INTEGRATED SAFEGUARDS DATA SHEET
CONCEPT STAGE

Report No.: ISDSC446

Date ISDS Prepared/Updated: 13-Dec-2012
Date ISDS Approved/Disclosed: 18-Feb-2013

I. BASIC INFORMATION

A. Basic Project Data

<table>
<thead>
<tr>
<th>Country:</th>
<th>Niger</th>
<th>Project ID:</th>
<th>P126049</th>
</tr>
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<tbody>
<tr>
<td>Project Name:</td>
<td>Skills Development for Growth Project (P126049)</td>
<td></td>
<td></td>
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<tr>
<td>Task Team Leader:</td>
<td>Boubou Cisse</td>
<td></td>
<td></td>
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<tr>
<td>Estimated Appraisal Date:</td>
<td>18-Dec-2012</td>
<td>Estimated Board Date:</td>
<td>30-Apr-2013</td>
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<td>AFTEW</td>
<td>Lending Instrument:</td>
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Financing (In USD Million)

<table>
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<th>Amount</th>
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<td>International Development Association (IDA)</td>
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<td>Total</td>
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</table>

Environmental Category: B - Partial Assessment

Is this a Repeater project? No

B. Project Objectives

24. The Project Development Objectives (PDO) are to increase access to upper secondary education, improve the quality of upper secondary and higher education; and to strengthen the institutional development of the post-basic education system.

C. Project Description

The project will be in the amount of US$30 million and will consist of the following three components.
Component 1: Developing and Delivering Effective Skills and Demand-Driven Training for Selected Priority Growth Pole sectors (US$ 19m).

The objective of this component is to harness youth and overall population qualifications and thus improve their employability by meeting the demand for skills in the economic sectors with the highest growth and employment potential. The component will support interventions that aim to improve the quality and relevance of TVET delivery, as well as training and employment support apprenticeships and internships activities in sectors with substantial growth and employment potential. The component will be implemented through two subcomponents and will strive to find the right balance between supporting medium/long term measures to promote a demand-driven TVET and shorter-term measures to promote faster response to economic opportunities in the formal and informal sector.

Sub-Component 1.1: Setting Up a Demand-Driven TVET (US$15m)

The objective of this sub-component is to address the demand for skills in the economic sectors with the highest growth and employment potential by improving the provision of training programs in key priority sectors through strengthening the capacity of training providers in four priority sectors and supporting on-demand training in these four and other priority sectors.

Training institutions are not market driven, display little flexibility and adaptability to the evolving economic environment requiring changing skills mix that need frequent upgrading. The deep goal of this sub-component is to introduce change in the culture of training organizations to become more customer-oriented and attentive to the evolving demands of the economy and embrace the tradition of working hand in hand with business organizations in developing training programs. This will be done through actions to improve training delivery and management in four sectors to create a strengthened relevant supply of skills for these sectors and to support higher flexibility in the existing training system by promoting mechanisms to address short-term training requests from the economy. These measures represent a compromise between shorter and longer-term support to the sector. Importantly, they are both necessary as a purely on-demand approach cannot work well without the necessary supply, while, in turn, supporting on-demand training helps address short-term needs while generating demonstration effects on how to be responsive to demand.

Training delivery and management in four priority sectors (US$ 10 millions): This first set of measures will improve training delivery and management in four priority sectors (two within the livestock industry) that are considered to have high growth prospects and employment creation potential in the short and longer-run. These sectors are the civil works and construction industry, the livestock industry (meat and leather) and the hospitality industry. The relevance of these sectors to the Niger economy (current and anticipated) was already explained in the project context. Sector diagnostics have confirmed that these are sectors with very limited or even no supply (in the case of meat processing) of education and training with therefore substantial jobs/skills mismatches at all skill levels which need to be urgently addressed. Additionally these sectors and/or skill level planned to be provided are not covered by other donors or projects (or just marginally). For the same reason, some other sectors and/or skill levels also of high relevance to Niger, such as the many skills needed for the operational phase of the mining sector, agriculture related skills and skills provided at the Technical Secondary Education Certificate Level (Baccalaureat Technique) are not supported through this first approach because already well supported by AFD (mining), BAD (Baccalaureat Technique) and World Bank agriculture projects such as PRODEX which has training programs designed to impart skills that lead to improved operational and quality efficiency and greater value-
added for agricultural products (e.g. onions). To minimize execution time while taking into account the concentration of the supply in few institutions and the need to create strong demonstration effects, the project will focus on restructuring/expanding one existing key structure per sector to bring it to best practice/state of the art structure. This will also imply changes in the curriculum and management structure of the institutions. Key institutions and their expected characteristics are detailed below:

Key institutions by sector:

(i) Civil works and construction industry: restructuring of one MFPE training center in construction and public works to create a new center which provides training (at CAP, BEP and Bac Professionnel as needed) for all construction related jobs in an integrated manner from semi-skilled to skilled level. While more and more jobs are being created in this sector, including in relation to the needs of the construction phase of the mining and oil industry and for large infrastructure, skill supply remains weak and of very low quality according to the employers that were consulted.

Livestock industry:

a. Meat processing: establishment of a light training organization in red meat processing. This training school could be established in Kolo, a livestock farm 30 km away from Niamey, at the Niamey slaughterhouse supported by the Growth Support and Competitiveness project or at the National Leather Center (see below). This structure would support the upgrading of the human resource skills operating in the livestock sector (techniques d’embouche) and the initial training and apprenticeship and upgrading of skills in meat cutting, processing, packaging, conservation and transport with the aim of supporting the growth of the meat exporting sector in full complementarity with other projects.

b. Leather: restructuring of the National Leather Center and Arts Profession to meet the demand for skills for both semi-skilled and skilled jobs in the leather processing and shoemaking industry.

(ii) Hospitality industry: restructuring of the technical school in Agadez to provide training to meet the hospitality industry demand for skilled and semi-skilled jobs.

Key expected characteristics: The four training institutes will provide: a) initial training in dual mode to combine theoretical and practical training and thus prepare trainees to the world of work; b) apprenticeship training for youth population in the 15-20 years age group; and, c) in-service training and continuous education for formal sector employees, artisans and other sector participants. These institutions will be expanded and upgraded to bring them to standards required to produce high quality technical and vocational skills required in the nigerien’s economy. The upgrade will include the application of new competency-based curricula based on the skill demand studies and related curricula under development by LuxDev, the application of a comprehensive partnership model with the private sector (both in curriculum design and institutions’ management) and management model with higher autonomy to introduce and adapt programs according to the new Law on Technical and Professional Training and additional technical assistance to conduct assessments of private sector training needs and monitor the quality and relevance of training provision. The physical and institutional and upgrade would be conducted in the first two to three years of the project.

Execution of on-demand training programs in priority sectors (US$5 millions):

This second approach will complement the first one by building on the existing training institutions to provide on-demand short-term skill development for critical economic sectors. Key sectors would include the four priority sectors highlighted above (to the extent that there are short-term demands which can be addressed with limited capacity increases), including the large infrastructure sector, other oil, mining, agriculture and livestock priority sub-sectors and additional sectors/sub-sectors and...
related needs for skills arising from the sector reports prepared by LuxDev. On-demand training would take place in the context of partnerships between private sector organizations and MFPE training institutions and private sector training organizations or professional associations. In the case of in-service training sponsored by the private sector, possible cost sharing between the government and enterprises could be to the tune of 70/30. Standard protocols/agreements defining the arrangements for the implementation of these on-demand programs, including eligibility criteria (of sectors, trainings, institutions and expenditures), the respective roles of the parties in the execution of these programs and, if applicable, the cost-sharing arrangements will be prepared. Funding at the institutional level would cover an evaluation of needs, a capacity strengthening program (including planning and management, identification of training needs, development of training on-demand and certificate programs, etc) which could include the support of international training providers hired through the project, and may include limited equipment.

Target beneficiaries: The overall sub component will target in school youth and working population. The expansion of four targeted schools is expected to lead to an additional enrollment of 2,200 students by the end of the project, which could increase to 3,300 if the dual training model is fully applied.

Key activities: In response to the two above approaches, the project will finance the following activities: (a) in-depth studies to define the size (enrollment capacity) of the four targeted training institutions and need evaluation studies for the provision of on-demand training; (b) infrastructure expansion and refurbishing; (c) equipment and pedagogical material; (d) curriculum adaptation; (e) training of trainers of public and private TVET institutes and other training providers in key priority sectors; and (f) capacity building (TA) to accompany newly restructured institutions and provision of on-demand training (for on demand-training, this would include the training of staff involved in the organization and monitoring of the on-demand training at ministry and institution level).

Implementation: This sub-component will be implemented by MFPE through its TVET directorate (Direction Générale de la Formation Professionnelle (DGFP)). Staff from the Ministry would be trained to get acquainted with the implementation of the on-demand training activities. A restructuring of the TVET directorate with sectoral sub-division would facilitate the implementation of this approach. An operational manual to be adopted by effectiveness will include the procedures for the implementation of the on-demand training activities.

International bidding will be launched to recruit training institutions that will mentor/twin with nigerien institutions selected for upgrading and on-demand training, as well as support the training of trainers. Through mentoring and twinning, local training providers will be thus be exposed to better business practices and training methods and thus acquire know-how. A special effort will also be made to activate the bilateral cooperation with Niger (for instance between Niger and some North African countries) to identify valid international partners.

Sub-Component 1.2: Increasing Apprenticeships and Short Term Training Programs(US$4m)

The objective of this sub-component is to address the demand for skills in key economic sectors by increasing the number of young people enrolled in different form/duration of apprenticeship programs in these sectors.

Apprenticeship programs combining formal training to confer cognitive skills (1/3 of the time) and apprenticeship (accounting for 2/3 of the time) spent in a formal or informal organization are considered most appropriate to the situation of Niger where the majority of enterprises operate in the
informal sector or consist of small size formal sector organizations. These programs may be accompanied by additional short-term training for specific professions. There will be significant strengthening of FAFPCA and FNAN, the two executing agencies for the sub-component, which will be in charge of managing the program, including the allocation of stipends for the apprentices. Priority apprenticeship programs to be launched in 2014 include the following sectors/activity areas: (i) construction industry with training in plumbing, paving and tiling; (ii) hospitality industry with training in cooking, baking and restoration services. The number of trainees and the choice of training activities to be conducted for the sector will be agreed with the Hospitality industry federation; (iii) leather tanning and shoes manufacturing: training for 3 groups of 15 apprentices in Niamey. Training will take place in upgraded traditional tanning facilities, leather and shoes boots manufacturing, including National Leather Center when ready; (iv) maintenance: training for 2 groups of apprentices in electro-mechanics in Niamey and Maradi.

Apprenticeship training programs from 2015 onwards will be agreed upon between FAFPCA and the various professional association branches also reflecting the growing sectors and supply availability. These discussions will be informed by the experience of the implementation of the apprenticeship program in 2014.

Target beneficiaries: The age group targeted by this sub component is unemployed 15-25 years old. The estimated number of apprentices enrolled in different types/duration of revamped/updated apprenticeship that meet the needs and profiles of the various target groups under the dual training mode would increase from 250 in 2014 to 700 at the end of the project for a total of 1350 trained apprentices. This estimate was informed by FAFPCA and FNAN capacity and the experience of the ILO executed, European Union financed pilot apprenticeship program.

Key activities: The project will finance the following activities under sub-component 1.2: (i) stipends to apprentices in the amount of FCFA 20,000/month and monetary incentives to master-apprentices and workshop owners in the amount of FCFA 50,000/annum/apprentice; (ii) strengthening of capacity for FAFPCA and FNAN, the 2 executing agencies for the sub-component. (iii) the organization of workshops and consultation forums with professional associations and private sector entities to discuss priority sectors and activities for the apprenticeship programs and the organization of prospecting activities to find placement for apprentices; (iv) communication campaign to inform enterprises and prospective apprentices about the apprenticeship scheme. (v) monitoring and evaluation of the sub-component which will compare actual achievements against annual work programs. ; and (vi) revision and updating of the regulatory framework for apprenticeship.

Implementation: This sub-component will be implemented by FAFPCA as lead for the implementation of apprenticeships and short term training programs, in partnership with FNAN and training providers called upon to deliver complementary training modules.

Component 2: Promoting Transversal Skills and School to Work/Business Transition (US$7m)-

The objective of this component is to improve employability by promoting transversal skills (entrepreneurship and practical skills) and school to work/business transition. This component will support:

Sub-component 2.1: Promoting entrepreneurship (US$3.5).
1. These value chains interact with the rest of the economy. Thus, capturing this potential requires improvement in the performance of existing business operations through improved internal processes to reduce transaction costs such as the cost of inventories, provide quality services, and develop a market orientation and innovation culture. In this context, promoting entrepreneurship is a government objective which is pursued under many projects. The most important aspect of this is changing the mindset not only of would-be entrepreneurs but also of the environment, including the financial sector and the public administration which must encourage risk taking and facilitate the creation of new business ventures. This should be the focus of entrepreneurship training, which is quite distinct from what is currently called training in entrepreneurship that consists of training in accounting and administration.

The objective of this sub-component is to promote an entrepreneurial culture by inserting entrepreneurship course modules in the curriculum, starting with higher education. The program will be gradually introduced in the lower levels of education, building on lessons learned from its implementation in higher education. The Economics Department of the University of Niamey will spearhead the development of the entrepreneurship curriculum for the various levels of the education system that will build in-house capacity to develop, run and disseminate entrepreneurship programs with the help of a partner institution that runs quality entrepreneurship programs. The relationship between the outside partner and the Economics program will be structured to create in-house capabilities to update/revise the curriculum to stay current with advances in the field, introduce new courses, develop curriculum for other levels of the education system, train secondary school instructors into teaching entrepreneurship classes, participate in communication campaigns designed to introduce entrepreneurship concept and mindset in Niger. The communication campaign will learn from the HIV-Aids approach to public awareness campaigns and the introduction of the HIV-Aids instruction in secondary and primary school curriculum.

The implementation of the program at the University of Niamey with outside assistance will provide the opportunity to introduce the culture of collaboration between the university/tertiary education institutions and the private sector. The entrepreneurship curriculum developed at the University of Niamey will be shared with other public and private higher education institutions as well as structures such as CNPG, the Chamber of Commerce ad-hoc education center. Their staff will participate in the training of trainers program. Entrepreneurship courses will be organized for would-be potential entrepreneurs to help them structure their project ideas and convert them into full-fledged business plans. Private sector entrepreneurs and financial institutions with experience in evaluating new project proposals submitted for financing will be invited to participate in the delivery of entrepreneurship courses, their involvement will bring into focus the attributes of an entrepreneur. Successful entrepreneurs will be called upon to mentor/coach budding entrepreneurs and provide critical assessment of students business plans.

Internship programs for young graduates will get them acquainted with the world of business and the reality of business life and thus facilitate their integration in the world of work. The entrepreneurship classes will be complemented with courses that bring into focus essential elements that competitive enterprises must have such as, the quality focus, the just-in time delivery, the importance of logistics, out-sourcing versus having in-house expertise, the advantage of moving from the informal to the formal sector, growth strategy, product diversification, inventory management and cash-flow management, etc. These concepts are not or adequately taught at present because of the paucity of qualified instructors. Courses taught at present are mostly of the accounting technique variety. The mastery of these concepts and their introduction in the every day life of business organizations is a prerequisite for Niger private sector to capture some of the contracts that are awarded by mining
firms and oil companies to foreign firms. The gamut of services and activities that could accrue to domestic firms if there were local capabilities is large.

The missing link that has frustrated entrepreneurship development has been the lack of connection between the business plan preparation phase and institutions providing risk capital project financing and managerial assistance during the startup phase. It will be assured by institutions that provide risk capital financing such as Sinergisa whose business model resembles that of US business angels.

The following activities will be conducted/financed under this sub-component:

(i) The development of an entrepreneurship program for the University of Niamey comprising long and short duration courses. This curriculum will be shared with other tertiary education institutions and training centers such as CNPG that run entrepreneurship programs;
(ii) The training of trainers in entrepreneurship teaching for higher education institutions and training centers that run entrepreneurship programs;
(iii) The delivery of entrepreneurship courses at the University of Niamey where the entrepreneurship curriculum program development will be housed and staff development in teaching entrepreneurship conducted. The objective is to engage in a long term collaboration with a foreign partner to establish a tradition of excellence and introduce best practices designing and delivering entrepreneurship programs at the university. The development of in-house capabilities will ensure that the program continues to run and develop after the project and even expand internationally by attracting students and business organizations from other countries as well as intervening through different arrangements in other countries;
(iv) The delivery of cutting-edge demand driven courses that address weaknesses hampering the development of Niger business organizations. These courses will complement the entrepreneurship curriculum and enable existing business modernize their business processes to increase productivity, profit margin and market share, improve product quality and customers service, diversify their product offering and move up the value chain. Assistance will be provided to institutions delivering business training to assess the demand for training by business organizations, develop tailored course offering, market their program to the private sector and deliver courses in a pedagogically effective manner;
(v) The development and implementation of an entrepreneurship promotion action program comprising entrepreneurship training modules tailored to the other categories of would be entrepreneurs (technical education graduates, apprentices, etc.);
(vi) The development and delivery of training modules for trainers in entrepreneurship working for training providers, professional associations, and independent trainers;
(vii) The development of a program to strengthen the capacity of organizations involved in the support services of entrepreneurship programs as well as incentives to encourage the emergence of entrepreneurship networks. The Professional Bankers Association which is about to launch its own training school to meet the training needs of its members will be called upon to participate in the preparation of training modules and coach potential entrepreneurs in preparing their business plans;
(viii) the development and introduction, on a pilot basis, of an entrepreneurship training programs in secondary schools, and technical and professional training organizations;
(ix) The project will finance an awareness campaign in the direction of students as well as other stakeholders such as the chamber of commerce and industry (CCIAN) and the employment promotion agency (ANPE); and,
(x) an impact evaluation of the entrepreneurship program.

Sub-Component 2.2: Improving Employability of Graduates (US$3.5).
An increasing number of employment seeking graduates don’t find jobs because the education and training system has not prepared them for the world of work, the training received is purely academic with no exposure to the enterprise world and thus little or no understanding of the requirements of working in a business organization. A survey of unemployed graduates conducted in 2009 by the National Employment Agency (ANPE) and the National Institute of Statistics revealed that there were 7363 unemployed graduates with the single largest categories of unemployed being those health related degree (1046) and business management (1370). The average length of graduates unemployment before finding a first job was 29 months.

To address this situation, ANPE has developed an internship program designed to introduce young graduates to the world of work. The internship of a 6 months duration can be extended to one. The interns receive a monthly stipend enabling them to meet the cost of transportation and basic necessities for survival. XXXXXX numbers of graduates have participated in the program since its introduction in …. sector account for the bulk of internship. ANPE performance has been mixed at best. Chief among the factors that account for this insufficient performance are:

(i) insufficient budget allocation which leads to scaled down ambitions with respects to the number of students that can be placed in internship with the monthly stipend of FCFA 25,000 per month;
(ii) limited human resources and organizational capabilities resulting in ANPE limited ability to look for internship possibilities, forge partnership with business organizations, and conduct follow-up activities to ensure that the intern is engaged in meaningful activities and receive adequate supervision from the host business organization. There are currently only 2 staff members that are in theory tasked with the task of prospecting for internship possibility and interns placement. In reality, the 2 staff members are absorbed by administrative tasks (contracts, payment of stipend allowance, etc.) Staffing is ANPE most acute problem with only a total of 10 staff members to run the entire operation at headquarters, while the 3 regional antenna are barely staffed and hardly operational; and,
(iii) the absence of an evaluation system and impact studies to assess ANPE system performance.

The objectives of the sub-components are to:

(i) organize supplemental training as necessary to bridge graduates recognized skills gaps or enable professional reconversion for those who lost their employment. A survey of unemployed graduates revealed that the majority of them expressed interest in receiving additional bridge classes to make for theoretical deficiencies and receive advice and information on how to look and apply for a job;
(ii) strengthen ANPE operational capacity and conduct a strong marketing campaign to make the public aware of its intermediation role in matching the supply and demand for labor and its mode of operation; and,
(iii) strengthen the MFPE employment and internship Directorate General capabilities to formulate employment strategies, apprenticeship programs and monitoring and evaluation and impact assessment of programs.

The project would finance the following:

(i) The development of an improved internship program. Total number of interns during the project period would be 4200 starting with a initial intake of 500 in 2014 to reach 1200 in the final year of the project. To achieve this objective, ANPE will need to strengthen qualitatively and quantitatively the service charged with running the internship operation both at its headquarter in Niamey and its regional antennas. ANPE board of directors will be examining the proposed restructuring towards improved performance at its December 2012 meeting. ANPE should actively develop the prospecting function towards enterprises in the formal sector particularly the industrial sector.
sector so as to not limit internship to the rather unsophisticated trade and service sectors. The project would finance 50% of the FCFA 50,000 monthly stipend granted to interns, the remaining 50% will be provided by ANPE out of its annual budget allocation and the tax levy of 0.5% of salaries declared to the social security (CNSS) and on foreigners employment contracts (20% percent of their monthly salary). Assuming an average internship duration of one year, the total cost of this activity financed from the project proceeds would amount to FCFA 1260 millions;

(ii) The development of supplemental training modules to bridge interns skills gaps and make them more attractive to potential employers. Lack of financing compelled ANPE to abandon supplemental training for interns altogether. The project would provide FCFA 55 millions to meet the cost of supplemental training programs contracted out to training providers. This program would benefit about 2000 interns during the project period. The cost for this activity was estimated on the basis of FCFA 20,000 per student for general courses and FCFA 35,000 per student for technical courses;

(iii) The strengthening of ANPE capacity through:

- Training of ANPE all staff categories both in Niamey and in the regional antenna, with special attention to those tasked with prospecting for internship opportunities and placement and follow-up. The training program will pay particular attention to the creation of a welcoming culture towards internship candidates and business organizations, information and advisory services on how to look for employment, the development of supplementary training modules and the evaluation and follow up of interns experience;
- The upgrading of ANPE information system;
- Technical assistance to review ongoing employment programs (5 currently) and their implementation modalities and propose remediation measures to make them more effective and organize a communication campaign around ANPE program in the direction of prospective interns and hosting business organizations;
- Evaluation of ANPE staffing needs and definition of employee profiles to meet ANPE program implementation requirements;
- Support the MFPE Employment General Directorate and ANPE is setting up and implementing a monitoring and evaluation system and an impact assessment of their activities; and,
- Provision of office equipment and material for ANPE existing 3 regional antennae et the rehabilitation and equipment of 2 new regional antennae to be created.

Component 3: Institutional Capacity Strengthening and Project Management (US$4m)

The objective of this component is to provide effective implementation of the project and support its implementation arrangements, by establishing a project support unit (PSU) embedded within MFPE and reporting to the SG as well as the Project Steering Committee. The PSU will be a small group of dedicated staff assisting MFPE and all participating agencies for effective coordination and monitoring and evaluation, as well as the implementation of an information and communications strategy. The technical support for implementation includes a team of short and long-term consultants, specializing in project implementation (including project management, financial management, procurement, environmental and social management, and M&E), resident in MFPE, and providing regular support to all participating agencies, training institutes and industry associations. For the monitoring and evaluation, MFPE will continue to update data to facilitate accurate reporting on the key progress indicators identified in the results framework. Most of the data for monitoring project outcomes will come from regular project reports, key surveys and a labor market observatory. This data will be supplemented by project preparatory studies in key economic sectors and a baseline survey undertaken during the first year of implementation. The project will also contract with an Independent Monitoring Firm (IMF) to
support M&E activities, including an impact evaluation.

The proposed component will fund key staff to be hired for the implementation of the proposed Project. This will, inter alia, include an Executive Director, Procurement Officer, Financial Management Officer, M&E Officer, and IT Specialist and others. The component will fund activities related to the overall Project implementation, including minor goods and materials.

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

The project area will cover six out of the eight regions in the country, i.e. Agadez, Diffa, Dosso, Maradi, Niamey et Tahoua. These regions are the main economic poles of the country where skill gaps are therefore most constraining. There are also strong security issues in the other two regions which make it very difficult to expand the project there. The salient physical characteristics relevant to safeguards analysis are to be determined.

E. Borrowers Institutional Capacity for Safeguard Policies

To be determined by the safeguard studies to be carried out before project appraisal.

F. Environmental and Social Safeguards Specialists on the Team

Serigne Omar Fye (CICAF)
Africa Eshogba Olojoba (AFTN3)

II. SAFEGUARD POLICIES THAT MIGHT APPLY

<table>
<thead>
<tr>
<th>Safeguard Policies</th>
<th>Triggered?</th>
<th>Explanation (Optional)</th>
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<tbody>
<tr>
<td>Environmental Assessment OP/BP 4.01</td>
<td>Yes</td>
<td>Due to the planned civil works and infrastructure expansion in clearly defined areas, the project triggers the OP on Environmental Assessment and since there are several different sites where construction will take place, the most appropriate safeguards instrument is an ESMF with detailed screening mechanisms and where necessary site specific EMPs.</td>
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<td>Natural Habitats OP/BP 4.04</td>
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<td>Forests OP/BP 4.36</td>
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<td>Pest Management OP 4.09</td>
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<tr>
<td>Physical Cultural Resources OP/BP 4.11</td>
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<td>Indigenous Peoples OP/BP 4.10</td>
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<tr>
<td>Involuntary Resettlement OP/BP 4.12</td>
<td>No</td>
<td>The project will not support any activities that trigger OP 4.12 The project will not finance activities involving involuntary taking of land, loss of assets or access to assets, loss of income sources or means of livelihood or the voluntary restriction of access to legally designated parks</td>
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and protected areas. Although the small scale civil construction activities under the Project are not expected to trigger OP 4.11 on Physical Resources, as precautionary measure, chance finds procedures will be included in civil works contracts terms of reference.

| Safety of Dams OP/BP 4.37 | No |
| Projects on International Waterways OP/BP 7.50 | No |
| Projects in Disputed Areas OP/BP 7.60 | No |

III. SAFEGUARD PREPARATION PLAN

A. Tentative target date for preparing the PAD Stage ISDS: 31-Dec-2012

B. Time frame for launching and completing the safeguard-related studies that may be needed. The specific studies and their timing\(^1\) should be specified in the PAD-stage ISDS:

All safeguard related studies will be completed and sent to aspen for review and approval prior to appraisal of the project. The time framework for carrying out the studies will be specified in the PAD stage ISDS.

IV. APPROVALS

| Task Team Leader: | Name: Boubou Cisse |
| Approved By: |
| Regional Safeguards Coordinator: | Name: Alexandra C. Bezeredi (RSA) | Date: 18-Feb-2013 |
| Sector Manager: | Name: Peter Nicolas Materu (SM) | Date: 13-Dec-2012 |

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\(^1\) Reminder: The Bank's Disclosure Policy requires that safeguard-related documents be disclosed before appraisal (i) at the InfoShop and (ii) in country, at publicly accessible locations and in a form and language that are accessible to potentially affected persons.