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Project Information Document/ Integrated Safeguards Data Sheet (PID/ISDS)

Concept Stage | Date Prepared/Updated: 13-Mar-2017 | Report No: PIDISDSC21085

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BASIC INFORMATION

A. Basic Project Data

Country Colombia	Project ID P162594	Parent Project ID (if any)	Project Name Colombia Multipurpose Cadaster Project (P162594)
Region LATIN AMERICA AND CARIBBEAN	Estimated Appraisal Date Apr 24, 2017	Estimated Board Date Jul 27, 2017	Practice Area (Lead) Social, Urban, Rural and Resilience Global Practice
Lending Instrument Investment Project Financing	Borrower(s) Ministerio de Hacienda y Credito Publico	Implementing Agency Departamento Nacional de Planeacion	

Proposed Development Objective(s)

The Project Development Objective is to implement the multipurpose cadaster in selected municipalities to strengthen tenure security and contribute to property taxation and land use planning.

Financing (in USD Million)

Financing Source	Amount	
International Bank for Reconstruction and Developmen	nt 100.00	
Total Project Cost	100.00	
Environmental Assessment Category	Concept Review Decision	
B-Partial Assessment	Track II-The review did authorize the preparation to continue	

Note to Task Teams: End of system generated content, document is editable from here.

Other Decision (as needed)

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B. Introduction and Context

Country Context

Colombia has experienced a decade of strong growth, yet falling oil prices caused growth to slow in 2014-15¹. The country's economy grew, on average, by 4.8 percent per year between 2004 and 2014, making it one of the strongest performers in Latin America. This expansion was underpinned by important macroeconomic and structural reforms. Growth rates were still strong in 2014 (4.6 percent), albeit down from 4.9 percent in 2013. Growth has been led by domestic demand, primarily private consumption and investment, although gross capital formation slowed considerably after years of strong increases. Throughout the last decade growth was accompanied by a fall in unemployment, which for the first time dipped below 9 percent in 2015.

Despite the country's important improvements in growth, large disparities persist between and within regions when it comes to poverty reduction². Uneven territorial development in the country is characterized by persistent gaps in standards of living between urban and rural areas, across geographic regions (e.g., Pacific, Atlantic, and Amazon) and even between and within departments and municipalities. For example, while the rate of poverty reduction for the last decade was similar in urban and rural areas, in 2014, total rural poverty was 41.4 percent while total urban poverty was 24.6 percent. Differences in poverty rates are also large between departments; with very high poverty rates persisting in Chocó, Cauca and La Guajira (66 %, 54% and 53% respectively) while Santander, Cundinamarca and Bogota have well below average poverty levels (19%, 17%, and 10% respectively)³. Gaps in access to water, sanitation, housing, education, and health are deep across the territory. While on average 42 percent of the national population has completed middle school, only 32 percent have done so in the department of Amazonas and 28.4 in the department of Putumayo. Illiteracy rates are twice as high in the southern municipalities of the Tolima department compared to the national average. And in the municipalities of Juradó, Riosucio and Ricaurte, located in the Pacific region, qualitative housing deficits are well over 70 percent, considerably higher than the average, estimated at 28 percent.⁴

In December 2016, the Colombian Congress ratified a historic peace agreement between the Colombian State and the country's largest rebel group, the Revolutionary Armed Forces of Colombia (FARC). The first of six points in the peace agenda to be negotiated and agreed was the one regarding land issues and rural development, and it called for improved access to and better use of land, which would include a massive effort towards land formalization and the creation and updating of the rural cadaster. The agreement stresses the need for an integral approach to rural development in the territory, with programs that can support productivity, promote access to land, provide technical assistance, and foster regional innovation. The importance of rural reform and land rights are intimately linked to the overall territorial development agenda for the country and the need for improvements is crucial for the country to consolidate both the economic gains of the past decade as well as the potential peace dividend.

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¹ Program Document of the First Programmatic Territorial Development Development Policy Financing (P158520), approved by the Board on December 8, 2016.

² Colombia, with a unitary government, organizes its territory in thirty-two Departments (*departamentos*) and 1,123 *municipalities*. Departments are headed by a popularly elected governor, while municipalities have elected mayors and municipal councils. The geographic diversity and the distinct way in which Colombia was populated has translated into six distinct regions, which do not represent an official jurisdiction but yet are recognized in the National Development Plan 2014-2018, namely *Caribe, Llanos, Pacifico, Centro-Oriente, Centro-Sur-Amazonia, y Eje Cafetero y Antioquia*. Municipalities and Departments that conform each region share important commonalities in terms of climate, culture, resources, and challenges.

³ Source: DANE, Pobreza Monetaria y Multidimensional- 2014

⁴ Bases del Plan Nacional de Desarrollo 2014-2018

Sectoral and Institutional Context

It has been the widely documented that Colombia's land resources are under-utilized and inequitably distributed in ways which incur significant costs for society through unrealized agricultural growth potential, environmental degradation, poverty, conflict and social dislocation. Several studies (IGAC, 2003, Malagon 1998, Accion Social) show that 62.3% of the country's territory presents a conflict with its potential or biophysical best use. In addition to land misuse, land distribution in Colombia remains highly unequal. Empirical studies of Colombia's rural sector show that about 1% of the parcels cover more than half (53.8%) of the available land; while about 90% of the parcels share approximately one fourth of the land. A further difficulty is the lack of complete land records in rural areas in Colombia. Today there is no cadastral record for 26% of the rural land of the country and 66.5% of the plots for which cadastral information exists have information that is out of date by five or more years. All of the above are major contributing factors to the persistence of regional disparities and pose challenges to sustaining economic growth and peace in a post-conflict context.

Global experience shows that dealing effectively with land issues has often been a pressing need in the immediate post-conflict period. Land-related grievances are often not the only source of conflict, yet failure to address them can further increase the potential for conflict. Managing land issues in the immediate post-conflict is essential for enduring peace. Failing to resolve widespread land conflicts can affect economic performance and social peace.

The GoC has approved the CONPES 3859 of June 13, 2016 on the multi-purpose cadastre, which specifies the action plan, tentative budget allocation required, and the new institutional arrangements to implement a new multi-purpose cadastre for Colombia. Specifically, the CONPES sets forth the following general objective for the reform: To design and implement a multi-purpose cadastre system that is complete, up-to-date, reliable, consistent with the property registry, and integrated with other information systems; to enhance property rights (*garantías del derecho de propiedad*), to contribute to fiscal strengthening, and to strengthen strategic planning and territorial development. Two aspects of this policy make it important for Colombia: 1) the process will proceed systematically from area to area across the country; and, 2) the data to be collected will provide a necessary base of information on parcels, rights and values that will be fundamental for the future development of the country. A fully functional, updated multi-purpose cadastre will yield important benefits, in particular for the post-conflict period and is necessary for territorial and land use planning, formalization of tenure, municipal property taxation, and investment prioritization.

Moreover, the GoC has approved the policy framework for delegating to subnational governments key functions and responsibilities for land management. This framework will be established as part of the National Program for the Delegation of Functions (Programa Nacional de Delegación de Competencias Diferenciadas, PNCD). The PNCD was established in Article 180 of the NDP 2014-2018 to delegate key functions and responsibilities from the national government to SNGs and other public territorial entities, aiming to ensure a more efficient delivery of public services.

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The functions that can be delegated, as defined by the NDP, include the development, updating, and maintenance of decentralized multipurpose cadastres in municipalities with population above 500,000.

Through the CONPES, the GoC has structured its action plan around four dimensions and strategic objectives, namely economic, physical/geographical, legal, and institutional. With regards to the multi-purpose cadastre's economic dimension, the reform aims to enable the estimation of property values that accurately reflect the physical and economic conditions of the parcels, through the identification, adoption and implementation of technical standards under the multi-purpose cadastre. In terms of its physical/geographical dimension, the multi-purpose cadastre aims to achieve full legal and physical identification and description of public and private land in the country, under the international standards adopted by the cadastral authority. With respect to legal aspects, the reforms plans to ensure the inter-relationship between the cadastre and the property registry, having integrated and unified standards in these matters, and enable land formalization. Finally, in regard to the institutional set-up, the reform aims to strengthen the cadastral institutional framework for the proper functioning of the multi-purpose cadastre, and ensure the adequacy of mechanisms to improve access and interoperability of land and property information.

Given the ambitious goals and the lack of recent precedent for the creation of a multi-purpose cadastre system, the GoC, through the National Planning Department (DNP) will carry out 23 cadastre pilots in an equal number of municipalities. The objective of these pilots is to inform the detailed implementation arrangements that will be rolled out throughout the country⁵ between 2017 and 2025. The key aspects to be tested under the pilots are: (i) surveying methodology and standards, (ii) implementation mechanism (implementation is expected to occur with significant private sector participation and hence partnership arrangements will be tested), (iii) available information and variables to be included in order to define the exact information layers to be included, and (iv) costs and identification of efficiency measures that could be adopted during the scale-up phase. Once the pilots are finalized (mid-2017, expected), methodological standards and implementation mechanisms will be approved and issued, and implementation of the national multi-purpose cadastre system will be rolled-out to the rest of the country.

In Colombia there is a complex set of institutional arrangements for land issues. Currently, the Instituto Geográfico Agustín Codazzi - IGAC, officially mapped to the National Administrative Statistics Department (Departamento Administrativo Nacional Estadístico, DANE), serves as the cadastral authority, sets the standards and is responsible for their implementation at the national level, both for urban and rural areas⁶. The only exceptions to IGAC's central management arrangement involves the cadastres for the cities of Bogotá, Medellín, and Cali, as well as the cadastre for the Department of Antioquia, which are all decentralized. Legal registration of land and property rights is managed by the Superintendent of Notaries (Superintendente de Notariados, SNR). While this arrangement is not unusual in the LAC region, it means that the physical parcel details and the legal ownership details are in two different institutions. IGAC and SNR have embarked on a joint-project to improve the quality and consistency of their respective data sets, but progress has been slow. In addition, Colombia has a National Land Agency (Agencia Nacional de Tierras, ANT) which is responsible for land formalization and – important processes in a country where some 40-60% of land parcels are held informally (estimate). And finally, the Restitution Agency is responsible for land restitution to internally displaced persons (IDPs) and their program includes cadaster, formalization and registration in certain parts of the country subject to the restitution process.

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⁵ The Bank is supporting the implementation of eleven such pilots under the Subnational Strengthening Project (P123879).

⁶ The GoC is in the process of changing the overall institutional set-up of the country's land administration system. It is expected that IGAC will not continue to be under DANE. The Bank team is monitoring closely the institutional developments of the sector.

Relationship to CPF

The Colombia County Partnership Framework (CPF) for 2016-21 recognizes land access and land rights as key constraints to both growth and peace. As such, the Bank has been supporting the GoC on land administration matters through a variety of instruments, including Technical Assistance (TA), Investment Projects, and Development Policy Loan (DPL). The Bank is financing the implementation of the multi-purpose cadastre pilots through the Colombia Subnational Institutional Strengthening Project (P123879), and the Bank is also providing technical assistance through a separate TA project for the implementation of the multi-purpose cadastre pilots, to provide advice and global experience and recommendations to improve the process and resolve issues/problems. Moreover, the Bank is supporting the institutional reforms through the First Programmatic DPL for Territorial Development (P158520).

C. Proposed Development Objective(s)

Note to Task Teams: The PDO has been pre-populated from the datasheet for the first time for your convenience. Please keep it up to date whenever it is changed in the datasheet.

To implement the multipurpose cadaster in selected municipalities to strengthen tenure security and contribute to property taxation and land use planning.

This will be achieved by expanding the coverage of the multipurpose cadaster and updating information on properties within the cadaster-registry system, and regularizing property rights where feasible; and through building the capacity of the responsible cadaster, registry and land rights institutions to expand services throughout the country and increase access to property information and services.

Key Results (From PCN)

The Proposed results indicators for the Project are:

- Increase in the number of properties with up to date cadastral and registry data, as well as values.
- Increase in the number of properties with legal security of tenure (registered title).
- Increase in the number of municipalities with access to property data and the capacity to use the data (based on established criteria)

D. Concept Description

The proposed Project will support the implementation of the multipurpose cadaster to survey parcels, update values and identify and secure property rights. In addition, formalization of informal tenure will be implemented in the field where possible. Special attention will be paid to awareness raising and socialization of the communities involved and conflict resolution in the field for land conflicts. A grievance redress mechanism will also be designed to respond to any conflicts not resolved. The proposed Project will also support the GoC to strengthen existing land administration institutions – cadaster, registry, formalization – to provide better services and make land services and data more widely available to municipalities and citizens. It is also expected that the updated cadastre system will provide updated

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property valuation for municipal property taxation, as well as information on the feasibility and impact of specific investments targeted for lagging regions and allow for the effective implementation of key initiatives for rural development. The proposed Project will have four components:

Component 1 - Institutional Strengthening. This component will focus on strengthening and improving the capacities of selected land administration institutions at the national level (DNP, SNR, IGAC, ANT) and at the territorial level (departments, metropolitan areas, municipalities). This component will finance activities related to the establishment of standards and norms, procedures and processes, as well as inter-institutional coordination for the new institutionality for the multipurpose cadaster. The component will also support training and technical assistance at the national level and the design of strategies and plans for decentralization and deconcentration of land administration services. Public awareness and education campaigns will also be implemented to build interest and understanding of the multipurpose cadaster and of the importance of maintaining the cadaster and registry data.

Component 2 - National Spatial Data Infrastructure. This component will finance the further improvement of the technological platform and the inter-operable national land information system to which different entities at the national and local level would access as users and producers of information. In addition, the component would support the definition and implementation of an interoperability plan involving both the main users and producers of land data.

Component 3 - Implementation of the Multipurpose Cadastre. This component would finance the scale up of the multi-purpose cadaster program to priority municipalities based on a number of criteria of the GoC. The multipurpose cadaster rollout will include close coordination and joint fieldwork with the Superintendecia de Notariado (SNR) and the Agencia Nacional de Tierras (ANT) to ensure that parcels surveyed are also formalized (to the extent possible) and registered. More specifically, it will finance the definition of geodesic and mapping standards, methodologies and process manuals for the establishment and maintenance of cadastral and property registry data. It will also finance land formalization, including the definition of the competencies, methodology, instruments, and conflict resolution (focusing on alternative and administrative conflict resolution where applicable). This component will also finance specific public awareness activities, including social mapping, to educate communities to support the systematic cadaster and registration and the definition of property rights through participatory means. Finally the component will support the necessary capacity building at the territorial level for decentralized land administration services.

Component 4 - Project Management. This component would provide support to a Project Management Unit (PMU), DNP and other implementing entities to carry out project coordination and management activities, including inter alia: administrative, financial management, procurement, safeguards, monitoring and evaluation, reporting, auditing and other operational activities required for effective project implementation

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SAFEGUARDS

A. Project location and salient physical characteristics relevant to the safeguard analysis (if known)

Colombia ranks third in terms of biodiversity and is home to almost 15 percent of all known terrestrial species, including

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the largest number of species of birds and amphibians in the world. Protected Areas (PAs) and indigenous reserves (resguardos) represent 34 percent of the national territory.

Several studies (IGAC, 2003, Malagon 1998, Accion Social) show that 62.3 percent of the country's territory presents a conflict with its potential or biophysical best use. Empirical studies of Colombia's rural sector show that about 1 percent of the parcels cover more than half (53.8 percent) of the available land; while about 90% of the parcels share approximately one fourth of the land. There is no cadastral record for 26 percent of the total rural land of the country and 66.5 percent of the plots for which cadastral information exists have information that is out of date by five years or more.

The Project would finance of the multi-purpose cadaster program to some 300 municipalities, including land regularization. In a post-conflict context, the risk of land conflicts is significant and the systematic multi-purpose cadaster process will include several mechanisms to reduce/manage conflict in the field, including social mapping and sensitization of the communities participating, alternative dispute resolution mechanisms during the process, and a grievance mechanism for those not fully satisfied. While the process cannot respond to 100% of conflicts the project will seek to minimize the potential and respond on the ground. There are important social groups whose land rights require extra attention - women, orphans, indigenous and Afro-colombians - and these groups will be assessed during the preparation and specific interventions designed into the Project to respond to their specific issues.

Concurrent to the Bank's proposed operation, the Inter-American Development Bank (IDB) is preparing an operation (USD50 million) that will also finance the rollout of the multi-purpose cadastre. The technical and operational coordination with IDB will be pivotal for the program's access. Moreover, the clear definition of each development partner's priority areas will be delineated and agreed during preparation.

B. Borrower's Institutional Capacity for Safeguard Policies

In Colombia there is a complex set of institutional arrangements for land issues. The National Planning Department (DNP) is caring out cadastre pilots. The Instituto Geográfico Agustín Codazzi (IGAC) serves as head of the cadastre system, sets the standards and is responsible for their implementation at the national level, both for urban and rural areas. Legal registration of land and property rights is managed by the Superintendent de Notariados (SNR). Colombia has a National Land Agency (ANT) which is responsible for land regularization and formalization. The Restitution Agency (RA) is responsible for land restitution to internally displaced persons (IDPs) and their program includes cadaster, formalization and registration in certain parts of the country subject to the restitution process. In 2016 the GoC has approved an institutional reform whereby IGAC will be formally mapped to the DNP.

The GoC has proposed the Colombia Peace Fund as the funds flow mechanism for the proposed project. However the fiduciary responsibility for implementation will be placed in the Administrative Department of the President (DAPRE) which has implemented several WB financed projects in the past. Technical implementation of the Project will be managed and coordinated through a Executing Unit in DNP. The safeguards monitoring and management will most likely reside in DNP but this is to be confirmed. Additional capacity will be needed for this role, though the current multipurpose cadaster technical unit in DNP already has capacity for safeguards monitoring.

In regard to safeguards policies, the key elements to be considered during project preparation are: (i) definition of a clear vertical and horizontal institutional arrangement; (ii) adoption of decision-making and monitoring processes; and (iii) establishment of a system of accountability through transparency and documentation.

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C. Environmental and Social Safeguards Specialists on the Team

Maria Bernadete Ribas Lange, Carlos Alberto Molina Prieto

D. Policies that might apply

Safeguard Policies	Triggered?	Explanation (Optional)
		The proposed Project is a land administration Project and it is rated as Category B, owing to the anticipated potential negative environmental and social impacts, albeit minor, site specific and easily manageable.
Environmental Assessment OP/BP 4.01	Yes	The Project is expected to have a positive impact on the environment as it seeks to promote rural cadaster and land regularization. Tenure security and secure access to resources are fundamental to sustainable natural resource management. Increased tenure security and proper land cadaster can contribute to sustainable natural resource management and agricultural productivity—leading to income benefits—as landholders are incentivized to adopt land use practices that lead to positive outcomes in the longer-term. In general is expected to have a positive impact on the environment as it seeks to promote the regularization of land and rural land. Notwithstanding these positive impacts, the proposed Project will be working in some sensitive biodiversity and forest areas.
		Potential negative environmental impacts associated with project activities would include: (i) legitimizing spurious claims of property in protected and/or critical areas for biodiversity; (ii) lead to deforestation and super exploitation of natural resources; and (iii) soil disturbance.
		Potentially adverse social impacts are expected to be small, as they will be avoided or minimized through appropriate preventive and mitigation measures.
		Following the Interim Guidance for Using Safeguard Frameworks in the World Bank (2013, World Bank) and as the selected municipalities to finance cadaster and land regularization would not be well defined/known ex ante (i.e., prior to project

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appraisal), the Borrower will prepare an Environmental and Social Management Framework (ESMF). Note that a framework is primarily a guide to Borrower that consists of a set of methodologies, procedures and measures to facilitate adequate environmental and social risk and impact management related to the works/investments financed under the project and whose specific location is not clearly known during project appraisal.

Therefore, the Government of Colombia will prepare a social and cultural assessment and environmental and social management framework (ESMF), to provide guidance on potential issues that could arise during Project implementation.

The ESMF should include: (i) definition of a clear vertical and horizontal institutional arrangement; (ii) adoption of decision-making and monitoring processes; and (iii) establishment of a system of accountability through transparency and documentation.

In addition, to avoid misunderstandings and make sure that cadaster process and implication are well understudied among holders the proposed Project's approach should include a broad communication strategy that mobilizes all holders and cover all holdings in the targeted areas.

As part of the project preparation, it would be agreed with the Borrower and IDB a common approach for the assessment and management of environmental and social risks and impacts of the Project. A common approach would be acceptable, if such approach will enable the project to achieve objectives materially consistent with the Bank safeguards policies.

The ESMF will draw on lessons from previous operations implemented. The ESMF will focus on Project-specific aspects, such as institutional arrangements and capacity, regulatory framework and environmental screening procedures.

The ESMF will also provide guidance on: (i) identifying

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		the potential social, environmental impacts and conflicts associated with the rural and urban landholding regularization, develop a methodology to minimize theses impacts, and include mitigation measures to into effect during the implementation; (ii) analysis of any economic or social impact project activities might have on vulnerable groups, traditional communities or poor rural dwellers; (iii) addressing identified impacts during subproject implementation; and (iv) monitoring and evaluating project activities focus com safeguard policies compliance. This ESMF will contain a detailed description of the institutional arrangement and responsibilities, as well as including measures to be taken to avoid potential social conflict that could result from project activities, including a grievance redress mechanism to receive and facilitate resolution of concerns and grievances of project-affected parties arising in connection with the project. The ESMF would present a budget and implementation schedule, both of which would be integrated into the overall project operating plan. The ESMF will be disclosed on the Borrower's website and will be discussed during public consultations with stakeholders. Government agencies, private sector
		The final version of the ESMF will be submitted to the Bank by appraisal stage.
Natural Habitats OP/BP 4.04	Yes	Activities under the proposed Project should lead to positive impacts on natural habitats, such as cadaster of protected areas and their conservation. Given that OP 4.04 is triggered and therefore all planning activities must follow World Bank policies, and identify monitoring and management activities to prevent or mitigate any possible negative impacts. Management and mitigation measures will be included in the ESMF to be prepared.
Forests OP/BP 4.36	TBD	The Project does not intend to invest in the forest sector and will not support plantations or any forest

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		related activities therefore the policy will not be triggered at this time. Nevertheless, this Project would contribute to the landscape conservation and land use planning in Colombia. The triggering of this policy will be determined as project preparation moves forward and more information is available on potential adverse environmental impacts from project activities.
Pest Management OP 4.09	No	This policy is not being triggered because the proposed Project will not support the purchase or increased use of pesticides and other agricultural chemicals as defined under the policy. The proposed Project will not include any support for forest plantations or other agriculture land use, which would promote pest management.
Physical Cultural Resources OP/BP 4.11	Yes	This policy is triggered in a preventative approach if Project activities include cadaster in areas containing sites deemed physical cultural resources by communities living there (e.g. holy sites such as sacred groves, sacred forests, historical urban building, etc.). Consultations with local authorities and communities will be required to identify these sites prior to implementation to determine eventual management measures such as the "Chance Find Procedure". Management measures for physical cultural resources and chance finds will be included in the ESMF.
Indigenous Peoples OP/BP 4.10	Yes	This policy is triggered as the project will have interaction with collective Afro-Colombian territories and Indigenous reserves. Although there will be no project interventions within the territories, nor will there be impacts on them, a Plan for Indigenous Peoples will be developed, which will be subject to consultations before appraisal. The details of these consultations are still under discussion and will be according to Colombian law and acceptable to the Bank.
		The IPP (including Afro), will present a general characterization of the indigenous and Afros peoples, evaluating their degree of vulnerability from variables such as - Organization, size, territorial presence, cultural survival, management capacity, among others - in order to determine differential approaches according to their condition of vulnerability.
		The IPP will contain protocols for an adequate interaction with ethnic groups, respecting their

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		culture, customs and habits. It will also ensure the active participation of communities and their authorities in the Project activities. To the extent possible the Project will work with the relevant authorities to recognize indigenous and Afro-Colombian territories.
Involuntary Resettlement OP/BP 4.12	No	The project does not require any partial or total land purchase, nor will it restrict access to the land that causes an impact on livelihoods. The project will not be delineating or registering new or existing parks or protected areas.
Safety of Dams OP/BP 4.37	No	This policy is not being triggered because the proposed Project will neither support the construction or rehabilitation of dams nor will it support other investments related with services of existing dams.
Projects on International Waterways OP/BP 7.50	No	This policy is not triggered because the project will not affect any international waterways as defined under the policy.
Projects in Disputed Areas OP/BP 7.60	No	This policy is not being triggered because the project will not work in any disputed areas as defined under the policy.

E. Safeguard Preparation Plan

Tentative target date for preparing the Appraisal Stage PID/ISDS

Apr 24, 2017

Time frame for launching and completing the safeguard-related studies that may be needed. The specific studies and their timing should be specified in the Appraisal Stage PID/ISDS

The Term of Reference of the ESMF is under preparation which includes an assessment of the social as well as environmental impacts. Final drafts of the ESMF should be completed by the end of March 2017. As part of the project preparation, a common approach will be agreed with the Borrower and IDB for the assessment and will be agreed for the management of environmental and social risks and impacts of the Project. A common approach would be acceptable, if such approach will enable the project to achieve objectives materially consistent with the Bank safeguards policies. An Indigenous Peoples Plan will be prepared, disclosed and consulted prior to appraisal, currently planned for April 24, 2017.

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