, and development of irrigation systems; (ii) extension work on drought-resistant seeds and on soil fertility-related techniques; (iii) creation and/or

strengthening of stores for agricultural inputs; (iv) construction of micro water-catchments; (v) development of watersheds through anti-erosion works, improved vegetation, biological treatment of river banks, etc. in order to reduce runoff and limit erosion of cultivated land

# Sustainable forestry: Major initiatives are the following: (i) protective vegetative measures; (ii) soil and water conservation measures; (iii) agro-forestry, (iv) development of productive chains of non-timber forest products; (v) pond stocking and aquaculture; (vi) beekeeping, (vii) wildlife protection and management; (viii) protection and management of basins and wetlands; (ix) measures against invasive plants, (x) management of bush fires; (xi) firewood saving practices

# Grazing areas: Major initiatives are the following: (i) supporting animal feed measures in pastoral and agro-pastoral areas; (ii) supporting animal health programmes; (iii) delimiting passageways for livestock; (iv) improving access of livestock to water points; (v) animal production initiatives (livestock fattening schemes, milk production, hides and skins, aviculture).

Following are some examples of SWLM:

# Vegetative measures: Village nursery creation, vegetative bands, windbreaks, areas protected for natural regeneration and community planting of multipurpose trees (hedges / windbreaks), dune fixation (through both mechanical fixation methods, with erosion control fences and screens, and biological fixation (with rapidly growing species plants), etc.

# Agro-forestry measures: Integration of trees and shrubs into production systems, for the production of fodder or wood and, above all, to take advantage of their qualities as fertilizers and of their microclimatic effects.

# Medium and mini water-catchments: Traditional mini water-catchments (traditional method, tassa or zai, consist of digging holes in hard soil approximately 30 cm in diameter and 15 cm deep, putting crop seeds and organic materials in the holes, and stimulating termite activity to break up the underlying soil).

# Physical soil and water conservation: Construction of stone bunds, banquettes, small dikes and rainwater harvesting.

# Management of watersheds: Protecting and reclaiming the soil on slopes (by means of small dykes and plant cover) and protecting the soil in shallow waters against vertical and lateral erosion (by means of stabilizing dykes and of filtering dykes).

# Burning: A package of measures aimed at reducing unplanned burning of forest areas and rangeland (creation of fire barriers) and of planned burning to help maintain biodiversity, promotes regeneration of plants and maintain suitable habitat for animals.

# Introduction of an anti-erosion plant: Covering along slopes, using grasses or shrubs with deep roots and strong leaves (possible to use vetiveria on account of its characteristics # fire- and flood-resistant and impervious to livestock or insects).

# Passageway for livestock: Delimiting passageway for livestock is to allow livestock access to water (community wells, boreholes, ponds, rivers, natural or artificial water reservoirs). Construction of corridors of a width of about 10-15 m, evidenced by visible markers, where any cropproduction would be prohibited.

# Construction of groynes: Construction of embankments using stone and timber cribs, anchored to the bank and jutting out into the bed of a river that interrupts water flow and limits the movement of sediment and make it possible to protect and reclaim the lands along river banks (for cultivated farm crops).

Support will also be provided for the implementation of a set of measures identified by the municipalities (Collectivités) and designed with the assistance of service providers (line departments, NGOs, private entrepreneurs, etc.). Adequate activities will build technical capacities of local producers and strengthen their organizations. The funds will be used in the following manner: (i) 40% for measures aimed at improving agricultural productivity, (ii) 30% for measures aimed at improving sustainable management of forest resources, (iii) 30% for measures aimed at improving the productivity of grazing areas.

Social protection and safety nets. Specific activities will also improve the resilience of the livelihoods of the most poor and vulnerable households to climate-related crises, by promoting innovative social protection measures. Initiatives will concern the following aspects: (i) protection and rehabilitation of socio-economic community facilities, that are vulnerable to main effects of climate risks; (ii) implementation of a simple and realistic monthly cash transfer system for the most vulnerable households; (iii) organization of remunerated seasonal labor intensive activities for the members of poor households; and (iv) distribution of #food stamps# or vouchers to chronically poor households in order to buy essential food items. In doing so, the CAPCR will define innovative ways of linking social protection and climate risks.

By protecting and rehabilitating social and economic infrastructure located in high risk climatic zones and by providing appropriate assistance (through #social safety nets#) to extremely poor households vulnerable to climate risks, the project aims at reintegrating the most vulnerable and marginalized social categories - particularly women and women who are heads of households - into a dynamic of social inclusion and economic growth. Amplification and optimization of this type of experience will better integrate climate vulnerability and resilience into the paradigm of a social protection policy appropriate to the Nigerien context (which emphasizes the specific vulnerabilities of women and children). Despite the fact that they are based on promising approaches undertaken in Niger over the last years (particularly by NGOs), these initiatives are still at an experimental phase and lack an appropriate institutional setting. Lessons learned by the CAPCR are likely to feed the reflection on national social protection policy, whose elaboration is currently being undertaken by the Government.

Social protection measures for the most vulnerable households will be constituted of:

# Protection and rehabilitation of socio-economic facilities: A total of about 210-250 socio-economic facilities include the following are targeted: health centers, nutrition centers for children, maternity hospitals, primary schools, markets, slaughterhouses, vaccination parks, feeder roads, water supply systems, small water infrastructure, and food storage facilities. The cost of works is estimated at about US\$ 8,000/facility.

# Cash transfer: A total of 18000 households will receive US\$ 160 each, over a period of 6-8 months (during 4 years) . Recipients of cash are women (free use of money

according to hhds priority needs) who participate in activities aimed at increasing human capital (training on health reproductive health, nutrition, and the like).

# Organization of seasonal labor intensive activities: A total of 20,000 workers (about 5000 each year) working an average of 4-5 hours/day over a period of 30 days/year, will benefit from the project support. Each individual worker will receive a wage of US\$2.5 /day (i.e., total amount of US\$ 100/working season) to participate to local public works identified as priorities by the Commune (including hygiene and sanitation of the habitat, collection & management of domestic waste, wastewater drainage, maintenance of collective facilities, and the like).

# Distribution of vouchers: A total of 17 000 chronically poor and vulnerable hhds, (vouchers to obtain essential food items, such as cooking oil, salt, sugar, tea, milk for children, condiments, etc.). Each individual will receive US\$ 50/year to purchase products through a network of agreed shopkeepers.

Local elected authorities will have the legitimate leadership for all the initiatives of this component, to be included in their respective annual #local investment plans#.

Component 3: Ensuring coordination of all the activities of the project, including monitoring and evaluation activities, and PSCR overall strategic coordination (US\$ 5 million)

Activities of this component are aimed at ensuring efficient and timely coordination of all the CAPCR activities, as well an overall strategic coordination to the PSCR. Different stakeholders, at different institutional levels, are involved in an inclusive Monitoring & Evaluation system. Knowledge concerning the approach, results, challenges and impacts of the programme are managed and shared at national level (with key stakeholders) and at international level (with other SPCR pilot countries).

#### **4. Project Location and salient physical characteristics relevant to the safeguard analysis**

The project will operate in 37 collectivities (Collectivités) that have been selected based on the combination of several criteria such as bio-physical risks, food insecurity, poverty, and vulnerability to severe weather conditions (low rainfall and poor distribution of rainfall between 1999 and 2011). In order to maximize inputs and create synergies, Collectivités have also been selected among those which are already covered by the PAC2 (especially in terms of building and strengthening decentralized institutions) and will be covered by the forthcoming #Safety Nets Project#.

Specific locations of the project activities to be implemented at field level are not yet identified.

Niger is a Sahelian landlocked country on an area of 1267 000 km<sup>2</sup> mostly occupied by desert while the southern is part of Niger River Basin. The climate is characterized by high rainfall variability from the south to the north. Vegetation is made of scarce savannahs on fragile soils substratum exposed to high erosion rate especially at the beginning of rainy season. Major natural factors of vulnerability include, amongst others, severe recurrent droughts, brutal and unpredictable floods, soil exposure to erosion, poor soil fertility, scarcity of water resources. As natural resources (soil vegetation, water) are

in degradation and population growths, climate change introduces medium and long term serious challenges. Any action related to natural resources exploitation/management must so be analyzed carefully to avoid adverse shocks and ensure sustainability.

## 5. Environmental and Social Safeguards Specialists

Mr Abdoul-Wahab Seyni (AFTCS)

Mr Maman-Sani Issa (AFTEN)

6. Safeguard Policies Triggered	Yes	No
Environmental Assessment (OP/BP 4.01)	X	
Natural Habitats (OP/BP 4.04)		X
Forests (OP/BP 4.36)	X	
Pest Management (OP 4.09)	X	
Physical Cultural Resources (OP/BP 4.11)	X	
Indigenous Peoples (OP/BP 4.10)		X
Involuntary Resettlement (OP/BP 4.12)	X	
Safety of Dams (OP/BP 4.37)		X
Projects on International Waterways (OP/BP 7.50)		X
Projects in Disputed Areas (OP/BP 7.60)		X

## II. Key Safeguard Policy Issues and Their Management

### A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts: The environmental and social effects/impacts of the project are mainly related to the implementation of component 2 which is designed to support various small-scale sub-projects/activities such as farming lands management, construction/rehabilitation of socio-economic facilities in rural and poorest areas, etc. During the preparation process, the established tentative list of activities which could be financed by the project comprises water resources management, agriculture pests control techniques, agroforestry, healthcare facilities, etc., which in nature could raise a concern of many safeguards policies. The borrower prepared an ESMF and a RPF. The two OP triggered (OP 4.01, OP 4.12), and the B category are confirmed but, (i) precautionary approach regarding cultural issues (chance find procedure) should further be applied at any time civil work subproject (irrigation, small) is implemented, while (ii) chemical pesticides financing be avoided. Despite of that, the overall environmental impact of the project is positive and the adopted ESMF and RPF provide enough information for making decision on safeguards aspects during the implementation phase.

The EMSF emphasizes on positive impacts like (i) increase of national contribution to global carbon sequestration effort, (ii) decrease of productive soils erosion types and rates, (iii) biodiversity conservation, (iv) availability of water for basic uses in scarcity context, (vi) decrease on number of conflicts in access to natural resources, (vii) reversion of sedimentation of water bodies, (viii) increased number of peasants implementing sustainable farming techniques.

Since some types of activities may potentially have small-scale social impacts that may potentially involve land acquisition/involuntary resettlement, the Project Coordination Unit will be responsible for following up safeguards issues as and when they arise during project implementation. Consultants will be engaged to prepare Resettlement Action Plans (RAPs) as and when necessary.

Though estimated minor to moderate some risks of pollution, land expropriation, etc. have been analyzed but, no significant large-scale or irreversible adverse impact has been identified during the participatory ESMF and RPF analysis conducted and approved by stakeholders.

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

Even if specific sub-projects implementation areas are not yet chosen, the target outcome of expanding food production by improving farming techniques and land management skills will, taking into account growing population constraint and subsequent land need, in medium term impact on vegetation/forest coverage. Also, any socio-economic facility likely to generate domestic wastes should be implemented along with sensitization actions to prevent poorest exposure to sanitation risks.

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

N/A

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 borrower has prepared an ESMF and a RPF to address adverse impacts of the project interventions under component 2, including resettlement in case of land expropriation. The ESMF and RPF have been approved and disclosed in-country (August 22, 2011) and in the Bank's Infoshop (date).

The approved ESMP guarantees sustainability through mitigation measures such as: (i) an environmental and social clearance mechanism and responsibilities for the approval of sub-projects to be financed under component 2, (ii) an ESMP and RPF implementation survey procedure and responsibility to be carried out by BEEEI, (iii) indicators for the monitoring of environmental outcomes, (iv) an estimated cost of sub-projects' EIA studies, (v) training of the stakeholders.

Two clearance tools have been approved: (i) the screening process to be led by the BEEEI, and (ii) a check-list of generic mitigation measures for each sub-project type in order to shorten and ease the approval time and ease the implementation.

A total budget of 623 million CFA is proposed to be included and earmarked in the overall project cost to cover ESMP implementation expenses, regardless of cost eventually induced by a RAP.

Niger's legislative framework includes a decree on Environmental Assessments that ensures the integration of environmental considerations at the project level and not at political or strategic levels. Institutional responsibility lies with the Bureau Environmental Assessments and Impact Studies (BEEEI), attached to the Ministry of the Environment and Desertification Control. Institutional reforms aimed at strengthening public financial management and the general business environment, are expected to lead to an overall improvement in the governance environment, which potentially will also positively affect environmental and natural resource management. In particular, the support towards increasing pro-poor expenditures, which also includes spending by the Ministry for Water, Environment, and Desertification, is likely to have a positive impact on environmental conditions and management. The law sets water quality standards.

The Borrower had experienced the World Bank Safeguard policies' requirements through several past Bank funded projects. In particular, the first CDD project (Programme d'Actions Communautaires #PAC-) had developed a comprehensive social and environmental mitigation framework. However, the GoN capacity to conduct safeguards assessment and issue recommendations per Bank's procedures and guidelines is limited. Qualified local consultants or international consultants will be recruited to enhance the project team capacity, to assess safeguard risks and to help to produce relevant ESMP/RAP recommendations for proper mitigation of eventual adverse impacts.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people. The project involves all level stakeholders like government, public institutions, private sector, local governments, communities, community-level professional groups (farmers, craftsmen, etc.) and NGOs.

During the preparation of the ESMF and the RPF, public consultations have been held (April 2011) in two sample local communities (Soudoure and Kao) for a participatory identification of (i) the project implementation challenges, (ii) the population's concerns and suggestions to be integrated in the project scope, (iii) existing local mechanisms for conflicts resolution, etc.

As of the provisions of national EIA regulations, draft reports of these two documents have been submitted to BEEEI (through the Ministry of Environment) who disclosed them prior to a national stakeholder's validation workshop held on (05 July 2011). After the issuance of the permit by the Ministry of Environment, the GoN disclosed in-country (22 August 2011) and keep informed the World Bank. The ESMF and RPF were then disclosed (date) at the Bank's Infoshop prior to appraisal.

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***B. Disclosure Requirements Date***

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

Was the document disclosed <b>prior to appraisal?</b>	Yes
Date of receipt by the Bank	08/10/2011

Date of "in-country" disclosure	08/22/2011
Date of submission to InfoShop	09/29/2011
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	

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**Resettlement Action Plan/Framework/Policy Process:**

Was the document disclosed <b>prior to appraisal?</b>	Yes
Date of receipt by the Bank	08/08/2011
Date of "in-country" disclosure	08/22/2011
Date of submission to InfoShop	09/29/2011

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**Indigenous Peoples Plan/Planning Framework:**

Was the document disclosed <b>prior to appraisal?</b>	
Date of receipt by the Bank	
Date of "in-country" disclosure	
Date of submission to InfoShop	

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**Pest Management Plan:**

Was the document disclosed <b>prior to appraisal?</b>	N/A	
Date of receipt by the Bank		N/A
Date of "in-country" disclosure		N/A
Date of submission to InfoShop		N/A

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**\* If the project triggers the Pest Management and/or Physical Cultural Resources, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.**

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**If in-country disclosure of any of the above documents is not expected, please explain why:**

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*C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting)*

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**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 Sector Manager (SM) review and approve the EA report?	Yes
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	Yes

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**OP 4.09 - Pest Management**

Does the EA adequately address the pest management issues?	N/A
Is a separate PMP required?	N/A
If yes, has the PMP been reviewed and approved by a safeguards specialist or SM? Are PMP requirements included in project design? If yes, does the project team include a Pest Management Specialist?	N/A

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

Does the EA include adequate measures related to cultural property?	N/A
Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?	N/A

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<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 Sector Manager review the plan?	Yes
<b>OP/BP 4.36 - Forests</b>	
Has the sector-wide analysis of policy and institutional issues and constraints been carried out?	Yes
Does the project design include satisfactory measures to overcome these constraints?	Yes
Does the project finance commercial harvesting, and if so, does it include provisions for certification system?	No
<b>The World Bank Policy on Disclosure of Information</b>	
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	No
Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?	No
<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

#### ***D. Approvals***

<b><i>Signed and submitted by:</i></b>	<b><i>Name</i></b>	<b><i>Date</i></b>
Task Team Leader:	Mr Taoufiq Bennouna	09/29/2011
Environmental Specialist:	Mr Maman-Sani Issa	09/17/2011
Social Development Specialist Additional Environmental and/or Social Development Specialist(s):	Mr Abdoul-Wahab Seyni	09/17/2011
<b><i>Approved by:</i></b>		
Sector Manager:	Ms Idah Z. Pswarayi-Riddihough	09/29/2011
Comments:		