

**INTEGRATED SAFEGUARDS DATASHEET  
APPRAISAL STAGE**

**I. Basic Information**

Date prepared/updated: 07/27/2010

Report No.: AC5574

**1. Basic Project Data**

Country: India	Project ID: P122096	
Project Name: Bihar Kosi Flood Recovery Project		
Task Team Leader: Christoph Pusch		
Estimated Appraisal Date:	Estimated Board Date: November 2, 2010	
Managing Unit: SASDU	Lending Instrument: Emergency Recovery Loan	
Sector: General water, sanitation and flood protection sector (100%)		
Theme: Natural disaster management (100%)		
IBRD Amount (US\$m.):	0.00	
IDA Amount (US\$m.):	220.00	
GEF Amount (US\$m.):	0.00	
PCF Amount (US\$m.):	0.00	
Other financing amounts by source:		
	<u>BORROWER/RECIPIENT</u>	39.00
		39.00
Environmental Category: B - Partial Assessment		
Simplified Processing	Simple <input checked="" type="checkbox"/>	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 checked="" type="checkbox"/>	No <input type="checkbox"/>

**2. Project Objectives**

The Project Development Objective of the Bihar: Kosi Flood Recovery Project is to support the flood recovery as well as future oriented risk reduction efforts of the Government of Bihar through:

- 1) Reconstruction of damaged houses and road infrastructure
- 2) Strengthening the flood management capacity in the Kosi Basin
- 3) Enhancing livelihoods opportunities of the affected people
- 4) Improving the emergency response capacity for future disasters.

The proposed project will finance the costs associated with helping the recovery of the Kosi flood affected areas of Bihar and constitutes phase one of larger multi-sector engagement on risk and vulnerability reduction, improved flood management capacity, increased agricultural productivity and connectivity.

On August 18, 2008, the Kosi river burst through its eastern embankment, 13 km upstream of the Kosi barrage in Nepal, 8 km north of the Indian border. This created major flooding in Nepal and Bihar. The river flooded five districts (Supaul, Madhepura, Saharsa, Araria and Purnea) in Bihar that had not experienced significant flooding since

the completion of the barrage and afflux embankments in 1963, with consequent lack of preparedness.

In Bihar, the flood catastrophe triggered one of the largest evacuation operations, with over 1,000,000 people evacuated, and about 460,000 persons accommodated in 360 relief camps. Significant damages to infrastructure including housing, rural roads, culverts and bridges apart from loss to livelihoods due to sand deposition on agricultural land have occurred. Although the flood event occurred in August 2008, there has not been any significant reconstruction. Recovery needs are still enormous and have remained largely unfulfilled due to lack of adequate financial support.

### **3. Project Description**

The project has the following six components:

- 1) Owner Driven Housing Reconstruction
- 2) Re-construction of Roads and Bridges
- 3) Strengthening Flood Management Capacity
- 4) Livelihood Restoration and Enhancement
- 5) Improving Emergency Response Capacity
- 6) Project Management and Implementation Support

A short description of objectives and activities envisaged under each of the said components is given below:

#### **1) Component A : Owner Driven Housing Reconstruction**

The objective of this component is to reconstruct the damaged houses and reduce the vulnerability of the population from natural disaster risks. In all, 35 blocks in the five districts of Supaul, Madhepura, Saharsa, Araria and Purnia were affected when the Kosi breached its embankment and changed its course. A very large population in these affected districts lived in mud or thatched houses, which have been affected by the flood. The component outcome is expected to result in reduced flood, windstorm and earthquake related vulnerability for about 1,00,000 households, whose houses will be reconstructed under the project. Using an owner driven reconstruction model, houses will be built with a brick and concrete plinth, bamboo superstructure and corrugated galvanised iron (CGI) sheet roofing.

#### **2) Component B : Re-construction of Roads and Bridges**

The objective of this component to restore the connectivity lost due to Kosi floods by reconstruction of damaged roads and bridges, in three of the five affected districts viz, Madhepura, Supaul and Saharsa. This includes construction of some new bridges that are required to restore the breaches due to creation of new streams and provide for bridges that were required but hadn't been constructed earlier, primarily on account of fund non-availability. The project under this component proposes to reconstruct 90 bridges and culverts on the State Highways and Major District Roads and about 290 km of rural roads reconstruction across the flood affected districts. Together, it is expected to benefit about

2.2 million people. Two departments involved in the road construction activities in the state, namely Road Construction Department (RCD) through Bihar Rajya Pul Nirman Nigam (BRPNN) and Rural Works Department (RWD) will be involved in the project.

### 3) Component C : Strengthening Flood Management Capacity

The component will focus on strengthening the over-all flood forecasting and flood and erosion management capacity in Bihar by enhancing the knowledge, understanding and capacity of flood and sediment management. This will be achieved by implementing both structural and non-structural measures, mainly focusing on the Kosi River Basin, but with several activities benefiting flood management in the state as a whole. The component has three sub-components: (i) knowledge management and capacity building; (ii) flood forecasting and early warning; and (iii) structural investments. The main proposed tasks under Component C include the following:

- a. Conducting a series of technical studies, mathematical and physical modeling, geo-technical and other investigations and setting-up a Center of Excellence for water resources and flood management Research and Development.
- b. Establishment of an embankment asset management system, including training on inspection of embankments.
- c. Development of a flood and sediment management master plan that will provide an over-all framework for flood management in the state.
- d. Enhancing the flood forecasting and early warning capacity in the state, including development of a digital elevation model (DEM) for the Kosi River Basin to prepare hazard and risk maps and assessments, development of an automatic hydro-meteorological monitoring system, development of rainfall-runoff models and development of a flood early warning and emergency system as well as community-based flood preparedness measures; and
- e. Strengthening of eight kilometres of Kosi left embankment and piloting of river training, erosion control and strengthening of sections of embankments using more adaptable and suitable materials and construction techniques.

### 4) Component D: Livelihood Restoration and Enhancement

The objective of the component is to build social and financial capital and expand the livelihood opportunities of the affected population. Decline in cultivable area coupled with decline in productivity due to sand deposits brought in by the floods has negatively impacted the food security of the poorest households in a region, which has more than 90 percent of the work force dependent on agriculture. Landless laborers, small and marginal farmers have been the most affected. The floods have also affected the households such as potters, basket weavers and small micro enterprises, dependent on income from non-farm sources due to the loss of their productive assets.

The implementing agency for the on-going World Bank funded Bihar Rural Livelihood Project (BRLP), JEEVIKA, will be the implementing agency for this component and will use the existing models for expansion of their activities into 13 blocks in the districts of Madhepura, Supaul and Saharsa. As in JEEVIKA, this component will have four sub-components: (i) Community Institution Development; (ii) Community Investment Fund; (iii) Technical Assistance Fund; and (iv) Project Management. In all, 50,000 households are being targeted under this component. The expected outcome includes: expanded livelihood options, enhanced incomes and reduced debt levels for the at least 80 percent of the targeted households.

#### 5) Component E: Improving Emergency Response Capacity

Under this component, contingency funding will be provided for civil works, consultant services and goods required to respond in a case of future emergencies. The detailed investments will depend on the nature, location and priority needs of the specific emergency. In addition, the component allows the financing of public and private sector expenditures directly related to the Emergency Recovery Program.

#### 6) Component F : Project Management and Implementation Support

The component's objective is to support project implementation through provision of necessary offices, including equipment and financing of associated incremental cost of team of the Project Management Unit at state level and its representative offices in the districts, support units for housing reconstruction, nodal units of various Implementing Agencies and the training and exposure visits of project staff.

This component will also finance the cost of related consulting services for design, planning and implementation support; management; quality, financial and third party audits and; evaluation and monitoring. The financial support for the component will also include technical studies and other project preparation expenses that may be required for the preparation of the successive phase(s) of the project.

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

The project is located in the State of Bihar in India. The locations of the project components within the state are spread across the five flood affected districts, namely Supaul, Madhepura, Saharsa, Araria and Purnea, in the northern part of the state.

The lateral movement of the Kosi River has led to erosion, loss of land and water logging in its basin over the years. A considerable portion of the land in the project area is waterlogged, a phenomenon that has been exacerbated by development. Natural drainage has been impeded by embankments, canals, roads, and railway tracks often due to poor design and insufficient attention to the larger hydrological context of the region as a whole.

Apart from the natural factors linked to geomorphology and hydrology of the Kosi basin, human interventions (both in Nepal as well as in Bihar) have impacted changes in sediment load or run-off through water resource management schemes such as bunds, barrages and embankments and accelerated erosion in the upper watershed due to deforestation and development works. The conventional flood-control measures have changed the agro-ecology of the Kosi basin. Flood-prone and waterlogged areas have increased, and erosion and sand casting has temporarily or permanently made huge areas of land uncultivable; and this, in turn, has increased landlessness and distress amongst the local community.

## 5. Environmental and Social Safeguards Specialists

Mr Venkata Rao Bayana (SASDS)

Ms Neha Pravash Kumar Mishra (SASDI)

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: Environmental Issues/Impacts. The project's potential adverse environmental impacts on human population and the project area will be largely minor, site-specific and reversible. As the investments are small and distributed along the five flood-affected districts, potential large-scale, significant and/or irreversible impacts are not anticipated due to the project activities. However, the implementation of project components will include substantial amount of re-construction work, which has a potential to create some local level adverse environment impacts in the process. Such key adverse environmental impacts that may arise due to the proposed project have been listed component-wise in the text below:

Owner Driven Housing Reconstruction: (a) Poor location/siting, such as construction near a water regulating structure/s or location at/next to embankments or close to ecologically important/sensitive features, that can affect the functioning of such infrastructure and may also create vulnerability to the resident/s during a flooding event; (b) impact on resource availability of materials like bamboo and the likely damage to

indigenous gene pool of the species on account of large-scale and unplanned or premature harvesting of bamboo; (c) inappropriate storage and handling of chemicals to be used for treatment of bamboo and other vegetative materials; and (d) post-treatment improper disposal of residual materials, that may create some local level pollution and health issues.

Re-construction of Roads and Bridges: (a) Impact on natural drainage pattern due to inadequate cross drainage works; (b) increase in local level water logging conditions due to substantial increase in embankment height or improper location of culverts; (c) possible diversion of small amount of forest land and/or plantation belt area or some tree felling for accommodating minor changes in alignment (primarily for improving the road geometry); (d) impact on physical environment (air, water, soil, noise) due to construction activities and setting-up of temporary camps and plant sites; (e) impacts associated with extraction and transportation of materials such as earth, sand, water and stones; (f) occupational health and safety issues related to various construction operations; and (g) generation and improper disposal of construction debris and other wastes.

Strengthening Flood Management Capacity: (a) Impact on natural drainage due to inappropriate design of embankments; (b) possible diversion of small amount of forest land and/or plantation belt area or some tree cutting for embankment re-construction activities; (d) impact on physical environment (air, water, soil, noise) due to construction activities and setting-up of temporary camps and plant sites; (e) impacts related to construction materials (such as earth, water and stones) sourcing and transportation and; (f) occupational health and safety issues related to various construction operations.

However, if the re-construction efforts are planned and managed well in line with the approach provided in the Environment and Social Management Framework, most of the environmental impacts are likely to be short-term or temporary in nature. From the implementation of other project components, namely Improving Emergency Response Capacity; Livelihood Restoration and Enhancement; and Project Management and Implementation Support, no significant or adverse environmental impacts are envisaged or anticipated.

Social Issues/Impacts: While the project on the whole is designed to benefit the flood hit communities, the implementation of proposed components of the Project may result in adverse impacts on people and land, if not mitigated. Bihar with huge population size and high dependence on land for economic pursuits has severe constraints in land availability for development works. Small land holdings and high density of population are other typical features of Bihar. The five flood-hit districts are among the poorest districts in India with about 90 per cent of population dependent on agriculture. The proportion of people belonging to Scheduled Tribes is very small, but the proportion of Scheduled Castes is high, especially in the districts of Madhepura and Saharsa.

An assessment of project components indicates that the implementation of the sub-projects may not result in any significant adverse social impacts. Among the project

components, it is only in case of Component II (re-construction/restoration of roads and bridges) and III (Flood Management and related works) that minor adverse social impacts are expected due to possible acquisition of small strips of land in some sub-projects. Partial loss of land, structures, loss of standing crops and trees are possible impacts that may arise due to implementation of some sub-projects.

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

Most of the proposed project activities are largely limited to re-construction and repair of infrastructure damaged due to Kosi floods. No large scale, long-term and/or indirect adverse environment and social impacts are likely to arise on account of future activities in the project area. However, the project is expected to contribute to a broader developmental goal of addressing vulnerability issues in the Kosi River Basin. The implementation of project components is likely to contribute to the development of the region to some extent by reducing vulnerability of the project beneficiaries from natural disasters through provision safe housing, strengthening of flood management capacity in Kosi Basin and by expanding livelihoods opportunities.

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

Not relevant in the over-all project context. However, during the design preparation of specific project sub-components related to re-construction of roads, bridges and structural interventions for improved flood management, alternatives to minimize adverse impacts will be explored. These could include small adjustments in the alignment and/or use of alternative materials to enhance the sustainability of infrastructure created.

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.

Approach: The proposed flood recovery investments need a framework to deal with the likely adverse environment and social impacts that may arise on account of construction of roads and bridges; housing reconstruction and civil works related to flood management and irrigation infrastructure re-construction. In order to deal with such unwarranted adverse impacts, an Environmental and Social Management Framework (ESMF) has been prepared for the project. The framework describes the principles, objectives and approach to be followed in avoiding, minimizing and mitigating the adverse environmental and social impacts that are likely to arise as a result of the implementation of the various reconstruction activities under the project. The ESMF specifically is an attempt to respond to the needs of the reconstruction and the opportunity provided by it, and seeks to:

1) Support the integration of environmental and social aspects into the decision making process of all stages related to planning, design, execution, operation and maintenance of sub-projects, by identifying, avoiding and/or minimizing adverse environmental and social impacts early-on in the project cycle.

- 2) Support displaced persons in their efforts to restore their livelihoods and living standards and compensate any loss of livelihood or assets that may occur due to project execution
- 3) Enhance the positive/sustainable environmental and social outcomes through improved/ sensitive planning, design and implementation of sub-activities.
- 4) Minimize environmental degradation as a result of either individual sub-projects or through their indirect, induced and cumulative effects.
- 5) Protect human health and
- 6) Minimize impacts on cultural property.

The ESMF details out the various policies, guidelines and procedures that need to be integrated during the planning, design and implementation cycle of the Bank-supported project for recovery and reconstruction activities in the districts affected by Kosi floods in the state of Bihar. It also provides the indicative management measures required to effectively address or deal with the key issues that have been identified for the project. The implementation of the ESMF will also support and assist with the achievement of compliance with applicable laws and regulations and with the relevant Bank policies on environment and social aspects.

**Institutional Arrangements:** A Bihar Disaster Rehabilitation and Reconstruction Society (BDRRS) has been constituted by the Government of Bihar (GoB) as a special purpose vehicle (Society) registered under the Indian Societies Registration Act, 1865 under the administrative control of the state Planning and Development Department. This society will act as the Project Management Unit, which will be primarily responsible for the planning, coordination, implementation and monitoring of the project, other than the livelihood component which will be implemented by the Bihar Rural Livelihood Promotion Society (BRLPS).

The society will co-ordinate with the World Bank and line agencies for both preparation and implementation of the project. It will be singularly responsible for reporting to the Bank on project progress, procurement control, financial management, audit and disbursement aspects, results monitoring and evaluation of the project and would ensure that the project is implemented in accordance with agreed procedures and guidelines of the Bank, including the Environment and Social Framework.

The Chairperson of the society will be the Development Commissioner, GoB, who will be supported by a Project Director. There would be other designated officers in BDRRS looking after project management, procurement, administrative and financial aspects of the project.

Within the PMU set-up, an Environment and Social Manager (under Deputy Director, Projects) will be deployed to handle all matters pertaining to environmental management in the project. The key responsibilities of the Environment and Social Manager includes: (a) Updating of the ESMF document (as required); (b) orientation and training of the PMU staff (both at headquarters and in the field offices) and implementing agency teams on aspects covered under the ESMF; (c) review of EA, EMPs and monitoring reports

submitted by the implementing agencies on ESMF implementation; (d) regular/monthly visits to project sites to review ESMF compliance during sub-project execution; (e) providing guidance and inputs to the PMU and implementing agency teams on environment and social management aspects. This specialist will also deal with matters pertaining to integration of ESMF into the sub-project design and contract documents; preparation of ToRs for studies (such as for EA); reporting, documentation, monitoring and evaluation on aspects covered under ESMF and will ensure over-all co-ordination with the Implementing Agencies and field offices of BDRRS. The representative offices of the BDRRS at the district and block level will support the Environment and Social Manager in carrying-out the responsibilities listed above.

Since the society is being newly created and it doesn't have prior experience in dealing with safeguard issues, focused training and hands-on capacity building efforts will be required for proper application and implementation of the Environment and Social Management Framework.

In addition, five departments/agencies of GoB will be involved in implementing the project components. These are:

- i. District Administration led by the District Magistrate for implementation and monitoring of the Housing Reconstruction component. This will be supported by the Owner Driven Reconstruction Collaborative (ODRC) and a Multi-Level Support and Monitoring Mechanism.
- ii. Road Construction Department (RCD) through its implementation arm the Bihar Rajya Pul Nirman Nigam (BRPNN) which will construct the bridges on the State Highways and Major District Roads.
- iii. Rural Works Department (RWD) that will implement rural road works through its implementation arm, the Bihar Rural Road Development Agency (BRRDA).
- iv. Water Resources Department (WRD) implementing the flood management and irrigation works and capacity building initiatives for Flood Management.
- v. Project Management Unit for the Bihar Rural Livelihood Project (JEEVIKA), which will be responsible for implementation of the Livelihood Support and Enhancement component.

Staff within the five line agencies/departments will be designated and trained to support the safeguard functions and implementation of ESMF at the field level. Safeguards capacity will be assessed during the early part of project implementation and necessary measures will be taken to ensure that technical support during the early period of project implementation will be provided, as required.

Within the Implementing Agencies for components B and C (BRRDA, BRPNN, WRD), a Nodal Officer will be designated, whose main responsibilities will include co-ordination with DoEF/other state agencies, as required to obtain regulatory clearances and ensure that regular supervision and monitoring of environmental aspects pertaining to the pre-construction and construction stages is carried out by the line departments field staff during the pre-construction and construction stages of the concerned sub-project.

The ESMF implementation and monitoring for component A will be carried out through ODRC. For Component D (Livelihoods), the BRLPS will be the implementing agency and will follow the ESMF procedures and implementing arrangements agreed under the on-going Bank funded Jeevika project.

During implementation, the Third Party Quality Auditor (TPQA), who will provide independent assurance on technical quality issues, will review the implementation of the works in accordance with environmental, health and safety management provisions set-out in the respective contracts. The contractor will be responsible for planning, executing and coordinating the implementation of the ESMF provisions as laid out in the contract documents; overseen by the line department staff.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people. The key stakeholders include Kosi flood-affected people, State Government, District Administrations of the flood-affected districts, Civil Society Organizations working in the project area, project affected people, concerned Village Panchayats, multi-lateral financial institutions and NGOs (including collaborative networks such as ODRC) who are assisting with the reconstruction activities. These stakeholders would be consulted during the preparation and implementation of safeguard-related mitigation or management plans.

The Environment and Social Management Framework (ESMF) is based on a strong participatory approach in undertaking all key activities involved in the reconstruction program. The Project Management Unit and implementing agencies will ensure that the all stakeholders particularly the affected people are consulted in a meaningful way and are allowed to participate in the consultation process. The consultations will be carried out in a way that is appropriate keeping in mind the cultural, gender and other differences among the stakeholders. The implementing agencies will initiate the consultations during early stages of the sub-project preparation cycle and provide the relevant material in a timely manner. The views and needs of vulnerable groups will be given due consideration while finalizing the sub-project design and during implementation later during the sub-project cycle.

The ESMF and other safeguard related documents will be disclosed in the Banks Info shop as well as the State Governments web sites. These will also be made available in other public places accessible to local people and NGOs. Any subsequent studies such as EA and EMP (as necessary in the sub-projects context) that would be prepared for proposed investments will also be disclosed on the Banks PIC, government websites and other public places accessible to the local people and NGOs in English and in local language (Hindi) during the project cycle.

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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>	No
Date of receipt by the Bank	06/29/2010
Date of "in-country" disclosure	07/26/2010
Date of submission to InfoShop	07/27/2010
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	
<b>Resettlement Action Plan/Framework/Policy Process:</b>	
Was the document disclosed <b>prior to appraisal?</b>	No
Date of receipt by the Bank	06/29/2010
Date of "in-country" disclosure	07/26/2010
Date of submission to InfoShop	07/27/2010
<b>Indigenous Peoples Plan/Planning Framework:</b>	
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	
<b>Pest Management Plan:</b>	
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	
<b>* 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.</b>	
<b>If in-country disclosure of any of the above documents is not expected, please explain why:</b>	

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

<b>OP/BP/GP 4.01 - Environment Assessment</b>	
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
<b>OP/BP 4.11 - Physical Cultural Resources</b>	
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
<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	Yes

Manager review the plan?

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**OP 7.50 - Projects on International Waterways**

Have the other riparians been notified of the project?	No
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?	Yes
Has the RVP approved such an exception?	No

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**The World Bank Policy on Disclosure of Information**

Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	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?	No

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**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

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***D. Approvals***

<b><i>Signed and submitted by:</i></b>	<b><i>Name</i></b>	<b><i>Date</i></b>
Task Team Leader:	Mr Christoph Pusch	07/16/2010
Environmental Specialist:	Ms Neha Pravash Kumar Mishra	07/16/2010
Social Development Specialist Additional Environmental and/or Social Development Specialist(s):	Mr Venkata Rao Bayana	07/16/2010
<b><i>Approved by:</i></b>		
Regional Safeguards Coordinator:	Mr Sanjay Srivastava	07/16/2010
Comments: cleared. Please follow disclosure requirements as soon as possible.		
Sector Manager:	Mr Songsu Choi	07/16/2010
Comments:		