



Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

Appraisal Stage | Date Prepared/Updated: 22-Oct-2019 | Report No: PIDISDSA26568



BASIC INFORMATION

A. Basic Project Data

Country West Bank and Gaza	Project ID P168739	Project Name Gaza Central Desalination Program: Associated Works Phase I	Parent Project ID (if any)
Region MIDDLE EAST AND NORTH AFRICA	Estimated Appraisal Date 20-Oct-2019	Estimated Board Date 17-Dec-2019	Practice Area (Lead) Water
Financing Instrument Investment Project Financing	Borrower(s) Palestine Liberation Organization for the Benefit of the Palestinian Authority	Implementing Agency Palestinian Water Authority	

Proposed Development Objective(s)

Improve the quality and quantity of bulk water supplied to the municipalities served in the project area and strengthen the capacity of the Palestinian Water Authority.

The capacity of the Palestinian Water Authority will be improved through: (i) the establishment of a Bulk Water Supply Unit (BWSU) in Gaza to operate the infrastructure developed by the project; (ii) advancing planning of priority investment for bulk water supply in the West Bank; and (iii) the design and piloting of a National Service Provider Improvement Program that will help Service Providers (SPs) improve the quality and efficiency of their drinking water distribution services, and strengthen their ability to pay for bulk water supply services.

The infrastructure developed by the project in the southern and middle governorates of Gaza will allow: (i) supplying bulk water meeting WHO guidelines of quality for drinking water; and (ii) for a more equitable distribution of bulk water supplying an average quantity of 90 liters per capita per day (lcd) in the project area.

Components

Improved Supply of Bulk Water to the southern and middle governorates of Gaza
Capacity Building
Project Management and Implementation Support

PROJECT FINANCING DATA (US\$, Millions)

SUMMARY



Total Project Cost	117.00
Total Financing	109.00
of which IBRD/IDA	0.00
Financing Gap	8.00

DETAILS

Non-World Bank Group Financing

Counterpart Funding	60.00
National Government	60.00
Trust Funds	49.00
Partnership for Infrastructure Development MDTF	34.00
Special Financing	15.00

Environmental Assessment Category

A-Full Assessment

Decision

The review did authorize the team to appraise and negotiate

Other Decision (as needed)

B. Introduction and Context

Country Context

- 1. The complex and unresolved political context in the WB&G undermines efficient public service delivery.** The Palestinian territories have experienced political instability (both regional and domestic) and a series of violent conflicts over the years. Israeli restrictions on key production inputs for Gaza, namely those deemed as “dual use”, affect the ability to deliver public infrastructure and provide services. The dual use regime in Gaza requires separate Israeli approvals for different types of restricted goods, resulting in delays and cost overruns, and often denial of entry. Internally, after the 2007-08 conflict, Fatah controls the West Bank, while *de facto* authority in Gaza has been with Hamas. Recent political developments, including elections in Israel, the formation of a new PA government,



and the possibility of a peace plan being presented, may provide an impetus for improved dialogue.

2. **The Palestinian economy is expected to slip into a recession in 2020 and 2021.** The Palestinian economy has been driven mainly by large inflows of transfers, which have dropped significantly in recent years and are no longer able to offset the impact of a weak business environment. According to the September 2019 World Bank Ad Hoc Liaison Committee (AHLC) report¹, after a steady improvement in the fiscal position over the past decade, the standoff over clearance revenues has severely constrained the PA budget, leading to a significant expansion in expenditure arrears. This started following a law enacted in 2018, where the Government of Israel (GoI) started in March 2019 to make unilateral deductions of almost US\$12 million per month from the tax revenues it collects on behalf of the Palestinian Authority (PA) (clearance revenues). In response, the PA has refused to accept these transfers altogether. Given that clearance revenues constitute 65 percent of the PA's total revenues and 15 percent of GDP, their loss has resulted in a severe liquidity squeeze forcing the PA to adopt an emergency cash management plan that includes paying partial salaries and reducing spending on goods and services.

3. **Gaza's economic fragility has a direct human impact.** Around 24 percent of Palestinians lived below the poverty line of US\$5.5 per day per capita in 2016/17 (latest available data) – 2.9 percentage points worse than in 2011. The gap between the West Bank and Gaza increased substantially in 2016/17, with 46 percent of the population living below the poverty line in Gaza, compared to 9 percent in the West Bank. In the West Bank, poverty status is sensitive to even small shocks in household expenditures, while in Gaza any change in social assistance flows can significantly affect the population's wellbeing. In addition, the unemployment rate in the WB&G continues to rise and reached 30.8 percent in 2018, which was 2.4 percentage points higher than the average in 2017. The increase is due to a strong jump in Gaza, where 52 percent of those in the labor force were unemployed in 2018, compared to 44.4 percent in 2017. Unemployment amongst Gaza's youth reached 67.4 percent, while it was even higher for females (70.6 percent)²; many highly educated women with readily available skills for the labor market were without a job.³

¹ Economic monitoring report to the Ad Hoc Liaison Committee, September 2019.

² *Ibid.*

³ Hillis, Samira, et.al 2018. TA Enhancing Job Opportunities for Skilled Palestinian Women, World Bank.



Sectoral and Institutional Context

Overview of the Water Sector

4. **The water sector in WB&G faces systemic challenges constraining its development.** The biggest challenge is the political and economic context, which limits availability and access to adequate quantities of acceptable quality water. Weak capacity throughout sector institutions and fragmentation of Service Providers (SPs) are the other two top systemic challenges. To address these systemic challenges, the Palestinian Water Authority (PWA) with support and endorsement from the donor community, has developed two key complementary policy instruments for a transformational and sustainable shift in the sector: The Water Law (of 2014) and a medium-term Strategic Development Plan (SDP) 2017-2022. The Bank has supported these reforms under the recently completed Water Sector Capacity Building Project (WSCBP, P117443).
5. **Development of water resources in the Palestinian territories is bound by Article 40 of the Israeli-Palestinian Interim Agreement on The West Bank and The Gaza Strip (Oslo Accords)⁴.** Article 40 (1995) is framed under certain assumptions, including that interim water development will be managed through a coordinated Palestinian-Israeli process and that water issues would be further delineated during the Permanent Status Negotiations. However, the lack of an on-going political dialogue or agreed and effective mechanisms for cooperation, together with the on-going restrictions on movement and access⁵, have limited Palestinian ability to develop new water resources, even as the population grows and the quality of existing water resources declines.
6. **SPs are fragmented.** Most SPs are departments within the municipal structure and are still governed under the 1997 Ministry of Local Government (MOLG) Law, which restricts their ability to function as autonomous modern water utilities. Moreover, LGUs are reluctant to cede water related revenue streams, leading to an absence of cost recovery for bulk water purchased by the PA from Israel⁶. A majority of the 300 water SPs across WB&G do not generate enough revenues to cover their operation and maintenance (O&M) costs. Less than 30 percent of SPs across the WB&G meet the standard metric for O&M cost recovery (i.e., an operating cost ratio greater than 1.2). SPs are fragmented in terms of their structure, size and authority: (i) they serve from 200 to 600,000 people; (ii) they range from obtaining water entirely from their own wells to 100 percent through bulk purchases; and (iii) their institutional setup ranges from village council run, municipal run, and joint service councils. Only JWU is a corporatized utility.
7. **The institutional setup of water service provision across the WB&G neither encourages nor enforces the ring-fencing of water revenues.** SPs within municipalities (typically water departments) are responsible for providing water and sanitation services to 70 percent of the people (3.7 million) across the WB&G and the Jerusalem Water Undertaking (JWU) serves 15 percent of the population. Village councils, joint service councils and cooperatives cover the remaining 15 percent. As water and sanitation revenues form a large portion (> 50 percent) of municipal revenues, they are often used to fund other municipal services (such as street lighting, garbage collection, road maintenance, etc.). Many SPs do not pay their bulk water bills, which exacerbates the lack of cost recovery in the water sector.
8. **The Water Law clarifies roles and responsibilities within the sector.** At the national level, two institutions already exist: (i) the PWA, which is responsible for the management of water resources, sector planning and development; and (ii) the independent Water Sector Regulatory Council (WSRC), which regulates and monitors the operation of water SPs. A third entity, which is yet to be established, is the National Water Company (NWC),



which will assume the role of bulk water provider to SPs. The Law envisages service delivery at the local level to be through a limited number of Regional Water Utilities (RWUs), which are to be formed through the aggregation of existing small SPs (water departments at the Local Government Units (LGUs)).

9. **The SDP has five main objectives:** (i) enhancing the integrated management and sustainable development of water sector resources; (ii) improving the quality, continuity and reliability of water supply services, as well as ensuring equitable water distribution; (iii) improving wastewater services and structure, including collection, treatment and reuse; (iv) developing water sector institutions to reinforce good governance within an integrated legal and institutional framework; and (v) improving the financial sustainability of SPs.
10. **However, lack of capacity and political realities has limited full implementation of the Water Law and the SDP.** The effectiveness of the PWA, particularly in Gaza, has been constrained by the political schism between Fatah and Hamas, and the consequent establishment of a parallel structure in Gaza. In March 2017, the PWA drafted a road map for establishing the NWC from the existing West Bank Water Department, but no decision has been made so far towards its implementation. In view of these constraints, there has been limited progress so far in achieving the ambitious objectives of SDP. Without full operationalization of the Water Law and SDP, the financial flows in the sector remain fragile and inefficient.
11. **In addition, the combination of low cost-recovery and the failure to ring-fence water revenues results in a US\$70 million annual burden on the PA's finances.** The PA covers this combined deficit by making payments not covered by SPs for: (i) bulk water purchases from Israel; (ii) electricity consumed; and (iii) the operating costs of wastewater treatment plants. In the West Bank these subsidies amounted in 2018⁷ to US\$55 million (equivalent to US\$18.3 per capita), while in Gaza they amounted to US\$15 million (equivalent to US\$7.7 per capita).

The Water Sector in Gaza

12. **The water situation in Gaza is even more challenging, with undrinkable water supplied through the municipal networks and almost everyone relying on water from expensive and unregulated small-scale private providers.** The main source of water in Gaza is groundwater from the coastal aquifer, which relies on rainfall for recharge.⁸ In the last five years, the average annual rainfall in Gaza has decreased by 20-30 percent, and the average recharge volume has dropped by 10-20 percent. The increased demand and over-abstraction of ground water (by an estimated 180 Million Cubic Meters (MCM) a year) has led to increased salinity of the aquifer, making it an ecological catastrophe. Most of the 260 municipal wells have salt and nitrate levels above the World Health Organization (WHO) standards. Water quality measurements in 2018 indicated that the salinity

⁴ <https://www.nad.ps/en/publication-resources/agreements/israeli-palestinian-interim-agreement-west-bank-and-gaza-strip>

⁵

http://peacemaker.un.org/sites/peacemaker.un.org/files/IsraelOPT_AgreedDocumentsOnMovementAccessGaza2005.pdf

⁶ Purchased from Mekorot (the Israeli bulk water provider)

⁷ In West Bank US\$40 million is for bulk water purchases from Israel and US\$15 million subsidy for waste water treatment plants. In Gaza US\$10 million is for bulk water from Israel and \$5 million for subsidy for waste water treatment and electricity.

⁸ In addition, PWA in collaboration with municipalities, undertake regular public awareness campaigns sensitizing the community, including on key aspects of water conservation.



of ground water used for municipal distribution networks was in the range of 800-3,000 Milligram per Liter (mg/liter) of Total Dissolved Solids (TDS).⁹ Currently, fresh water purchased from Israel (10 MCM a year)¹⁰ is improperly mixed with highly saline groundwater. The mixed water is not fit for human consumption and is not distributed equitably. As a result, and although 95 percent of the population is connected to the piped network, access to drinking-quality water is just 1 percent, compared to universal access 20 years ago. The result is that 97 percent of the drinking water consumed in Gaza is supplied, mainly via tanker, by small-scale private providers or Non-Governmental Organizations (NGOs). They are not systematically regulated in terms of abstraction, quality and cost (which is often seven times the cost of public water supply).¹¹ While the immediate needs of Gaza are at the center of the proposed project, challenges in the West Bank in terms of water shortages and bulk water supply are as important.

13. **Overall, only 36 percent of households in Gaza are satisfied with the reliability and quality of water supply, with little to no difference between female and male heads of households.**¹² Availability of water, however, affects men and women differently, with the latter being affected in different ways depending on where they are in their life-cycle. Poor toilet facilities and inadequate water are among the reasons “why post-pubescent girls drop out of school and women miss days from work.” For working women and those of child-bearing age, lack of access to reliable and clean water coupled with a limited role in the sector to give voice and act on change likely increases domestic drudgery and impacts their empowerment and status negatively.¹³

14. **The WB&G currently are, and will in the future continue to be, exposed to natural hazards such as drought; extreme heat hazard risk in WB&G is classified as ‘high’.** The International Panel on Climate Change (IPCC) predicts that the mean annual temperature increase over the century in WB&G will be larger than global annual mean warming – which is approximately between 2.2 to 5.1 degrees Celsius - with a similar expected rate of warming for all seasons and increased risk in the frequency and intensity of droughts. There is a more than 25 percent risk that at least one period of prolonged exposure of extreme heat, resulting in heat stress, will occur in the next five years. Rainfall has been decreasing in the WB&G since the beginning of the century to levels below the historical average. This decrease in mean annual precipitation is expected to continue until 2050 (reaching as high as up to 30 percent). Droughts are becoming more frequent and water scarcity is growing in severity; water security risk in the region is classified as ‘high’. This challenge will affect the Gaza population significantly and will result in additional pressure on an already scarce resource, thus underlying the need to achieve more effective water distribution.

⁹ WHO guidelines in relation to TDS levels are as follows: excellent, less than 300 mg/liter; good, between 300 to 600 mg/liter; fair, 600 and 900mg/liter; poor, between 900 and 1,200 mg/liter; and unacceptable, greater than 1,200 mg/liter

¹⁰ Currently water purchased from Israel is supplied as 5 MCM for Gaza City and northern governorates; and 5 MCM for southern and middle governorates

¹¹ West Bank and Gaza WASH Poverty Diagnostic, 2017

¹² The Performance of Palestinian Local Governments: An Assessment of Service Delivery Outcomes And Performance Drivers In The West Bank And Gaza, June 2017 (this data was collected 2016/2017).

¹³ Das, Maitreyi. 2018. The Rising Tide: A New Look at Water and Gender. World Bank.



The Proposed Project

15. **The proposed project is a part of a coordinated international effort to address chronic poor water quality in Gaza and the significant increase in domestic demand expected in the medium term, which is projected to reach around 145 MCM a year by 2030.** PWA, in partnership with the European Commission (EC), the European Investment Bank (EIB), the Union for the Mediterranean (UfM), the Islamic Development Bank (ISDB) and the World Bank, formulated the Gaza Central Desalination Program (GCDP). The GCDP covers all Gaza and comprises two main components: (i) construction of a desalination plant with initial capacity to produce 55 MCM a year of desalinated water that can be doubled in the future; and (ii) construction of a north-south water carrier, including storage reservoirs to convey and properly blend the desalinated water with groundwater sources to achieve water supply meeting WHO standards for potable water. The latter component is referred as “Associated Works.”¹⁴ In addition, as part of this component, the European Union (EU) is financing a non-revenue water (NRW) reduction program in major municipalities of the Gaza strip to maximize use of the blended water.
16. **Securing the required funding for implementing the GCDP will take several years, leaving the water situation in Gaza, and particularly in the southern and middle governorates, in urgent need of improvement.** In this context, the international community supported the construction of two Short-Term Low-Volume (STLV) desalination plants which produce 4.7 MCM per year as interim measures to alleviate the needs for fresh water. In addition, PWA has negotiated the purchase of an additional 5 MCM per year of fresh water for the middle and southern governorates of Gaza from Israel (Mekorot) for a total of 10 MCM. The proposed project, through blending these new high-quality water sources with 15.3 MCM per year from existing saline groundwater, will supply bulk water to all 16 municipalities in the project area (with an estimated 870,000 people)¹⁵ with at least 90 liters per capita per day (lcd) meeting WHO standards for potable water. As these activities will increase the supply of drinking water in the project area, the project will raise the beneficiaries’ resilience to climate change–exacerbated droughts and extreme heat.
17. **The project will also contribute towards enhancing soundness of the sector institutional set up.** The proposed operation includes institutional strengthening activities aimed at the establishment of a small unit to manage bulk water supply operations in Gaza laying a sound foundation for the future establishment of the NWC, which is mandated by the Water Law to manage and operate bulk water throughout the West Bank and Gaza. The project also lays the foundation for enhancing the performance of service providers by supporting the design and piloting of a national services improvement program, which will serve to guide all future interventions aimed at improving municipal water and sanitation service delivery, regardless of the source of financing.
18. **The design of the proposed operation is informed by lessons learned through the implementation of previous World Bank financed water and sanitation operations in Gaza.** The project incorporates several lessons listed in Section II.F below.

¹⁴ The preparation of the designs, bidding documents and environmental impact assessment for the Associated Works under the GCDP were carried out through the World Bank financed Gaza Sustainable Water Supply Program (P150494).

¹⁵ Based on the Palestinian Census Bureau for Statistics’ 2017 Census. 49 percent are women.



C. Proposed Development Objective(s)

Development Objective(s) (From PAD)

- 21. Improve the quality and quantity of bulk water supplied to the municipalities served in the project area and strengthen the capacity of the Palestinian Water Authority.**
22. The capacity of the Palestinian Water Authority will be improved through: (i) the establishment of a Bulk Water Supply Unit (BWSU) in Gaza to operate the infrastructure developed by the project; (ii) advancing planning of priority investment for bulk water supply in the West Bank; and (iii) the design and piloting of a National Service Provider Improvement Program that will help municipalities improve the quality and efficiency of their drinking water distribution services, and strengthen their ability to pay for bulk water supply services.
23. The infrastructure developed by the project in the southern and middle governorates of Gaza will allow: (i) supplying bulk water meeting WHO quality standards for drinking water; and (ii) for a more equitable distribution of bulk water supplying an average quantity of 90 lcd in the project area.

Key Results

24. The achievement of the PDO will be assessed through:
 - a. The Gaza BWSU is established and is operational.
 - b. Volume of bulk water supplied by the BWSU to benefiting municipalities.
 - c. Percentage of bulk water samples meeting the quality of salinity standards set by WHO for potable water.
 - d. BWSU bulk water quality report published biannually by PWA.
 - e. National Service Providers' Improvement Program is designed and approved.

D. Project Description

25. The project comprises three components to: (i) build the necessary water infrastructure for improved bulk water supply by conveying and blending water from various sources in the southern and middle governorates; (ii) build capacity to improve the performance of selected institutions; and (iii) provide project management and implementation support. The three components are described below; a more detailed description is provided in Annex 2.

Component 1: Improved Supply of Bulk Water to the southern and middle governorates of Gaza



(Estimated Cost US\$91.0 million)¹⁶

26. Component 1 comprises four packages to implement an integrated system of water carriers and reservoirs to convey and blend water from three different sources to achieve the desired salinity (See map in Annex 4). Packages 1.1 and 1.2 are financed by a parallel grant from the Kuwait Fund for Arab Economic Development (KFAED) in the amount of US\$60 million equivalent.
- a. Package 1.1: Southern Main Carrier System (US\$48.0 million) will enhance the capacity for blending, storage and bulk supply of drinking water to Rafah and Khan Younis Governorates. This package is being tendered and implementation will likely start in early 2020; implementation is expected to be complete by mid 2023.
 - b. Package 1.2: Additional Water Supply Network Improvement Works for Middle and Khan Younis Governorates (US\$10.0 million) will increase the capacity to effectively utilize the 10 MCM/year of fresh water purchased from Israel at Bani Said and Bani Suhaila connection points. This package is being tendered and implementation will likely start in early 2020; implementation is expected to be completed by mid 2023.
 - c. Package 1.3: Reconfiguration of the water distribution system in the Southern Gaza Governorates (US\$27.0 million) and Package 1.4: Reconfiguration of the water distribution system in Middle Gaza Governorate (US\$6.0 million) will reconfigure the municipal primary distribution networks where they connect with the new bulk water system to enable them to receive and effectively distribute the blended bulk water. The tender documents for both these packages are ready and tendering will proceed after appraisal. The implementation period for each of these two contracts is 30 months.

Component 2: Capacity Building (Estimated Cost US\$9.5 million)

27. This component is designed primarily to create adequate capacity to ensure operations and maintenance of the STLVs during project implementation and subsequently during the O&M of the integrated bulk water supply system implemented by the project. This component will also support the design of a National Service Provider Improvement Program (NSPIP) to improve service delivery in the West Bank and Gaza, and reduce the need for sector subsidies, as well as to prepare priority bulk water investments in the West Bank.

¹⁶ The packages under component 1 will increase the resilience extreme heat and drought through the diversification of water sources, investments in water and wastewater infrastructure, better management and O&M of water and wastewater resources, and improvements in the quality of water and water services. These measures will enhance the beneficiaries' resilience to climate change—exacerbated droughts and rising temperatures.



- a. Sub-Component 2.1: Establishment of a unit to operate bulk water supply in Gaza (US\$1.0 million) will fund the design and implementation of a road map for establishing a unit over the implementation period of this project, and take on gradual responsibility for: (i) operation and maintenance of the STLVs; (ii) monitoring and management of bulk water purchases from Israel; (iii) management and operation of groundwater wells in the middle and southern Gaza governorates to be utilized for blending; (iv) blending of these bulk water sources for distribution and onward sale to municipalities (the SPs); and (v) billing and collection (on behalf of PWA) for bulk water sales to municipalities. In line with PWA's long-term plan to create the NWC, this unit will eventually scale up its roles and responsibilities to be the Gaza nucleus of the NWC proposed in the 2014 Water Law. As part of the establishment of the Bulk Water Supply Unit enhancement of the opportunities for female employment will be undertaken, to utilize the untapped resource that highly educated and skilled women represent.¹⁷ This sub-component will also fund a study of private water vendors' livelihoods and potential mitigation measures.

- b. Sub-Component 2.2 - Design of a National Service Provider Improvement Program (NSPIP) (US\$2.5 million) will fund the design of a national program to improve the operational and financial performance of service providers across the WB&G. The NSPIP will set out a framework of incentives that will: (i) support SPs to move up the performance ladder; (ii) separate water service provision from other municipal services; (iii) where appropriate, support clustering of SPs to achieve economies of scale and work towards the establishment of regional utilities; and (iv) promote future public private partnerships (PPPs) to the extent feasible, either through performance based contracts to reduce NRW, meter reading, billing and collection, or more comprehensive management contracts. As part of the development of NSPIP, pilot measures for improving cost recovery will be tested in a) the municipalities in Gaza targeted by the infrastructure improvements in component 1 and b) selected service providers in West Bank. This sub-component will include support for municipalities to engage consumers in the process, and to ensure that consumers' voice is represented both in the policy discussions on how to develop the NSPIP and will also include training, complemented with technical assistance to municipalities, on engaging with water consumers. Linked to these actions, representatives of women's groups will be consulted in the design of the NSPIP and opportunities for empowering young women across the water supply and sanitation value chain will be explored through innovative partnerships with the private sector. There is consensus among donors of the importance of such a program. It is envisaged that the implementation of this program will be funded by a future Bank/donor supported project.

- c. Sub-Component 2.3: Priority investment planning for bulk water supply in the West Bank (US\$6.0 million) will finance: (i) updating the water sector policy and strategy; (ii) an integrated bulk water master plan for the West Bank, which will identify and prioritize investments to set up a bulk water supply and conveyance system for the West Bank; and (iii) prepare detail designs and ESIAAs for the identified priority investments related to distribution of water brought in from Mekorot. It is envisaged that the implementation of this investment will be funded by a future Bank/donor supported project.

¹⁷ This will include support to the PWA gender unit.



Component 3: Project Management and Implementation Support (Estimated cost US\$16.5 million)

28. This component is designed to support effective implementation of the project and provide funds to ensure continued operations of vital water and wastewater assets in Gaza and comprises four sub-components: (i) project management; (ii) project supervision; and, (iii) incremental operation and maintenance costs of bulk water operations in Gaza.
- a. Sub-Component 3.1: Project management (US\$3.2 million) will support PWA to implement the project through a Project Management Support Unit (PMSU). It will finance, *inter alia*: (i) cash compensations and expenses associated with the implementation of the Bank approved RAP for the project; (ii) salaries of PMSU staff; (iii) PMSU operating costs; (iv) provision of needed office equipment; (v) consultant services to support technical reviews and implementation of environmental and social safeguards; and (vi) overall project management, monitoring, evaluation and reporting.
 - b. Sub-Component 3.2: Project supervision (US\$3.6 million, of which US\$2.1 million financed through a parallel grant from KFAED) will support PWA in the procurement and implementation of the construction contracts. It will finance an independent international Project Implementation Consultant (PIC) who will provide technical assistance on procurement processing and will supervise the implementation of the construction contracts.¹⁸
 - c. Sub-Component 3.3: Incremental operations and maintenance costs (US\$9.7 million) will support on a declining basis the new bulk water supply unit in Gaza, *inter alia*: (i) salaries and incremental operating costs for bulk water supply in Gaza; (ii) cost of STLVs' consumables (limited to chemicals, cartridge filters, and membrane replacement); and (iii) maintenance costs.

E. Implementation

Institutional and Implementation Arrangements

29. The Ministry of Finance and Planning (MOFP), representing the Palestinian Liberation Organization (PLO), will sign Grant Agreements (GAs) with the Trust Fund for Gaza and the West Bank (TFGWB) and with the PID MDTF. The PA has already signed a grant agreement for the parallel grant from KFAED. PWA will be the implementing agency for this Project. PWA will manage the Project as part of GCDP, for which three main structures have been established and are operational:

¹⁸ The supervision consultant was selected competitively in accordance with the World Bank Procurement Guidelines, under the previous World Bank-financed Gaza Sustainable Water Project, for the design and supervision of the associated works packages. PWA entered into a subsequent contract with the consultant for the supervision of the works packages financed by the Kuwait Fund. PWA plans to hire the same consultant under a separate contract to supervise the works packages financed by the Bank under the Project.



- a. **A Project Steering Committee (PSC)** will provide strategic guidance for the Project and will facilitate the required PA work. The PSC is comprised of decision-making representatives headed by the PWA, and representatives from the Prime Minister’s Office (PMO), the Palestinian Energy and Natural Resources Authority (PENRA), the Environmental Quality Authority (EQO), the Ministry of Civil Affairs (MOCA), and the Ministry of Finance and Planning (MOFP). A representative of the Donors will act as an observer.
 - b. **The International Coordination Committee (ICC)** will provide a forum to coordinate and lead the work of the international partners.
 - c. **The Task Force** will provide a forum to facilitate and coordinate between the Palestinian and the Israeli sides on all aspects, in particular on access to materials, goods, and personnel. The Task Force, facilitated by the Office of the Quartet, will meet monthly or as necessary.
30. A PMSU has already been set up within PWA, with key staff experienced in Bank projects on board. The PMSU will be responsible for project oversight, monitoring, reporting, facilitation, hiring of consultants, contract awards and contract management, financial management, implementation of environmental and social safeguards and coordination with stakeholders. A qualified and experienced Project Director has been appointed as Head of the PMSU and will be the focal person for communicating and coordinating with the Bank, other donors, and all other parties involved in the project. A qualified Capacity Building Expert, Financial Manager, and Procurement Manager are already on board. A qualified safeguards specialist is yet to be recruited. An international Project Implementation Consultant (PIC) has been hired to provide technical assistance on procurement and supervise the implementation of construction contracts. Annex 1 provides more details of the institutional and implementation arrangements for the project and on PMSU staffing composition.
31. To facilitate effective project preparation, and in view of the fiscal constraints facing the PA, a provision for retroactive financing is included to cover a defined list of costs associated with project preparation from January 1, 2019. A detailed cost breakdown of these eligible expenditures is included in the Project files.

F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)

The construction activities are expected to take place on governmental lands and existing right-of-way in the middle and southern governorates in Gaza Strip, namely: the Middle governorate, Khanyounis governorate, and Rafah governorate. Some stretches of the main water carrier will be aligned along the main regional road in Gaza, namely Salaheden Road. The Mekorot connections in the middle and south will cross the security fence between Israel and Gaza. The 2 Short-term-low-volume desalination plants (STLVs) are located close to the coast line with intakes from shore wells and brine outlets with diffusers extending 100 meters offshore. The packages also include reconfiguration of the networks in the middle and south



governorates and construction of mixing reservoirs in those governorates. Given the dense population of Gaza, construction activities are expected to have impacts on community safety, traffic flow, and other municipal services. The project is expected to improve service provision, impacts during operation are related to increased demand on energy, wastewater facilities, and increased costs of the service provision.

G. Environmental and Social Safeguards Specialists on the Team

Helen Z. Shahriari, Social Specialist
Zeyad Abu-Hassanein, Environmental Specialist

SAFEGUARD POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	<p>The construction activities for Component 1 of the project are expected to take place on governmental lands and existing right-of-ways. However, given the dense population of in the project areas, construction activities are expected to have impacts on community safety and interruption to traffic and other municipal services.</p> <p>Even though the activities are spanning a significant portion of the middle and southern governorates, the impacts during construction are localized to construction sites, short term, and can be minimized with careful planning and construction management and coordination with local authorities.</p> <p>The project is expected to improve water quality and quantity of potable water service provision and . Negative impacts during operation are related to increased demand on energy, increased effluent volumes going to wastewater facilities, and increased costs of the service provision. The expected increase in tariff is moderate due to the fact the desalination water will be mixed with cheaper water from groundwater wells before pumping in the networks. Detailed analysis of tariff</p>



restructuring will be conducted by PWA during project implementation.

The above impacts and others have been studied in an ESIA conducted by PWA in 2017, cleared by the Bank in May 2018, and disclosed on the Bank’s website in February 21, 2019. Other impacts of the project assessed by the ESIA include impacts on the livelihoods of small private desalination vendors, land issues, and impacts on encroachers and/or squatters in some locations of the right-of-way.

The project will support the operation and maintenance of two short-term low-volume (STLV) desalination plants in Deir Al Balah and South (with total output of 4.7 million cubic meter of water per year). Both were constructed through donor financing prior to the Bank engagement.

Since the project will technically and financially support the operations and maintenance of these two STLVs through establishing a management unit, the Bank’s safeguards policies will apply on them. Therefore the team reviewed their ESIA’s and found them to be complying with the Bank’s safeguard policies, which were nationally approved. Since one of the STLVs is already operating and the other one is under commissioning, an Environment Audit for both STLVs was carried out. The audit findings revealed some gaps that need to be addressed to comply with the World Bank safeguard policies especially on public and worker health and safety. A time-bound Action Plan to fill in the Audit gaps, has been developed.

Given the contextual and multidimensional environmental and social risks of the project, and the activities spanning large portions of the densely populated Gaza Strip, the project is assigned an environmental category “A”.

Performance Standards for Private Sector Activities OP/BP 4.03	No	No private sector entities involved in the financing of project activities.
Natural Habitats OP/BP 4.04	No	no significant natural habitats have been identified by the ESIA to be impacted by the project activities



Forests OP/BP 4.36	No	none identified by the ESIA to be impacted
Pest Management OP 4.09	No	no pest management chemicals and/or equipment will be financed by the project
Physical Cultural Resources OP/BP 4.11	No	No significant physical cultural resources identified by the ESIA to be directly or indirectly impacted by the project activities. A chance find procedure in coordination between PWA and the antiquity authority will be enforced to cater for any findings during the earthworks.
Indigenous Peoples OP/BP 4.10	No	no indigenous people have been identified in the project sites and locations
Involuntary Resettlement OP/BP 4.12	Yes	<p>Component one includes a number of water supply infrastructures to address the immediate needs for improved quality of water supply in south and middle Gaza. Types of infrastructure include a number of small reservoirs/storages, Southern Carrier that will be the backbone for future bulk conveyance, and water distribution network reconfiguration. A RAP was prepared by PWA, approved, and disclosed in the Bank extrenal Website on August 7, 2019] and in the country on July 28, 2019. A GRM at PWA has been developed and enhanced for the project. RAP identified three categories of impact.</p> <p>A. Temporary loss of livelihood due to the construction of the South Carrier - During construction, the livelihoods of 785 persons in a crowded market in Khan Younis city will be affected. The Project Affected Persons (PAPs) will be compensated in cash, as per the RAP, prior to the start of construction.</p> <p>B. Permanent loss of land due to the construction of reservoirs and pumping stations - Of the 12 sites needed for the project, eight sites are either government or municipal owned. These sites were not encroached and had no claim on them (documented in the RAP), and therefore no land acquisition was required. Of the remaining four sites, two sites have already been acquired, while land acquisition is in progress for the sites in Al Buraij and Al Qarara. For the two sites that have already been acquired, an audit under the RAP confirmed that they were carried out in accordance with the</p>



requirements of OP 4.12; the findings of the audit are documented in the RAP. For the two remaining sites, consultations have been carried out with the affected people; also documented in the RAP.

C. STLVs – The Deir Al Balah STLV is on government land and did not require involuntary resettlement. Squatters found to the east of the South STLV site were compensated in 2014 following the standards of the EIB, i.e. the multilateral that financed the construction of the facility. The due diligence undertook as part of the RAP of the Project concluded that compensations made to squatters affected by the construction of these facilities complied with World Bank policies and to the requirements of the RAP.

The project includes the construction and rehabilitation of numerous water reservoirs in different urban and rural locations for blending water supply from different sources. These are concrete structures with different shapes, heights, and capacities which do not fit the definition of the Bank Policy on Dam Safety OP 4.37. Yet, the structural safety and integrity of those structures shall be assured via best industrial practices including the World Bank Environmental Health and Safety Guidelines.

Projects on International Waterways OP 7.50: The Policy is triggered for this project because the activities will involve the use of the Gaza aquifer which is hydrologically connected and part of the Coastal Aquifer which extends between Israel, Gaza (Palestinian Authority), and Egypt, see attached Map 1. Component (1) of the project includes rehabilitation and upgrading of 80 municipal groundwater wells in the middle and southern governorates of Gaza Strip, part of the project Packages 1.3 and 1.4. These project activities are planned to help in the reduction and control of the amount of water that is being abstracted from the groundwater aquifer. This reduction will be achieved

Safety of Dams OP/BP 4.37

No

Projects on International Waterways
OP/BP 7.50

Yes



by shutting down some municipal wells and rehabilitating other municipal wells with better chloride and nitrate concentrations. The total number of municipal wells that will be rehabilitated and operated in the Project is 80 wells, four out of these 80 wells are near the border between Gaza and Egypt (1 km); therefore, these wells may draw from parts of the aquifer with direct hydrologic connectivity with Egypt.

Two groundwater model numerical simulations provided by the client, the Palestinian Water Authority (PWA), and done independently by two professional hydrogeologists have shown that, (i) the general direction of groundwater flow is from east to west towards the Mediterranean in the parts of the Aquifer in Egypt, Gaza (the Palestinian Authority), and Israel, (ii) the current (2019) net groundwater flow across the border between Israel and Gaza (the Palestinian Authority) in the southern part of Gaza Strip is close to zero, (iii) the net groundwater flow across the border between Egypt and Gaza is in the range of 1.0 Million Cubic Meters (MCM) to 9.0 (MCM) annually. The two models also confirm that groundwater flow across the border will decrease gradually overtime to approach a net zero flux between the years 2030-2035. This is due to the fact that the abstraction from the aquifer will drop from the current value of 33.1 MCM annually to a value of 18.65 MCM once the project implementation is complete, i.e., 61 water wells are closed, and 80 wells are rehabilitated. The Project activities will not adversely affect the quantity or quality of groundwater flows to other riparian countries in any significant way and will not be adversely affected by the other riparian's possible water use. Therefore, an exception to the riparian notification requirement applies according to paragraph 7 (a) of the policy; and has been approved by the Regional Vice President.

Projects in Disputed Areas OP/BP 7.60	No	N/A
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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 construction activities for Component 1 of the project are expected to take place on governmental lands and existing right-of-ways. However, given the dense population of in the project areas, construction activities are expected to have impacts on community safety and interruption to traffic and other municipal services.

Even though the activities are spanning a significant portion of the middle and southern governorates, the impacts during construction are localized to construction sites, short term, and can be minimized with careful planning and construction management and coordination with local authorities.

The project is expected to improve water quality and quantity of potable water service provision and impacts during operation are related to increased demand on energy, increased effluent volumes going to wastewater facilities, and increased costs of the service provision. The expected increase in tariff is moderate due to the fact the desalination water will be mixed with cheaper water from groundwater wells before pumping in the networks. Detailed analysis of tariff restructuring will be conducted by PWA during project implementation.

The above impacts and others have been studied in an ESIA conducted by PWA in 2017, approved by the Bank in May 2018, and disclosed on the Bank's website in February 21, 2019. Other impacts of the project assessed by the ESIA include impacts on the livelihoods of small desalination private vendors, land issues, and impacts on encroachers and/or squatters in some locations of the right-of-way.

The project will support the operational and maintenance of two short-term low-volume (STLV) desalination plants in Deir Al Balah and South (with total output of 4.7 million cubic meter of water per year) and which were constructed through donor financing prior to the project. The environmental and social impact assessments for the two STLVs were reviewed.

In addition since the project will technically and financially support the operations and maintenance of two existing STLVs through establishing a management unit, the Bank's safeguards team reviewed their ESIA's which were nationally approved. In addition an Environmental Audit for both STLVs was carried out. The audit findings revealed some gaps that need to be addressed to comply with the World Bank safeguard policies especially on public and worker health and safety. A time-bound Action Plan was prepared. The Action Plan and the STLV ESIA's are disclosed as an Annex to the project ESIA. The Action Plan will also be clearly referred to in the Grant Agreements Agreement and annexed to the Project Implementation Manual .

Given the contextual and multidimensional environmental and social risks of the project, and the activities spanning large portions of the densely populated Gaza Strip, the project is assigned a environmental category "A".

Safety of Dams OP4.37: The project includes the construction and rehabilitation of numerous water reservoirs in different urban and rural locations for blending water supply from different sources. These are concrete structures with different shapes, heights, and capacities which do not fit the definition of the Bank Policy on Dam Safety OP 4.37. Yet, the structural safety and integrity of those structures shall be assured via best industrial practices including the World Bank Environmental Health and Safety Guidelines.

Projects on International Waterways OP 7.50: The Policy is triggered for this project because the activities will involve the use of the Gaza aquifer which is hydrologically connected and part of the Coastal Aquifer which extends between Israel, Gaza (Palestinian Authority), and Egypt, see attached Map 1. Component (1) of the project includes rehabilitation and upgrading of (80) municipal groundwater wells in the middle and southern governorates of Gaza



Strip, part of the project Packages 1.3 and 1.4. These project activities are planned to help in the reduction and control of the amount of water that is being abstracted from the groundwater aquifer. This reduction will be achieved by shutting down some municipal wells and rehabilitating other municipal wells with better chloride and nitrate concentrations. The total number of municipal wells that will be rehabilitated and operated in the Project is 80 wells, four out of these 80 wells are near the border between Gaza and Egypt (1 km); therefore, these wells may draw from parts of the aquifer with direct hydrologic connectivity with Egypt.

Two groundwater model numerical simulations provided by the client, the Palestinian Water Authority (PWA), and done independently by two professional hydrogeologists have shown that, (i) the general direction of groundwater flow is from east to west towards the Mediterranean in the parts of the Aquifer in Egypt, Gaza (the Palestinian Authority), and Israel, (ii) the current (2019) net groundwater flow across the border between Israel and Gaza (the Palestinian Authority) in the southern part of Gaza Strip is close to zero, (iii) the net groundwater flow across the border between Egypt and Gaza is in the range of 1.0 Million Cubic Meters (MCM) to 9.0 (MCM) annually. The two models also confirm that groundwater flow across the border will decrease gradually overtime to approach a net zero flux between the years 2030-2035. This is due to the fact that the abstraction from the aquifer will drop from the current value of 33.1 MCM annually to a value of 18.65 MCM once the project implementation is complete, i.e., 61 water wells are closed, and 80 wells are rehabilitated. The Project activities will not adversely affect the quantity or quality of groundwater flows to other riparian countries in any significant way and will not be adversely affected by the other riparian's possible water use. Therefore, an exception to the riparian notification requirement applies according to paragraph 7 (a) of the policy; and has been approved by the Regional Vice President on October 21, 2019.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area: Potential impacts are expected to be limited mainly to the construction phase, with a few impacts identified during the operation phase. The impacts are localized, site specific, short-lived and reversible by adopting well identified practical mitigation measures which have been well articulated in the prepared ESIA. The proposed improvements in the water distribution networks and bulk water supply system are expected to have significant positive long terms impacts on the aquifer quality in Gaza due to decreasing the stress on the aquifer, and will have overall positive long term health impacts on the population due to improving the water quality after mixing the water from the STLVs and Meckorot with the water with less quality from the local groundwater wells. On the longer term, it is expected the bulk water supply facilities constructed will be connected to a central desalination plant of larger capacity. Design, construction, and operation of the central desalination plant should follow best industrial practice to minimize environmental impacts of the seawater intakes and brine outlets to marine environment.

Component one includes a number of water supply infrastructures to address the immediate needs for improved quality of water supply in south and middle Gaza. Types of infrastructure include a number of small reservoirs/storages, Southern Carrier that will be the backbone for future bulk conveyance, and water distribution network reconfiguration. A RAP was prepared by PWA, approved, and disclosed in the Bank extrenal Website on [date] and in the country on [date]. A GRM at PWA has been developed and enhanced for the project. RAP identified three categories of impact.

A. Temporary loss of livelihood due to the construction of the South Carrier - During construction, the livelihoods of 785 persons in a crowded market in Khan Younis city will be affected. The Project Affected Persons (PAPs) will be compensated in cash, as per the RAP, prior to the start of construction.

B. Permanent loss of land due to the construction of reservoirs and pumping stations - Of the 12 sites needed for



the project, eight sites are either government or municipal owned. These sites were not encroached and had no claim on them (documented in the RAP), and therefore no land acquisition was required. Of the remaining four sites, two sites have already been acquired, while land acquisition is in progress for the sites in Al Burajj and Al Qarara. For the two sites that have already been acquired, an audit under the RAP confirmed that they were carried out in accordance with the requirements of OP 4.12; the findings of the audit are documented in the RAP. For the two remaining sites, consultations have been carried out with the affected people; also documented in the RAP.

C. STLVs – The Deir Al Balah STLV is on government land and did not require involuntary resettlement. Squatters found to the east of the South STLV site were compensated in 2014 following the standards of the EIB, i.e. the multilateral that financed the construction of the facility. The due diligence undertook as part of the RAP of the Project concluded that compensations made to squatters affected by the construction of these facilities complied with World Bank policies and to the requirements of the RAP.

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

There are no viable alternative options for developing alternative water sources in the Gaza Strip. At the conceptualization of the design of the project (which was supported by a previous Bank TA) PWA has instructed the consultant engineer to look at various options for the bulk supply system. The current system was selected based on economical, technical, safeguards, and political issues, optimal system design was selected to combine water supply from local wells, with available amounts imported from Israel (Meckorot) in addition to water from desalination plants. This combination provides affordable water supply with improved water quality and least environmental impacts.

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.

PWA prepared an Environmental and Social Impact Assessment (ESIA) which covers the entire Gaza strip “Associated Works”, including the southern governorates covered by the scope of this project. The ESIA was cleared by the Bank in May 2018 and was subsequently disclosed on February 21, 2019 on the Bank external website. The ESIA was also disclosed locally. Two stakeholders’ consultations were conducted by PWA as part of the preparation of the ESIA. Two consultations were conducted as part of the preparation of the ESIA on October 13, 2017 and December 11, 2017, respectively. The final version of the ESIA incorporating all feedback received during these consultations was disclosed. The ESIA includes an ESMP where the impacts, mitigation measures, estimated costs, monitoring arrangements, institutional responsibilities and monitoring frequencies are all elaborated.

The existing two desalination plants (STLVs) in southern Gaza, were constructed outside the scope of the project. However, the operation and maintenance of these two STLVs will be financed under the project. As part of the Bank due diligence, the Bank reviewed the ESIA reports prepared for these two STLVs and noted that these ESIAs covered construction and operation impacts and mitigation measures. The main operational risks of the STLVs include



seawater intakes and brine disposal outlets and their impacts on marine habitats and species. The ESIA reports and field visits indicated that the seawater intakes for both STLVs are beach wells with no impact on marine environment. The brine disposal outlets for both STLVs are in the form of 100 meters offshore diffusers. The ESIA reports indicated that the brine volumes and mixing zones are of minimal impacts to the marine environment. PWA prepare an “Environmental Audit” for the operation of the 2 STLVs including the aspects of water quality at different control points of the plant and the aspects of Occupational Health and Safety (OHS).

PWA has worked in partnership with the Bank for many years since the establishment of the Palestinian Authority. They have a good record of compliance with the Bank safeguards policies and accumulated good experience working with the Bank on several operations. Components 2 and 3 will, inter alia, aim to enhance the capacity of the PMSU to ensure the environmental due diligence, especially for construction activities under Component 1. The PMSU will recruit an environmental safeguard specialist, who will be responsible for managing and monitoring the environmental performance of the contractors. The PMSU will also recruit an environmental safeguard consultant under Component 3 to support the PMSU’s environmental safeguard specialist in monitoring the implementation of the ESIA/ESMP and for the preparation of environmental reports. The supervisory engineering consulting firm will be responsible for monitoring the implementation of environmental and social safeguards. Environmental and social safeguards aspects will be addressed in a separate section of its monthly and quarterly reports. The winning contractor is required to include a full-time occupational health and safety officer to supervise and monitor all aspects of environmental and social safeguards during the construction phase and prepare monthly safety reports. The cost of implementing the ESMP measures will be included in cost of construction. Performance indicators specific to environmental safeguards compliance and monetary penalties associated with insufficient performance specific to environmental safeguard compliance will be defined in the bid documents.

A Grievance Redress Mechanism (GRM) at the project level, which will be established at the PWA in accordance to the RAP. The GRM system at the project level will include (A) Complaint receiving and processing office, (B) Complaints receiving channels, (C) Levels of complaint escalation, (D) Complaints handling mechanism.

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

The stakeholders include different relevant Palestinian authorities, water utility, and municipalities, international Non-governmental Organizations and local civil society organizations who represent local community categories that are directly involved in or affected by the proposed project components.

PWA has prepared an Environmental and Social Impact Assessment (ESIA) which covers the entire Gaza strip “Associated Works” designed under the Gaza Sustainable Water Supply Program. All components of this project are covered by the ESIA, which was cleared by the Bank in May 2018 and was disclosed on the Bank’s external website on February 21, 2019. Two consultations were conducted as part of the preparation of the ESIA on October 13, 2017 and December 11, 2017, respectively. The ESIA includes an ESMP where the impacts, mitigation measures, estimated costs, monitoring arrangements, institutional responsibilities and monitoring frequencies are all elaborated.

Activities under Component 1 will require some land acquisition and/or will have livelihoods impacts. As a result, OP 4.12 Involuntary Resettlement has been triggered and a RAP has been prepared. It will be disclosed on the Bank external Website as well as on the PWA website in Gaza before appraisal.



B. Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other

Date of receipt by the Bank	Date of submission for disclosure	For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors
13-May-2018	21-Feb-2019	21-Oct-2019

"In country" Disclosure

West Bank and Gaza

21-Feb-2019

Comments

Resettlement Action Plan/Framework/Policy Process

Date of receipt by the Bank	Date of submission for disclosure
28-Jul-2019	07-Aug-2019

"In country" Disclosure

West Bank and Gaza

28-Aug-2019

Comments

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

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 4.12 - 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 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?

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



CONTACT POINT

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APPROVAL

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Approved By

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Country Director:	Samira Ahmed Hillis	24-Oct-2019
