



Additional Financing Appraisal Environmental and
Social Review Summary
Appraisal Stage
(AF ESRS Appraisal Stage)

Date Prepared/Updated: 10/19/2023 | Report No: ESRSAFA626



I. BASIC INFORMATION

A. Basic Project Data

Country	Region	Borrower(s)	Implementing Agency(ies)
Eastern and Southern Africa, Mozambique	EASTERN AND SOUTHERN AFRICA		
Project ID	Project Name		
P181363	Mozambique Sadc Regional Statistics Af		
Parent Project ID (if any)	Parent Project Name		
P175731	SADC Regional Statistics Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Poverty and Equity	Investment Project Financing	10/30/2023	12/15/2023
Estimated Decision Review Date	Total Project Cost		
10/25/2023	0		

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Proposed Development Objective

The Project Development Objective (PDO) is to strengthen the institutional capacity of SADC and participating countries to produce, disseminate and use quality statistics while increasing regional harmonization and collaboration.

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

No

C. Summary Description of Proposed Project Activities

The SADC Regional Statistics Project will promote the production of high-quality statistics, regional harmonization of statistics, and timely dissemination to enhance their use. With support from the SADC secretariat, quality and harmonized statistics will be produced and disseminated by the National Statistical Offices (NSOs) of SADC Member States and project beneficiary countries. The timely release of statistics and collaboration with policymakers and other stakeholders will lead to enhanced use of statistics, which – in turn – encourages more production of statistics



creating a positive feedback loop enhancing the sustainability of the project objective. Specialized training and capacity-building activities will be implemented to enhance national monitoring and evaluation systems, involving NSOs and agencies from the governments of participants countries to promote evidence-based policymaking. At the country level, the project will support activities to raise the level of national statistical systems (NSS), allowing countries to align themselves to SADC standards, per the SADC Protocol on Statistics.

The project will cover the following SADC IDA countries: Madagascar, Malawi, Zambia and Comoros, as well as a non-SADC state, Sao Tome and Principe. The project will also include the SADC secretariat. The estimated cost is tentatively US\$ 104.5 million, to be provided through a combination of International Development Association (IDA) credits and grants from country-specific and regional windows. The project is planned for five years.

The project has three components: Component 1: Improve harmonization, quality, and dissemination of core social and economic statistics. This component supports the implementation of the Regional Strategy for the Development of Statistics (RSDS) that the Southern African Development Community (SADC) started implementing in 2015 and that is reflected in the SADC Protocol on Statistics, the legal framework to enable and enhance statistical development and innovation in SADC member states. Under this component, SADC will primarily support NSOs to improve their ability to collect and produce statistical information by developing guidelines and delivering technical assistance for data collection from administrative records, expanding the use of specialized software, assisting development and maintenance of Statistical Business Registers, piloting processing Big Data for statistical purposes, delivering trainings for accessing and use of spatial information to collect census and survey data (GIS) through cartographic work, providing advanced training on sampling techniques, develop harmonized survey modules to collect household-level surveys to generate more data on informal sector, poverty, labor statistics, gender, migration, etc. The component will also deliver technical assistance and trainings to conduct of agricultural census and surveys. On macroeconomic data, the component will develop and implement harmonized Supply and Use Tables (SUTs) to generate regional value chains, will support country level harmonization of National Accounts (including rebasing of GDP), provide technical assistance to develop Integrated Economic Accounts (Environment) and Satellite Accounts, and develop and implement regional Producer Price Indices, Trade Indices and Index of Industrial Production. The component will also strengthen the capacity of the SADC Statistics Department in terms of expert training and equipment, generate partnership opportunities with academic institutions in the region on use of data for policy design, implementation, and evaluation, especially to monitor the implementation of the Protocol on Statistics.

Component 2: Close gaps in data production, statistical capacity, and data use at country level seeks to extend the D4P package in beneficiary countries under the harmonizing guidelines, recognizing initial institutional and human resource capacities and building on existing core statistics, infrastructure and technical capacity. The activities planned under this component therefore aim to close some of the most important gaps in data production, equipment, materials, technical expertise, dissemination and use at a country level. These activities are mostly focused on country-level NSOs, however, to enhance use of data for policy design and monitoring, some countries will also undertake activities to strengthen analytical capacity at other public institutions, such as the Ministry of Finance.

Component 3: Project Management will oversee, supervise and monitoring the first two components.

D. Environmental and Social Overview

D.1 Overview of Environmental and Social Project Settings



During the preparation and appraisal of the SADC Regional Statistics Project (P175731), Mozambique was initially included as a project participant with an allocation of US\$60 million. However, due to a shortage of IDA National Performance-Based Allocation (PBA) for Mozambique in FY23, a decision was made to incorporate Mozambique in FY24 through an Additional Financing (AF).

The main client, Mozambique National Statistics Office (INE), heavily relies on this Additional Financing to successfully carry out its core statistical operations. Since the conclusion of the initial Statistical Capacity Building Project (P162621) in December 2022, INE has faced significant challenges in executing essential statistical operations as outlined in its National Strategy for the Development of Statistics (NSDS). This includes critical tasks such as cartographic work for the upcoming 2027 Digital Population and Housing Census, the Agriculture and Livestock Census, as well as the collection of price data and the production of national accounts.

The project is planned for five years and has three components: Component 1: Improve harmonization, quality, and dissemination of core social and economic statistics. This component supports the implementation of the Regional Strategy for the Development of Statistics (RSDS) that the Southern African Development Community (SADC) started implementing in 2015 and that is reflected in the SADC Protocol on Statistics, the legal framework to enable and enhance statistical development and innovation in SADC member states. Under this component, SADC will primarily support NSOs to improve their ability to collect and produce statistical information by developing guidelines and delivering technical assistance for data collection from administrative records, expanding the use of specialized software, assisting development and maintenance of Statistical Business Registers, piloting processing Big Data for statistical purposes, delivering trainings for accessing and use of spatial information to collect census and survey data (GIS) through cartographic work, providing advanced training on sampling techniques, develop harmonized survey modules to collect household-level surveys to generate more data on informal sector, poverty, labor statistics, gender, migration, etc. The component will also deliver technical assistance and trainings to conduct of agricultural census and surveys. On macroeconomic data, the component will develop and implement harmonized Supply and Use Tables (SUTs) to generate regional value chains, will support country level harmonization of National Accounts (including rebasing of GDP), provide technical assistance to develop Integrated Economic Accounts (Environment) and Satellite Accounts, and develop and implement regional Producer Price Indices, Trade Indices and Index of Industrial Production. The component will also strengthen the capacity of the SADC Statistics Department in terms of expert training and equipment, generate partnership opportunities with academic institutions in the region on use of data for policy design, implementation, and evaluation, especially to monitor the implementation of the Protocol on Statistics.

Component 2: The Country Component seeks to close key gaps in data production (for example, a Household and Expenditure Survey and an Agriculture and Livestock Census), statistical capacity, and data use. At the country level, the component addresses capacity constraints specific to each National Statistical Office (NSO), in order to contribute to the RSDS. The country-level component seeks to extend the Data for Policy (D4P) package in participating countries under the harmonizing guidelines, recognizing initial institutional and human resource capacities and acknowledging the amount of existing core statistics. D4P is a World Bank initiative aimed at strengthening national statistical systems and building capacity in Sub-Saharan African (SSA) countries. The objective of D4P is to close data gaps on a core set of economic, social, and sustainability statistics that are crucial for designing, monitoring, and evaluating National Development Plans and Sustainable Development Goals (SDGs).



Component 3: Project Management will oversee, supervise and monitoring the first two components.

Component 4: Contingency Emergency Response Component (CERC) was only added for Madagascar and Malawi given the high levels of vulnerability of these countries to shocks.

D.2 Overview of Borrower’s Institutional Capacity for Managing Environmental and Social Risks and Impacts

In Mozambique, the project will have two implementing agencies MEF (Ministerio de Economia e Finanças) and INE (Instituto Nacional de Estatística). Each implementing agency will be responsible for carrying out day-to-day activities, however INE, through its PIU, will handle the management off E&S aspect since MEF will be implementing only a small subcomponent Sub-component 2.3.2: Promoting data use by key stakeholders. The Mozambique PIU being established will have weak capacity in E&S risk management. As such there will be a strong need to strengthen capacity at country levels to ensure ESF requirements are met accordingly. At national level at least one E&S specialist will be recruited to support managing the project environmental and social impacts and risks in each participating country. A number of the NSOs have limited knowledge and little or no experience in managing environmental and social risk and implementing environmental and social measures in compliance with the World Bank’s ESF standards. Relevant capacity building on ESF will include Stakeholder Engagement, GBV/SEA/SH, GRM, Occupational and Community Health and Safety, Labor Management, e-Waste Management etc. for relevant staff and contractors.

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

A. Environmental and Social Risk Classification (ESRC)

Moderate

A.1 Environmental Risk Rating

Moderate

The environmental risk rating is considered 'Moderate' due to some potential adverse risks and impacts on the physical environment that are likely to be non significant, temporary, site-specific, reversible and easily mitigated. The project will not support major civil works or new construction although there may be some minor civil works during establishment of data and training centers and installation of some equipment and materials, such as upgraded IT systems. Under Component 1, the improvement of harmonization, quality, and dissemination of statistics will involve human resource development through workers capacity building workshops and trainings that could lead to transmission of communicable diseases. COVID-19 risk is expected to be minor since public institutions have been enforcing national protocols for prevention of the disease at workplace and cases have dropped worldwide. This measure will be reinforced through the use of World Bank guidelines such as “Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings” and its appropriate measures inclusion in the Project Operations Manual (POM). Under Component 2, minimal environmental risks are foreseen related to the ICT and statistical infrastructures, equipment and materials, such as the replacement or purchase of new ICT are not expected to exceed the minimal threshold for management of e-Waste management issues. However, a simple Code of Practices for e-Waste has been developed, approved by the Bank and disclosed. Civil works under this component are anticipated to be of minor and simple physical renovation therefore the risks and impacts (small quantities or level of dust, noise, vibration, waste, etc.) likely to arise are

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negligible, site specific, reversible and the Borrower can easily manage them. As such simple best practices procedures and national environmental legislation provisions will be included on the Project Operations Manual (POM) to assist the Borrower to address potential minor risks and impacts. The agricultural, enterprise and household surveys will involve contact with the public and associated risks of COVID-19 transmission. As such a COVID-19 Contingency Plan was developed and approved by the Bank. Under Component 3, Project Management, mainly technical assistance will be provided at (i) regional level with PIUs established at SADC secretariats (as part of the parent project - P175731) and at (ii) country level where INE will be the main implementing agencies of the project in Mozambique. At national level at least one E&S specialist will be recruited to support managing the project environmental and social impacts and risks. Component 1, 2 and 3 all include Technical Assistance activities such as training, seminars, summer-schools, conferences and workshops classified as Type-3 (capacity building) that have diffuse and induced impacts, often playing out over a longer term, however the Type-2 activities (policies, plans & strategies) including updating National Strategies for the Development of Statistics (NSDS), development of statistical regulations and review and amendment of laws have potential significant downstream E&S impacts. As such, under Type-2 TA activities, the TOR will be reviewed and approved by WB to ensure consistency with the ESF and the Project ESRC rating, and to ensure that it considers adequate assessment of environmental and social implications and that the advice provided through the TA for addressing those implications is consistent with the ESF. Additional health and safety risks may include traffic and road safety issues from project staff or enumerators traveling on poorly maintained rural roads. Travel to sites using project vehicles could also contribute to GHG emissions (due to absence of routine vehicle maintenance).

A.2 Social Risk Rating

Moderate

The Social Risk Rating is considered to be moderate. Project activities are expected to strengthen the regional statistical system of Mozambique through supporting the harmonization, production, dissemination, and use of quality controlled social and economic statistics for evidence-based policy making. However, achieving such outcomes may imply social risks and impacts. Potential adverse social risks and impacts that were identified during project preparation relate to ensuring that (i) any statistical guidelines and frameworks established under the project should include considerations of digital data protection and digital security; (ii) there is appropriate stakeholder engagement at the national level with all stakeholders, including civil society and marginalized groups, in a manner that is understandable and transparent and explains the benefits and impacts of the activities; (iii) labor conditions, including any HR restructuring activities, salary re-adjustments and skills needs assessments, as well as occupational health and safety (minor cuts and injuries, road safety for enumerators, etc. during work); (iv) ensuring that inclusion and data protection covers vulnerable and marginalized groups; and (v) possible risks of sexual exploitation and abuse and sexual harassment (SEA/SH) at the work place and during the roll out of surveys/censuses. Capacity of the PIU and respective implementing agencies to manage social risk is expected to be limited. However, as the nature of the proposed social risks are relatively low these risks and impacts should be manageable through known mitigation measures. Stakeholder identification and analysis will be of particular importance to ensure that there is appropriate stakeholder engagement at the national level with all stakeholders, including civil society and marginalized groups, on the collection and use of statistical data.

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

B.1 Relevance of Environmental and Social Standards



ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Relevant

Project activities are expected to strengthen the regional statistical system of participating countries through supporting the harmonization, production, dissemination, and use of quality controlled social and economic statistics for evidence-based policy making. However, achieving the above outcomes may imply environmental and social risks. Key adverse environmental and social risks and impacts relate to ensuring that (i) minor civil works and installation of ICT equipment are managed adequately considering mitigation hierarchy, particularly in relation to construction, waste generation and occupational health and safety issues; (ii) the replacement, transportation and disposal of old ITC equipment (e-waste) as well newly acquired equipment are undertaken properly; (iii) TA activities including face-to-face trainings, workshops and statistical survey follows prevention measure against COVID-19 or other communicable diseases; (iv) the Terms of Reference for TA type-2 activities (review or development of new policies, plans & strategies) will be reviewed and approved by WB to ensure consistency with the ESF; (v) any statistical guidelines and frameworks established under the project include considerations of digital data protection and digital security; (vi) there is appropriate stakeholder engagement at the regional and national level with all stakeholders, including civil society and marginalized groups, in a manner that is understandable and transparent and explains the benefits and impacts of the activities; (vii) labor conditions, especially with regards to HR restructuring activities, salary re-adjustments and skills needs assessments, as well as occupational health and safety (minor cuts and injuries, road safety, etc. during work); (viii) ensuring that inclusion and data protection covers vulnerable and marginalized groups; and (iv) possible risks of sexual exploitation and abuse and sexual harassment (SEA/SH) at the work place and during the roll out of surveys/censuses.

Capacity of the PIU to manage environmental and social risk is expected to be limited, however, as the nature of the proposed environmental and social risks are relatively low to moderate these risks and impacts should be manageable through known mitigation measures. Environment and Social Commitment Plans, Stakeholder Engagement Plans have been produced and disclosed. A Labor Management Procedures (LMPs) and Project Operational Manuals (POMs) will be developed before beginning project activities on the ground. The project also has prepared and disclosed draft Codes of Practices for e-Waste Management, and COVID-19 Contingency Plan.

ESS2 Labor and Working Conditions

Relevant

ESS 2 is relevant for the project activities. The Project will require the use of Direct Project Workers and Contracted Workers to undertake the TA to develop institutions and frameworks for the development and harmonization of data. This is likely to involve desk-based research, workshops and meeting with stakeholders. The program may engage consulting firms to support technical capacity building activities. The SADC statistics department and INE will prepare Labor Management Procedures (LMPs) proportionate to the activities, risks and impacts which provide detailed information on the work terms and conditions for their respective worker categories before commencement of activities. The Project is not expected to finance major physical infrastructure with civil works, however, there may be installation of IT equipment, upgrade of IT systems, establishment of data and training centers. As such, very minor waste management issues and occupational health and safety (OHS) risks are anticipated, and such simply best practices procedures and national environmental legislation provisions will be included on the POM. Although labor risks are expected to be minimal, including OHS, child labor and labor influx risks, the procedures will include codes of conduct acceptable to the Bank to mitigate the risk of Sexual Exploitation and Abuse / Sexual Harassment or misconduct in the LMP and the POM. The LMP will also ensure that national labor-related laws are upheld, such as public service act, labor law, and public service human resource policy and institutional roles related to enforcement

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of the laws, and recruitment, discipline, appraisals and dismissals. A grievance mechanism (GM) for work-related grievances will be provided to project workers including consultants and other contracted workers, with necessary considerations for confidentiality and whistle-blower protection. Where possible, this may build on existing GMs that are already in place. To mitigate risks of COVID-19 transmission during TA activities a draft Contingency Plan has been prepared for each country and will be finalized within 60 days of project effectiveness date. The Terms of Reference for TA type-2 activities (review or development of new policies, plans & strategies) will be reviewed and approved by WB during project implementation to ensure consistency with the ESS2.

ESS3 Resource Efficiency and Pollution Prevention and Management

Relevant

ESS 3 is relevant to the project activities. The proposed project activities may generate some adverse impacts from disposal and management of waste during the renovation works and pose non-significant public health concerns due to nuisance related to dust, vibration and noise emissions. Travel to sites using project vehicles could also contribute to GHG emissions (due to absence of routine vehicle maintenance). The POM will also include risk management procedures to manage with construction debris and hazardous or non-hazardous materials that may need to be disposed of. Additionally, the installation of ITC equipment may pose environmental risks related to safe final disposal of hazardous and electric and electronic equipment waste. The purchase of new ICT is not expected to exceed minimum thresholds for management of e-Waste management issues, as determined by international best practice. However, a simple draft Code of Practices for e-Waste has been prepared that will include procurement, usage, and disposal measures. All equipment and materials procured and deployed (e.g. computers, tablets, printers, tablets, phones) will follow resource efficiency standards. Where relevant, clean energy efficiency standards will be required in the procurement of the equipment/services and the monitoring of energy use will be promoted. It is not expected that the project will generate large amounts of GHG emission, however some emissions are expected from fuel engines of project vehicles and back-up generators. The Terms of Reference for TA type-2 activities (review or development of new policies, plans & strategies) will be reviewed and approved by WB during project implementation to ensure consistency with the ESS3.

ESS4 Community Health and Safety

Relevant

ESS 4 is considered relevant to project activities. The project will involve procurement and installation of IT infrastructure and minor office rehabilitation, however, these infrastructures are limited to survey equipment and only limited site-specific installations would be required. Risks to community health and safety have been identified as potential electronic waste management. Additional health and safety risks may include community exposure to infectious diseases, including COVID-19 from project workers carrying out surveys. There is also the risk of traffic and road safety issues from project staff or enumerators traveling on poorly maintained rural roads. There are and low risks of SEA/SH to communities and project workers given the nature of activities, mainly involving technical assistance and capacity building and limited engagement by project-financed enumerators who will be conducting surveys at national level. Nevertheless, the LMP will include measures such as codes of conduct (CoC) and awareness raising to further reduce the risk, and the PIU will prepare a series of SEA/SH prevention and response mitigation measures, including community awareness raising, mapping of SEA/SH service providers and referral paths, and ensuring SEA/SH-sensitive GMs. The workers' CoC to be developed under each LMP also includes safe/defensive driving and road awareness practices, as the potential numbers of enumerators utilizing the transport network may be quite significant at any one time. The project is not expected to induce labor influx. The Terms of Reference for TA type-2 activities (review or development of new policies, plans & strategies) will be reviewed and approved by WB during project implementation to ensure consistency with the ESS4.

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ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Not Currently Relevant

This standard is not currently relevant. Land acquisition, restrictions on land use and involuntary resettlement are not anticipated for the project.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

Not Currently Relevant

This standard is not currently relevant. No specific activities which could affect biodiversity are anticipated for the project.

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

Not Currently Relevant

This standard is currently not considered relevant as groups that meet the aspirations of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (IPs/SSAHUTLC) as defined by ESS7 are not present in the Participating countries (Comoros, Madagascar, Malawi, Mozambique, Zambia and Sao Tome and Principe).

ESS8 Cultural Heritage

Not Currently Relevant

This standard is not currently considered to be relevant as no major civil works are envisaged and there is no proposed use of intangible cultural heritage as part of the project.

ESS9 Financial Intermediaries

Not Currently Relevant

This standard is not relevant to this project as financial intermediaries will not be involved.

ESS10 Stakeholder Engagement and Information Disclosure

Relevant

The project will require inputs from different stakeholder groups. Preliminary groups that have been identified are include government departments and ministries and INE who will be the main beneficiaries of the TA and capacity building activities. In addition, academics (universities which may work on issues related to statistics and use of data); development partners; NGOs and CSOs at both the national and regional level addressing issues related to data protection, use of statistics etc., as well as organizations representing the rights of vulnerable and marginalized groups have all been identified. The Project PIUs within SADC and in Mozambique have developed and disclosed Stakeholder Engagement Plans by Appraisal (held in February, 2023) that will set out common approaches to stakeholder engagement that is envisioned across the participating countries, with some variation depending on country-specific stakeholders and schedules of activities. The scope and level of detail of the SEP was commensurate with the nature and scale, potential risks, and impacts of the project and the level of concern in the project area (Mozambique). Considering Covid-19 restrictions, the SEPs identify ways to ensure consultations are fit for purpose, effective and meaningful in order to meet Program and stakeholder needs in line with national regulations as well as WHO guidelines. COVID-19 measures shall include smaller meetings, to be conducted as appropriate taking full precautions with all stakeholders, one-on-one interviews through phones and online meetings platforms with stakeholders. The approaches taken will thereby ensure that information is meaningful, timely, and accessible to all affected stakeholders.



As part of the SEP, Mozambique and SADC will develop Grievance Mechanisms (GM) to be adopted and become operational prior to commencement of any activities. The GMs shall provide multiple avenues of access, a fair, transparent, and rapid decision-making process, as well as monitoring and reporting processes by the PIUs.

B.2 Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

B.3 Other Salient Features

Use of Borrower Framework No

The use of Borrower Framework is not currently being considered.

Use of Common Approach No

No use of common Approach is expected as there are no other agencies that will co-finance the Project

C. Overview of Required Environmental and Social Risk Management Activities

C.1 What Borrower environmental and social analyses, instruments, plans and/or frameworks are planned or required during implementation?

During the preparation and appraisal of the SADC Regional Statistics Project (P175731), Mozambique was initially included as a project participant with an allocation of US\$60 million. However, due to a shortage of IDA National Performance-Based Allocation (PBA) for Mozambique in FY23, a decision was made by management to incorporate Mozambique in FY24 through an Additional Financing (AF).

The proposed AF is part of an "active" regional integration Project which intends to strengthen the regional statistical system of SADC member countries, as well as Sao Tome and Principe, through supporting the harmonization, production, dissemination, and use of quality controlled social and economic statistics for evidence-based policy making. Participating countries include five SADC IDA countries, including Comoros, Madagascar, Malawi, Mozambique, Zambia, and one non-SADC state, Sao Tome and Principe. Activities will primarily be based in the SADC Secretariat in Botswana, and participating country National Statistical Offices, which conduct surveys that are national in scope.

The project’s exact intervention locations are not known at this stage and will be determined during project implementation. However, the project will have a national scope in Mozambique and other participating countries (Madagascar, Malawi, Comoros, Zambia and São Tomé and Príncipe) targeting both rural and urban settings through the agricultural, enterprise and household surveys.

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The project invests primarily in technical aspects to strengthen the institutional capacity INE to produce, disseminate and use quality statistics while increasing regional harmonization and collaboration. The physical footprint of the project and its activities mainly include project coordination activities in the SADC Secretariat in Gaborone and data collection and analysis at INE. No construction is anticipated for Mozambique. However, light renovation works will take place.

The Environment and Social Commitment Plans, and Stakeholder Engagement Plans have been produced and disclosed. The project also has prepared and disclosed draft Codes of Practices for e-Waste Management, and COVID-19 Contingency Plan. A Labor Management Procedures (LMPs) and Project Operational Manuals (POMs) will be developed before beginning project activities on the ground.

III. CONTACT POINTS

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V. APPROVAL

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Practice Manager (ENV/SOC)	Africa Eshogba Olojoba Cleared on 19-Oct-2023 at 11:00:14 EDT

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