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

Appraisal Stage | Date Prepared/Updated: 10-Mar-2020 | Report No: PIDISDSA28109
BASIC INFORMATION

A. Basic Project Data

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<th>Country</th>
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<td>P171409</td>
<td>Development Response to Displacement Impacts Project in the Horn of Africa</td>
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Proposed Development Objective(s) Parent

The Project Development Objective (PDO) is to improve access to basic social services, expand economic opportunities, and enhance environmental management for communities hosting refugees in the target areas of Djibouti, Ethiopia and Uganda.

The proposed regional project will embed the essential features of ensuring citizen participation and engagement in identifying and prioritizing developmental needs, including socio-economic infrastructure and livelihood opportunities to improve self-reliance of refugee hosting communities; improving social cohesion between refugees and refugee hosting communities; increasing citizen voice and role in development decision making; and eliciting greater demand for social accountability. The operational approach will be Community Driven Development (CDD) and will involve: (i) building and capacitating grassroots institutions; (ii) ensuring the voice of all communities is heard in decision making; (iii) strengthening decentralized government administrative functions; and (iv) investing in public service delivery and social mobilization to enhance social cohesion among beneficiary communities.

Components

- Social and Economic Services and Infrastructure
- Sustainable Environmental and Natural Management
- Livelihoods Support Program
- Project Policy and Accountability systems support and Administration
- Regional Support for Coordination, Capacity and Knowledge
B. Introduction and Context

Introduction

1. **The aim of this project is to provide an Additional Financing (AF) in an amount of US$10 million equivalent, to the Development Response to Displacement Impacts Project in the Horn of Africa (DRDIP - P152822).** The proposed AF (P171409) is a credit in the amount of US$10 million. The original project, referred to as the DRDIP or ‘the parent project’ with an IDA Credit of US$20 million for Djibouti (Credit Number 5833-DJ), was approved by the World Bank Board on May 31, 2016, and became effective on September 29, 2016. The project’s original closing date is June 30, 2021. The Djibouti DRDIP is being implemented by the Djiboutian Social Development Agency (Agence Djiboutienne de Développement Social – ADDS).

2. **Djibouti has traditionally been a host country for refugee populations from neighboring countries.** Djibouti currently hosts 30,794 registered refugees and asylum-seekers, mostly from Ethiopia,
Eritrea, Somalia and Yemen (as of January 20, 2020). Most of the refugees are hosted in Ali-Addeh, and Holl Holl refugee camps in the Ali Sabieh region, and Markazi refugee camp in the Obock region. The influx of refugees has impacted local host communities, especially in rural areas, that face challenges related to weak service delivery and few socio-economic opportunities. The Government of Djibouti has however, maintained an open-door policy for refugees, a commitment to refugee protection for nearly four decades through legislative reforms, and embraced the Comprehensive Refugee Response Framework (CRRF).

3. The proposed AF is a development response to the protracted and new refugee flows to Djibouti, to mitigate increased competition for scarce social services, economic opportunities, and natural resources. The Project Development Objective (PDO) of the parent project is “to improve access to basic social services, expand economic opportunities, and enhance environmental management for communities hosting refugees in the target areas of Djibouti, Ethiopia and Uganda.” The proposed AF provides an opportunity to build on the gains made in the parent project to date in Djibouti and to further strengthen the design to adapt to the changing refugee and host community context in country. The parent project as well as AF address the impact of protracted presence of refugees in the Horn of Africa (HOA) region thus continuing to safeguard the asylum space for refugees in Djibouti. The project is closely aligned with both the World Bank Group Strategy for Fragility, Conflict and Violence 2020–2025 and the World Bank’s new Horn of Africa Initiative in their emphasis on social inclusion and building communities’ resilience as a key to mitigating the drivers of conflict.

4. The Additional Financing (AF) will have six components – the five components of the parent project and one additional component on Contingent Emergency Response. The five components of the regional operation implemented by the DRDIP countries and the Intergovernmental Authority on Development (IGAD) are focused on (a) improving social and economic services and infrastructure; (b) ensuring sustainable environmental management; (c) livelihoods support program; (d) project management and monitoring and evaluation; and (e) regional support for coordination, capacity and knowledge on forced displacement (implemented by IGAD and supported by DRDIP countries). The proposed AF will support an additional sixth component on Contingent Emergency Response to support Djibouti’s emergency preparedness and response capacity. The closing date for the AF will be December 31, 2023.

Country Context

5. Djibouti is a small, strategically located lower-middle-income country in the HOA with nearly one million inhabitants. Located at the southern entrance to the Red Sea, the country is adjacent to the Straits of Mandeb and the Suez-Aden waterway, through which 20 percent of global commerce transits. Its economy has been expanding at a remarkable pace with per capita gross domestic product (GDP) growing at more than 3 percent a year on average and real GDP at 6 percent.

6. Despite significant investments and remarkable economic growth, Djibouti ranks very low on human development, registering at 171 out of 189 countries and territories on the human development index in 2019. In 2018, an estimated 20.8 percent of Djiboutians were affected by extreme poverty and the country’s Gini index was at 42 in 2017 due largely to weak governance and lack of inclusive social and economic development. The most impoverished Djiboutian population is concentrated in the 13 most precarious urban areas of the capital city, with least access to basic services and highest exposure to natural hazards (mainly floods, fires and water scarcity). Climate change is also expected to exacerbate

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1 United Nations Development Program (UNDP), 2019.
the already critical water situation and place even more stress on the limited fresh water resources. Both the quantity and quality of fresh water resources in cities could be in danger.

7. **Women face particular disadvantages in accessing socio-economic services and economic opportunities, and additional burdens associated with low literacy and school enrollment and high economic inactivity.** Only 23 percent of women receive four or more antenatal care visits, and only 54 percent receive any form of postnatal care. Maternal mortality, although decreasing (from 517 per 100,000 live births in 1990 to 229 in 2016), is still markedly higher than the target of 129 of the Millennium Development Goals that was set for 2015. These indicators show the challenges that remain in improving access to and quality of obstetric and neonatal care. Girls are much less likely than boys to continue beyond primary school and the rural girls’ enrollment and primary completion rates are even lower. Female literacy stands at about 39.5 percent (compared to 60.1 percent for men) and drops to 22 percent outside the capital city. Children from poor households and rural areas are significantly less likely than better-off and urban children to be enrolled at any level of school. Unemployment remains widespread reaching 47 percent in 2017. Djibouti employs just about a quarter of its working age population (15 and older); this low employment rate is due to low labor force participation, especially by women which renders very vulnerable with higher unemployment, limited access to services and participation in decision-making, compared to men.

8. **Women also face difficulties in launching formal enterprises.** While women represent 39 percent of the active population in Djibouti, they typically run small and informal firms in lower value-added sectors, which offer smaller returns to creditors, thus impeding their access to finance. Some small-scale support programs, life skills training and entrepreneurship skills seem to be paying off, but these women entrepreneurs then face difficulties accessing finance and actually launching formal enterprises.

9. **Djibouti’s location in an arid desert climate zone poses high risks to its environmental sustainability and has driven important human migration towards Djibouti cities, in particular Djibouti ville.** The country ranks 159th out of 181 with respect to its vulnerability to climate change and its lack of readiness to address these vulnerabilities. Year-round high temperatures limited arable land, low rainfall, together with extended multi-annual droughts and a scarcity of ground water have adverse effects on livelihoods and agriculture production. Natural hazard risks also include intense flash floods which caused damages and losses; fires fueled by droughts and exacerbated by precarious construction materials; frequent earthquakes in magnitude from four to five on the Richter scale; volcanic activity along the Afar Rift area; and sea level rise with most of the population living in the coastal capital city. The recent prolonged drought in Djibouti and its neighboring countries has further spurred desertification and exposed at least 20 percent of the population in Djibouti Ville and 75 percent of rural households to food insecurity.

10. **Djibouti’s natural hazard vulnerability is aggravated by limited water resource management, insufficient land-use planning, and limited capacity to prevent and respond effectively to natural disasters.** High population growth rates (2%) and the high rate of per capita consumption of fresh water – due to temperature increases – could lead to chronic water scarcity. Today, it is estimated that about a

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2 Global Partnership for Financial Inclusion and the International Finance Corporation (IFC).
3 Djibouti experienced two disastrous flooding events in 1994 and 2004, with losses estimated at US$11.3 million in 2004 and more recently a major flooding event in late 2019. The latter has caused significant damage of housing ($16 million of estimated damage particularly in low-income neighborhoods); damage to health infrastructure and increase in waterborne and vector borne illnesses (estimated US$5 million for infrastructure reconstruction, restoration of services and emergency preparedness and risk reduction); and locust infestation.
quarter of one million people residing in Djibouti require direct assistance, including Djiboutian nationals\(^4\) living in extreme poverty, but also those that have been forcibly displaced internally and from neighboring countries. Women and children are disproportionately affected by climate change, especially as they possess fewer financial assets to recover from a shock (e.g. to rebuild their home) and tend to face less opportunities for employment. Children on the other hand, are affected disproportionally through, for example, a possible disruption of their education and as they are more susceptible to heat-related illness.

11. Against this background, protracted and new displacement has further exacerbated the situation of communities that host refugees with increased competition for scarce social services, economic opportunities, and natural resources. The forcibly displaced – both refugees and internally displaced persons (IDPs) are growing at a steady pace due to the prolonged drought in the region and conflicts in neighboring countries. As of January 2020, Djibouti hosted 30,794 registered refugees and asylum-seekers, mostly from Ethiopia, Eritrea, Somalia and Yemen.\(^5\) Most of the refugees are hosted in Ali-Addeh, and Holl Holl refugee camps in the Ali Sabieh region (an estimated 15,000 and 6,000, respectively), and Markazi refugee camp in the Obock region (more than 2,000). The influx of refugees puts even greater pressure on host communities, especially in rural areas that are already struggling with weak service delivery and few socio-economic opportunities. Across all the sites, the surrounding host population faces greater food insecurity and has limited access to basic social services and livelihood opportunities. The situation for displaced women and girls is particularly difficult. Women and girls are disproportionately exposed to economic and social vulnerabilities and face multiple challenges associated with poorer health, lower education and labor market outcomes compared to refugee men. For example, men are roughly two-thirds more likely to be working than women and are paid 24 percent more. Refugee women, on the other hand, are more likely to be employed in the informal economy.

12. The departure points around the Obock areas of Djibouti have become the locus for mixed migration flows of individuals attempting to reach Yemen. While the crisis in Yemen had initially caused the return of foreign nationals from there into Djibouti, the onward flows have resumed in the recent with migrants form the HOA passing through Djibouti with the hope to reach Saudi Arabia. Along with the internally displaced and unregistered refugees, migrants are largely settled in Djibouti’s towns and cities, especially Djibouti ville and the surrounding Balbala settlements though the exact numbers are unknown.

Sectoral and Institutional Context

Policy and Institutional Environment for Refugees

13. Djibouti has traditionally been a host country for populations from neighboring countries. As stated above and as of January 2020, Djibouti hosts 30,794 registered refugees and asylum-seekers, mostly from Somalia (12 827), Ethiopia (10 519), Yemen (4 916), Eritrea (884), and others (68).\(^6\) Djibouti is a signatory to (i) the 1951 United Nations Convention relating to the Status of Refugees (1951 Convention) and the 1967 Protocol; and (ii) the 1969 Organization of African Unity (OAU) Convention Governing Specific Aspects of Refugee Problems in Africa (1969 OAU Convention). Djibouti’s National

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\(^4\) The definition of “nationals” includes communities that host refugees and also other nationals within the target areas that can also benefit from project activities.


\(^6\) UNHCR/ONARS, January 2020.
Refugee Law (January 2017) ensures a favorable protection environment and paves the way for the socio-economic integration of refugees and asylum-seekers in the country.\(^7\)

14. **The Government of Djibouti has maintained an open-door policy for refugees and has shown a commitment to providing adequate protection to refugees over the past four decades.** The Djibouti government has been providing refugee protection through legislative reforms and has embraced the CRRF - a United Nations initiative that aims to safeguard the wellbeing of host communities and refugees. In 2017, a new National Refugee Law came into force and decrees were enacted that ensure the integration of refugees into national systems such as health, education and the labor market. The law ensures the protection environment for refugees and enables them to enjoy fundamental rights, including access to health and education services, socio-economic inclusion through employment and naturalization. The Ministry of Interior, through the National Office for Assistance to Refugees and Disasters (ONARS), with support from the United Nations High Commissioner for Refugees (UNHCR), is responsible for the implementation of the National Action Plan, in collaboration with all relevant ministries and national agencies. The Government is keen to ensure that international support is not limited to refugees registered by UNHCR but also helps to manage broader migration issues, including those issues facing undocumented economic migrants.

15. **The DRDIP demonstrates a practical application of the Comprehensive Refugee Response Framework.** The project is directly implementing the first two of CRRF’s four objectives and by focusing on host communities and easing pressures on Djibouti’s service delivery systems and enhancing host communities’ self-reliance. As a government-led project with a whole of society-approach, the proposed AF is implementing the CRRF as it aligns with existing structures, utilizes existing local systems, and builds the capacity of local governments and communities. The World Bank has determined in consultation with UNHCR that Djibouti adheres to a framework for the protection of refugees and that the Government of Djibouti has articulated a strategic approach to move towards long-term solutions that benefit refugees and host communities. Against this background, the proposed AF also contributes to further strengthening the Government of Djibouti’s protection framework and strategic approach to long-term solutions that benefit refugees and host communities, through its focus on integrated investments in the social and economic infrastructure and improved natural resource management in refugee hosting areas, and regional learning and knowledge sharing on forced displacement.

16. **The proposed AF is also fully aligned with the objectives and expected results of the National Action Plan (2017-2022) which was prepared by the Government of Djibouti, with the support from the United Nations, to ensure the effective implementation of the law.** More precisely, through multi-sector investments in refugee hosting areas, the AF will contribute to the Plan’s objectives 1 (Support and protect asylum), 2 (Autonomy and access to services for refugees and host communities), and 4 (Support host country through international development and shared responsibilities).

\(^7\) In December 2019, the Government of Djibouti issued five pledges during the Global Refugee Forum: 1) Integrating refugees into the national development plan as part of Vision 2035; 2) Strengthen the value of teachers through a certification training scheme and national budget support; 3) Provide refugees with technical and vocational training for better socio-economic inclusion; 4) Investing more health in technical platforms to strengthen health facilities in refugee-hosting areas for better service at all levels (1, 2 and 3); 5) Gradually include 12,500 refugees in the universal health insurance program by 2021.
Relationship with Country Partnership Framework and other strategies

17. The proposed AF like the parent project, is in strong alignment with Djibouti’s development strategies and plans. The project is fully aligned with the Systematic Country Diagnostic (SCD) – report no. 134321-DJ (2018-2023). The project will contribute to setting Djibouti’s economic transformation into motion by contributing to the (a) enabling environment for business and investment; and (b) human capital and workforce skills. It is also aligned with the (a) Country Partnership Strategy (CPS) for FY14-17 report no. 83874-DJ, in particular its first pillar on “reducing vulnerability”, including through enhancing basic infrastructure services, strengthening institutions and promoting social development in disadvantaged areas; and the (b) forthcoming Country Partnership Framework (CPF) for FY20-FY25. The AF also contributes to the implementation of the World Bank Group’s Middle East and North Africa Strategy, particularly its pillars on renewing the social contract (by improving the quality of service delivery for poor and marginalized groups and hence building trust between citizens and local/national authorities) and resilience to IDP/refugee shocks. In addition, the project remains relevant to contributing towards reducing extreme poverty and boosting shared prosperity in Djibouti through its investments in basic services related to education, health and water that will enable access and benefits especially for women and girls, and support for livelihoods and income opportunities for women and youth.

18. The project will continue to create synergies with other World Bank projects and building strategic partnerships. There are other IDA projects providing support to some sectors in refugee-hosting regions. In particular, the proposed AF will create synergies, where possible, with the Sustainable Electrification Program, the Integrated Slum Upgrading Project, the Cash Transfer and Human Capital Project, the Expanding Opportunities for Learning Project, the Improving Health Sector Performance Project and the Towards Zero Stunting in Djibouti Project. In addition, the project will continue to build strategic partnerships with key actors, such as the International Organization for Migration (IOM), UNHCR and UNDP. To date, partnership activities have included data sharing, joint missions and a joint study with UNHCR and IOM. The partnership with UNDP has focused on climate resilient livelihood opportunities and urban agriculture.

19. The project is also aligned with the World Bank Group Strategy for Fragility, Conflict and Violence 2020–2025 (WBG FCV Strategy) and the World Bank’s new Horn of Africa Initiative, amongst others. The WBG FCV Strategy emphasizes inclusion as a key value to mitigate the drivers of conflict. The proposed AF and the parent project contribute to the social, economic and infrastructural inclusion of hitherto underserved host communities in the developmental process by mitigating the impacts of the protracted presence and new inflows of refugees. In also supporting refugee communities access basic health and education services under the parent project, and energy and water services under the proposed AF, the project as a whole is an example of operationalizing the FCV strategy on the ground. It contributes to preventing conflict among refugees and hosts, supporting fragile refugee-hosting regions in Djibouti transition out of fragility, and mitigating the spillover effects of conflict at the regional HOA level. In particular, the area-based spatial approach adopted by the DRDIP not only in Djibouti but across the HOA is consistent with the WBG’s FCV strategy in taking a spatial approach in addressing fragility at the community, subnational, and regional levels and in tackling regional forced displacement challenges. The proposed AF and the parent project are both consistent with the World Bank’s new Horn of Africa Initiative and its two pillars on addressing resilience and climate change, including building resilience to climatic shocks, and the fourth pillar on the development of human capital.

20. The project is also aligned with the government’s Vision 2035. This government-driven long-term strategy to build the country’s future is based on five core pillars: (i) Peace and national unity:
Strengthening unity, peace and solidarity; (ii) Good governance: Reinforcing good governance and democracy; (iii) A diversified economy: Promoting competitive and healthy economic growth; (iv) Investing in human capital: Building a hardworking, healthy and educated workforce; and (v) Regional integration: Increasing trade and commerce with regional partners. The project will contribute to all its pillars and in particular the pillars 1, 3 and 4.

C. Proposed Development Objective(s)

Original PDO

21. **The Project Development Objective (PDO)** is to improve access to basic social services, expand economic opportunities, and enhance environmental management for communities hosting refugees in the target areas of Djibouti, Ethiopia and Uganda.

22. The proposed regional project will embed the essential features of ensuring citizen participation and engagement in identifying and prioritizing developmental needs, including socio-economic infrastructure and livelihood opportunities to improve self-reliance of refugee hosting communities; improving social cohesion between refugees and refugee hosting communities; increasing citizen voice and role in development decision making; and eliciting greater demand for social accountability. The operational approach will be Community Driven Development (CDD) and will involve: (i) building and capacitating grassroots institutions; (ii) ensuring the voice of all communities is heard in decision making; (iii) strengthening decentralized government administrative functions; and (iv) investing in public service delivery and social mobilization to enhance social cohesion among beneficiary communities.

Current PDO

23. **The PDO will remain the same.** It is therefore “to improve access to basic social services, expand economic opportunities, and enhance environmental management for communities hosting refugees in the target areas of Djibouti, Ethiopia and Uganda”.

Key Results

24. **The key results indicators will also remain the same.** The following key indicators will continue to be used to track progress toward the PDO:

   i. Beneficiaries with access to social and economic services and infrastructure (disaggregated by type of service and target group)
   ii. Direct project beneficiaries (number)
   iii. Female beneficiaries (percentage)
   iv. Beneficiaries of economic development activities that report an increase in income (disaggregated by type of service, gender, and target group)
   v. Land area where sustainable land management practices have been adopted as a result of the project (hectare)
   vi. Strategy for the Regional Secretariat and annual progress reports endorsed by participating countries

D. Project Description

25. **The AF will continue to support the implementation of the Djibouti DRDIP in the target refugee-hosting regions of Ali Sabieh and Obock that have experienced negative impacts due to protracted**
refugee presence (including high natural resource degradation). The project will also continue to support an area-based planning approach that will enable communities especially women and youth to identify and prioritize investments that specifically focus on their needs along with female-headed households that are disproportionately affected by displacement and by land degradation practices and climate change effects. While host communities are the main focus of the project, the project’s holistic approach ensures that refugees, besides host communities, will benefit from its investments in socioeconomic infrastructure and environmental amelioration; thus, also contributing to mitigate latent and potential conflicts caused by increased competition. However, refugees are not targeted under the livelihood program that component 3 supports. All project investments are in host community areas which are accessed by refugees and their design has taken into consideration the needs of both host and refugee communities.

26. The proposed AF supports three interlinked investments components and the synergies between these components are designed to amplify impacts. For instance, market, storage, and access roads created under Component 1 will enhance economic opportunities supported under Component 3. Soil and water conservation efforts under Component 2 will support enhanced productivity of traditional livelihoods supported under Component 3. Improved access to energy and efficient devices under Component 2 will provide women the opportunity to participate in economic opportunities under Component 3 with time saved and improved physical and mental well-being. In addition, all activities have been aligned and agreed with the different ministerial departments and only activities where maintenance can be assured after the project intervention are financed. Component 5 further amplifies impacts by supporting knowledge and experience sharing among the participating countries.

27. The key proposed changes from the parent project is a scale-up of existing components and activities, and the inclusion of a CERC. The proposed AF will continue to support the parent project activities and deepen investments in target areas, in particular through improved access to water and energy and targeted LED interventions. This AF provides an opportunity to build on the gains made in the parent project to date and to further strengthen the design. The project will also continue to address impacts of climate change on host communities and refugees in the target areas. The components are the following:

Component 1: Social and Economic Services and Infrastructure (US$6.0 million equivalent)

28. This component provides investment funds to expand and improve service delivery and build infrastructure for local development. It has two subcomponents:

- **Subcomponent 1.1: Community Investment Fund** (US$5.9 million) will continue to support communities’ access to basic social services and economic infrastructure by providing investment funds that expand and improve service delivery and build infrastructure for local development. Investments are identified, prioritized, implemented, and monitored by beneficiary communities, with a particular focus on the participation of women and their role in all these processes of decision-making and management. Infrastructure supported under this component includes the construction, upgrading, rehabilitation, and/or expansion of basic social services, such as education, water supply, health, and economic infrastructure such as rural roads, market and community buildings. Facilities that are currently operational with staff and basic infrastructure and have operational budget provided by their respective administration, are supported under the project to ensure functionality and sustainability of the interventions. Local governments are responsible for operation and maintenance of these sub-
The activities that the AF will potentially support include:

- **Subcomponent 1.2: Strengthening Local Planning and Decentralized Service Delivery (US$0.1 million)** will continue to focus on improving implementation efficiency of local government units and implementing agency staff in participatory planning processes (including government adaptation capacities to increased climate change vulnerability), mobilizing communities and establishing community institutions for planning, implementation, M&E and oversight of subprojects.

29. Regarding climate change considerations, this component will support the development of infrastructure for economic development and social services in areas that are subject to climate variability. The project will therefore, ensure that the design and construction of these community infrastructure integrate climate change considerations. The design of schools and health will ensure options for greater natural light and therefore be energy efficient. The water pipeline to be constructed will use gravity flow and where required will use solar panels and hybrid systems to reduce dependence on diesel. Seasonal floods and landslides are witnessed in the project areas and measures to mitigate impact of these in the construction of the infrastructure will be ensured incorporating critical design elements.

**Component 2: Sustainable Environmental Management (US$2 million equivalent)**

30. This component supports (a) a comprehensive package of the demand-driven soil and water conservation and management practices and interventions to rehabilitate degraded lands, and (b) alternate energy sources. It has two subcomponents:

- **Subcomponent 2.1: Integrated Natural Resources Management (US$1.7 million)** will continue to support rehabilitation of degraded areas, using both natural and assisted regeneration and agroforestry systems. The soil and water conservation activities financed under this subcomponent will allow for increased groundwater recharge to support source sustainability for drinking water and micro-irrigation and to maintain soil fertility. New activities that will be added through this AF include greening solutions including planting of trees/afforestation, climate smart agriculture technical assistance, and landscape management in project areas and around infrastructure investments.

- **Subcomponent 2.2: Access to Energy (US$0.3 million)** will continue to support the enhancement of energy efficiency through improved efficiency of woodfire-dependent livelihoods (e.g. through improved cookstoves) and access to alternate energy sources such as solar energy for lighting and water pumping. The AF will in particular support the extension of the solar power plant in Ali Addeh.  

25. Regarding climate change considerations and as outlined above, this component will support environmental management including soil and water conservation, and afforestation activities. The choice of interventions and the location of soil and water conservation activities and greening activities will be informed by local knowledge on climate change risks based on community consultations. The design of

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8 The AF will cover the additional costs that are needed for reaching a wider geographical area as planned under the parent project.
the specific physical interventions as well as the species selection for the biological interventions, will take into consideration climate change risks and necessary adaptions. These intervention considerations are critical especially in project areas which are highly degraded. The rehabilitation of these areas would greatly reduce soil and water erosion as well as increased infiltration of water, potentially improving soil moisture supporting biomass production including fruits and vegetables for local consumption.

**Component 3: Livelihoods Program (US$1.0 million equivalent)**

31. This component supports the development and expansion of traditional and non-traditional livelihoods of the beneficiary households to increase income-earning opportunities and adaptation capacities to the increased impacts of climate change. Through the AF, this component will support the government’s aim to promote LED by supporting women and youth groups to pursue higher level livelihoods through value chains, territorial planning considering natural assets, and linking with economic infrastructure. The component will build on and deepen higher order economic activities in both farm and non-farm sectors including climate-smart agriculture and value chain development, and enterprise and skills development. It will also support the development of cluster level local economic development plans to engage collectives to leverage the value chain in select sub-sectors in the target regions. Component 3 will continue to have two subcomponents:

- **Subcomponent 3.1: Support to Traditional and Nontraditional Livelihoods** (US$0.6 million) will continue to support the production and productivity of agriculture (crops and livestock), pastoralism (livestock), agro-pastoralism (crop and livestock), silvo-pastoralist systems and fisheries, and the commercialization of livelihood activities for improved incomes, employment, and self-reliance. The activities under this sub-component focus on women and youth livelihood groups.\(^9\) Given that handicrafts, fisheries, and agriculture have been identified as growth sectors that are socially inclusive, can contribute to regional development and afford many job opportunities for women and youth, the project has a particular focus on these sectors. In addition, targeted LED interventions will support women and youth groups to improved livelihoods through value chains, territorial planning, and linking with economic infrastructure.

- **Subcomponent 3.2: Capacity Support of Community-Based Organizations for Livelihoods** (US$0.4 million) will continue to (a) support identification of beneficiaries and the traditional and non-traditional livelihoods to support; (b) create community livelihoods groups and support group management activities; and (c) provide individuals and groups with necessary technical, business, market, and financial advisory services for pursuing livelihood opportunities. A particular focus will be given to women-led community-based organizations as was the case under the parent project. Through this AF, additional capacity-building activities for producer groups with particular attention to the sectors of fishery, handicraft, and agriculture in the Ali Sabieh and Obock Region will be added to this sub-component. Technical assistance on climate smart agriculture, fishery techniques and nature-based solutions will also be provided to livelihood groups.

32. Agriculture, livestock and fishery livelihoods that will be supported through this component are likely to be affected by climate trends. Support for resilient crops and cultivation practices will therefore

\(^9\) While the project indicators in the results framework for this regional project do not include a target of female beneficiaries of livelihood support activities, the number of this has been measured on a regular basis in the parent project and will continue to be measured in the AF. So far, the number of female beneficiaries has always surpassed 50 percent and the Djibouti’s target is to continue having at least 50 percent of women benefitting from Component 3 activities.
be promoted and the choice of livestock will also be based on climate change considerations. Fish processing related livelihood activities will include the promotion of healthier sea-escapes and be supported with energy-efficient methods including solar energy for refrigeration and drying.

Component 4: Project Management, M&E and Knowledge Sharing (US$1 million equivalent)

33. This component supports enhanced and effective project management, coordination, communications and the project’s M&E system. It also supports the establishment and/or strengthening of institutions at multiple levels with different roles and responsibilities, including oversight, coordination, and technical bodies. This component will also finance studies as needed and when related to the project, such as, for example, (a) a study on the socio-economic infrastructure, sustainable environmental management and livelihood needs of the displaced in the Damerdjog area; and (b) a detailed study on possible mangrove development interventions in the Obock region for coastal resilience management.

Component 5: Regional Support for Coordination, Capacity and Knowledge

34. This regional component is implemented by the Intergovernmental Authority on Development (IGAD) with an objective to support the establishment of the Regional Secretariat on Forced Displacement and Mixed Migration, primarily for the HOA. The Secretariat: (i) spearheads the advancement of the development approach to displacement in the HOA; (ii) facilitates knowledge creation in partnership with relevant think tanks and/or universities in the four project countries of Djibouti, Ethiopia, Kenya and Uganda and the HOA; emerging from the implementation of the DRDIP with respect to development solutions to forced displacement; (iii) ensures annual learning and sharing workshops for all the HOA countries; and (iv) contributes to a better understanding of the nexus between socioeconomic development, forced displacement, and mixed migration in the HOA by commissioning studies and/or focused research.

Component 6: Contingent Emergency Response Component (CERC) (US$0.0)

35. This zero-budget component establishes a disaster contingency fund that could be triggered in the event of a natural or man-made disaster (including health emergencies) through formal declaration of a national emergency, or upon a formal request from the government. In the event of such a disaster, funds from other project components could be re-allocated to finance emergency response expenditures to meet emergency needs. The proposed CERC will thus enable the project to respond to natural and climate related disasters, with due consideration to climate change considerations in the design and construction of infrastructure rehabilitated or constructed in response. In order to ensure the proper implementation of this component, the borrower shall prepare and furnish to IDA an updated operations manual that describes in detail the implementation arrangements for the Emergency Response Mechanism.

E. Implementation

Institutional and Implementation Arrangements

36. **Lead ministries and project implementation unit.** The lead ministries for Djibouti will remain the same. These are the Ministry of Economy and Finance (coordination) and the Ministry of Social Affairs and Solidarity (technical). The national project implementation team that has been set-up within ADDS in

---

10 Though no additional financing will be provided to this component through the proposed AF. Component 5 is part of the parent project and will continue to play an important role both in the parent project as well as this AF.
Djibouti will continue to be responsible for managing the project at the national level, including financial, procurement, and environment and social safeguards management as well as M&E in accordance with World Bank guidelines and procedures; and producing national progress reports on the project. In addition, regional and local-level project implementation teams have been established and will continue to operate.

37. **Steering Committees.** Steering and technical committees have been established at the national and regional levels and will continue their respective roles and activities (oversight, guidance, coordination, etc.) under this AF. The national steering committee (NSC) is led by the Secretary General of the Ministry of Economy and Finance and is composed of General Secretaries of the Ministry of Interior; Ministry of Agriculture; Ministry of Health; Ministry of Housing, Urbanism, and Environment; Ministry of Education and Vocational Training; and Ministry of Social Affairs and Solidarity. It also includes presidents of the Regional Council of Obock and Ali-Sabieh, the director of external financing, the director of housing funds, and the director general of ADDS. ONARS is represented in the project’s NSC through the Ministry of Interior. The NSC will continue to provide overall strategic guidance, reinforce intersectoral coordination, and oversee project implementation. It will continue to play a crucial role in coordinating the project’s multisectoral activities. ADDS will also continue to act as the steering committee secretariat. The DRDIP Regional Project Steering Committee in IGAD will continue to support regular meetings across DRDIP country representatives, and provide strategic guidance and oversight regarding project management, coordination and implementation at a regional level.

38. **Other implementation arrangements.** The institutional, financial management, disbursement, procurement, safeguards, and monitoring and evaluation arrangements will also remain the same.

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

For Djibouti, the proposed AF will scale-up ongoing project activities to support the underserved communities in the same project target regions of Ali Sabieh (Ali Addeh and Holl Holl) and Obock Region (Obock Town and surroundings) of the parent project. The CERC activities will cover the entire territory of Djibouti.

**G. Environmental and Social Safeguards Specialists on the Team**

Eloise Sophie Fluet, Social Specialist  
Mohamed Adnene Bezzaouia, Environmental Specialist
## SAFEGUARD POLICIES THAT MIGHT APPLY

<table>
<thead>
<tr>
<th>Safeguard Policies</th>
<th>Triggered?</th>
<th>Explanation (Optional)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental Assessment OP/BP 4.01</td>
<td>Yes</td>
<td>OP 4.01 is triggered for the original project for Ethiopia, Djibouti and Uganda. For Djibouti, the proposed AF will scale-up ongoing project activities to support the underserved communities in the project target regions of Ali Sabieh and Obock. Some of the local-level investment activities under Component 1, 2 and 3, as well as activities that could be added through the CERC component may have limited adverse environmental and social risks and impacts. The ESMF prepared for the parent project for Djibouti has been updated to take in account the scale up of ongoing activities in target regions of Ali Sabieh and Obock and to provide additional funding for meeting the enhanced needs. The ESMF would be used to develop a site-specific Environmental Management Plan prior to the commencement of activities mainly under Components 1, 2, and 3. The ESMF includes standard methods and procedures, along with appropriate institutional arrangements for screening and reviewing program activities and monitoring the implementation of mitigation measures to prevent adverse and cumulative impacts. The ESMF includes a negative list of activities not to be funded under the project. For the Component 6 related to CERC activities, The updated ESMF includes a positive list of activities that can be funded under this component. The updated instrument also includes generic measures such as clauses sanctioning GBV and sexual exploitation of children, and awareness raising among workers and communities. The updated ESMF has been consulted in Djibouti in Ali Sabieh and Obock regions and disclosed in country and WB external websites on April 1, 2020.</td>
</tr>
<tr>
<td>Performance Standards for Private Sector Activities OP/BP 4.03</td>
<td>No</td>
<td>n/a</td>
</tr>
</tbody>
</table>
| Natural Habitats OP/BP 4.04                             | Yes        | Project activities in Ethiopia and Uganda are not likely to encompass natural habitats in the original project. However in Djibouti, the Ali Sabieh Region is home to unique biodiversity, especially the “Aire naturelle
The World Bank
Development Response to Displacement Impacts Project in the Horn of Africa (P171409)

<table>
<thead>
<tr>
<th>Policy Area</th>
<th>Triggered?</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Terrestre protege d’Assamo” which is natural habitat to the Beira antelope. No project activities will be supported in this protected area. The project will also not support any activities which are likely to indirectly affect the ecosystem critical for the survival of this species. The ESMF will screen out any activities that could have indirect or cumulative impacts on this habitat. This policy is triggered because the AF in Djibouti may fund a detailed study on possible mangrove development interventions in the Obock region.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>OP 4.36 Forests</td>
<td>Yes</td>
<td>OP 4.36 is triggered for the original project. For Djibouti, Activities under Component 2 are likely to have a positive impact on forests with the implementation of physical and biological measures for soil and water conservation and afforestation. The ESMF provides detailed procedures to screen program activities/sub-projects for potential adverse environmental and social impacts, and to take measures to avoid, minimize and mitigate impacts on forests. Project activities in Djibouti are not likely to take place in protected forest areas. The updated ESMF screen out in a negative list any activities that could have, direct indirect or cumulative impacts on this habitat.</td>
</tr>
<tr>
<td>OP 4.09 Pest Management</td>
<td>Yes</td>
<td>The Project will support activities under Component 3 which are likely to be agriculture based and may increase the application of agrochemicals (insecticides, herbicides, fertilizers, etc.). Therefore, the ESMF includes a guideline for an Integrated Pest Management (IPM) to address related environmental and social impacts of the project. This is applicable to the AF in Djibouti. The updated ESMF has a negative list which lists any activities related to the purchase of agrochemicals.</td>
</tr>
<tr>
<td>OP/BP 4.11 Physical Cultural Resources</td>
<td>Yes</td>
<td>The Project sites and their potential cultural and historical significance are not known. The ESMF includes provisions and a set of procedures to screen project activities for such impacts and to deal with chance finds. This is applicable to the AF in Djibouti.</td>
</tr>
<tr>
<td>OP/BP 4.10 Indigenous Peoples</td>
<td>No</td>
<td>The policy was triggered for Ethiopia in the original project. However for the AF in Djibouti, the policy is not triggered since there are no IPs in the project areas.</td>
</tr>
</tbody>
</table>
### Involuntary Resettlement OP/BP 4.12

| Yes |

In all the three countries, the project has not planned to undertake any activities that will physically relocate people. However, as the project supports small-scale infrastructure that might affect land holdings of individual farmers or non primary structures, the project has prepared and consulted upon resettlement policy frameworks for all three countries as a precautionary measure. This triggered policy is also applicable for the AF in Djibouti and the original RPF has been revised, consulted upon and disclosed.

### Safety of Dams OP/BP 4.37

| Yes |

This policy was triggered under the parent project as it was believed that Component 2 might support small dam construction (less than 4.5 meters) as part of small and micro scale irrigation schemes. However, this is not applicable to the AF in Djibouti.

### Projects on International Waterways OP/BP 7.50

| Yes |

This policy has been triggered for the parent project for Ethiopia and Uganda. The AF in Djibouti will not fund any small-scale irrigation investments or use international waterways.

### Projects in Disputed Areas OP/BP 7.60

| No | n/a |


### 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:

**ON THE REGIONAL PROJECT:**

The project is Category B for the IDA Credit supported activities. Nine out of the ten safeguard polices have been triggered for the original project: Environmental Assessment (OP/BP 4.01), Natural Habitats (OP/BP 4.04), Forests (OP/BP 4.36), Pest Management (OP/BP 4.09), Physical Cultural Resources (OP/BP 4.11), Involuntary Resettlement (OP/BP 4.12), Indigenous Peoples/Underserved and Vulnerable peoples (OP/BP 4.10), Safety of Dams (OP/BP 4.37), and International Waterways (OP/BP 7.50). Overall, the project would have positive social and environmental impacts through its activities.

Environment: For all three countries, some of the local-level investment activities under Component 1 and 2 may have limited adverse environmental risks and impacts. These activities could potentially include: (i) expansion and improvement of service delivery which will include construction of small infrastructure, (ii) construction or rehabilitation of physical structures for water catchment management such as check-dams, water harvesting structures, etc., and (iii) land-based livelihood activities which could have limited adverse environmental and social impacts. The infrastructure works under Component 1 will pose civil works/ construction related impacts including health and safety considerations, vegetation clearance and soil erosion, impacts on Physical Cultural Resources (PCRs), dust pollution, disposal of construction waste, etc. Component 2 and 3 are expected to be positive through alleviating...
pressures on the poor that lead to unsustainable exploitation of natural resources and environmental degradation. ESMFs have been prepared in all three countries to avoid or mitigate environmental and social risks from these activities.

Social: For all three countries, the project’s anticipated social impacts have triggered OP 4.12 and in line with the Bank’s safeguard policies, the project has put in place mitigation mechanisms acceptable to the World Bank to mitigate these impacts. For impact on potential land take and/or restrictions in access to communal natural resources, a Resettlement Policy Framework (RPF) has been prepared and consulted upon in all three countries.

DJIBOUTI SPECIFIC AND ACTIVITIES UNDER THIS ADDITIONAL FINANCING:
The environmental and social impacts of the activities proposed under the AF are deemed moderate, small-scale and easily mitigated. The AF has thus been classified as Category B and five (05) policies are triggered - Environmental Assessment (OP/BP 4.01), Natural Habitat (OP/BP 4.04), Pest Management (OP/BP 4.09), Physical Cultural Resources (OP/BP 4.11) and Involuntary Resettlement (OP/BP 4.12).

To date, the management of environmental and social risks has been carried out in accordance with the World Bank’s Guidelines. ADDS has recruited a full-time qualified safeguard specialist who is supported by regional focal points who remain on site. Safeguard implementation is also supported by supervision consultants who undertake environmental and social monitoring of civil works and issue monthly reports to ADDS. ADDS representatives confirmed that project activities in Djibouti have not led to any major accidents/incidents to date. ADDS prepared a due diligence report on the involuntary resettlement impacts of the 11 subprojects ("activities") that have been completed or are ongoing, which indicates that no resettlement impact has been identified in Djibouti up to now. Up to recently, the resolution of grievances, which mostly involved with access to employment, was taking place informally will no substantiated documentation. Discussions with ADDS confirmed that the updated ESMF will build on this procedure, to ensure grievances were documented and addressed in a transparent manner.

The proposed Additional Financing (AF) will scale-up project activities in Djibouti to support the underserved communities in the project target regions of Ali Sabieh and Obock. Some activities under Component 1 “Social and Economic Services and Infrastructure”, Component 2 “Sustainable Environmental Management” and Component 3 “Livelihood Improvement Program” may have adverse environmental and social risks and impacts. These activities could potentially include: (i) expansion and improvement of service delivery which will include the construction, upgrading, rehabilitation, and/or expansion of basic social services, such as water supply, health, and economic infrastructure such as market and community structures and access to energy; (ii) rehabilitation of degraded areas; and (iii) land-based livelihood activities which could have limited adverse environmental impacts. The AF also includes a Contingent Emergency Response Component (CERC - Component 6) that establishes a disaster contingency fund that could be triggered in the event of a natural or man-made disaster. Activities to be financed under this category have not be defined at this time and would only be identified at the time of the CERC activation.

The ESMF prepared for the parent project has been updated to take in account the scale up of ongoing activities in targeted regions of Ali Sabieh and Obock and to provide additional funding for meeting the enhanced needs. The ESMF would be used to develop a site-specific Environmental and Social Management Plan (ESMPs) prior to the commencement of activities. The ESMF includes standard methods and procedures, along with appropriate institutional arrangements for screening and reviewing program activities and monitoring the implementation of mitigation measures to prevent adverse and cumulative impacts. It includes a grievance redress mechanism that has been instrument also includes a negative list of activities not to be funded under the project and a positive list of activities to be funded under the CERC component. Finally, the ESMF includes generic measures such as clauses
sanctioning gender based violence and sexual exploitation of children, and awareness raising among workers and communities.

In terms of social impacts, only minor economic resettlement impacts and impacts on structures and auxiliary assets (sheds, fence, garden) are expected under the AF. It is not expected that any activities will lead to physical relocation. Most resettlement impacts are associated with the construction of the new water pipeline, for which an abbreviated resettlement plan will be prepared once the detailed design is finalized. The RPF was updated to summarize the activities undertaken since the approval of the project and to take into account the activities proposed under the AF. The updated RPF includes a new due diligence checklist to facilitate the screening and documentation of involuntary resettlement impacts of new activities and original activities that are yet to be implemented. It also includes an entitlement matrix to ensure that impacts on assets and income of all affected person, regardless whether they are legal titled-holders, are fairly compensated.

ADDS is in the process of recruiting two separate firms to conduct the detailed design and prepare the environmental and social impact assessment and resettlement plan of the water pipeline from Ali Sabieh to Holl Holl and Ali Addeh, and the expansion of the solar power plant in Ali Addeh. The documents have been disclosed in-country and on the World Bank's website.

The updated ESMF and RPF documents were discussed with affected communities during consultations undertaken in the three targeted regions during the AF preparation between February 27th and March 3rd. The instruments were cleared by the World Bank and disclosed in-country on ADDS website and on the WB external website on April 1, 2020. Consultations will continue during the preparation of the site-specific safeguard instruments and during the implementation of the AF.

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

It is anticipated that the project will improve access to social services, expand economic opportunities and enhance environmental management for host community in the targeted areas, with no indirect and/or long-term negative impact in these areas. It is anticipated that the project will result in long-term positive impacts in the project area because of the project's emphasis on ensuring sustainable environmental management of natural resources and reduction in the unsustainable exploitation of natural resources, including mitigation of risks and other challenges faced by affected households. For Djibouti's AF, the long term impacts remain the same with the scale up activities in the two regions.

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

The “no project” alternative would deprive host communities already impacted negatively by refugee influx, the opportunity to improve access to basic social services, expand economic opportunities, and enhance environmental management. For Djibouti's AF, the description of project alternatives remains the same as for the parent project.

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.

In Djibouti, ADDS includes a safeguard specialist who works full-time to supervise the implementation of the ESMF and RPF. The safeguard specialist is supported by ADDS's focal points that are based in the regions and by the environmental and social experts from the various supervision consultants. This model will be maintained under the
AF. Other supervision consultants, with adequate social and environmental staffing will be hired to support safeguard aspects related to the expansion of the solar facility and the construction of the water pipeline, both subprojects that are located in the Ali Sabieh region.

While ADDS initially faced challenges in documenting the implementation of safeguard activities in the first years - including the operationalization of the grievance mechanism, it is expected that this will improve thanks to the revision of formats and checklists of the safeguard instruments and the requirement to submit semi-annual safeguard reports to the World Bank. Moreover, the World Bank will conduct safeguard trainings to ADDS and provide on the job support. Special attention will be required to ensure that activities in the Ali Sabieh region do not have negative impacts on the protected area in Assamo.

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

Key project stakeholder for the project in Djibouti - including additional financing activities - are estimated at 140,000, which include refugees and host community members in the project areas, locally-based organizations and businesses and local and sector line government officials. Consultations on the scope of additional financing activities and their expected environmental and social impacts were conducted between February 27th and March 3rd 2020, to which 32 participated including 9 women. The updated ESMF and the RPF, which summarize these recent consultations, have been disclosed on the World Bank and ADDS websites.

B. Disclosure Requirements (N.B. The sections below appear only if corresponding safeguard policy is triggered)

<table>
<thead>
<tr>
<th>Environmental Assessment/Audit/Management Plan/Other</th>
<th>For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of receipt by the Bank</td>
<td>Date of submission for disclosure</td>
</tr>
<tr>
<td>06-Mar-2020</td>
<td>01-Apr-2020</td>
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</tbody>
</table>

"In country" Disclosure

Djibouti
01-Apr-2020

Comments

<table>
<thead>
<tr>
<th>Resettlement Action Plan/Framework/Policy Process</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of receipt by the Bank</td>
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<tr>
<td>06-Mar-2020</td>
<td>01-Apr-2020</td>
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</table>

"In country" Disclosure
Pest Management Plan

<table>
<thead>
<tr>
<th>Was the document disclosed prior to appraisal?</th>
<th>Date of receipt by the Bank</th>
<th>Date of submission for disclosure</th>
</tr>
</thead>
<tbody>
<tr>
<td>NA</td>
<td>NA</td>
<td>NA</td>
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</tbody>
</table>

"In country" Disclosure

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 (to be filled in when the ISDS is finalized by the project decision meeting) (N.B. The sections below appear only if corresponding safeguard policy is triggered)

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 4.04 - Natural Habitats

Would the project result in any significant conversion or degradation of critical natural habitats?
No

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?
NA

OP 4.09 - Pest Management

Does the EA adequately address the pest management issues?
Yes

Is a separate PMP required?
No

If yes, has the PMP been reviewed and approved by a safeguards specialist or PM? Are PMP requirements included in project design? If yes, does the project team include a Pest Management Specialist?
NA

OP/BP 4.11 - Physical Cultural Resources

Does the EA include adequate measures related to cultural property?
Yes

Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?
NA

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?
No

Is physical displacement/relocation expected?
No

Is economic displacement expected? (loss of assets or access to assets that leads to loss of income sources or other means of livelihoods)
Yes

Provide estimated number of people to be affected 40

OP/BP 4.36 - Forests

Has the sector-wide analysis of policy and institutional issues and constraints been carried out?
NA

Does the project design include satisfactory measures to overcome these constraints?
NA

Does the project finance commercial harvesting, and if so, does it include provisions for certification system?
NA

OP/BP 4.37 - Safety of Dams
Have dam safety plans been prepared?
NA

Have the TORs as well as composition for the independent Panel of Experts (POE) been reviewed and approved by the Bank?
NA

Has an Emergency Preparedness Plan (EPP) been prepared and arrangements been made for public awareness and training?
NA

**OP 7.50 - Projects on International Waterways**

Have the other riparians been notified of the project?

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?

Has the RVP approved such an exception?

**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
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APPROVAL

Task Team Leader(s): Varalakshmi Vemuru
Benjamin Burckhart
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Approved By

<table>
<thead>
<tr>
<th>Safeguards Advisor:</th>
<th>Nina Chee</th>
<th>02-Apr-2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Practice Manager/Manager:</td>
<td>Robin Mearns</td>
<td>02-Apr-2020</td>
</tr>
<tr>
<td>Country Director:</td>
<td>Boubacar-Sid Barry</td>
<td>03-Apr-2020</td>
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