



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

Appraisal Stage | Date Prepared/Updated: 30-October-2018 | Report No: PIDISDSA24994



**BASIC INFORMATION**

**A. Basic Project Data**

Country Liberia	Project ID P160945	Project Name Smallholder agriculture Transformation and Agribusiness Revitalization Project (STAR-P)	Parent Project ID (if any)
Region AFRICA	Estimated Appraisal Date 05-Nov-2018	Estimated Board Date 19-Dec-2018	Practice Area (Lead) Agriculture
Financing Instrument Investment Project Financing	Borrower(s) Ministry of Finance and Development Planning	Implementing Agency Ministry of Agriculture	

Proposed Development Objective(s)

The project development objective (PDO) is to increase agricultural productivity and commercialization of smallholder farmers for selected value chains in selected counties of Liberia.

Components

**PROJECT FINANCING DATA (US\$, Millions)**

**SUMMARY**

<b>Total Project Cost</b>	25.00
<b>Total Financing</b>	25.00
<b>of which IBRD/IDA</b>	25.00
<b>Financing Gap</b>	0.00

**DETAILS**

**World Bank Group Financing**

International Development Association (IDA)	25.00
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IDA Credit	25.00
Environmental Assessment Category	
B-Partial Assessment	
Have the Safeguards oversight and clearance functions been transferred to the Practice Manager? (Will not be disclosed)	
No	
Decision	
The review did authorize the team to appraise and negotiate	

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Other Decision (as needed)

## B. Introduction and Context

### Country Context

1. **Liberia is a post-conflict state with a rapidly growing population, abundant natural resources and substantial arable land but its 14 years of civil war left it with low levels of human capital, dilapidated infrastructure and hollowed out institutions.** The country of 111,369 km<sup>2</sup>, is home to about 4,7 million people with a population growth rate of about 2.4 percent per annum<sup>1</sup>. Liberia’s economy remains heavily dependent on primary commodities from mining and agriculture and structural transformation has been slow, resulting in limited movement of labor between sectors. Additionally, poor governance and weak institutions inhibit the development of Liberia’s private sector. Most investment focuses on the extractive industries, and firms in the other sectors face major obstacles to doing business. With a rank of 172 out of 190 in the 2018 Doing Business Report, Liberia continues to lag behind in terms of creating an attractive business environment for the private sector. While some important steps have been taken to strengthen public administration, policy reforms have outpaced policy implementation. Further, while there have been some improvements in governance indicators, limited administrative capacity and an entrenched patronage system presents major obstacles to reform.

2. **Liberia experienced a steady per capita GDP growth at the end of the civil war from 2003 to 2013 but the economy contracted at an average rate of 0.8 percent per year between 2014 and 2016 as a result of the twin shocks of the Ebola crisis and the sharp drop in global commodity prices.** The economy began to recover in 2017 with an estimated GDP growth rate of 2.5 percent, as increased mining sector output compensated for the poor performance of other sectors. However, the rapid depreciation of the Liberian dollar, sluggish overall export growth and reduced inflows of aid and remittances have intensified inflationary pressures. At the same time, declining domestic revenues and rising mandatory expenditures, including the cost of the 2017 election cycle and the increase in security spending that accompanied the drawdown of the United Nations peacekeeping forces, have strained fiscal balances.

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<sup>1</sup> Liberia Institute of Statistics and Geo-Information Services (LISGIS) 2018. Handbook on Liberia.



3. **Despite Liberia’s large arable land, a 2015 assessment<sup>2</sup> estimated that at least 15 percent of the population was severely food insecure.** Endowed with bountiful and diverse natural resources, Liberia is also susceptible to the adverse effects of climate change. Contributing factors include shifting cultivation, unsustainable logging practices, unregulated coastal mining and high levels of biomass consumption (charcoal and fire wood). Albeit agricultural land covers some 28 percent of the country’s area, much of this land is under concession for industrial crops and suffers from low productivity due to unsustainable agricultural practices which combined with climate change have led to growing erosion and loss of soil fertility. Combined with the high population growth rate this has led to a chronic food production deficit relative to demand. Global economic shocks and the country’s high dependence on food imports tend to increase food insecurity even further.

4. **Poverty remains widespread underlining the urgent need for structural transformation to promote broad-based growth and reduce poverty.** Liberia’s poverty rate increased from 51.4 percent in the first half of 2014 to an estimated 61.2 percent in the first half of 2016 resulting from slowing economic growth, the lingering impact of the Ebola crisis, and the secondary effects of rising cost of food imports. According to the 2016 UNDP Human Development Index report, the country ranked 177 out of 188 countries.

5. **The new Administration, which came to power in 2018, has signaled its intent to pursue an agenda of pro-poor growth.** Government is currently elaborating the five-year Pro-Poor Agenda for Prosperity and Development (PAPD). As stated the draft PAPD, the government recognizes the need for inclusive and sustainable economic diversification to achieve structural transformation and growth, the urgency of facilitating private sector participation in the economy, and the importance of the agri-food sector as an engine of growth. The government has prioritized the agriculture sector to diversify the economy and has identified seven priority value chains for support under their Pro-Poor Agenda for Prosperity and Development (PAPD) 2018-2022. Those include rice, oil palm, horticulture, cocoa, rubber, cassava and poultry/pig husbandry.

#### Sectoral and Institutional Context

6. **Agriculture continue to play a key role in Liberia’s economic growth, trade, and employment.** Agriculture’s contribution to total GDP shrank from 58 percent in 2009 to 36 percent in 2017<sup>3</sup>, due in part to the rise of the urban service sector. Similarly, the agriculture sector’s growth rate has declined from a peak of 8.9 percent in 2007 to 6.4 percent in 2009 to 4 percent in 2012<sup>4</sup>. Nevertheless, the sector currently employs about 70 percent of the labor force. Industrial export crops composed of rubber, oil palm and cocoa – which accounted for 56 percent of total exports in 2014 – are a significant source of foreign exchange but leave the country severely exposed to commodity market fluctuations. Rubber, oil palm and cocoa combined represent 56 percent of export earnings, and they represent respectively 87 percent, 12 percent and 1 percent of agriculture exports. Beyond large commercial operations often under concession agreements working with outgrowers, Liberia’s family farms also produce rice, cassava and horticultural crops which with the exception of rice are produced mostly on small near subsistence scale.

7. **The agri-food sector is confronted with a number of structural challenges which inhibit its effective development:**

- *Policy, regulatory, and coordination failures lead to an uncompetitive business environment for agricultural production and agribusiness. A wide range of policy, taxation laws, and inconsistent*

<sup>2</sup> LISGIS. 2016. “Household Income and Expenditure Survey 2014-2015.”

<sup>3</sup> African Development Bank, LIBERIA: Agriculture Commercialization and Agribusiness Development: Sector Scan Draft Report, March 2017.

<sup>4</sup> World Bank, November 2014 in FAO/WFP Crop and Food Security Assessment, Special Report, December 2017



application of incentives inhibit private sector investments in agriculture and agribusiness development. Free or heavily subsidized distribution of agricultural inputs, such as seeds and fertilizers, by the government or donors distort incentives for investments in input supply and distribution networks. Procedures for import and export of agricultural products are burdensome and costly, including long wait periods to get import tariff exemption on agricultural products or inputs.

- *Structural weaknesses within agricultural value chains, reflected in low farm productivity and weak linkages between farm production and upstream and downstream services.* Farm level yield of key crops, particularly in the smallholder sector is very low, compared to their potential. Small farmers use very little certified inputs and the lack of demand especially in competition with the government's subsidized input distribution does not provide the necessary stimuli for an effective private input supply system to develop. The entire agribusiness sector, including agro-processing, is highly fragmented, consisting of few medium- and large-size formal firms, and a vast number of small, low-productivity firms operating with a few commodities, such as oil palm, rice, horticulture, cassava, and cocoa. Agricultural productivity remains low, which combined with low levels of farmer organization and coordination leads to highly unstable markets for agricultural commodities and unpredictable input supplies for agribusiness SMEs.
- *Agro-processors in rice also find it difficult to compete with imports* because they get lower conversion rates from milled products due to high levels of debris, dirt, and broken grains from produce originating on smallholder farms. Perishable products fail to reach the markets because of the poor condition of rural infrastructure including roads and accessibility but also the lack of basic warehouse and cool storage facilities.
- *Limited access to finance, inputs, and other critical services necessary to increase farm productivity and strengthen agribusiness competitiveness.* The small number of financial institutions in existence provide a limited array of products and services to the agri-food sector. Total credit to agriculture is estimated at only 5.4 percent of total lending in the economy. There is little financing for agriculture beyond export crops such as rubber and cocoa where foreign investors provide finance for plantation development and donor supported project channel small amounts of financing through financial institutions. Both the supply from credit institutions as well as demand from farmers are very weak and together reinforce the lack of agricultural financing. Informal financing for agriculture is also low since there is scant use of purchased inputs and the level of smallholder commercial agriculture is low. The situation is compounded by the fact that lending often is done in US dollars thus exposing borrowers to significant currency risks.
- *Weak level of human and organizational capacity both in the private and public-sector institutions is a primary cause of the uncompetitive environment.* Many farmers are members of farmer organizations and cooperatives, but these bodies often have weak leadership and management and suffer from governance issues that make business development challenging. Inadequacies in current policies and regulations governing farmer organizations and cooperatives as well as limited institutional capacity to support them also constrain their capacity to undertake value chain development. Within the public sector, many government agencies are involved with designing and implementing initiatives on business and the regulatory environment in agriculture, agribusiness, and SME development, but there is limited coordination among them. In addition, there is a lack of effective industry associations to discuss industry interests and/or advocate effectively for policy



reforms and investment priorities for agribusiness development. A lack of trust and understanding between the public and private sector prevents effective consultation and prioritization of integrated industry solutions, including a reform agenda.

- *Existing property rights complicate acquisition of land for agricultural investments.* Acquisition of land for agricultural investments remains a major challenge even though foreign and/or non-resident investors can get access to land through leaseholds. Land ownership in rural areas is complicated because of communal rights, concession leases, and, in some instances, land titles. Community land is most common and clear titles of ownership are rare. This situation hampers long term investments in plantations or processing mills. The situation is complicated with land concessions where there are potential legal and other challenges from communities and NGOs who fear that community lands are being taken over by large companies.
- *The agriculture sector in Liberia is vulnerable to the impacts of climate change, specifically unpredictable precipitation and increasing temperatures.* Liberia has experienced an increase in the average annual temperature by 0.8°C in a period of 40 years (1960 to 2006) and with an average rate of 0.18°C per decade. On the other hand, although average annual precipitation has declined since the 1960s, inconsistent rain patterns have persisted. For example, the 1960s and late 1970s were particularly wet while the early 1970s and 1980s were very dry. Liberia has also experienced an increase in the frequency and unpredictability of intense rainfall events (considered an extreme climatic event). Consequently, floods are a recurrent natural disaster in Liberia and are projected to worsen particularly along the coasts due to the unpredictability of rain, rising sea level, and lack of implementation of appropriate adaptation and climate resilience measures by the Government of Liberia.
- *Women’s contribution to agriculture in Liberia is substantial: they represent the majority of the agricultural labor force (80 percent) and are responsible for 93 percent of household food crop production<sup>5</sup>.* A high share of women engages in agri-processing and 85 percent of those are engaged in marketing and trading. Women shape the totality of agricultural production, processing, distribution/ marketing and consumption. Despite their important contributions, women have weaker influence in the marketplace due to restriction in their mobility to market produce too far from homes and limited business skills, voice and agency. They also face significant disadvantages accessing land use rights due to cultural norms and inability to pay cooperative membership fees to use cooperative land. Women face more obstacles than men in accessing improved agricultural production technology, finance, and extension services. The lack of productive capital poses additional and considerable barrier to women who would like to engage in commercial agriculture.

**8. Against all these challenges, there are significant untapped opportunities for value addition in rice, oil palm, and horticulture for food consumption and industrial use in domestic, regional, and international markets.**

- *Rice markets offers considerable unexploited opportunities.* With an estimated 3 percent annual growth in domestic consumption imports are now estimated at US\$150 million annually, providing significant opportunities for competitive import substitution. Furthermore, the regional rice deficit was about 8 million metric tons – or nearly 80 percent of milled rice production – in 2016/2017 and

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<sup>5</sup> Gender Analysis Report 2018. Gender Assessment study commissioned by STAR-P



is increasing annually. Niche market opportunities exist such as for “red rice,” produced only in Liberia and which attracts premium prices in domestic and export markets because of its perceived nutritional and health benefits. Rice by-products, such as rice husk, can be used for value addition activities that generate jobs and income opportunities for SMEs. Some rice companies are already using this by-product to produce animal feed, organic charcoal, and organic fertilizer.

- *Liberia has the second highest oil palm yield in West Africa but is a net importer of palm oil – estimated at about US\$7.4 million annually – and about half of all palm oil retailers regularly run out of stock every week.* The global palm oil market is estimated at US\$70 billion and projected to increase to US\$93 billion by 2021. The opportunities for competitive import substitution and exports of crude palm oil, both within West Africa and globally are significant. While production of oil palm has been associated with practices that are environmentally unsustainable, oil palm can be produced in a sustainable manner when not tied to deforestation and the land between the tree rows is maintained covered with vegetation to reduce soil erosion. Although used primarily for consumption as cooking oil in Liberia, palm oil has multiple uses, including for cosmetic products, soaps, margarine. There is growing demand from multinational companies for use in a range of their products. While domestic demand for industrial products may be limited, the domestic capacity to meet regional and international demand could justify large-scale investments in the sub-sector. Contract manufacturing opportunities for international branded soap and skincare product manufacturers can also be attractive for domestic SMEs<sup>67</sup>. The palm kernel oil and its derivatives are also used in feed and biofuels. Red oil (dura) demand in the region and the global diaspora is a market that is largely available to Liberia, as one of the few dura-growing countries at a sizeable scale. Even within Liberia, palm oil sellers constantly run out of stock of the dura variety, given strong domestic demand.
- *Liberia has a significant potential for horticulture products, mainly fruits and vegetables.* There is a large and increasing domestic market as well as access to regional ECOWAS market where urbanization and rising demands are driving demand for fruits and vegetables. In addition, there is significant international demand in the European Union and United States for tropical fruits and vegetables, fruit juice, and their intermediaries such as pulp, puree and concentrates. In 2015, the Liberia market for horticulture was estimated at US\$103.6 million<sup>8</sup>, of which US\$90.4 million was produced locally. In the same year, the country produced an estimated 291,000 tons of fruit and vegetables and imported 14,300 tons. The import substitution potential for fruit and vegetable is estimated at US\$10-20 million annually. Liberia also has preferential access to several lucrative markets, including European Union market and the USA through the African Growth and Opportunity Act (AGOA). It boasts proximity to these markets compared to leading exporters like Kenya and South Africa. The vegetables value chain is divided into two types of vegetables: domestic and exotic vegetables. The main types of vegetables in the former are pepper, potato leaves and bitter-balls, while the latter comprise of cabbages, cucumbers, tomatoes and lettuces. There are over 300,000

<sup>6</sup> “Mapping and understanding the UK palm oil supply chain,” Proforest, 2011.

<sup>7</sup> In terms of Value-addition, a young Liberian entrepreneur is the first in the country to use palm kernel oil to produce a range of skin care products, for which he won the Johnson and Johnson 2017 African Innovation Award. His company, J-Palm Liberia is working with smallholders – a significant number of whom are young and female – has successfully tapped into the export market and is an example of the potential for attracting young people into agribusiness and employment generation.

<sup>8</sup> Liberia National Investment Commission Report 2018.



Liberian households involved in vegetable production and in recent years, the demand for vegetables has increased tremendously due to an increase in urban population, rising income levels, and growth in the retail, hospitality and catering services industry. The growth in the hospitality industry has translated into a large increase in demand for vegetables, driven by the dietary preferences of these institutions' expatriate clientele. There are also opportunities for Liberia to move into fruit and vegetable processing to tap into the lucrative EU and US markets as well as growing demand for processed foods in regional markets.

9. **A combination of adequate policies and investments are necessary to seize those opportunities and for the agriculture sector to play the development role envisaged in the draft PAPD.** For the successful transformation of smallholder agriculture in Liberia from subsistence farming to farming as a business, value chain players - farmers and agribusinesses - will need assistance to establish viable commercial relationships. This would require, among others, creating an enabling environment for commercial agriculture, investing in human capital and institutional development, and increasing productivity.

### C. Proposed Development Objective(s)

Development Objective(s) (From PAD)

10. The project development objective (PDO) is to increase agricultural productivity and commercialization of smallholder farmers for selected value chains in selected counties of Liberia.

Key Results

11. The following key performance indicators are proposed to measure project outcomes:

- (i) Increased yields of crops produced by targeted farmer groups (mt/ha), disaggregated by gender;
- (ii) Increased sale of crops produced by targeted farmer groups (value of annual sales (US\$), disaggregated by gender;
- (iii) Number of farmers directly benefiting from the project, disaggregated by gender.

### D. Project Description

12. The value chains selected for support under the project are based on a sector scan<sup>9</sup> that prioritized agribusiness sub-sectors on a range of development impact and investor potential criteria, including job and income opportunities. The analysis shows that the three value chains selected for intervention – rice, oil palm, and horticulture – have the strongest potential for development impact, ease of implementation and attractiveness for private sector investment (see annex 1.2). Rice provides the largest potential in terms of development impact, but investors also face some significant challenges in implementation. Horticulture generates strong development impact and is ranked higher than rice for challenges in implementation. Oil palm is ranked highest of all three sectors in terms of development impact and ease of implementation, making it the top priority sub-sector for maximizing development impact and private sector investments.

<sup>9</sup> WB/IFC/GoL. Agricultural Commercialization and Agribusiness Development: Sector Scan Report commissioned by STAR-P 2017



13. The findings from the sector scan are consistent with those from an earlier IFC-supported sector prioritization assessment in Liberia, which included the three value chains in the top-ranking sectors for intervention. The project will start with two value chains, rice and oil palm, in five Counties as indicated in the table below. The five Counties were selected based on comparative and competitive advantages in the production of the targeted commodities. Further analytical work will be undertaken to determine the commodities of focus for horticulture in Nimba and Margibi counties. Additional value chains and counties will be considered, based on viable business cases and fund availability<sup>10</sup>.

14. The project design is based on three strategic pillars, which are prerequisites for efficient and competitive value chains: (i) Institutional development to address critical capacity and coordination gaps, (ii) Enhancement of productivity, quality, and efficiency along the targeted value chains, and (iii) Improvements in the enabling environment.

15. Within the framework of these pillars, the project will intervene at the level of groups of farmers who will take an active role in prioritizing project activities. Farmers based organizations (FBOs) and Cooperative Associations (CAs) will be supported in a demand driven manner through a participatory process involving their members. With project support, FBOs, in consultation with local administration and agencies, will produce business plans and receive financing for the implementation of those business plans. Technical assistance to FBOs will be delivered through business development services. Extensive facilitation, training, and technical assistance will also be provided under the project to ensure that poor rural communities and disadvantaged groups, including women, participate in the collective decision-making process. The project will help give voice to those groups as well as promote the principles of transparency and accountability in planning and management of public investments.

16. The project interventions are expected to generate significant interest by the private sector considering that the targeted commodities have a wide appeal to various industries and are in high demand globally. IFC will provide the technical support to SMEs and Agribusiness firms to ensure optimal use of the limited financing available under this project. IFC will also provide any facilitation needed in order to improve access to rural credit by farmers and SMEs.

17. Activities that will address gender gaps resulting from cultural norms, lack of access to improved technology, finance and extension services will be incorporated across project components, through data collection and analysis, awareness raising, training, policy dialogue, input, grant support and positive discrimination as criteria to access project funds as reflected in annex 5 and 6. The project takes a comprehensive approach to facilitating smallholders' efficient participation in competitive value chains through coordination with other projects financed by the Bank and/or by other Development Partners. This will ensure consistency and synergies in development of integrated solutions to address constraints facing the targeted value chains.

18. Project design is based on extensive consultations with the client, private sector, IFC and development partners in order to leverage resources from both the public and private sectors. The collaborative working arrangement

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<sup>10</sup> IFAD has indicated their interest in co-financing the Project through a US\$23 million grant. The Government has written to confirm this. Should there be IFAD co-financing, the Project will expand its coverage to support beneficiaries under the Smallholder Tree Crops Revitalization Support Project (STCRSP, P113273), which will close on November 30, 2018. The STCRSP supported smallholder farmers to rehabilitate or replant tree crops on communal farms. A number of these farmer groups need additional support to take their investment to another stage in the value chain, which can be accommodated under STAR-P.



among the Ministry of Finance and Development Planning, the Ministry of Agriculture, and the Ministry of Commerce and Industry, which was established during project preparation will be strengthened during implementation.

19. The project consists of three components: (1) Institutional Capacity Building and Strengthening the Enabling Environment for Farmers, State and non-State Actors, (2) Enhancing Productivity and Competitiveness, and (3) Project management, Monitoring & Evaluation, Citizens Engagement, and Contingency Emergency Response.

20. **Component 1: Institutional Capacity Building and Strengthening the Enabling Environment for Farmers, State, and non-State Actors (US\$5.0 million).** This component aims to strengthen the capacity of Farmer-Based Organizations (FBOs), the institutional capacity of key public agencies and that of the private sector to deliver priority services necessary to promote competitive commercial agriculture in Liberia. This component will also address selected regulatory and policy binding constraints in the agri-food sector by financing studies and analyses on a demand basis. The component will be managed directly by the Project Implementation Unit (PIU) of the Ministry of Agriculture (MoA).

21. **Sub-component 1.1: Strengthening market-oriented smallholder farmer groups for selected commodity value chains (US\$2.0 million).** The sub-component will finance services for strengthening of existing and formation of new farmer groups and cooperatives. Using a participative approach, those Farmer-Based Organizations (FBOs) will be strengthened for enhanced member trust and inclusiveness, and accountability in reporting to members and in the management of funds. Individual farmers will be invited to mobilize themselves into groups using the village/community as the unit of aggregation. Three strategies will be used for social mobilization: (i) extensive communication and awareness creation of the market opportunities identified by the project including an incentive support for agribusiness firms and SMEs to create a business linkage that will serve as a stimulus for aggregation and consistent supply of high quality products; and (ii) use of Business Development Service Providers (BDSPs), contracted by the project, to identify market opportunities for farmers and work with them to prepare Business Plans; and (iii) organizational strengthening and entrepreneurship training.

22. Project financing will cover services for farmer mobilization; capacity building and institutional development, based on market and farmer demand. An initial needs assessments and consultations with farmers has helped identify the main needs in terms of capacity building of FBOs.

23. Training and capacity development will be delivered by the Cooperative Development Agency (CDA) and through vetted Business Development Services Providers (BDSPs) and Non-Governmental Organizations (NGOs).

24. **Sub-component 1.2: Institutional Strengthening for selected Government Ministries, Departments, and Agencies- MDAs (US\$1.5 million).** This sub-component will build the capacity of and/or strengthen coordination among the Ministry of Agriculture (MoA), CDA, Liberia Agriculture Commodity Regulatory Agency (LACRA), the Ministry of Commerce and Industry (MoCI) and the Ministry of Finance and Development Planning. This subcomponent will promote the use of institutional development plans and that of disbursement-linked or performance-based indicators in the delivery of support services. The sub-component will be coordinated through the PIU at MoA, with the support to be provided to each institution defined in consultation with the LASIP Secretariat and the concerned beneficiary agency or Ministry. This subcomponent will finance technical assistance, studies, goods and works.



25. **Sub-component 1.3: Capacity Building for selected Private Sector and non-State Institutions (US\$1.5 million).**

Most of Liberia's agribusiness firms are relatively small, with human resources and management capacity limitations. In addition, coordination and collaboration among actors in the value chains, including linkages between firms and farmers, remain weak and affected by a lack of trust. This sub-component will finance technical assistance, training and studies to build capacity of selected agribusiness firms and non-State actors to enhance coordination and collaboration between firms and farmers. This subcomponent will be coordinated by the PIU and the offices at the various counties and will provide:

- (i) Capacity building to agribusinesses with good business linkage plans with smallholder farmers focusing on SMEs and large firms providing upstream and downstream services such as mechanization, logistics, packaging and distribution in targeted value chains;
- (ii) Technical assistance and training to umbrella bodies representing the value chain actors such as the Liberia Business Association (LIBA), the Farmers' Union Network, and the Agribusiness Investment Network;
- (iii) Support for establishing and/or institutionalizing rice and oil palm value chain stakeholder forum;

26. **Sub-component 1.4: Strengthening the Enabling Environment- Policy, Regulations, and Administrative procedures for Agribusiness Development (US\$0.5 million).** Liberia's business environment provides limited incentives for private investments. The aim of this sub-component is to improve the enabling environment for the development of agribusiness. This component will be coordinated by the PIU in MoA in collaboration with the Ministry of Finance and the Ministry of Commerce and Industry. It will finance TA, training, workshops and studies and include the following activities:

- (i) Policy/business regulatory diagnostics to identify priority areas for reform and support under the project, such as tariff reform, and the establishment of the Liberia Incentive-based Risk Sharing Agricultural Lending facility (LIRSAL);
- (ii) Workshops to raise awareness about and facilitate the ratification of ECOWAS Trade Liberalization Scheme;
- (iii) Convening of Development Partners to facilitate the establishment and development of the Agri-Public-Private Sector Forum to facilitate dialogue and concerted action on policy initiatives.

27. **Component 2: Enhancing Productivity and Competitiveness (US\$15 million).** This component aims at improving smallholders' integration in the value chains targeted by the project. Under this component, the project will finance matching grants (MG) for smallholder farmers, agribusinesses, business development services providers and financial institutions through the establishment of the Liberia Agriculture Commercialization Fund (LACF), to contribute to the costs of investment subprojects. The LACF will be created as a special Designated Account under the Project Implementation Unit (PIU) and will be managed by an independent Fund Manager. The Government of Liberia and the relevant stakeholders will establish a Fund Advisory Committee to provide appropriate governance and oversight over the use of the LACF.

28. The subprojects to be supported through the LACF will be based on business plans prepared by eligible beneficiaries, who will have undergone an independent screening and evaluation process to determine their technical, socioeconomic, financial, and environmental viability. Eligible expenditure categories under this



component include: (a) civil works (for example, lowland rehabilitation, clearing of bushland, construction of post-harvest, storage, and processing facilities, small-scale irrigation); (b) productive equipment (for example, farm machinery, processing equipment, transport vehicles); (c) incremental working capital (for example, for improved inputs); and (d) technical assistance and business advisory services. Details of the design features and implementation arrangements will be provided in the LACF Operational Manual. Advisory services, under Component 1, will be available to eligible beneficiaries to prepare investment proposals and ensure the applicant has the capacity to implement the proposed investment. Details of the design features and implementation arrangements will be provided in the LACF Operational Manual that will be a condition of disbursement for this component.

29. The LACF will have four windows: (i) investment support for productive linkages between smallholder farmers and agribusinesses in an off-taker arrangement, (ii) investment support for out-grower productive linkages between smallholder farmers and Concessionaires (iii) investment support to agribusinesses and business development service providers; (iv) support to financial institutions for product innovation and outreach. The matching grants (MG) for subprojects will involve different terms covering FBOs and SMEs, in different value-chains, and in different segments of the value-chain, in accordance with the details on set ceilings and beneficiary contributions.

30. **Sub-component 2.1. Investment support for productive linkages between smallholder farmers and agribusinesses (US\$12 million).** The successful inclusion of smallholder farmers into organized and well-structured value-chains largely depends on their organization to gain the confidence and trust of agribusinesses and the Concessionaires. Aggregating farmers will help smallholder farmers to access more efficiently market inputs, procure supplies, and disseminate information that facilitate improvement in farm productivity and quality. Off-takers that source directly from farmer organizations can expand their supply base, strengthen their supply chain, and increase their processing conversion rates. The project will engage with existing FBOs and Cooperative associations, while supporting market driven establishment of new groups. Sub component 2.1 will provide MGs to support project activities from Windows 1 and 2 of LACF.

31. **Window 1.** A first window will support Rice / Horticulture FBOs and off-takers/processors business linkages. It will provide MG to finance FBOs' business plans including technical assistance, small works, equipment and goods. It is estimated that about 240 FBOs with 25 members each (of which 100 in rice, 60 in oil palm and 80 and horticulture) and 42 coops (with 250 members each) would be supported under this window. All MGs will be based on approved business plans that will detail the business needs, activities, amount, the targeted market, and the contribution by the beneficiary FBO. Some of these arrangements have been identified during project preparation, including (i) linkages to processors, (ii) linkages to importers/traders, (iii) linkages to institutional programs (e.g. School Feeding Program) and finally, (iv) other agribusiness linkages (with the hospitality industry, supermarkets and other firms).

32. **Window 2.** The second window will provide MG to FBOs of oil palm value chains and it is expected to finance an estimated 30 out-grower schemes in the oil palm value chain. Out-grower schemes in Liberia typically integrate four main elements: (i) a nucleus farm engaged in primary production and/or business operations such as processing, storage, transportation and marketing; (ii) provision of inputs and technical assistance by the agribusiness to participating farmers; (iii) off-take agreements to purchase pre-defined quality of farmer output; and (iv) an agreed-upon price mechanism or benefit sharing. The out-grower model is included in the Government's oil palm concession agreements to make development of the sector more inclusive. This window will invest in and/or scale-up out-grower-concessionaire partnerships based on either (i) the model piloted under the Smallholder Tree Crops Revitalization Support Project, in which farmers cultivate individual owned lands and sell their produce to concessionaires or (ii) the IDH-Trade Initiative model that combines community oil palm farm ownership with technical and management capacity from concessionaires – to ensure high management standards and yields; and the use of Production



Protection Agreements – as an innovative approach to tie investments in agricultural productivity to forest conservation over the long term.

33. **Sub-component 2.2: Support to agribusinesses and business development service enterprises (US\$2 million).**

Under this subcomponent, window 3 of the LACF will co-finance investment proposals by agribusinesses and BDS enterprises that contribute to the project’s objective of enabling smallholder farmers to be profitably linked to commercial markets. Business plans submitted by these enterprises are expected to have a clear linkage to smallholder farmers in the form of service provision, sourcing, or co-investment and the sub-projects can include:

- (i) Downstream services, such as aggregation, warehousing, packaging, distribution, logistics. Proposals can also be submitted for processing equipment, such as rice mills and oil palm processing equipment;
- (ii) ICT services to improve market information dissemination to producers, providing agrometeorological alerts for crop treatments to mitigate risks of pests, etc...

34. **Sub-component 2.3. Support to financial institutions (US\$1 million).** This is the fourth window of LACF and will facilitate smallholders’ and FBOs’ access to adapted formal financial services, particularly for tree crop value chains that need longer term finance. This sub-component aims to strengthen the capacity of financial institutions to improve services to Liberia’s agriculture sector. It will therefore support developing of suitable financing products and services for the targeted value chains and rolling them out in the project districts. Eligible sub-projects submitted by financial institutions include:

- (i) Detailed market research on the specific requirements of actors (particularly smallholder farmers, women, FBOs, and SMEs) in the targeted value chains and the potential market size;
- (ii) Assessment of market barriers and policy challenges that constrain the development of products for the Liberian market to mitigate climate change risks;
- (iii) Product design and pilot testing, including delivery mechanisms (e.g. digital finance) and setting up of value chain finance arrangements;
- (iv) Outreach plans to roll out successful products, services and delivery mechanisms in the project areas.

35. Eligible activities under the financial institutions sub-projects includes technical assistance, staff training, some ICT equipment and transport equipment to strengthen rural delivery capacity. Loanable funds will not be eligible for support under the project.

36. **Component 3. Project Management, M&E, citizens engagement, and contingency emergency response (US\$5.0 million).** The objectives of this component are to facilitate (i) efficient coordination and monitoring and evaluation of project activities, (ii) stakeholder awareness and participation through timely communication of results and consistent citizen engagement, and (iii) a response to a possible emergency. These objectives will be addressed under three sub-components.

37. **Sub-component 3.1. Efficient Project management, monitoring and evaluation (US\$3.5 million).** To ensure efficient project delivery, financial and technical support will be provided to increase and strengthen the skills sets at the In addition to the existing staff, the Project Coordinator, accountant, and M&E officer, the project will support the recruitment of other experts. Some of the expertise (such as the communications, safeguards and citizen engagement officers) will be shared between STAR-P and WAATP. The project will also support the design and implementation of an efficient M&E and MIS system for the project.



38. **Sub-component 3.2. Effective communication and citizen engagement (US\$1.5 million).** The aim of this sub-component is to use communication and engagement to maximize the development impact of the project by ensuring information about project objectives, scope, and activities are communicated to intended beneficiaries accurately and on a timely basis and by facilitating a wider range of Liberian citizens and other stakeholders to become aware of the agri-food sector's potential and participate in its promotion. The subcomponent will also facilitate public-private sector policy dialogue and private sector engagement.

39. This sub-component will support the elaboration of a communication strategy aligned to the component's objectives and the implementation of the strategy. It will identify a wide range of methods and tools for implementation, including ensuring that these would be accessible to citizens with varying literacy skills, language use, and IT access.

40. **Sub-component 3.3. Contingency emergency response (US\$0 million).** In accordance with the World Bank's operational policy (OP10.00, paragraphs 12–14), this window will allow for rapid reallocation of project funds in the event of a natural or man-made disaster or crisis that has caused or is likely to cause a major adverse economic and/or social impact. If triggered, this sub-component, the government must declare an emergency or provide a statement of fact justifying the need for the activation of the use of emergency funding. If the World Bank Group agrees with the emergency assessment, this subcomponent would allow the government to request the Bank to re-categorize and reallocate financing from other project components to cover emergency response and recovery costs.

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## **E. Implementation**



## Institutional and Implementation Arrangements

41. **The Ministry of Agriculture (MoA) will be responsible for overall project implementation through its PIU.** MoA will collaborate closely with other relevant ministries and their respective departments and agencies, including the Ministry of Commerce and Industry for project activities focusing on connecting producers to traders and agri-processors and support for rehabilitation/standardization of quality laboratories. MoA will also work with the Ministry of Finance and Development Planning for project activities focusing on policy coordination among ministries; the Cooperative Development Agency (CDA) for project activities designed to strengthen FBOs and cooperatives' capacity to organize and foster linkages (leadership, management, governance). Finally, the MoA will liaise with the Liberia Agriculture Commodity Regulatory Agency (LACRA) for project activities to support regulatory function and setting of product standards.

42. **An inter-ministerial National Project Steering Committee (NPSC) headed by the Ministry of Agriculture will provide strategic oversight to the project.** The committee will include representatives of all relevant ministries and agencies, and both public and private sector institutions and non-state actors' representative such as the National Chamber of Commerce, and representatives of youth and women engaged in the agri-food sector. It will meet at least twice a year and it will be chaired by the Minister of Agriculture or its designated representative. The main responsibilities of the NPSC will include: (i) providing strategic and policy guidance to the PIU in MoA for implementation and coordination of activities; (ii) ensuring overall conformity with government policies and strategies; (iii) reviewing project progress and performance; (iv) approving the annual work plan and budget (AWP&B); (v) resolving implementation problems or conflicts; and (iv) assisting the PIU in obtaining, whenever needed, government assistance and contributions to the project.

43. At the national level the project management, monitoring and evaluation functions will rely primarily on existing MoA structure, the Project Implementation Unit (PIU), which is managed by the Program Management Unit (PMU). The MoA has established a Program Management Unit (PMU) in charge of the preparation and management of externally-funded programs<sup>11</sup>. The PIUs of all externally funded projects operate under the coordination of the PMU. The STAR-P PC,U's main responsibilities include (i) coordinating the consolidation and review of annual work programs, budgets and procurement plans; (ii) providing assistance for the preparation of terms of references, procurement, contracts supervision, and the like; (iii) disbursing project funds and ensuring the replenishment of project accounts; and (iv) undertaking the necessary reporting, audit and M&E activities, (v) overseeing the implementation of project activities and their management.

44. At the county level, the PIU will coordinate project implementation through county project focal points in cooperation with county level agricultural offices to implement component 1 and ensure collection of data regularly for M&E under component 3. The project officers at the county unit will coordinate project activities and ensure that work plans are prepared, budgeted and implemented in a timely manner and that use of project funds is in line with the provisions of the project's eligibility and targeting guidelines.

45. The Liberia Agriculture Commercialization Fund (LACF) will be managed by an independent party, recruited through a competitive process. A LACF Operational Manual will be developed to set out the process for grant application, proposal evaluation, disbursement, and monitoring and evaluation of funded sub-projects including forms/templates to be used and dedicated sections for financial management and procurement. This will be a disbursement condition for component 2.

46. A value chain/market specialist will be hired through a competitive process to be housed at the PIU. The primary



role of the specialist will include market identification, facilitation of market arrangements, facilitation of sub-sector dialogue and coordination with the aim of engendering industry associations, and on-going assessment of farmers and other chain actors' needs. The specialist will be supported by market brokers contracted by the Project. The SIDA supported Grow Liberia program will also provide TA support to the specialist and collaborate with the PIU on the market identification and facilitation objectives.

47. Project implementation arrangements are based on the following principles:
- (a) Build synergies with on-going and planned Government and donor funded programs. It was agreed that the project PIU of the MoA will provide coordination of the project while incorporating members from the MFDP, MOCI, National Investment Commission and the private sector; and other on-going and/or planned donor and Bank funded operations;
  - (b) Build on existing institutional structures;
  - (c) Project implementation mechanisms will be adapted as needed to accommodate possible changes in institutional structures and additional and related programs, such as WAATP;
  - (d) Apply subsidiarity principles, with the responsibility for delivering project activities taking into consideration both the nature of the activity and the available implementation capacity to deliver it efficiently.

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

The project aims to work with smallholder farmers and farmer groups, private agribusiness firms and MSME groups to increase agricultural productivity and promote commercialization of smallholder farmers. The specific sites for sub-project investment are currently unknown. Notwithstanding, five counties (Bomi, Grand Cape Mount, Lofa, Nimba and Margibi) have been targeted as potential areas for investment. The selected counties are largely rural communities which were primarily agricultural areas before the conflict and have had some level of private sector agricultural operations in the selected value chains. Safeguards supervision of projects with multiple sub-project locations are usually challenging and will require strong monitoring system at the local level. However, the ESMF provides mechanisms for screening sub-projects, and each sub-project will be screened to identify relevant characteristics, including location and activities to be undertaken, which may necessitate the preparation of site-specific instruments, including ESMP and or RAP, to mitigate the potential risks and impacts of such sub-project.

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

Gloria Malia Mahama, Social Safeguards Specialist  
Sekou Abou Kamara, Environmental Safeguards Specialist

<sup>11</sup> The PMU is currently supported by various donors including World Bank, USAID, EC, AfDB, IFAD, etc., with the aim of providing the Ministry with the capacity to manage and coordinate all donor funded projects.



**SAFEGUARD POLICIES THAT MIGHT APPLY**

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Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	This policy is triggered since proposed activities will involve agricultural productivity enhancement. Productivity enhancement may involve introduction of hybrid varieties and increased use of agrochemicals which may have potential adverse impacts on the environment. The project also intends to undertake some civil works. Under sub-component 2.1, the project will support the development or improvement of transportation and market access infrastructure, especially feeder roads, in the selected project locations. The potential project impacts are however expected to be moderate. The Client has prepared an ESMF because sub-project locations are undetermined at this time. Sub-project screening and Follow up ESIA's, EMPs will be prepared as required during implementation. The ESMF was reviewed and cleared by the Bank on 11 October, 2018 and subsequently disclosed in-country on 17 October, 2018 and on the Bank's Website on 23 October 2018.
Performance Standards for Private Sector Activities OP/BP 4.03	No	
Natural Habitats OP/BP 4.04	No	Project will not support activities in natural habitats. Sub-projects will be screened to avoid impacts on natural habitat.
Forests OP/BP 4.36	No	The project activities will not involve investment in forest or protected areas or related forestry activities that have the potential to adversely impact forests, or restrict people access to or use of forest resources
Pest Management OP 4.09	Yes	The project activities may involve procurement, transportation or storage of pesticides or pesticide application equipment as well as other agrochemicals. A stand-alone Pest Management Plan (PMP) has been prepared in addition to the ESMF and the RFP. The PMP was reviewed and cleared by the Bank on 11 October, 2018. As required, the PMP



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		has also been disclosed in-country on 17 <sup>th</sup> October, 2018 and on the Bank’s Website on 24 October, 2018.
Physical Cultural Resources OP/BP 4.11	No	There are no recognized physical cultural resources in the project area. Project activities will not involve large excavation. Chance find procedure may be included in the project ESMF and site-specific ESMPs when required.
Indigenous Peoples OP/BP 4.10	No	This not applicable to the project area and to Liberia at large
Involuntary Resettlement OP/BP 4.12	Yes	The project will invest in civil works including construction of small-scale irrigation facilities, post-harvest, storage and processing facilities, rehabilitation and maintenance of farm roads etc. These activities may lead to land acquisition, increase the vulnerability of existing land users especially women to displacement which in turn may negatively impact livelihoods. These risks however are expected to extend moderate to substantial social impacts. Based on the risk profile, the World Bank safeguard policy on Involuntary Resettlement (OP 4.12) is triggered. In line with this policy, the borrower prepared a Resettlement Policy Framework (RPF) and this was cleared by the Bank on 11 October, 2018 and disclosed in- country on 17 October 2018 and on the Bank’s website on 24 October 2018. An RPF is prepared because site location for the sub-projects investment cannot be determined until at implementation. RAPs will be prepared as necessary once works and sites have been identified.
Safety of Dams OP/BP 4.37	No	Project activities do not involve construction of new dam or renovation of existing dams. The project will not rely on any existing dams.
Projects on International Waterways OP/BP 7.50	No	The project activities will have no impact on international waterways.
Projects in Disputed Areas OP/BP 7.60	No	Project activities are not within disputed areas.



## 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:

The project will involve crop cultivation and infrastructural support to increase productivity and enhance agricultural commercialization. Productivity enhancement may involve introduction of hybrid varieties and increased use of agrochemicals and pesticides which may have potential adverse impacts on the environment. Civils works may also lead to land acquisition, displacement and restriction to land resources which in turn may negatively impact livelihoods. These risks however are not expected to extend large scale, significant and/or irreversible impacts. The Client has prepared an Environmental and Social Management Framework (ESMF), a Pest Management Plan (PMP) and a Resettlement Policy Framework during project preparation which were approved and disclosed prior to Appraisal. The ESMF and RPF establish and clarify the safeguards arrangement to put in place prior to the start of sub-projects activities. In addition, the ESMF and RPF contain a check list for screening each sub-project during implementation. Environmental and Social Management Plans (ESMPs) or Resettlement Action Plan(s) will subsequently be developed and disclosed where required.

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

The potential long-term impacts by large are anticipated to be positive. Activities will lead to an increase in household incomes for participating farmers, improved agriculture-related capacity (such as knowledge of technology and improved farming methods which would have spill-over effects) and it may result in monetary and non-monetary benefits at the community level (a result of community negotiations with private investors).

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

Analysis of alternatives will be conducted as part of the sub-project environmental and social impact screening during implementation. The project's approach is however to avoid impacts on dwellings, critical natural habitats and livelihoods through identification of alternative site. Since specific locations and designs are undetermined at this stage, an ESMF and RPF will be prepared and disclosed prior to appraisal.

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.

Based on the risks profile, the project triggers OP4.01 on Environmental Assessment, OP 4.09 on Pest Management and OP4.12 on Involuntary Resettlement. In order to comply with these policies, the Client has prepared an ESMF, an RPF and a PMP. The Frameworks are prepared because specific locations and designs are undetermined at this stage. The ESMF and RPF provide the framework and guidance for environmental and social due diligence, impact assessments and mitigation planning once the project intervention areas are identified during implementation. The project has made provision of a social and environmental screening for each sub-project. The borrower is required to prepare, publicly disclose and implement sub-project level ESIA's, RAPs as needed prior to commencement of any civil works.

It is required that both smallholder farmers and private investors whose investment is supported by land acquisition apply the RPF and comply with the project's safeguards requirement. Safeguards knowledge at these levels are usually insufficient. The PIU under MOA however has the ultimate responsibility for ensuring successful project implementation, including adherence to safeguards measures and compliance. The MoA as an institution does not



have trained staff. In previous projects, it had had to rely on consultants for safeguards support. Currently there are no trained staff or qualified personal to support safeguards implementation on this project. It has been agreed that the project will recruit and add to the PMU level staffing, an environmental officer, safeguards and citizens engagement specialist and a gender specialist prior to project implementation. These specialists, will be based at the PMU to provide safeguards support to STAR-P, WATTP and other agricultural projects that may emerge. Since project activities will span 5 counties with multiple sub-project locations, the project will coordinate safeguards implementation through county project focal points who are usually the county level agricultural or extension officers. It is envisaged that during the inception workshop, safeguards training for the PMU staff and extension officers will be organized. Several trainings will be organized during implementation to include for extension officers and designated safeguards focal points of implementing partners.

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

Key stakeholder under the project include (i) local communities (smallholder farmers) (ii) government institutions (Ministry of Agriculture, Liberia Agriculture Commodity Regulation Agency (LACRA), Cooperative Development Agency, the Ministry of Commerce and Industry, the Ministry of Finance and Development Planning) (iii) non-state institutions (Liberia Business Association (LIBA) and the Central Agriculture Research Institute (CARI)) (iv) private agribusiness firms and NGOs etc.

To comply with national regulations and Bank safeguard policies, all project safeguards instruments would be amply consulted upon and publicly disclosed in-country through various media channels, with extensive usage of local languages to ensure community understanding and buy in before appraisal; they would also be disclosed on the World Bank’s InfoShop. Overall, these series of public/ stakeholder consultations are to encourage in-built ownership towards the project. Such ownership should foster more social accountability, which will ultimately add to the sustainability of project activities.

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

**Environmental Assessment/Audit/Management Plan/Other**

Date of receipt by the Bank	Date of submission for disclosure	For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors
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**"In country" Disclosure**

**Resettlement Action Plan/Framework/Policy Process**

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Date of receipt by the Bank

**October 17, 2018**

Date of submission for disclosure

**October 24, 2018**

**"In country" Disclosure**

**October 17, 2018**

**Pest Management Plan**

Was the document disclosed prior to appraisal? Yes

Date of receipt by the Bank

**October 17, 2018**

Date of submission for disclosure

**October 24, 2018**

**"In country" Disclosure**

**October 17, 2018**

**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, the ESMF was reviewed and cleared by the PM (This is a transferred project).

Are the cost and the accountabilities for the EMP incorporated in the credit/loan?

Yes, the cost of sub-projects ESMPs and ARAP/RAP has been incorporated.

**OP 4.09 - Pest Management**

Does the EA adequately address the pest management issues?

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An EA could not be prepared at this stage since sub-project sites are not known.

Is a separate PMP required?

Yes

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?

Yes, both the safeguards specialist and the PM have reviewed the PMP, and the PMP has been approved by the PM.

#### **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?

Yes, the PM has reviewed and cleared the RPF

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)

No

#### **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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**Approved By**

Safeguards Advisor:		
Practice Manager/Manager:		
Country Director:		

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