INTEGRATED SAFEGUARDS DATA SHEET
APPRAISAL STAGE

I. BASIC INFORMATION

1. Basic Project Data

<table>
<thead>
<tr>
<th>Country:</th>
<th>Costa Rica</th>
<th>Project ID:</th>
<th>P123146</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Name:</td>
<td>Costa Rica Higher Education (P123146)</td>
<td></td>
<td></td>
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<tr>
<td>Task Team Leader:</td>
<td>Marcelo Becerra</td>
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<tr>
<td>Estimated Appraisal Date:</td>
<td>16-Mar-2012</td>
<td></td>
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<tr>
<td>Estimated Board Date:</td>
<td>10-Jul-2012</td>
<td></td>
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<td>Managing Unit:</td>
<td>LCSHE</td>
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<td>Lending Instrument:</td>
<td>Specific Investment Loan</td>
<td></td>
<td></td>
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<tr>
<td>Sector:</td>
<td>Tertiary education (100%)</td>
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<tr>
<td>Theme:</td>
<td>Education for the knowledge economy (100%)</td>
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<td>International Bank for Reconstruction and Development</td>
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<td>Total</td>
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<tr>
<td>Environmental Category:</td>
<td>B - Partial Assessment</td>
<td></td>
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<tr>
<td>Is this a Repeater project?</td>
<td>No</td>
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2. Project Objectives

The Project Development Objective (PDO) is to improve access and quality, to increase investments in innovation and scientific and technologic development, as well as to upgrade institutional management in Costa Rica’s public higher education system.

3. Project Description

The Project will achieve its development objective through the implementation of the following two components.

Component 1. Institutional Improvement Agreements (AMIs) (Total: US$236.3 million; Bank: US$200 million; Universities: US$36.3 million). The objective of this Component would be: (a) to help public universities increase access by investing in infrastructure for teaching, learning and research; (b) to increase the quality of higher education by, among others, upgrading faculty qualifications toward accreditation; (c) to increase relevance in higher education by focusing resources on key priority disciplines that are critical to respond to the challenge of increasing country competitiveness; and (d) to strengthen public universities’ management capacity and accountability, by enabling them to develop a culture: (i) of strategic long-term planning, including the formulation of an institutional mission, vision and strategy; and (ii) of measurement, target setting, accountability, monitoring and evaluation that could lead to further performance-based financing innovations.

Component 2. Strengthening institutional capacity for quality enhancement (Total: US$17 million; Bank: US$0 million; Government and CONARE: US$17 million). The objective of this Component would be to promote the development of strategic activities with a system-wide scope in order to support the objectives of Component 1. By strengthening some key elements of the overall higher education system in Costa Rica, this Component would play an important role in achieving the PDO.

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

The Project area is the entire country of Costa Rica. Component 1’s subprojects will finance civil works, investments and activities that are located primarily on existing University campuses and regional centers, with the exception of a few civil works that may be located in new sites. The new sites may already be under the proprietorship of the Universities. In the case that they are not, the EMSF will ensure that any land acquisition is carried out through voluntary means (per OP 4.12 (Involuntary Resettlement)). The EMSF will also ensure that no works are carried out in areas with critical natural habitats. Component 2 will carry out activities to strengthen higher education in general that are not site-specific, but will produce benefits at the national level.

Costa Rica has an Indigenous population of approximately 70,000 people from eight ethnic groups that live primarily in and around 24 autonomous indigenous territories. As described below this population will benefit from the Project.

5. Environmental and Social Safeguards Specialists

Ruth Tiffer-Sotomayor (LCSEN)
Dianna M. Pizarro (LCSDE)

6. Safeguard Policies

<table>
<thead>
<tr>
<th>Triggered?</th>
<th>Explanation (Optional)</th>
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Page 1 of 7
### Environmental Assessment OP/BP 4.01

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</table>
| Yes | The four Universities are tasked with the preparation of the Project’s safeguards instruments. A preliminary screening of all proposed civil works by the four universities prior to appraisal was carried out to determine their level of preparation and potential environmental and social impact. Two types of subprojects (civil works) have been identified in the four universities: (i) subprojects with advance designs and site selected (about 10) and (ii) subprojects with basic layout “proposals” (about 30).

Subprojects with only basic layouts: In the case of infrastructure investments with designs to be finalized after appraisal, an Environmental and Social Management Framework (ESMF) has been developed to screen out subprojects according to eligibility criteria, guide site selection, assessment of construction related environmental and social impacts, and development of specific environmental management plans. The ESMF includes appropriate protocols, training, and standards for environmental management, health and safety, disposal of waste, dangerous or hazardous materials, which may be generated during construction and operation (laboratories). The ESMF includes screening criteria to exclude any subprojects with potential adverse impacts on critical natural habitats, physical cultural resources and that all civil works contracts should include appropriate provisions for addressing chance-finds during construction. The ESMF has been disclosed prior to Appraisal. All subprojects will be required to develop a site-specific Environmental Management Plan (EMP) which will include specific mitigation and prevention measures to reduced impacts. The Project's ESMF bridges any gaps between Bank safeguards requirements and national standards.

Subprojects with advanced design plans. A screening of all works defined prior to appraisal was carried out to determine their level of preparation. In cases where specific designs are being prepared and sites have been selected, the Client prepared an Environmental Assessment (EA) and Environmental Management Plans (EMPs) that have been disclosed in the Infoshop and locally prior to Appraisal. The EMPs include specific mitigation and prevention measures to reduce impacts, taking into account the environmental and social characteristics of the specific site, the country environmental legislation and the safeguards policies. The mitigation measures will be included in the construction bidding documents and contractors will be required to comply with these.

In the potential case where an Environmental License has previously been approved by SETENA, Costa Rica's Environmental Agency, the Bank team will review the existing EA and EMP to ensure that it fully complies with Bank safeguard requirements and the ESMF. Each university will have an Environmental Unit which will be responsible for the environmental management and overall environmental supervision of the project’s activities. The ESMF includes a grievance mechanism and communication activities to ensure participation of the stakeholders for project implementation.

The Safeguards section of the Project’s Operational Manual would make specific reference to: (i) the ESMF and safeguards procedures for the environmental management the project; (ii) the formats of project environmental reports; and (iii) the institutional arrangements.

The Institutional Improvement Agreements (AMIs) will include a clause that specifically binds the project activities to the ESMF (which will be part of the Project Operation Manual) and outlines the timeframe and foreseen budget source to prepare, consult and implement the necessary EMPs. With respect to Annual Investment Plans (AIPs), all proposed subprojects will be screen out of for significant environmental and social impacts and include the cost of environmental supervision and EMP plans will be included in these budgets. |

### Natural Habitats OP/BP 4.04

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<tr>
<td>Yes</td>
<td>Since the majority of the works are currently unknown, the Natural Habitats policy is triggered and any impacts on non-critical natural habitats will be mitigated through the subproject's EMP following procedures laid out in the ESMF. Any subprojects with significant conversion or degradation of critical natural habitats will be screened out of the project.</td>
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</table>

### Forests OP/BP 4.36

| No | The Forest policy is not triggered as the Project will not finance any activities that could affect the health and quality of forests, the rights and welfare of the people that depend on them, or changes in their management or utilization. All subprojects proposals are located within urbanized areas or non forested areas. |

### Pest Management OP 4.09

| No | This policy is not triggered since the project will not procure pesticides or lead to their increased use. |
The Physical Cultural Resources policy is triggered as significant excavations will take place. The EMF will include screening criteria to exclude any subprojects with potential adverse impacts on physical cultural resources. All civil works contracts will include appropriate provisions for addressing potential chance-finds during construction.

Indigenous Peoples OP/BP 4.10
Yes
Given the Project’s objective to improve access and quality of higher education offered by the four public Universities in Costa Rica, the Indigenous Peoples Policy (OP 4.10) has been triggered to ensure that Costa Rica’s Indigenous peoples have the opportunity to participate in project benefits and that these are delivered in culturally appropriate ways. Whereas the Indigenous population makes up a relatively small percentage of the overall population, the Government, the four participating universities and the Bank are actively engaged with these peoples in improving both their access to and the cultural relevance of primary, secondary and tertiary education. Several social, cultural, geographical and economic barriers exist for these populations to reach, enroll, and successfully complete University education. This Project provides a unique opportunity to build upon existing initiatives to systematically assess and overcome, as feasible, these barriers. The aim of this will be to provide this population, which is among the most economically disadvantaged in the country, with an opportunity to aspire and succeed in higher education as a tool to promoting their own visions for development and cultural identity.

Selected Safeguards Instrument: Given that the issues related to access, relevance and retention for Indigenous students require very specific solutions; a Socio-Cultural Assessment (SCA) was carried out during preparation to systematically identify and assess the barriers to access, relevance and retention of Indigenous students in higher education. An Indigenous Peoples Planning Framework (IPPF) has been prepared and disclosed that outlines the legal framework, institutional arrangements and procedures for preparing, consulting, and implementing a five-year Indigenous Peoples Plan (IPP) that will include actions specific to each University as well as inter-institutional efforts. The IPPF includes an Annex that synthesizes the barriers to access identified in the SCA and recommends concrete actions that could be adopted within each University’s institutional mandates and programs. These actions include not only the recommendations from the community workshops carried out as part of the SCA, but specific recommendations presented by several Indigenous representatives and organizations through a letter presented to CONARE in a national workshop with Indigenous peoples on February 24th, 2012. Specific activities will be selected by each University for inclusion in the IPP, in consultation with beneficiary indigenous peoples, and in accordance with the procedures outlined in the IPPF.

Involuntary Resettlement OP/BP 4.12
No
The majority of civil works will be constructed on existing university campus lands and thus will not require land acquisition. In cases where lands need to be acquired, the Project, through the EMF’s screening criteria, will ensure that all acquisitions are carried out in a voluntary manner with no involuntary taking of land that results in physical displacement or livelihood impacts. Per OP 4.12, for land acquisition to be voluntary the following conditions should apply: (a) the land to be acquired is not fully dependent on one specific site, (b) the proprietor is fully aware of their rights and is making an informed choice with full consent, and (c) the proprietor maintains the power of choice and thus the right to not donate or sell the land in question. An initial assessment of land proprietorship was carried out for each University’s pre-identified subprojects. From this initial screening it has been confirmed that all of the proposed subprojects are located on existing University properties and that none of these lands were acquired through involuntary means.

The Project will not be supporting any activities related to protected areas or designated parks that could result in potential restrictions in access.

Safety of Dams OP/BP 4.37
No
The Project will neither construct nor use water from any dams.

Projects on International Waterways OP/BP 7.50
No
No Project activities will take place on or affect International Waterways.

Projects in Disputed Areas OP/BP 7.60
No
No Project activities will take place in Disputed Areas.

II. 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:

<table>
<thead>
<tr>
<th>Environmental Safeguards</th>
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<tbody>
<tr>
<td>Investments under Component 1 that require environmental assessment and mitigation measures include the construction of basic science laboratories (biology, chemistry, physics, etc) as well high technology labs and research centers for hydraulics, mechatronics, food technology,</td>
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</table>
Based on the information provided by each university of the proposed subprojects, it is expected that the environmental impacts resulting from the civil works will be low to moderate in nature and can be prevented and mitigated by proper implementation of environmental management plans and on site supervision. Given this, the Project has been assigned a Category B classification under OP 4.01. It has been agreed that any subproject that could generate significant environmental impacts merits a Category A classification per OP 4.01 will be ineligible for project financing.

The primary adverse environmental and social impacts will be those common in construction works such as noise, waste, dust, soil erosion, water effluents, sedimentation, air emissions, affectation of public access roads, conflicts with campus life, etc.

Potential adverse environmental impacts could result from poor environmental management at construction sites or lack of implementation of the EMP. The Project's ESMF requires that each subproject assess these impacts through an Environmental Assessment and include an Environmental Management Plan (EMP) to prevent, avoid or mitigate adverse impacts. The ESMF ensures that all procedures for environmental screening, assessments, monitoring and supervision are carried out in compliance with National Environmental Laws and the Bank's environmental safeguards requirements.

Social Safeguards

Indigenous Peoples (OP 4.10): For Indigenous peoples this Project’s primary safeguards issue is the potential for their implicit exclusion from project benefits if the Universities do not adopt a proactive and culturally appropriate strategy for their inclusion. This exclusion would result from providing support to a system where existing barriers significantly limit Indigenous peoples’ capacity to participate in higher education. These barriers were identified and evaluated through a Socio Cultural Assessment carried out for this Project, among which the following were highlighted: (a) geographical distance of Indigenous territories to University centers; (b) economic and technological limitations, including the opportunity cost of secondary and higher education for Indigenous families and lack of access to computers and the internet to complete admission forms, etc.; (c) lack of delivery of key, actionable and timely information in manners that can be easily understood by Indigenous families regarding admission requirements, key dates, economic and social assistance opportunities, among other; (d) fears and cultural perceptions related to the loss of cultural ties and identity, and discrimination that could result from leaving their communities to participate in urban University life; and finally, (e) poor quality secondary education- limiting Indigenous students interest and capacity to successfully complete secondary school and perform in the entrance exams and University programs. For Indigenous students that have successfully entered Universities, challenges to successfully complete programs are primarily related to: (a) their inability to maintain the financial costs related to housing, food and transportation, and (i) the cultural shock and isolation experienced within the urban University setting.

During project implementation, key safeguards issues for Indigenous peoples will include: (i) the creation of false expectations or misinformation among Indigenous peoples of the scope and timing of benefits that they will receive from the Project, and in particular from the Indigenous Peoples Plan, (ii) the activities adopted by the Universities within the IPP are considered marginal, and fail to address the systematic barriers to access, retention, and pertinence of higher education for Indigenous peoples, and (iii) the mechanisms employed to engage and consult with Indigenous peoples by the Project are not considered to be meaningful and in line with the consultation principles of OP 4.10 (free, prior, and informed) and of the national legal framework.

Involuntary Resettlement (OP 4.12): No subprojects will be financed under this Project that require the involuntary taking of land that results in: (i) the relocation or loss of shelter, (ii) the loss of assets or access to assets, or (iii) the loss of income sources or means of livelihood, whether or not the affected persons must move to another location. This Project will not support any activities that result in restrictions in access to designated parks or protected areas.

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

No indirect or long term impacts are anticipated to result from the construction of Project infrastructure. However, during implementation several of the high technology labs related to chemistry, toxicology, radioactive research will produce hazardous wastes which will need to be properly treated. Only some subprojects will be connected to treatment plants so some indirect impacts will be connected to the discharge of residual waters to local streams which are already polluted.

From a social safeguards perspective the only potential long term indirect impact related to the Project would be if the increased access and opportunities for Indigenous peoples to study in Universities were to result in a human resource drain from Indigenous territories and a cumulative and gradual loss of cultural identity.

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

Environmental Safeguards

Environmental analysis of alternative sites was not done since project site selection will be limited to land that the university can purchase or is already owned within campus.

Social Safeguards

The approach towards how to most effectively reach Indigenous students has undergone alternative analysis. The first option considered was for the Project to develop an IPPF to screen subprojects for potential affectation on Indigenous peoples and make any adaptations as necessary to avoid negative impacts. However, this approach would not have been fully in line with the Policy’s requirements for Indigenous peoples to participate in Project benefits, as most likely the majority of investments would have not reached them (given the existing barriers described above).

A second alternative considered was to carry out a socio-cultural assessment and develop an Indigenous Peoples Plan during Project preparation for all four universities. However, it was decided, that given the multi-actor and multiple subprojects and activities envisioned, and the importance of Indigenous peoples active participation in the development of the activities to be covered in the Plan, it would be more effective to carry-out a socio-cultural assessment to better understand access barriers, and to prepare an IPPF that would effectively guide meaningful engagement with Indigenous peoples to design the actions under the IPP.
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.

Environmental Safeguards

As part of Project preparation the Team organized several meetings with representatives of the four public universities to discuss current environmental management, institutional arrangement for safeguards and identify potential risks associated with the proposed works. For works with final designs ready prior to appraisal, the Environmental specialists from each University prepared the respective EAs and EMPs for disclosure prior to appraisal.

A preliminary evaluation was carried out of each university’s capacity to implement infrastructure investments. In regards to environmental management, it was found that: (i) each university’s department charged with infrastructure development is familiar and has experience assessing and mitigating environmental impacts related to civil works following the requirement and procedures of the Costa Rican Environmental Agency (SETENA), (ii) for supervision of the works, the university hires short term environmental consultants “regentes ambientales”, but there are no permanent staff, (iii) most universities have environmental programs, policies or strategies that indicate a strong interest and commitment to environmental management, (iv) for project implementation it will be necessary to provide support to the PIU with additional full time environmental staff to cope with the number of project activities and future environmental requirements and supervision.

Each University will have an Environmental Unit (EU) which will be in charge of the overall environmental management and supervision of the project activities. An environmental specialist full time has been agreed to be part of the EU at each university. The Bank will provide additional support with training and information to ensure that these units’ environmental staff are familiar with the Bank’s safeguards policies and the ESMF’s requirements and procedures. The Bank team’s environmental specialist will provide the no-objection to the subprojects reviewing the environmental instruments included in the ESMF and according to each year’s proposed activities, in tandem with the annual investment cycle and other Bank no-objections described within the Project’s Institutional arrangements.

Social Safeguards

CONARE, through its Interuniversity Subcommission for Coordination with Indigenous Peoples, commissioned a team of social scientists and a legal expert to carry out the SCA and prepare the IPPF. The SCA was developed based on inputs from: (i) 19 participatory workshops in 15 Indigenous territories with the participation of 582 indigenous stakeholders; (ii) interviews with University officials, Indigenous University students, and national and local indigenous organizations; (iii) a desk-review and analysis of existing admission, scholarship, and other outreach programs and initiatives pertinent for Indigenous peoples in each University; (iv) an analysis of the pertinent legal framework for Indigenous peoples and higher education; and (v) existing work and past experience that CONARE’s sub-commission on Indigenous peoples has produced.

On February 24th, 2012 a national workshop was held where approximately 60 Indigenous representatives were brought to San Jose and where Indigenous organizations and University representatives, including two of the four Rectors were present. The Indigenous representatives from the territories had prepared a set of proposals that they delivered in a letter at the event. These recommendations, as well as the feedback on the Consultation Protocol were incorporated into the final Matrix and Proposed Protocol that were included in the Project’s IPPF.

The Project’s IPPF outlines the strategy for engaging Indigenous peoples, once the Project is approved, in the preparation, consultation, implementation and monitoring and evaluation of a five year Inter-University Indigenous Peoples Plan (IPP). The Plan will draw on the recommendations in the SCA Proposal Matrix, the Universities existing projects with Indigenous Peoples, and any additional recommendations received during its preparation and consultation. It will then be consulted in each Territory, in accordance with the Consultation Protocol included in the IPPF and its activities will be included within the Project’s Annual Operation Plans.

The subsidiary legal agreement between the Government, the Bank and each University (the AMTs) includes a specific Clause obliging the University to prepare, finance and implement the IPP in accordance with the procedures established in the IPPF.

The SCA has identified existing programs and offices within each University that include experienced professionals and a relevant mandate to take on the IPP preparation and implementation activities. The Rector of each University, based on the recommendations of the SCA, and the proposals and requirements of the IPPF, will name a Coordinator for the Indigenous Peoples Plan for their respective University. As established in the IPPF timeline, once this occurs, the Bank’s social specialist will meet with these Coordinators to discuss the approach to date, key policy requirements, and assess whether any capacity building is needed. Each University IP Coordinator will report to the University Project Coordinator and to CONARE’s Project Coordinating Office. CONARE’s Project Coordinator will be charged with overseeing that the IPP is prepared in accordance with the IPPF and will report any issues to the Bank. CONARE’s Project Coordinator will be supported by CONARE’s Interuniversity Subcommission for Coordination with Indigenous Peoples for the technical review and analysis of the IPP.

At the same time, an Indigenous Peoples Liaison Commission will be established for the Project with a representative from each Territory and a representative from the four Indigenous Organizations currently working on education issues in the Country. The procedures for selecting the members of this Commission and their roles are outlined in the proposed protocol for consultation, included within the IPPF. A working group with the University IP Coordinators, a representative from each of the four Indigenous organizations, and CONARE’s Subcommission for Coordination with Indigenous Peoples will develop the draft IPP prior to disseminating it for consultation within the Territories. This working group will also revise the proposed protocol for consultation, and adopt as is seen necessary. The Indigenous Peoples Liaison Commission will serve as the Project’s direct communication channel to and from the Indigenous communities for the Project. The Indigenous community liaisons will be key in defining and facilitating adequate consultation and participation methodologies for the preparation, implementation and...
B. Disclosure Requirements Date

<table>
<thead>
<tr>
<th>Environmental Assessment/Audit/Management Plan/Other</th>
<th>Yes</th>
</tr>
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<tbody>
<tr>
<td>Was the document disclosed prior to appraisal?</td>
<td>Yes</td>
</tr>
<tr>
<td>Date of receipt by the Bank</td>
<td>09-Mar-2012</td>
</tr>
</tbody>
</table>

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

Environmental Safeguards

Costa Rica’s higher education field is complex and includes numerous prominent stakeholders. These include not only Rectors and policy makers, but also all those participating in university life (particularly important are university councils and students) and employers. The Bank, CONARE and the Government have taken into account inputs from these stakeholders in Project design that have been voiced both in focus groups with private sector leaders and students and through ongoing meetings to review project design details with CONARE’s Extended Council that is made up of faculty and student representatives from the four participating universities.

The Government organized a preliminary consultation on the project, its ESMF and EMPs at each university with relevant stakeholders before Appraisal. Results of the consultation are included in the ESMF. The ESMF and EMPs have been disclosed at each university web site and the InfoShop. The Universities carried out consultations on the EAs and EMPs for each civil work with final designs and selected sites, with key stakeholders and people potentially affected by the construction related impacts of the infrastructure investments.

During implementation, the AMIs will need to be officially approved by the universities’ assemblies, which include university authorities, faculty, and students. To ensure that the voices of stakeholders are heard, the M&E Committee (CSE) will be responsible for collecting and reporting stakeholder views on the Project to the Government, the universities, and the Bank. This may be done by organizing focus groups, particularly with representative samples of students and employers.

Social Safeguards

In regards to consultation with Indigenous Peoples, the SCA was developed based on inputs from 19 participatory workshops in 15 Indigenous territories and numerous interviews and meetings with University officials, Indigenous University students, and national and local indigenous organizations. A total of 582 Indigenous stakeholders participated, including local representatives, traditional leaders, parents, students, teachers, among others. Each workshop followed a structured methodology where the Project and the Bank’s safeguard requirements were presented, and participants worked in subgroups with a set of guiding questions to articulate: (i) their vision for higher education, (ii) existing barriers to access and success, and (iii) recommendations to overcome the barriers identified. At the completion of each Workshop, the participants elected one representative to provide ongoing follow-up with the CONARE team and the Project. A summarized version of the SCA, once completed, was delivered back to each community where workshops took place so that the communities could see directly how their inputs had been considered. This was carried out prior to the National Workshop.

On February 24th, 2012 a national workshop was held where approximately 60 Indigenous representatives were brought to San Jose and where Indigenous organizations and University representatives, including two of the four Rectors were present. The Project, World Bank Safeguards, and results of the SCA were presented and a plenary session allowed for Indigenous representatives to provide feedback on the process to date and their vision for the Project as it moved forward. A proposal for a consultation protocol for the IPP and a matrix summarizing the 15 primary barriers of access and proposals for the IPP were presented and the participants separated into groups to review and comment on each. The Indigenous representatives from the territories had prepared a set of proposals that they delivered in a letter at the event. These recommendations, as well as the feedback on the Consultation Protocol were incorporated into the final Matrix and Proposed Protocol that were included in the Project’s IPPF.

Prior to Appraisal the final IPPF was disclosed in the Bank’s InfoShop, on CONARE’s website, and distributed to Indigenous organizations. Responses to the comments received were either directly integrated into the IPPF or highlighted in the SCA proposal matrix.

Subsequent to appraisal, the IPP will be prepared by the four IP Coordinators from each University with the technical support and feedback of the representatives from the four Indigenous organizations, and CONARE's Subcommission for Coordination with Indigenous Peoples. The draft IPP will be consulted in each Territory in accordance with the IPPF’s consultation protocol. This process will be facilitated by the Indigenous Peoples Liaison Commission. The Indigenous Peoples Liaison Commission will serve as the Project’s direct communication channel to and from the Indigenous communities for the Project. The Indigenous community liaisons will be key in defining and facilitating adequate consultation and participation methodologies for the preparation, implementation and monitoring of the IPP.

8. Disclosure Requirements Date

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<tr>
<th>Environmental Assessment/Audit/Management Plan/Other</th>
<th>Yes</th>
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<td>Date of receipt by the Bank</td>
<td>09-Mar-2012</td>
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### Date of "in-country" disclosure
- 09-Mar-2012

### Date of submission to InfoShop
- 09-Mar-2012

### For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors
- 09-Mar-2012

### Indigenous Peoples Development Plan/Framework

| Was the document disclosed prior to appraisal? | Yes |
| Date of receipt by the Bank | 12-Mar-2012 |
| Date of "in-country" disclosure | 12-Mar-2012 |
| Date of submission to InfoShop | 12-Mar-2012 |

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)

#### OP/BP/GP 4.01 - Environment Assessment
- Are the cost and the accountabilities for the EMP incorporated in the credit/loan? Yes [✓] No [ ] NA [ ]

#### OP/BP 4.04 - Natural Habitats
- 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? Yes [✓] No [ ] NA [ ]

#### OP/BP 4.11 - Physical Cultural Resources
- Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property? Yes [✓] No [ ] NA [ ]

#### OP/BP 4.10 - Indigenous Peoples
- If the whole project is designed to benefit IP, has the design been reviewed and approved by the Regional Social Development Unit or Sector Manager? Yes [✓] No [ ] NA [ ]

### The World Bank Policy on Disclosure of Information

- Have relevant safeguard policies documents been sent to the World Bank’s Infoshop? Yes [✓] No [ ] NA [ ]
- Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs? Yes [✓] No [ ] NA [ ]

### All Safeguard Policies

- Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies? Yes [✓] No [ ] NA [ ]
- Have costs related to safeguard policy measures been included in the project cost? Yes [✓] No [ ] NA [ ]
- Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies? Yes [✓] No [ ] NA [ ]
- Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents? Yes [✓] No [ ] NA [ ]

### III. APPROVALS

| Task Team Leader: | Marcelo Becerra |
| Approved By: | 
| Sector Manager: | Name Janet K. Entwistle (SM) | Date: 13-Mar-2012 |