INTEGRATED SAFEGUARDS DATA SHEET
APPRAISAL STAGE

Report No.: ISDSA2672

Date ISDS Prepared/Updated: 02-Apr-2013
Date ISDS Approved/Disclosed: 02-Apr-2013

I. BASIC INFORMATION

1. Basic Project Data

<table>
<thead>
<tr>
<th>Country:</th>
<th>Africa</th>
<th>Project ID:</th>
<th>P123093</th>
</tr>
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<tbody>
<tr>
<td>Project Name:</td>
<td>West Africa Regional Communications Infrastructure Project - APL 2 (P123093)</td>
<td></td>
<td></td>
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<tr>
<td>Task Team Leader:</td>
<td>Boutheina Guermazi</td>
<td></td>
<td></td>
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<tr>
<td>Estimated Appraisal Date:</td>
<td>18-Mar-2013</td>
<td>Estimated Board Date:</td>
<td>30-May-2013</td>
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<td>Managing Unit:</td>
<td>TWICT</td>
<td>Lending Instrument:</td>
<td>Adaptable Program Loan</td>
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<td>Sector:</td>
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<td>Theme:</td>
<td>Regulation and competition policy (40%), Regional integration (40%), Infrastructure services for private sector development (20%)</td>
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Financing (In USD Million)

<table>
<thead>
<tr>
<th>Total Project Cost:</th>
<th>88.40</th>
<th>Total Bank Financing:</th>
<th>60.00</th>
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<tbody>
<tr>
<td>Total Cofinancing:</td>
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<table>
<thead>
<tr>
<th>Financing Source</th>
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<tr>
<td>BORROWER/RECIPIENT</td>
<td>9.20</td>
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<tr>
<td>International Development Association (IDA)</td>
<td>60.00</td>
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<td>EC European Investment Bank</td>
<td>19.20</td>
</tr>
<tr>
<td>Total</td>
<td>88.40</td>
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Environmental Category: | B - Partial Assessment

Is this a Repeater project? | No

2. Project Objectives

The objectives of the project are to increase the geographical reach of broadband networks and to reduce costs of communications services in the territories of the Islamic Republic of Mauritania and in the Republic of Togo.

3. Project Description
Similarly to APL 1-A and APL 1-B, the proposed operation will have in each country three components as follows:

Component 1: Supporting connectivity,
Component 2: Creating an enabling environment for connectivity, and
Component 3: Project implementation.

WARCIP Mauritania

Component 1 Supporting connectivity will focus on: (a) building 4 fiber optic missing links (Link 1: 531km Nouakchott-Atar-Choum; Link 2: 723km Rosso-Boghe Kaedi-Selibaby-Kiffa; Link 3: 280km Aioun-Nema; Link 4 – 43km Selibaby towards Mali border) to provide redundancy connectivity for cross-border links towards ECOWAS - namely towards landlocked countries Mali, Niger and Burkina Faso - and towards North Africa (via the connection with Morocco) as well as dissemination of international connectivity to most provincial capitals contributing hereby to reducing the urban/rural divide in the sub-region and a IXP / Carrier hotel / Datacenter building ; (b) establishing a national and regional Internet Exchange Point (IXP ) in this IXP / carrier hotel / datacenter building. Missing links and IXPs shall be built and operated under a PPP and in accordance with open access principles. Economic and financial analysis has been conducted for the proposed investment as part of project preparation. Missing links and neutral carrier hotel are jointly-co-financed with EIB.

Component 2 Creating an enabling environment for connectivity will include the following activities, that have been identified taking due account of the strategic projects of the 2012-2016 Strategy for ICT and Modernization of Public Service: (i) Technical Assistance (TA) to implement Open Access Regime & PPP for national backbone including transaction/legal, regulatory and economic/financial support as well as supporting the drafting of the technical tender for backbone links and for IXP/ Datacenter; (ii) TA on key regulatory priorities (develop technical, financial, and operational conditions to access existing fibers; define fiber interconnection and sharing regulation tools; define Reference Offer for International Connectivity; develop cost models for interconnection (fixed and mobile) and for broadband wholesale offers including facility sharing and support in defining the relevant markets and approving the interconnection catalogue; set up an observatory of the telecoms/ICT sector) ; (iii) TA to set up an Internet Exchange Point (IXP) and to design a management policy for “.mr” domain name; (iv) TA on broadband stimulation strategies, including supporting ISPs creation, using universal access funds and costing and leveraging national postal operator Mauripost network, and associated action plan; (v) TA on a sector fiscal study; (vi) TA to develop institutional and operational capacities of MDEFPTN and other beneficiaries in policy and regulation, including training and (vii) Control/evaluation of backbone and Internet Xpoint and Carrierhotel/Datacenter building works.

Component 3 Project implementation will (i) finance environmental and social studies, including their implementation and/or the monitoring of their implementation, (ii) provide support needed to strengthen the capacity of GoM to implement WARCIP Mauritania, including setting up a Project Implementation Unit (PIU) located within the Line Ministry (see below), covering office equipment and some operating costs, trainings on Bank’s project cycle and procurement and FM guidelines of Bank funded projects, (iii) finance audits, monitoring and evaluation (M&E) including appropriate actions to support efficient data collection, and communication and (iv) provide project implementation contingencies.

WARCIP Togo

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Component 1- Supporting Connectivity- will have financing and support for 2 main activities: (i) establishing a carrier hotel and national / regional IXP where a bandwidth market and a national / regional hub for capacity could be established in order to improve terms of access to international capacity at lower costs, and (ii) Purchase of bulk international bandwidth capacity to ensure that international (and national) capacity is available to the country at the lowest cost and highest quality. WARCIP Togo will provide resources for the launch of a competitive tender to purchase high capacity bandwidth from neighboring coastal countries to be delivered at the carrier hotel. By doing so, Togo will benefit from similar conditions of access to connectivity (diversity of choice, low prices) as other countries in the ECOWAS region.

Component 2 - Creating an Enabling Environment for Connectivity will focus on (i) the transactional design and operating model for ownership and management of the carrier hotel using PPP and support for the competitive tender for the international bandwidth(ii) development of open access principles to create an enabling environment for improved connectivity, specifically through support to the regulator to develop regulatory instruments for open access to capacity and to ensure that the benefits of lower prices trickle down to end users on the retail level, (iii) policy and regulatory support to improve sectoral efficiency, including price regulation and market competition, in application of the new ICT policy and (iv) institutional strengthening to the Ministry, to the regulatory authority and to WACS SPV. A detailed list of activities is provided in Annex 2.

Component 3: Project Implementation, Communications and M&E will provide support needed to strengthen the capacity of the Government to implement the connectivity project, including setting up a Project Implementation Unit (PIU) located within the Line Ministry and covering office equipment, operating costs, trainings. The component will also cover the cost audits, communications, monitoring and evaluation (M&E), and environmental and social studies, including their implementation and/or the monitoring of their implementation as well as provide project implementation contingencies.

4. Project location and salient physical characteristics relevant to the safeguard analysis (if known)
For Mauritania and Togo, the exact sites and paths for civil works are not yet known. Some additional information to the exact paths of the missing links in the case of Mauritania and sites of neutral carrier hotels / national and regional IXPs in both countries could be known before the Board meeting, but likely not all the details will be available by then.

5. Environmental and Social Safeguards Specialists
Lucienne M. M'Baipor (AFTCS)
Rita Dambita (TWICT)
Paul-Jean Feno (AFTN1)

<table>
<thead>
<tr>
<th>Environmental Policies</th>
<th>Triggered?</th>
<th>Explanation (Optional)</th>
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<tbody>
<tr>
<td>Environmental Assessment OP/ BP 4.01</td>
<td>Yes</td>
<td>The operation includes physical investments such as missing links of national and regional backbones and neutral carrier hotels / national and regional IXPs. Because the exact nature and location of investments may not be determined up front, the Borrower has prepared an Environment</td>
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</table>
and Social Management Framework (ESMF) for Bank’s approval before appraisal stage. ESIAs/ESMPs will be prepared, consulted upon, and disclosed once sites and works are finalized.

<table>
<thead>
<tr>
<th>Issue</th>
<th>Approval</th>
<th>Notes</th>
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<tbody>
<tr>
<td>Natural Habitats OP/BP 4.04</td>
<td>Yes</td>
<td>The missing links shall be deployed alongside existing roads and the neutral carrier hotels / national and regional IXPs shall be established in the capital city. While the links are not expected to affect critical habitats, the ESMF process will assess the possibility and, where necessary, include mitigation measures for such impacts.</td>
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<tr>
<td>Forests OP/BP 4.36</td>
<td>No</td>
<td></td>
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<td>Pest Management OP 4.09</td>
<td>No</td>
<td></td>
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<tr>
<td>Physical Cultural Resources OP/BP 4.11</td>
<td>Yes</td>
<td>The missing links shall be deployed alongside existing roads and the neutral carrier hotels / national and regional IXPs shall be established in the capital city. While the civil works are not expected to affect physical cultural resources, the ESMF process will assess this possibility and include “chance finds” procedures for inclusion in the contractors’ contract.</td>
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<tr>
<td>Indigenous Peoples OP/BP 4.10</td>
<td>No</td>
<td></td>
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<tr>
<td>Involuntary Resettlement OP/BP 4.12</td>
<td>Yes</td>
<td>The missing links should be deployed alongside existing roads and the neutral carrier hotels / national and regional IXPs should be established in the capital city. While the civil works will most likely lead to some small land take and temporary disruptions, due diligence will be undertaken in each country. RPFs have been prepared, consulted upon, and disclosed. RAPs will be prepared, consulted upon, and disclosed as and when necessary during project implementation.</td>
</tr>
<tr>
<td>Safety of Dams OP/BP 4.37</td>
<td>No</td>
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<tr>
<td>Projects on International Waterways OP/BP 7.50</td>
<td>No</td>
<td></td>
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<tr>
<td>Projects in Disputed Areas OP/BP 7.60</td>
<td>No</td>
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II. Key Safeguard Policy Issues and Their Management

A. Summary of Key Safeguard Issues
1. Describe any safeguard issues and impacts associated with the Restructured project. Identify and describe any potential large scale, significant and/or irreversible impacts:

The terrestrial fiber optic links are expected to follow roads already in place and the IXP/Carrier Hotel/Datacenter to be built on an existing technical site. In the case of Togo a site will be defined for the carrier Hotel/Datacenter. The physical components of this project will mostly be limited to the building of the terrestrial fiber optic links and the IXP/Carrier Hotel/Datacenter. The risks associated with this kind of infrastructure are generally low.

From an environmental and social safeguard standpoint, the WARCIP Mauritania and WARCIP Togo projects are rated as a Category B. That is, the environmental and social impacts of the project, for the most part, are expected to be minimal, site-specific and manageable to an acceptable level. Therefore, the following Safeguards policies are triggered: OP/BP 4.01 (Environmental Assessment); OP/BP 4.04 (Natural Habitat), OP/BP 4.11 (Physical Cultural) and OP/BP 4.12 (Involuntary Resettlement). As the exact nature and location of investments may not be determined up front, the borrowers prepared and consulted upon an Environmental and Social Management Framework (ESMF) and a Resettlement Policy Framework (RPF).

Negative environmental and social impacts of the project will come mainly from the laying of the fiber in the case of Mauritania and building the carrier Hotel in the case of Togo (and excavation through human settlements, fields, forests, etc.) that could lead to: soil erosion (esp in dune areas); soil and water pollution; loss of vegetation (tree felling); the disruption of life (waste from work), of socio-economic activities and livelihoods located on the way (workshops, garages, shops, etc.); disturbance of traffic; noise; dust; risk of accident and the generation of waste; risks of land acquisitions, occupation of private land; possible destruction of crops (in the areas of Rosso, Boghé, Kaédí, Selibabi, Kiffa and Nema), but also the risk of vandalism and social frustration when local workforce is not used. The potential environmental and social impacts are likely to be small-scale and site-specific and thus easily remediable and reversible. The accurate estimate of the number of people who will be affected is not feasible at this stage of the study. However, in the case of Mauritania a rough estimate of 1,192 could be made according to the proposed RoW, which is yet to be finalized. Land requirements are estimated at 85 ha. The specific ESIA with the EMPS when the detailed technical studies are available will confirm the project impacts to the land acquisitions and the number of population affected by the project in compliance with the principles and procedures agreed within RPF. In the case of Togo the figure does not exist as the site is still not identified.

As the carrier Hotel in Mauritania will be built on an existing technical site, negative impacts for the IXP/Carrier Hotel/Datacenter should be limited to risks of accidents during the works and the works wastes.

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

n/a

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

n/a

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.

Because the exact nature and location of investments may not be determined up front, the borrowers prepared and consulted upon an Environmental and Social Management Framework
(ESMF) and a Resettlement Policy Framework (RPF). Once the final path for the carrier hotel in Togo and the terrestrial fiber foreseen alongside existing railway tracks and roads and the final location of the associated technical sites are chosen and the specific civil works identified, the Borrowers will prepare and consult upon an Environmental and Social Management Plan (ESMP) as well as a Resettlement Action Plan (RAP) or an Abbreviated RAP whichever will be appropriate. These safeguard documents will be prepared as part of project implementation but before the carrier Hotel is built and the terrestrial fiber optic link is laid.

The ESMF for Mauritania and ESMF for Togo outline: (i) Mitigation of impacts of the fiber laying and building the carrier hotel including environmental guidelines for contractors and guidelines applicable to health, safety and environment; (ii) Measures in case of archaeological discovery; (iii) Institutional strengthening measures (strengthening environmental expertise of the WARCIP PIU); (iv) Strengthening technical measures (provision for the implementation of environmental impact assessments; monitoring and evaluation of WARCIP); (v) Informing stakeholders involved in the implementation of the project and public awareness; (vi) A program of surveillance and monitoring; (vii) Institutional responsibilities for environmental monitoring; (viii) The institutional arrangements for implementing the ESMF; (ix) The recommendations for implementation; (x) The timing for the implementation of measures and the Costs of environmental and social measures.

The ESMF guides the preparation of safeguards instruments during sub-project preparation and implementation. It contains a simple of TORs for Environmental and Social Impacts Assessments (ESIA) and the screening guidelines to be used by the Environment and Social Focal Point of the project. Based on the outcomes of the screening process, the requirement to carry out an Environmental and Social Impact Assessment (ESIA) that includes an Environmental and Social Management Plan (ESMP) will be undertaken during project implementation in parallel with subproject technical feasibility studies. At the same time, prior to subproject appraisal, the implementing agency will agree to apply the following minimum standards during implementation: inclusion of standard Environmental Codes of Practice (ECOP) in the bid documents for the rehabilitation of IXP/Carrier Hotel/Datacenter.

The proposed operation mainly the terrestrial fiber optic links which follow roads already in place and the IXP/Carrier Hotel/Datacenter to be built on an existing technical site, is not expected to pose risks of damaging existing community cultural property. Nevertheless, proposed subprojects will be screened for their potential impacts on cultural property and chance find procedures will be applied and appropriate mitigation measures for both the identification and protection of cultural property. These measures will be included in standard bidding documents as part of the social and environmental clauses for consideration by the construction companies. While not damaging cultural property, subproject preparation may later identify and include assistance for preservation of historical or archeological sites. If these opportunities occur, cultural property management plans would be prepared for those subprojects. The ESMF has provided the systematic steps to be followed once these properties are discovered during project implementation.

The need for involuntary resettlement resulting from land acquisition in specific subproject areas
will only be known during project implementation when site-specific plans are available. The RPF includes guidance for preparing socio-economic surveys, a census of people and assets, and appropriate eligibility and entitlement frameworks. Therefore, subprojects will be screened for application of the resettlement policy and any subprojects involving involuntary resettlement or land acquisition will only be approved after preparation of a Resettlement Action Plan (RAP) acceptable to the Bank. Several issues will increase the complexity of land acquisition, including the lack of reliable land record systems and the inability of people losing land to either document ownership or be physically present to make eligibility claims. The safeguards framework will thus include procedures for identifying eligible project-affected individuals, calculating and delivering compensation, and determining mechanisms for land dispute grievance redress as well as mechanisms for adequately monitoring and evaluating the level of compliance.

For Mauritania The total cost of activities is estimated at US$1,190,000. Bank will finance US $800,000 and GoM US$390,000. For Togo it is estimated at US$ 406,000. The Bank funds will not finance land acquisition.

The supervision of safeguards implementation for WARCIP Mauritania will be done as part of the overall project implementation by the WARCIP PIU (on behalf of the National Connectivity Commission) in conjunction with the Line Ministry in charge of Environment and Sustainable Development. The technical expert within the WARCIP PIU will serve as an Environment and Social Safeguards Focal Point (Point Focal Environnement et Social (PFES) that will be in charge of coordinating the implementation, the monitoring (control and audit) of social and environmental aspects and be an interface between the project, local authorities and other stakeholders. He will be assisted by two external environmental and social experts. To ensure successful implementation of the project safeguard measures, capacity of the WARCIP PIU as well as of the Line Ministry MDEFPNT, the APAUS and of the Line Ministry in charge of Environment and Sustainable Development will be strengthened throughout the project. To ensure effective Bank supervision, the WARCIP PIU will prepare and update reports on the implementation of the safeguards instruments prepared under WARCIP Mauritania before Bank supervision missions. During and throughout the project supervision, the World Bank task team will assess the appropriate implementation of the environmental and social mitigation measures and subsequently recommend additional strengthening measures as needed.

In the case of Togo, WARCIP Togo PIU will be strengthened by hiring an environmental and social safeguards consultant (part time) who will work closely with Agence Nationale de la Gestion Environnementale (ANGE). This environmental and social focal point (SEFP) responsible for following up on safeguards concerns to ensure that all subprojects identified for operation financing have included consistent and coherent environmental and social measures and are responsible for applying the safeguard screening and mitigation requirements to each subproject.

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

**Mauritania**

Key stakeholders for consultation include current inhabitants (where applicable), Line Ministry in charge of Environment and Sustainable Development, the Line Ministry MDEFPNT, the APAUS, businesses and civil society. Stakeholders were interviewed in the project target areas during field visits made by the consultants working on the environmental and social safeguards. All the key actors, called to play a part in this process, have been consulted and informed. The potentially affected persons have been consulted as well.
In the case of Togo key stakeholders for consultations included elected local governments, operators including Togo Télécom, le DT de Moov and Togo cellulaire, in addition to Ministry of post and Telecom, Ministry of Environment and ANGE, in addition to businesses, civil society in the three potential sites for the carrier hotel (Afidényigba site, new Presidency site and Cacavelli site, all in the Capital city).

During the preparation of safeguard documents for the subprojects and their implementation, the PUI will consult project-affected groups and local nongovernmental organizations on all environmental and social aspects of the project and will take their views into account accordingly. The implementing agency will initiate these public consultations as early as possible and will provide all relevant material in a form and language(s) that are understandable and accessible to the groups being consulted in a timely manner prior to consultation. The ESMF and RPF have been disclosed in the countries, in Mauritania on March 12, 2013 and in Togo on March 20, 2013. Both documents have been also disclosed at the World Bank's Infoshop for Mauritania on March 08, 2013 and Togo on March 19, 2013.

### B. Disclosure Requirements

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<thead>
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<th>Environmental Assessment/Audit/Management Plan/Other</th>
<th>Was the document disclosed prior to appraisal?</th>
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<td>Date of receipt by the Bank</td>
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<tr>
<td></td>
<td>14-Jan-2013</td>
</tr>
<tr>
<td></td>
<td>For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors</td>
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<td>&quot;In country&quot; Disclosure</td>
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<td>Mauritania</td>
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<td>Comments:</td>
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<tr>
<td></td>
<td>Togo</td>
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<tr>
<td></td>
<td>Comments:</td>
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<tr>
<td>Resettlement Action Plan/Framework/Policy Process</td>
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<td>Comments:</td>
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<tr>
<td></td>
<td>Togo</td>
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<td></td>
<td>Comments:</td>
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</tbody>
</table>

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

If in-country disclosure of any of the above documents is not expected, please explain why:
### C. Compliance Monitoring Indicators at the Corporate Level

<table>
<thead>
<tr>
<th>OP/BP/GP 4.01 - Environment Assessment</th>
<th></th>
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<tbody>
<tr>
<td>Are the cost and the accountabilities for the EMP incorporated in the credit/loan?</td>
<td>Yes [✓] No [ ] NA [ ]</td>
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</table>

<table>
<thead>
<tr>
<th>OP/BP 4.04 - Natural Habitats</th>
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<tbody>
<tr>
<td>If the project would result in significant conversion or degradation of other (non-critical) natural habitats, does the project include mitigation measures acceptable to the Bank?</td>
<td>Yes [ ] No [✗] NA [ ]</td>
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</table>

<table>
<thead>
<tr>
<th>OP/BP 4.11 - Physical Cultural Resources</th>
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</thead>
<tbody>
<tr>
<td>Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?</td>
<td>Yes [✗] No [ ] NA [ ]</td>
</tr>
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</table>

<table>
<thead>
<tr>
<th>OP/BP 4.12 - Involuntary Resettlement</th>
<th></th>
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<tbody>
<tr>
<td>If yes, then did the Regional unit responsible for safeguards or Sector Manager review the plan?</td>
<td>Yes [✓] No [ ] NA [ ]</td>
</tr>
</tbody>
</table>

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

|  |
|-----------------------------|---|
| Have relevant safeguard policies documents been sent to the World Bank’s Infoshop? | Yes [✓] No [ ] NA [ ] |

|  |
|-----------------------------|---|
| 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 [✓] No [ ] NA [ ] |

#### All Safeguard Policies

|  |
|-----------------------------|---|
| Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies? | Yes [✓] No [ ] NA [ ] |

|  |
|-----------------------------|---|
| Have costs related to safeguard policy measures been included in the project cost? | Yes [✓] No [ ] NA [ ] |

|  |
|-----------------------------|---|
| Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies? | Yes [✓] No [ ] NA [ ] |

|  |
|-----------------------------|---|
| Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents? | Yes [✓] No [ ] NA [ ] |

### III. APPROVALS

<table>
<thead>
<tr>
<th>Task Team Leader:</th>
<th>Boutheina Guermazi</th>
<th></th>
</tr>
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</table>

**Approved By**

<table>
<thead>
<tr>
<th>Regional Safeguards Coordinator:</th>
<th>Name: Alexandra C. Bezeredi (RSA)</th>
<th>Date: 02-Apr-2013</th>
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<table>
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<tr>
<th>Sector Manager:</th>
<th>Name: Randeep Sudan (SM)</th>
<th>Date: 31-Mar-2013</th>
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