



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 07/18/2020 | Report No: ESRSA00970



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Afghanistan	SOUTH ASIA	P174348	
Project Name	Emergency Agriculture and Food Supply Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Agriculture and Food	Investment Project Financing	7/15/2020	8/7/2020
Borrower(s)	Implementing Agency(ies)		
Ministry of Finance	Ministry of Agriculture, Irrigation and Livestock		

Proposed Development Objective

In response to Covid-19 emergency, the proposed project development objective is to support critical food supply chains and create short-term economic opportunities.

Financing (in USD Million)	Amount
Total Project Cost	100.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

Yes

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The proposed operation will be designed as an Investment Project Financing (IPF), funded by an IDA grant in the amount of US\$55 million and a US\$45 million grant from the ARTF over a two-year period. The Project responds to the food security and reduced income challenges posed by the COVID-19 crisis by: (i) increasing local food production with an initial emphasis on wheat, key staple crop for the country; and (ii) creating COVID-era short-term employment to rehabilitate productive irrigation infrastructure and support sustainable watershed development for longer term water availability for food production and resilience. It also mitigates the economic impact of the crisis by supporting micro, small and medium enterprises (MSMEs) in critical domestic food supply chains, including—but not restricted to—wheat and flour.



D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The project will support staple food production in irrigated and rain-fed areas located in six regions of Afghanistan: Northeast/ Baghlan, East/Nangarhar, Center/Kabul, North/Balkh Southwest/Kandahar and West/Herat. The project will work closely with local communities who will contribute to its implementation through the existing Community Development Councils (CDC). Participatory planning will be implemented for all irrigation scheme improvement and watershed management activities and in-kind contributions are expected from the beneficiary communities.

The Project will also finance targeted Technical Assistance (TA) to support wheat seed production activities in the public research farms network and with private seed multiplier companies. Improved seeds distribution will have a national coverage. Criteria will be applied for the selection of the beneficiary farmers who will also have to pay a share of the cost. The Criteria will include, access to at least one acre of land, willingness of farmers to pay contribution and agreeing to following technical guidance.

The project will finance small scale civil works activities including rehabilitation of irrigation schemes and watershed management activities. The project will distribute seeds to poor farmers and appropriate training would be required to ensure proper handling of these inputs and avoid excessive leaching of the applied fertilizer. The risks to spread the COVID-19 infection among and between project workers and community laborers are significant and appropriate mitigation measures shall be activated during project implementation stage.

D. 2. Borrower's Institutional Capacity

The project's Agriculture, Irrigation and Food component is national in scope and the Ministry of Agriculture, Irrigation and Livestock (MAIL) is responsible for implementing it at national level. MAIL has been implementing four World Bank and ARTF funded projects, (NHLP, OFWMP, SGR and AAIP) and thus has good experience with the World Bank previous environmental and social safeguards Policies implementation with the help of Safeguards Focal Officers. The Bank has trained the current Environmental and Social Management Focal Officers for the preparation and implementation of the Environmental and Social Management Framework (ESMF), Resettlement Policy Framework (RPF) and Pest Management Plans (PMP) for different projects implemented by MAIL and funded by both WB and ARTF. The environment and social specialists have also attended the ESF trainings conducted by the World Bank.

Due to the emergency nature of this project, finalization and disclosure of the ESMF, RPF and LMP has been deferred to the project implementation phase. The borrower has already prepared the Stakeholder Engagement Plan (SEP) and Environmental and Social Commitment Plan (ESCP) for project Appraisal. The client will conduct an in-depth capacity assessment during the preparation of the ESMF that will provide more information on the borrower's institutional capacity and clarify roles and responsibilities on environment and social risks and impacts management. The client will also identify the capacity building gap and a capacity building plan will be proposed by appraisal in the ESCP of the project.

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Substantial



Environmental Risk Rating

Substantial

The project will have positive impacts on the agricultural systems, including irrigated and dry land farming. On irrigation, it will contribute to increase water conveyance and distribution efficiency and will build the capacity of Irrigation Associations to manage water in a productive way. The project interventions will introduce the integrated watershed and landscape management approach, and facilitate the adoption of sustainable land and water management techniques and practices. The proposed interventions will increase the overall resilience of the communities to climate-related shocks. The project will have land-management options that enhance carbon sequestration and, concurrently, prevent erosion and land degradation.

Despite the environmentally positive design objectives, there are a number of risks related to the project activities: (i) some of the construction activities (irrigation and erosion control structures), although limited in scale, carry the usual pollution risks associated with the use of machinery such as noise, dust etc. (ii) although no work would be allowed in environmentally sensitive areas (any such area would be considered not eligible for project intervention), the intervention on watersheds could impact the land use and result in some unintended impacts such as soil erosion, loss of land vegetative cover, land disputes etc. if not properly managed; (iii) the potential COVID-19 Infection risk and borrowers capacity to manage such risks at project sites including putting in place adequate Occupational Health and Safety issues. Although the project will not finance agrochemicals, it might indirectly result in increased use of such products because when water availability is improved farmers will use excessive fertilizer and agrochemicals which could be harmful to the health of farmers and communities if they are not provided guidance on how to use the right amount and quality of such products. The residues of such products could harm the local environment and the health of the communities.

The Project risks and impacts of this project might be significant when considered in an integrated manner taking into account the scale and involvement of many diverse stakeholders, e.g., involvement of NEPA as a regulatory agency, communities and their organizations, NGOs and potential private sector entities. The potential project related risks and impacts might be mostly temporary, predictable and/or reversible, the potential for cumulative impacts may exist, but they are less severe and more readily avoided or mitigated, there is medium to low probability of serious adverse effects to human health and/or the environment (e.g., due to accidents, toxic waste disposal, etc.), and the project will use its prepared ESF documents and mechanisms available to prevent or minimize such incidents. The effects of the Project on areas of high value or sensitivity are expected to be lower than High Risk Projects and such areas will be avoided as far as possible. The Project is being developed in a legal or regulatory environment where the enforcement capacity is limited in the country but the implementing agencies have good experience with the WB Safeguards Policies and the Bank will work with them to address the potential risks and impacts of the project activities. There might be some concerns over capacity and experience in managing stakeholder engagement, but these could be readily addressed through implementation support.

Social Risk Rating

Substantial

The planned intervention will include civil works such as rehabilitation of irrigation schemes, small check-dams, water reservoirs, watershed management and distribution of seeds which are expected to have potential social impacts. The risks related to spread of infection among and between project workers and communities is an issue that requires close attention during implementation stage, especially in the COVID context.

The project activities are expected to cause some social impacts and risks that are site-specific and manageable through the application of appropriate mitigation measures. Among the potential identified risks are : (i) minor land acquisition for irrigation canals and water harvesting structures in the watershed areas, demonstration plots and water reservoirs structures, (ii) potential site-specific disputes over water use and seed distribution among the farmers (between beneficiary and non-beneficiary farmers); (iii) risks or impacts associated with land and natural



resources tenure and use; (iv) labor influx risk as some of the supported activities may rely on hiring laborers from outside the project's area of influence and possible GBV/SEA/SH risks; (v) if not properly managed, the project activities can lead to social exclusion, corruption and nepotism resulting in decreased trust in local and national government and social conflicts among vulnerable, elite groups and local authorities. Any potential disputes will be mitigated through well-established dispute resolution system already being practiced under the recently closed OFWMP and on-going IRDP projects Therefore, considering the above social risks and impacts, the overall Social Risk Rating of the project is Substantial at this stage.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

This standard is relevant considering the described potential negative impacts and environmental and social risks associated with the project activities. These impacts and risks need to be properly identified for each project intervention site and be managed with the help of the tools provided by the ESF documents of the projects, e.g, ESMF, LMP, SEP etc. Therefore; the ESS1 application will help the project implementation team to assess and manage the potential impacts.

In order to manage the environmental and social risks, the implementing agency (MAIL) will ensure that environmental and social standards are applied effectively. The IA will prepare an Environmental and Social Management Framework (ESMF) during implementation phase which will be clearly outlined in the Environmental and Social Commitment Plan (ESCP). These documents will be disclosed in-country on MAIL Website and in the WB external website. Other E&S documents including RPF and LMP will also be prepared during the implementation stage. The ESMF will be disclosed no later than 45 days after project effectiveness. The ESMF and the LMP will have the OHS measures including the guidelines for the COVID-19 risk mitigation measures as well as the Infection Prevention and Control (IPC) mechanisms and this will be considered in all relevant activities, e.g., training and orientations consultations considering the COVID 19 restrictions, monitoring and reporting and etc.

The ESMF will consider the following challenges and provide instruments, tools and guidelines to manage and mitigate them: (i) the lack of enforcement capacity in the country, (ii) the implementation of the project involving many other different stakeholders including National Environmental Protection Agency (NEPA), other national and provincial authorities, Communities, CSOs and engaged in multiple sites in the planning and implementation of different activities of various nature (e.g. participatory planning, physical investments, seed distribution etc.) which makes it difficult to monitor the implementation of measures to minimize adverse impacts in accordance with the mitigation hierarchy; (iii) the need to ensure a transparent and inclusive participatory design process for irrigation scheme improvement and watershed management planning; (iv) the possible encroachment on sensitive areas if exclusion criteria are not well applied; (v) possible occurrence of armed conflict near project sites; (vi) pollution; (vii) social risks associated with the civil works; (viii) the risk of introducing invasive species as part of the plantation activities; (ix) the risk of farmers improperly using agrochemicals while treating wheat seed and storing and applying it to crops to increase production. To mitigate the risk of improper use of inputs, fertilizer, agrochemicals etc by farmers in their own practices, the project will prepare a Pest Management Plan (PMP) and adopt an Integrated Pest Management (IPM) approach. The Pest Management Plan (PMP)/IPM approach would be a standalone document and will be prepared within 45 days after the project effectiveness. While a Pesticide Law is in place, the



country Pesticide Regulation is still pending and waiting to be passed by the Government. In the absence of this regulation the Pesticide Law of Afghanistan will not be very effective.

ESS10 Stakeholder Engagement and Information Disclosure

A preliminary stakeholder engagement plan (SEP) was prepared for the project, with information sharing mechanism and a Grievance Redress Mechanism (GRM). It will be disclosed and consultations will be held with key stakeholders from the project taking into account the COVID-19 restrictions and limitations (social distancing rules). The SEP will be updated 30 days into project effectiveness and thereafter as more stakeholder engagement activities take place throughout the life of the project.

Local stakeholders will be engaged through the participatory design process to be conducted for each irrigation scheme and each watershed area before the start of construction activities. The designs will be vetted by the communities following a public disclosure organized with the CDCs. Specific attention will be provided in the SEP for specific groups, like the Kuchies (Nomads) to design culturally appropriate processes that are respectful to their traditional mechanisms.

Consultation activities will be held with project affected and interested parties in locations that will be identified in consultation with the communities and the local authorities. Other relevant stakeholders will include, production unions and cooperatives (e.g. wheat, high value crops, etc.), protected areas' sponsors and managers where relevant, representatives from departments and municipalities, Kuchies' representatives, Mirabs, Water Associations, Irrigation Associations, Provincial Departments in charge of agriculture, irrigation and livestock, NEPA, Community Development Councils (CDCs), NGOs, local communities, media, etc. The SEP also prescribes specific activities to engage with vulnerable and disadvantages sections of the population in the project area.

The project will include measures to strengthen the social accountability, citizen engagement and customer responsiveness. This includes: (i) effective consultations respecting COVID-19 social distancing rules, (ii) operating a functional GRM, (iii) ensuring substantive interaction between beneficiaries and the government on issues of project design and choice of options. The project has included the Citizen Engagement Indicators in the project Results frameworks and the client will carry out beneficiary satisfaction surveys in the selected sites to evaluate public satisfaction through phone surveys, workshops, and community score cards during the implementation. The SEP with consultation strategy is prepared and disclosed on MAIL and WB external websites. The SEP is a living document which will be updated throughout the project implementation period.

The GRM will build on the well-established dispute resolution system practiced by most of the communities in Afghanistan and on the systems implemented by the OFWMP and IRDP projects. The project social mobilizers will contribute to solving disputes arising in sub-project sites. In irrigated areas, the traditional Water Master (Merab) system will be used. The NGOs and the WB funded projects have added value to this system through training and it is working well.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions



ESS2 is relevant to the project, as the proposed activities include civil works for rehabilitation of irrigation schemes and watershed management which will involve hired labor and community workers. During the project implementation, labor management related risks, such as the potential discrimination against the labors who will be hired from other communities and the Occupational Health and Safety (OHS) issues affecting the workers of the executing agency, contracted workers and primary supply workers, as well as community workers will be monitored and managed. Assessment of risks will also include the potential use of child and adolescent labor in productive activities, disability constraints and special needs of gender and age groups for each of the foreseen activities. OHS measures in addition to the construction works risks will include the risks and mitigation measures related to the COVID-19 infection prevention in the project sites, since workers will be coming into close contact with communities. The IA (MAIL) will prepare the Labour Management Procedures which will cover cover all types of labor (i.e. direct, contracted, primary supply, community workers and and migrant workers).The labor management procedures will also include GRM for workers so that they have an official way to communicate grievances or other issues to the management. The contractor labor management plan will need to include specific GBV/SEA/SH codes of conduct as well as a general code for interacting with communities and partners. Child labor will be prevented in line with the requirements of ESS2 during the life of the project in project areas and activities. The LMP will be prepared during the project implementation no later than 45 days after project effectiveness and disclosed on MAIL and WB websites.

ESS3 Resource Efficiency and Pollution Prevention and Management

The project will have multiple benefits related to resource efficiency: improved water conveyance and distribution efficiency on irrigation schemes; improved and more sustainable use of land and water resources in watershed areas; The ESS3 is relevant to manage the risk of increased use of agricultural chemicals due to additional cropping intensity and the potential impacts on construction sites.

The proposed activities could result in the potential increase in the use of chemical fertilizers and pesticides for agriculture production and related risk of water pollution through runoff or leaching into groundwater. Although the project will not finance agricultural chemicals, the expected increase in cropping intensity allowed by the project may result in an increased use of such products by the farmers. The project will promote best fertilizer and chemical application practices, following the Integrated Pest Management (IPM) approach, through its farmer field school and demonstration plots activities already incorporated and budgeted under the Component A. GHG emissions will be minimized through the use of carbon sequestration practices. The ESMF and the PMP will further specify the activities to be implemented at the level of each watershed area and irrigation scheme.

With relation to the construction works, the project will also result in extraction of raw construction materials including sand, gravel and stone. Due care will be needed to avoid any sustained damage to riverbeds and flood plains. The construction contracts will include provisions for the management of dust, use of appropriate fuel quality, fuel-saving driving patterns and vehicle maintenance to reduce pollution of the local air quality especially near schools and hospitals and in urban areas.

ESS4 Community Health and Safety

The ESS4 is relevant as the proposed activities are expected to employ community labors who will have close interaction with the relevant communities and there will be risk of COVID-19 Infection and other OHS issues. The ESMF to be prepared within 45 days after the project effectiveness will include assessment of Community Health and Safety issues including the COVID-19 Infection risks steaming from people gathering from local villages and the



nearby areas. It will define appropriate mitigation measures to manage the infection risk and the stigma and rumor issues associated with the disease. The Borrower operates quarantine and isolation centers in line with WHO guidelines. Such guidelines will be included in the ESMF.

The Borrower will ensure the avoidance of any form of Sexual Exploitation and Abuse to any project worker and or the project beneficiaries. The ESMF will include the mitigation measures to ensure that individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable have access to the development benefits resulting from the Project. The ESMF will also include template and guidelines for preparation of labor influx management plan. In case of involvement of security personnel, the security personnel will follow a strict code of conduct in line with ESS4 and seek to avoid any escalation in its interaction with communities as well as the potential stress related to it. The ESMF will also include identification of necessary measures to manage traffic accidents and to improve community health and safety and define mechanisms to monitor their implementation. Due consideration will be given to promotion of and training on IPM to prevent negative health impacts from the use of agro-chemicals among producers, their families and the adjacent communities. The infrastructure to be built to improve water use efficiency, e.g. canal lining will be considering community safety and security, as well as social needs like access points for washing and livestock. Adequate safety training and safety gears will be provided for workers by the relevant contractors with whom they are working with and road safety issues will be addressed through appropriate provisions in works contracts.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The ESS5 is relevant as the project activities could involve minor land acquisition impacts. The construction and rehabilitation works will take place on government-owned land; however, due to the nature of the project activities, the proposed interventions may cause minor land acquisition for irrigation schemes, small reservoirs, erosion-control structures, and rehabilitation and etc. The client will develop a stand-alone Resettlement Policy Framework (RPF) during project implementation phase. The RPF will include comparative analysis between the relevant national framework and the WB ESS5. The RPF will also include the procedures and approaches for land acquisition/land donation, community contribution and related impacts under various phases of the project and will provide guidance for preparation of Resettlement Action Plans (RAP), if required. In cases of land donation, the project will ensure that: a) no land donation is done under coercion and pressure; b) donated land is not more than 10% of total asset of the donor; and c) the donor legally transfer the land for investment under the Project. The land donation criteria and steps will be clearly reflected in the RPF which will be reviewed and cleared by the World Bank. The RPF will cover the potential temporary and permanent impact on such land and assets and propose appropriate mitigation measures. The client will also conduct meaningful and participatory stakeholder consultations in the project areas in accordance to COVID-19 permitted measures. The RPF will be reviewed/cleared by the Bank and publicly disclosed in English and local languages on MAIL and WB external websites.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

This standard is relevant as the project intends to promote the sustainable management of land, water and plants in irrigated and rain-fed areas. The ESMF will provide check lists and guidelines to be considered by site and watershed specific Environmental and Social Assessment instruments to be used later on during implementation to avoid adversely impacting the living natural resources around the irrigation schemes and in the watersheds areas. The ESMF will prepare generic ToRs for all potential assessment tools e.g. preparation of ESMPs, established to minimize



and mitigate adverse impacts on biodiversity and ecosystems. Sensitive sites will be excluded from the project intervention areas and the ESMF will include a screening criteria to ensure that only the allowed activities are considered. Participatory design and planning process for irrigation scheme rehabilitation and watershed management will include the subject of livestock including animal welfare and supply chain issues when relevant, notably in relation with grazing requirements (for example, in case of establishment of no-grazing areas in the watershed management plan). Relevant guidelines will be included in the ESMF. The Project will not implement any activity that may have potential adverse impact on critical habitats when identified during the assessment made during selection of sub-project sites. Consultations will be held for the preparation of the ESMF and then as part of the planning and design activities on each project site.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

ESS7 is not relevant to the project as there are no IP/SSAHUTLCs in Afghanistan as per standard definition of ESS7.

ESS8 Cultural Heritage

Currently there is no indication of potential impacts on cultural heritage. However, this will be thoroughly assessed as part of the ESMF development process for all specific investments, covering both “man-made” cultural or archaeological resources as well as any natural features (such as water bodies) which may hold intangible cultural or religious value to local communities. If potential impacts on cultural heritage near or on any project sites are identified, cultural heritage plan(s) will be developed in accordance with this standard and national law, including chance find procedures.

The ESMF will include guidelines for Chance Find Procedures according to national law, which will be followed. The ESMF will also include TOR for Cultural Heritage Management Plan (CHMP) which will be used in case any site is determined to involve cultural heritage impacts.

ESS9 Financial Intermediaries

The government agency (MAIL) is responsible for the project design, implementation, supervision and monitoring; therefore, this standard is not relevant.

B.3 Other Relevant Project Risks

There will be no other Environmental and Social Risks.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

Yes

Some of the existing canal rehabilitation and water supply works will take place in international river basins that cover most of the country, including Amu Darya River Basin, Harirud-Murghab River Basin, Helmand River Basin and Kabul River Basin. The nature of the interventions will not involve additional water abstraction but will ensure proper transmission and distribution by rehabilitation / replacement and minor additions to the ongoing schemes. Therefore, given the nature of works envisaged under the proposed project: (a) the project will not adversely affect

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the quality or quantity of water flows to other riparians; and (b) it will not be adversely affected by other riparians' water use. Therefore, an exemption to the notification requirement was requested on June 21,2020. The request has been cleared by Senior Counsel, LEGEN; and the Country Director and has been sent to Regional Vice President for final clearance.

OP 7.60 Projects in Disputed Areas

No

III. BORROWER’S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED	TIMELINE
ESS 1 Assessment and Management of Environmental and Social Risks and Impacts	
Environmental and Social Management Framework (ESMF) with environmental and social screening criteria and an Exclusion List to be prepared within 45 days of project effectiveness.	10/2020
ESS 10 Stakeholder Engagement and Information Disclosure	
The client has prepared a Preliminary Stakeholder Engagement Plan (SEP) which will be updated and finalized within 30 days of Project Effectiveness.	09/2020
ESS 2 Labor and Working Conditions	
MAIL to prepare Labor Management Procedures (LMP) as appropriate and acceptable to the Bank within 45 days of project effectiveness. Sensitization in the code of conduct should be conducted prior to any project activity.	10/2020
ESS 3 Resource Efficiency and Pollution Prevention and Management	
The relevant aspects of ESS3 shall be incorporated in the ESMF to be prepared under ESS1 within 45 days of project effectiveness. A Pest Management Plan (PMP) that takes an IPM approach will be prepared within 45 days of the project effectiveness.	10/2020
ESS 4 Community Health and Safety	
Relevant aspects of this standard shall be considered, as needed, under the assessment of ESS1 within 45 days of project effectiveness.	10/2020
ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	
MAIL will develop a stand-alone Resettlement Policy Framework (RPF) within 45 days of project effectiveness	10/2020
ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	
Relevant aspects of ESS6 shall be incorporated in the ESMF to be prepared under ESS1.	10/2020
ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	

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Not Relevant	
ESS 8 Cultural Heritage	
Chance find procedure will be prepared under the ESS1 under the ESMF within 45 days of the project effectiveness.	10/2020
ESS 9 Financial Intermediaries	
Not Relevant. The project is implemented by MAIL.	

B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework? No

Areas where “Use of Borrower Framework” is being considered:

Use of borrower’s framework is not being considered for this project. The project will comply with the Bank’s new Environmental and Social Framework and its Environmental and Social Standards, as well as with the applicable WBG EHSs. The Project, however, is also subject to the national and local permits and clearances as per the existing legal-institutional framework. The exact requirements to obtain such permits and clearances will be recorded in the ESCP.

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IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Ministry of Finance

Implementing Agency(ies)



Implementing Agency: Ministry of Agriculture, Irrigation and Livestock

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

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Practice Manager (ENR/Social)	David Seth Warren Cleared on 17-Jul-2020 at 19:44:9 EDT
Safeguards Advisor ESSA	Agnes I. Kiss (SAESSA) Concurred on 18-Jul-2020 at 15:41:9 EDT