INTEGRATED SAFEGUARDS DATA SHEET
APPRaisal STAGE

Report No.: ISDSA8157

Date ISDS Prepared/Updated: 19-Mar-2014
Date ISDS Approved/Disclosed: 25-Mar-2014

I. BASIC INFORMATION

1. Basic Project Data

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<th>Country:</th>
<th>Sri Lanka</th>
<th>Project ID:</th>
<th>P150140</th>
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<tr>
<td>Project Name:</td>
<td>North East Local Services Improvement Project - Additional Financing (P150140)</td>
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<tr>
<td>Task Team Leader:</td>
<td>Seenithamby Manoharan</td>
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<tr>
<td>Estimated Appraisal Date:</td>
<td>15-Apr-2014</td>
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<td>Managing Unit:</td>
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<td>Sector(s):</td>
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<td>Theme(s):</td>
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Environmental Category: B - Partial Assessment

2. Project Development Objective(s)

Original Project Development Objective (PDO) is to support local authorities in the Northern and Eastern Provinces to deliver services and local infrastructure in a responsive and accountable manner.
Revised Project Development Objective is to support local authorities in the Northern and Eastern Provinces and Adjoining Provinces to deliver services and local infrastructure in a responsive and accountable manner.

3. Project Description

The parent project was initially financed with IDA resources. Co-financing grant has been received grant from the Australian Department of Foreign Affairs and Trade – DFAT -World Bank. Partnership for South Asia to continue the activities supported by the project. The project activities eligible for financing will remain as it is for the DFAT funds.

There are five components in the project:

Component 1: Infrastructure Service Delivery: The objective of this component is to improve the quantity and quality of public goods delivered and maintained by Local Authorities (LAs). These may include rural roads, drains, culverts and bridges, public buildings, markets and fairs, waste disposal, rural water supply, parks, recreation facilities and libraries, nursery schools, playgrounds and dispensaries.

Component 2: Institutionalizing Accountabilities: This component aims at ensuring that LAs undertake public expenditures and deliver local services in a transparent and accountable manner. It will strengthen upward and downward accountability systems at the LAs and will support: (a) transparent and independent annual financial audits of LAs to ensure their financial accountability; (b) social and technical audits of public expenditures undertaken by LAs to ensure effective use of funds in line with citizen expectations; and (c) systems and processes to bring greater transparency in LA affairs and strengthen citizen voice in planning, budgeting and monitoring. This component will also support an Information Education & Communication (IEC) campaign aimed at disseminating project related information to different stakeholders at all levels.

Component 3: Building Capacities: This component aims at strengthening the service delivery systems and capacities of the LAs to deliver their mandated services as well as strengthening the monitoring capacities of the provincial and national level institutions. It will support (a) improving the efficiency of current systems and procedures relating to planning, budgeting, financial management, revenue management and procurement at the LA level, (b) improving the efficiency, timeliness and follow up of the internal and external audits of LAs, (c) training elected representatives and staff of LAs on financial management, procurement and project management, (d) providing effective hand holding support to LAs on day to day basis, and (e) developing a long term capacity building strategy for LAs. It will also support the strengthening of the capacities of the national and provincial level institutions that play a critical role in the support and oversight of local government functions.

Component 4: Assessments and Evaluation: This component will finance: (i) activities pertaining to establishing a comprehensive monitoring system, including baseline assessment, repeater surveys of social assessments, social accountability assessment, and capacity assessments; (ii) evaluating technical and social audits and preparation of citizens score cards; and (iii) other needed analysis as and when they are needed.

Component 5: Project Management: This component will support the key agencies at the central,
provincial and local levels that are involved in the day to day management of the project to procure necessary consultant, equipment and operational support for the smooth implementation of the project.

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

Project will be located in the North and Eastern Provinces of Sri Lanka. Both provinces are located in the low country dry zone in Sri Lanka.

Northern Province: Northern Province has an area of 8,884 square kilometers. The province is surrounded by the Gulf of Mannar and Palk Bay to the west, Palk Strait to the north, the Bay of Bengal to the east and the Eastern, North Central and North Western provinces to the south.

The province is divided into two distinct geographic areas: Jaffna peninsula and the Vanni. Jaffna peninsula is irrigated by underground aquifers fed by wells whereas the Vanni has irrigation tanks fed by perennial rivers. Major rivers include: Akkarayan Aru, Aruvi Aru, Kanakarayan Aru, Kodilikallu Aru, Mandekal Aru, Nay Aru, Netheli Aru, Pali Aru, Pallavarayankkudu Aru, Parangi Aru, Per Aru, Piramenthal Aru, Theravil Aru. The province has a number of lagoons, the largest being Jaffna Lagoon, Nanthi Kadal, Chundikkulam Lagoon, Vadamarachchi Lagoon, Uppu Aru Lagoon, Kokkilai lagoon, Nai Aru Lagoon and Chalai Lagoon. Most of the islands around Sri Lanka are to be found to the west of the Northern Province. The largest islands are: Mannar island, Kayts, Neduntivu, Karaitivu, Pungudutivu and Mandativu.

The Northern Province tends to be hot and dry in the dry season (February to September), and moderately cool and wet in the wet season (October to January) when the North-east monsoons takes place. Province's climate is tropical and therefore during monsoons there is always the chance of a deluge. In the lowlands the climate is typically tropical with the average temperature is around 28º to 30º for the year. Relative Humidity varies from 70% during the day to 90% at night. Annual rainfall is less than 1250 mm in the north west and south east of the Inland.

Majority of the people earn their livelihood as farmers, fishers and professionals in the civil and business sectors. Agriculture is the prominent source of livelihood for vast majority of the people. Jaffna peninsula is irrigated by underground aquifers fed by wells whereas the Vanni has irrigation tanks fed by perennial rivers. Agricultural is the prominent source of income for the people of the province. The Major agricultural crops produced in this province are Paddy, Chilli, Red Onion, Black gram, Green gram, Cowpea, Groundnut, Bombay Onion. Other agricultural productions are Fruits such as Banana, Mango, Papaya, Lime, Orange, Guava. Major vegetables grown in this province are Beans, Capsicum, Tomato, Cabbage, Beet root, Carrot, Vendakkai, Snakeguard, Bitterguard, Brinjal, Ashplantain, Long beans, Manioc and sweet potatoes.

The Province has a wide range of flora and fauna, although there are hardly much information of their status. The Province has wide range of ecosystems spanning from deep jungles in the interior lands, scrub forest, thorn forest, drylands, wetlands and as well as beaches, estuaries, salt marshes, mangroves, and to coral reefs of the Bay of Bengal and Gulf of Mannar providing habitat to diverse array of fauna and flora.

Eastern Province: Eastern province has an area of 9,996 square kilometers. The province is surrounded by the Northern Province to the north, the Bay of Bengal to the east, the Southern Province to the south, and the Uva, Central and North Central provinces to the west. The province's
coast is dominated by lagoons, the largest being Batticaloa Lagoon, Kokkilai lagoon, Upaar Lagoon and Ullackalie Lagoon.

The climatic conditions of the Eastern Province are similar to Northern Province with similar wet and dry periods. Eastern Province has long coastline. The average temperature is around 24° to 32° for the year. Relative Humidity varies from 40% during the day to 100% at night. Average rainfall is from 70 mm in January and 396 mm in October.

The mains economic activities are paddy cultivation and fishery. Paddy from this province accounts for the highest proportion of the countries rice production.

The ecosystems present are similar to the Northern Province and very little is known of their biodiversity.

With the Additional Financing the adjoining districts of Anuradhapura, Polonnaruwa, Puttalam and Moneragala. Anuradhapura and Pollonaruwa belong to the North Central province that borders the Eastern and Northern Province. Puttlam belong to the North western province and borders the Northern Province while Monaragala belongs to the Uva province and borders the Eastern province. These areas have dry climatic conditions similar to that of the Northern and Eastern province as they too belong to the dry zone. Anuradhapura and Pollonaruwa are both sites of historic significance, where the main city areas have been built around the remains of the archeological remains of two historical cities of the same names. The area around the main cities, that encompass the district are mostly Paddy and Chena land and settlements and populations are fairly dispersed.

The adjoining districts consist by population belong to all three main ethnic groups with large majority of Sinhala community. No identifiable in digenous groups live in these districts.

5. Environmental and Social Safeguards Specialists

Mohamed Ghani Razaak (SASDS)
Mokshana Nerandika Wijeyeratne (SASDI)

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<td>Involuntary Resettlement OP/BP 4.12</td>
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II. Key Safeguard Policy Issues and Their Management

A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

   Currently all resettlement activities in the North and East have already been completed. The following environmental issues can be identified in these areas: (1) loss and change of natural habitats due to human settlements, agriculture activities and infrastructure expansion, (2) pollution due to inadequate sewage systems and solid waste management, (3) promotion of destructive fishing in the coastal areas, (4) contamination of groundwater due to agriculture intensification and poor drainage systems within human settlements impacting water quality, (5) flooding due to poor drainage, (6) poor sanitation among settlements, (7) unplanned natural resource extraction for development activities, and (8) contributing to the human-elephant conflict. The project is expected to ensure that these issues are addressed as part of the Local Authorities (LA) service delivery activities and this has been done successfully in the North and East over the previous course of the project. Nevertheless, the proposed activities of the LAs have a potential to be negatively impacting on the environment and will need to take necessary actions to ensure that impacts are avoided or minimized through suitable mitigation measures.

   LAs have been conducting their planning process and prioritization of activities that will be funded through this project. Based on the preliminary list of potential activities that will be carried out by the LAs, the following overall environmental impacts have been identified, which will need to be taken into consideration and will require mitigation measures when planning and implementation of these activities.

   Impacts due to raw material extraction: Most of the proposed sub-project activities will require number of natural resources such as sand, timber, metal, clay, etc. in order to implement the activities thereby increasing the demand for these materials. This increased demand for raw material will invariably intensify mining and extraction from the environment. In addition, due to lack of consolidated planning for sustainable extraction of required quantities, it is difficult to assess the resultant environmental damage and their long-term implications. Therefore, it is important to consider the cumulative impacts of natural resource extraction and follow the guidelines for extraction and management of the resources. All World Bank funded projects should not extract resources or carry out any activities within protected areas gazetted under the Flora and Fauna Protection Ordinance and forest reserves under the Forest Ordinance.

   Impacts on environmentally sensitive sites: The locations of sub-projects are crucial in determining the nature and magnitude of human-environment interaction. While reconstruction activities may have less potential to create negative impacts on sensitive areas, new construction...
activities will have high potential for negative impacts. Site selection continues annually as part of the local authority planning exercises and during site selection for activities, the safeguard process ensures that encroachment on environmentally sensitive areas such as forests, mangroves, lagoon, marshes, archaeological reserves, river/stream/tank reservations, etc. have not taken place.

Overall, the project is expected to have general positive and little or no negative social impacts. The expected positive impact is improved delivery of public goods and services from LAs along with effective community involvement in the decision making process in managing resources. The potential adverse social safeguard related impacts, as anticipated at this stage, would largely result from land acquisition and involuntary resettlement which may be required in connection with the LA investments in rural infrastructure such as rural access, rural water, sanitation, street lighting, rural markets, and intra & inter village infrastructure.

Most communities of Indigenous Peoples in Sri Lanka live in remote locations in the East, such as in Muratthananai, Akkuranai, Minuminuththaveli, Paalchenai and Kathiraveli in the Batticaloa district and in Muthur East in Trincomalee, while the “Veddah” community is found in bordering villages of the East. While OP/BP 4.10 does apply to these reasonably well defined groups in the interior of Sri Lanka, the issue of ethnic and religious affiliation is a larger factor in determining vulnerability at national and local level in the present Sri Lankan context.

A separate Social Impact Assessment has been completed prior to appraisal to assess and to identify (i) the overall direct and indirect social impact of the planned project activities on the general conflict potential in the two provinces, (ii) how local authorities have been functioning during the years of conflict, and implications hereof for the present project, and (iii) the perception of the role and function of the local authorities by the various stakeholder groups and their needs and future expectations.

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

The above mentioned direct impacts will also have a potential to cause indirect and long term impacts to the environment and natural resources. Resource extraction has the possibility of degrading the land, reducing the watershed and hence the quality and quantity of water available for natural ecosystems, people and their economic activities unless it is sustainable. Also if the investments are provided for activities to take place even closer to sensitive ecosystems, through time there is a high potential for communities to encroach into these areas. Therefore, it is essential to conduct sub-project specific environmental assessments once the types and localities are identified incorporating mitigation measures taking direct, indirect, short-term and long-term impacts into considerations.

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

Not Applicable

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.

Sri Lanka is one of the leading countries in the South Asian region in enacting environmental legislations. Its concern for environment dates back to over two and a half millennia. The constitution of the Democratic Socialist Republic of Sri Lanka under chapter VI Directive Principles of State policy & Fundamental duties in section 27-14 and in section 28-f proclaim “The state shall protect, preserve and improve the environment for the benefit of the community”,
“The duty & obligation of every person in Sri Lanka to protect nature and conserve its riches” thus showing the commitment by the state and obligations of the citizens. The constitution of Sri Lanka contains several provisions, relating to the environment. (i.e. Article 27 (14) and Article 28). The 13th constitutional amendment introduced a new level of institution for environmental protection and management. Therefore, provincial government also has legislative and executive power over environmental matters. (i.e. Article 154 (A) 9,19 and (III) 17).

The National Environmental Act (NEA) provides conservation and development guidelines for natural resources including water, forest, flora and fauna in Sri Lanka. The 1988 amendment transformed the Central Environmental Authority (CEA) to enforcement and implementing agency. The CEA issues Environmental Protection Licences (EPL) to medium and high polluting industries under the section 23 (A) of the NEA. Since 1994 issues of EPL to low polluting industries has been delegated to relevant local authorities. Under the section 7 (1), there is provision to establish an Environmental Council to in collaboration with respective line agencies to advise the CEA. The section 9 (1) provide necessary guidelines to establish District Environmental Agency and District Secretary is the Chairman of each District Environmental Agency. Therefore, CEA has special power to monitor, assess and advise the government on critical environmental conservation, management and development issues. Under the Environmental Management functions of CEA, widely included, land use management, natural resources management and conservation, management policy for fisheries and aquatic resources, management policy for wild life, management policy for forestry and management policy on soil conservation. In addition to this, there are number of legislations in relation to LA services that provide guidance to environmental safeguards in conduction such activities.

Specifically for the project, the burrower has developed an Environmental and Social Assessment and Management Framework (ESMF) to ensure compliance with the World Bank’s environmental and social safeguard policies and the relevant provisions under the National Environmental Act (NEA), the Land Acquisition Act and the National Involuntary Resettlement Policy (NIRP) and associated regulations. ESMF has been prepared in lieu of a project specific EA, as the specific sites of interventions within North and East are not known at this point of time. The ESMF provides the necessary background for environmental and social dimensions to be built into the design of the project in order to ensure that project implementation will take place in an environmentally and socially sustainable manner. To aid this process, the ESMF sets a framework of guidelines and procedures, which is intended to direct the process of planning and managing environmental and social concerns of project activities. The ESMF will serve as a template document, identifying potential risks and based on which specific social and environmental impact assessments will be conducted for specific project components or sub-components later in the project cycle.

The ESMF has been prepared taking the following Bank safeguards policies into consideration:
OP/BP 4.01 Environmental Assessment
OP/BP 4.10 Indigenous Peoples
OP/BP 4.11 Physical Cultural Resources
OP/BP 4.12 Involuntary Resettlement

Certain types of activities that the LAs generally carry out as part of their service delivery such as waste management has been dropped off from this project, as there possibilities of opening up for adverse environmental and social issues due to land issues. The ESMF has identified a negative list of activities that will not be supported in addition to the negative list of the NEA.
All infrastructure sub projects are planned to be assessed for environmental and social safeguards. The economic returns of sub projects should not be compensated for the negative environmental and social impacts they will have on the project sites and the immediate environment, as well as the wider environment. Once planning process of the LAs have been completed and sub-projects and technologies have been identified environmental screening will be undertaken to deduce the form of environmental instrument as per the ESMF that should be used to ensure each subproject is environmentally sound. Due to the nature of the subprojects envisioned the typical instrument will be an site specific Environmental Management Plan, which will be implemented and monitored throughout the period of the subproject Based on the project experience in the North and East an Environmental Manuel should be prepared to assist the Additional Districts as well as all LAs prior to project commencement.

According to GOSL regulations, reconstruction and rehabilitation activities will not require an environmental assessment. Similarly new constructions will require an environmental assessment only if it falls into one of the prescribed categories. Since the sites are not yet known as yet, it is too early to review on the level of analysis that Project Approving Agencies (PAA) recommend. However, as per the World Bank safeguard policies, the borrower and CEA have agreed that all sub-projects and sites will be subjected to an environmental assessment and be cleared before fund disbursement takes place.

The ESMF Coordinator at the national level and Environmental and Social Safeguards Officers at the provincial level will be directly responsible for all environment related work and will take the lead role in initiating the processes described above and for obtaining GOSL and IDA concurrence for each EA, as relevant. The Environmental Committee at the LA level will be responsible to assess the proposals initially ensuring all necessary safeguards documents are in place and also contribute to the monitoring process once the implementation commence. In addition, the implementing agency is planning to conduct an independent audit once in every two years from the date of project effectiveness to review environmental safeguards compliance.

Each sub-project and site will also be subject to a social screening to determine whether land acquisition will be required or any indigenous communities will be affected by the planned investment. The Local Authority Operations Manual will provide the institutional input that is required to conduct the social screening and will provide technical guidelines for land acquisition process, Indigenous People’s Plan and Chance Find Procedures. The LAOM also provides the process to be followed for both environmental and social safeguard requirements.

OP/BP 4.01: All proposed and potential LA service deliver activities that require infrastructure development will be subjected to the sub-project specific EAs. The composite GOSL environmental clearance process, in principle, is consistent with World Bank environmental assessment and public disclosure requirements. The exception being the screening criteria adopted in the GOSL process under the NEA, where project thresholds are used to determine the type of clearance required and the content of public consultation. However, under the CEA the PAA can take a decision based on anticipated impacts even if the project does not fall into the listed categories and under the CCA and the FFPO the director has the discretion to request for an EA. However, all activities under the proposed project will be subjected to the EA process regardless of the project threshold, prior to disbursement of funds.
OP/BP 4.12: Since the exact location of project interventions are not know at appraisal, and will be determined on a continuous basis according to the annual grants received by the LA, the GOSL has prepared a Framework for Land Acquisition and Involuntary Resettlement, consistent with the requirements of the NIRP and OP/BP 4.12. In the event that land acquisition is unavoidable, the land acquisition process, consultation and compensation procedures and principles will be as per Sri Lankan Governmental policies and compliant with OP 4.12.

OP/BP 4.11: The proposed operations pose limited risks of damaging physical cultural resources since subprojects will largely consist of small investments in community infrastructure and minor public works. Further, the ESMF comprises a list of negative subproject attributes, which would make a subproject ineligible for support, including any activity that would adversely impact cultural property. The stipulated procedures for identification, protection from theft, and treatment of discovered artifacts should be included in standard bidding documents. This is a key requirement as per the ESMF prepared.

OP/BP 4.10: No identifiable indigenous communities live in the proposed new project locations. However, initial social screening of subprojects will be carried to determine whether there are any IP communities as such in new project locations, and any of these communities are to be directly impacted by any NELSIP sub-project. Based on the social screening results, NELSIP will decide the specific implementation modalities for such communities, if necessary.

Borrowers capacity to implement safeguards measures: The proposed implementation agencies in the new Districts currently do not have dedicated staff to implement safeguards measures. However, at the LA level as per the LA Act, there is provision for Social Audit Committee and Environmental Committee with responsibilities to ensure that social and environmental issues are taken care of in their activities. In addition to that, the project proposed to include an Environmental and Social Coordinator and an Environmental and Social Officer at the provincial level for the North and East. For the new districts the Social and Environmental Officer in the PMU will overlook the implementation activities and will be supported by the Provincial level coordinators.

Current Project Experience:

Overall, the experience so far has been the sites selected for various activities were existing sites to be rehabilitated such as roads, markets, and drainage connected to roads. The initial assessments after project implementation also indicated these sites are generally not selected within sensitive areas. No impacts (direct or indirect) towards physical cultural resources have been observed. It was also witnessed that impacts were often low in scale, as the sub-projects supported have been small in scale. Hence the project has focused mainly on preparing site-specific Environmental Management Plans (EMLA).

Since the design of the project was to improve internal capacity to manage small works as part of the Local Authority mandate, an attempt is being made to internalize the preparation of site-specific EMLA through the support from Provincial Council to the relevant Local Authority. Since the budget allocations have to be managed by the respective local authority to ensure maximum benefit towards community is achieved, the EMLA were simplified focusing more on site-specific issues with more detailed specification on environment, health and safety included in the bid document. The project has provided initial training to prepare EMLA and compliance monitoring.
Project has been preparing bi-annual progress reports on the implementation of EMLA and identifying practical challenges during implementation. It is proposed that a more formal training should be provided to the Technical Officers (TOs) of the Local Authorities on integrating safeguards into the local authority activities.

A new monitoring mechanism was introduced at the Mid Term Review stage, which focused on strengthening monitoring at both the LA level and District level and ensures documentation is done stringently and in a timely manner to ensure safeguard measures are implemented at the sites. This involved the active participation of EOs of the Project Appraisal Teams (PATs) based at the ACLG level. Continuous training of TOs on an annual basis to all TOs involved in project implementation is currently being done and copies of all training material are shared with all LAs to ensure basic guidelines are available for new recruits when necessary.

Implementation support missions have reviewed the documentation process and implementation of safeguard requirements at the site-level and found to be improving since the commencement of the project, but have space for further improvements. Documentation has been generally prepared in local languages and has been made available at the PCs, offices of CLGs, ACLG and LAs. It is proposed that an environmental audit should be conducted in 2014.

Districts like Moneragala, Polonnaruwa, Anuradhapura and Puttalam in the adjoining provinces were affected during the conflict which resulted in a severe strain on their already thin stretched infrastructure and service delivery systems. Hence the Government of Sri Lanka is desirous of extending the scope of NELSIP to selected LAs in the adjoining provinces that were significantly impacted during the conflict. The same safeguard mechanisms and activities implemented in the Northern and Eastern Province will be duplicated in to the adjoining Districts as well. Capacity building programs on safeguards implementation will be conducted for all LAs as the project commences activities in the adjoining Districts.

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

ESMF has been shared with the Provincial Council (PC) staff, Commissioners of Local Government (CLG), Assistant Commissioners of Local Government (ACLG) and LA staff of North and East Provinces for their review and comments. Overall consultation with this group was held on August 31, 2009 and their inputs and suggestions have been incorporated into the Environmental and Social Management Framework. Specific activities in each LA are yet to be identified and therefore consultations with other stakeholders will take place once the LA plans to be funded are finalized. Consultation with affected people and other stakeholders in preparing the EMLA will be an integral part of the project and will be held prior to the finalization of sub-project proposals. All documents will be made available all times to public throughout the project period at the PCs, offices of CLGs, ACLG and LAs.

The project has continued to hold consultations with affected people and stakeholders as activities are selected for financing. The ESMF of the parent project was updated to reflect the co-financing received by the DFAT and has been re-disclosed prior to commencing the additional financing and consultations will be held with stakeholders in the additional four districts accordingly.
B. Disclosure Requirements

### Environmental Assessment/Audit/Management Plan/Other

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"In country" Disclosure

Sri Lanka | 28-Feb-2014

Comments:

### Resettlement Action Plan/Framework/Policy Process

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"In country" Disclosure

Comments:

### Indigenous Peoples Development Plan/Framework

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"In country" Disclosure

Comments:

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:

In-country disclosure of Resettlement framework/RAPs and IPP not required as these policies triggered only as precautionary measures under the Additional Financing. Thus the previous disclosure dates of the original documents under the parent project stand.

C. Compliance Monitoring Indicators at the Corporate Level

### OP/BP/GP 4.01 - Environment Assessment

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### OP/BP 4.04 - Natural Habitats

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<td>Would the project result in any significant conversion or degradation of critical natural habitats?</td>
<td>Yes [ ] No [ × ] NA [ ]</td>
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</table>
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 EA include adequate measures related to cultural property?  
Yes [×]  No [ ] NA [ ]

Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?  
Yes [×]  No [ ] NA [ ]

**OP/BP 4.10 - Indigenous Peoples**

Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?  
Yes [ ]  No [×]  NA [ ]

**OP/BP 4.12 - Involuntary Resettlement**

Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?  
Yes [ ]  No [ ] NA [×]  
If yes, then did the Regional unit responsible for safeguards or Sector Manager review the plan?  
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**

<table>
<thead>
<tr>
<th>Task Team Leader:</th>
<th>Name: Seenithamby Manoharan</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Approved By</strong></td>
<td></td>
</tr>
<tr>
<td>Regional Safeguards Advisor:</td>
<td>Name: Francis V. Fragano (RSA)</td>
</tr>
<tr>
<td>Sector Manager:</td>
<td>Name: Shobha Shetty (SM)</td>
</tr>
</tbody>
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