

**INTEGRATED SAFEGUARDS DATA SHEET  
APPRAISAL STAGE**

**Report No.: ISDSA1498**

**Date ISDS Prepared/Updated:** 27-Mar-2013

**Date ISDS Approved/Disclosed:** 28-Mar-2013

**I. BASIC INFORMATION**

**1. Basic Project Data**

<b>Country:</b>	Montenegro	<b>Project ID:</b>	P122139
<b>Project Name:</b>	Montenegro Industrial Waste Management and Cleanup Project (P122139)		
<b>Task Team Leader:</b>	Frank Van Woerden		
<b>Estimated Appraisal Date:</b>	27-Mar-2013	<b>Estimated Board Date:</b>	23-May-2013
<b>Managing Unit:</b>	ECSEN	<b>Lending Instrument:</b>	Specific Investment Loan
<b>Sector:</b>	Solid waste management (60%), General industry and trade sector (20%), Energy efficiency in Heat and Power (10%), Other Mining and E xtractive Industries (10%)		
<b>Theme:</b>	Pollution management and environmental health (70%), Environmental policies and institutions (30%)		
<b>Financing (In USD Million)</b>			
Total Project Cost:	77.10	Total Bank Financing:	66.00
Total Cofinancing:		Financing Gap:	0.00
<b>Financing Source</b>		<b>Amount</b>	
Borrower		11.10	
International Bank for Reconstruction and Development		66.00	
Total		77.10	
<b>Environmental Category:</b>	A - Full Assessment		
<b>Is this a Repeater project?</b>	No		

**2. Project Objectives**

The Development Objective of the Project is to reduce contamination of Montenegro's natural resources and public health risks of exposure to this contamination from selected industrial waste disposal sites.

The Project will achieve its objective through: (i) the development and implementation of a

remediation investment program for selected legacy industrial waste disposal sites; and (ii) related to these interventions, supporting institutions and the related industries in bringing the management of industrial waste in compliance with Montenegrin legislation.

### 3. Project Description

The proposed project would have three components: (1) Remediation of Selected Legacy Industrial Waste Disposal Sites; (2) Future Industrial Waste Management; (3) project management.

The Project comprises of three components as summarized below.

Component 1 – Remediation of Selected Legacy Industrial Waste Disposal Sites (US\$ 61.6 million equivalent)

This component supports investments to remediate the four selected first-priority waste disposal sites. The feasibility study with site investigations, comprehensive and site-specific Environmental and Social Impact Assessment (ESIA) and basic designs were completed for all four sites during project preparation and financed by the Project Preparation Facility. The investments and main environmental impacts and benefits on the four sites are following:

(a) Mine tailings disposal facility Gradac. The 12.5 ha disposal facility in Gradac contains tailings (inert residues) from former zinc-lead ore flotation processing.

The current impact from the tailings site at Gradac includes several negative impacts on the environment and on the social-economic environment. The three most significant current environmental impacts are:

- Humans' exposure to heavy contaminated dust particles.
- Impact on groundwater from percolating contaminated water.
- Impact on river water from contaminated drain water.

The selected remediation option comprises of in-situ slope stabilization and full encapsulation with reshaping, top cover and re-vegetation. Water management is based on prevention of infiltration into the tailings body and diversion of run-off water. The re-cultivation of the tailings surface will reduce the possible particle transport by wind erosion and further limit the uncontrolled spreading of contaminated material. In addition, the sealing of the surface and the installation of drainage systems for melting snow water and rainwater will limit the percolation through the waste body and minimize the leakage of contaminated water. This remediation is selected because it significantly limits both the impact from dust and the impact on river water and groundwater. The remediation has a significant positive impact on the environment.

(b) Maljevac Coal ash disposal facility in Pljevlja. This 53.5 ha facility for disposal of ash from the lignite fired power plant in Pljevlja is owned and operated by Elektroprivreda Crne Gore (EPCG), the Montenegrin state-owned power company. The current impact from the dumpsite at Maljevac Ash Dumpsite includes several negative impacts on the environment and on the social-economic environment. The three most significant current environmental impacts are:

- Human exposure to dust particles
- Risk of dam failure
- Impact on river water

The selected solution for closure and remediation of the ash disposal facility in Pljevlja is comparable to the preferred option in Gradac: reshaping, drainage, encapsulation with re-vegetation and investments in water management. The remediation has a significant positive impact on the environment.

An associated investment to the Maljevac Ash Dumpsite is the development of the new Ash Facility

in the Sumani site by EPCG. The Sumani site earmarked for the Sumani Ash Facility development is an abandoned lignite mine located in the south of Pljevelja TPP. The former open cast mine is some 15 m deep and has not been re-cultivated. EPCG is planning an ash facility at the Sumani site and will prepare a resettlement plan if required for possibly affected residences at the Sumani site. New ash handling and disposal will be operated in line with good international practices. Water consumption will be reduced by factor 6 to 10 compared to the current facility in Maljevac area currently in operation and dust emissions will be reduced.

(c) Ship blasting waste and site contamination at Bijela shipyard. This shipyard is located at the Boka Bay and has an estimated volume of 60,000 tons of contaminated blasting grid stored in big bags. Blasting grid is used for ship paint stripping and cleaning, and the historic volumes of blasting grid contain heavy metals and should be considered as hazardous waste. Due to reduction of heavy metals in ship paints, the newly produced blasting grid is not considered as hazardous waste anymore.

The earlier bulk storage of this material has caused soil pollution in an area of around 1.5 ha and it is expected that excavation works necessary for the redevelopment of the site, will generate an estimated volume of 40,000 tons of contaminated soil and 7,200 tons of contaminated sediments. The current impact from the dumpsite at Bijela Shipyard includes several negative impacts on the environment and on the social-economic environment. The three most significant current environmental impacts are:

- Exposure to human from contaminated dust
- Direct exposure of human (employed at the shipyard) to contaminated waste
- Impact on sea water quality

The selection of remediation option consists of the removal of the contaminated blasting grit (hazardous waste) and the volumes of excavated contaminated soil from the site to meet redevelopment standards. The contaminated soil volumes are classified as non-hazardous waste and qualify for disposal within Montenegro in one of the municipal waste landfills in the country that meet the standards of the national waste law and the EU Landfill Directive. The large volume of blasting grit is foreseen to be exported in compliance with requirements of the Basel Convention. The remediation has a significant positive impact on the environment.

(d) Red-mud basins and solid waste disposal site at Kombinat Aluminija Podgorica (KAP). Red-mud is a by-product from the processing of bauxite in the alumina production, the main input material for the electro-chemical production of aluminum. It is the high alkalinity of the red-mud that causes high mobility of some heavy metals but also cyanide, fluoride and aromatic hydrocarbons from the basins are found in soil and groundwater, but in time, without adding fresh red mud, the pH gradually decreases to more neutral levels, reducing environmental risks.

The current impact from the contaminated sites at KAP includes several negative impacts on the environment and on the social-economic environment. The three most significant environmental impacts are:

- Risk of impact on groundwater
- Exposure to human from contaminated dust
- Impact on river water

The proposed remediation consists of draining basin water after treatment, reshaping, covering and stabilization of the impoundment slopes. Further groundwater contamination and migrating of pollutants in groundwater is not expected but should be carefully monitored. If for unexpected reasons the polluting will keep migrating in the groundwater system, a future pump-and-treat system could be considered, if needed. The remediation has a significant positive impact on the environment.

The solid waste disposal site of 11 ha at KAP contains both hazardous and non-hazardous waste. Also this disposal site has been a substantial source of soil pollution, although disposal practices in recent years have somewhat improved because now waste categories are sorted and stored separately with hazardous materials stored on concrete surfaces, but still in the open and subject to weather conditions. Remediation is costly, due to the special nature of the waste which contains toxic materials that require tailored techniques for containment and the fact that all materials need to be removed, sorted and put in special cells for final disposal. To facilitate the disposal of future hazardous waste from KAP's aluminum production which is in principle the largest source of hazardous waste production in the country, the remediation containment will have a separate cell with the same environmental protection standards to receive this waste. This will also have a significant positive impact on the environment.

Implementation will start with the preparation in parallel for each site of the detailed design for remediation works, including the detailed design Environmental Impact Assessment (EIA) prepared in line with the WB safeguards policies and national legislation and, for national environmental and construction permitting purposes and bidding documents for the works.

#### Component 2 – Future Industrial Waste Management (US\$ 1.2 million equivalent)

This component will support actions of the government and industries related to the remediation sites under Component 1 managing future industrial waste generation in a manner that complies with national and EU legislation, since three out of the four identified priority sites are still actively in use for waste disposal from current industrial operations. In addition, this component also serves a broader purpose and will support strengthening regulation of industrial waste management in Montenegro and explore options for developing infrastructure for industrial waste disposal at the national level. Specifically, in addition to the support for proper arrangements for future waste for the industries related to the priority sites to be remediated under the Project, the component will also support the further development and implementation of a national industrial hazardous and non-hazardous waste register which will be an integral part of the Environmental Information System and workshop and trainings for industrial waste generators regarding separation of waste streams and proper interim storage requirements in line with EU legislation as well as reporting obligations.

The component will also support the planning and national permitting process for the realization of infrastructure for management and disposal of hazardous waste for possible future industrial waste from generators other than the industries related to the project sites under Component 1. Based on the more detailed overview of the different types of hazardous waste generated which will be part of the national industrial waste register, this component will also include an analysis of the possibility to allow acceptance of third party hazardous waste of similar characteristics on the KAP site (in the waste disposal cell to be constructed under Component 1 for future waste from KAP) or whether other options such as export or a different location for such infrastructure would be more suitable given the small quantities generated in Montenegro and the required planning process.

#### Component 3 – Project Management (US\$ 1.2 million equivalent)

The objective of this component is to support project management in accordance with the project's objectives and procedures as outlined in the Project Operational Manual (POM) which will be finalized before project effectiveness.

Under this component, the project will finance the following sub-components: (i) Project Management; and (ii) Establishment of a Monitoring and Evaluation system.

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

The priority sites for remediation under Component 1 are: (i) the solid waste disposal site and the red-mud basins of the Aluminum Plant in Podgorica (KAP); (ii) the Bijela Adriatic Shipyard, located at the Boka Bay; (iii) the coal ash disposal facility of Pljevlja Thermo-Electric Power Plant and the associated investment in the new Sumani Ash coal ash facility (EPCG); and (iv) the lead and zinc tailing disposal facility in Gradac near Pljevlja.

#### 5. Environmental and Social Safeguards Specialists

Bekim Imeri (ECSSO)

Natasa Vetma (ECSEN)

6. Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	The project includes remediation of the industrial waste disposal sites that partly include hazardous waste and development of hazardous waste disposal cell in KAP. According to OP 4.01 the comprehensive Environmental and Social Impact Assessments (ESIAs) for all sites including the associated investment for the Sumane site for ash disposal in Pljevlja have been commissioned and conducted by an independent environmental consultant. During the design stage, updated site specific EIAs will be prepared according to the national and WB requirements by independent consultant for national environmental permitting purposes.
Natural Habitats OP/BP 4.04	No	While KAP is in the vicinity of Lake Skadar which is a national park and Ramsar site, OP 4.04 is not triggered as the KAP site itself is an industrial estate with substantial environmental issues (brownfield site).
Forests OP/BP 4.36	No	
Pest Management OP 4.09	No	
Physical Cultural Resources OP/BP 4.11	No	
Indigenous Peoples OP/BP 4.10	No	
Involuntary Resettlement OP/BP 4.12	Yes	The closure and remediation of the Pljevlja coal ash disposal facility is not possible without the development of an alternative ash disposal facility in the area which will be located at the Sumane site. It is possible that, depending on the pace of development of this alternative facility

		and its footprint, land expropriation could be required in the future. The detail design and pace of the development of the footprint of the new facility is currently not know, which is why a Resettlement Policy Framework has been developed based on which RAP would be prepared if resettlement or loss of assets, income or access is involved.
Safety of Dams OP/BP 4.37	Yes	Some of the industrial waste disposal sites have materials contained within embankments that require stabilization works and which trigger this policy. Dam and slope stabilities of these objects have been investigated and reviewed in the feasibility study for remediation works under project preparation. The existing dams are not considered objects of high hazards, as defined by the Policy. Resulting from the feasibility study and a review by one of the Bank's experts on dam safety, measures related to dam safety have been defined to be included in the detailed design and the remediation works during project implementation, including stabilization measures. The detailed design and the works will be reviewed by independent dam safety experts.
Projects on International Waterways OP/BP 7.50	Yes	The following activities as part of remediation works trigger the policy: (i) some limited contaminated sediment dredging in a shipyards operational area in the Kotor Bay; (ii) the diversion of a creek currently passing ash dump in Pljevlja; and (iii) the possibility that surface water from KAP red-mud basins after treatment will be discharged into the Moraca river. For the first two activities an exception of the notification requirement was sought and which is pending approval since these are rehabilitation work on existing schemes which do not have adverse impact on quality or quantity of waters. For the third activity, the notification letter was sent on March 06, 2013 to Albanian government due to potential impact on Skadar lake.
Projects in Disputed Areas OP/BP 7.60	No	

## II. Key Safeguard Policy Issues and Their Management

### A. Summary of Key Safeguard Issues

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

The project is expected to result in substantial improvement in the environmental situation in Montenegro, particularly in areas surrounding the project's remediation sites. These improvements will be achieved both through the actual remediation of some of the most pressing environmental legacy issues in Montenegro and through improvements in environmental performance from enhanced management of ongoing waste production with the industries related to the remediation sites. In addition, it is expected that the capacity of local and central authorized bodies to manage environmental liabilities will be strengthened through their involvement in the project.

In line with the World Bank's OP 4.01, the project has been assigned an environmental assessment category 'A'. The Government of Montenegro has contracted a qualified consulting team to undertake comprehensive and site specific Environmental and Social Impact Assessments (ESIAs) under terms acceptable to the Bank. The ESIAs covered all existing remediation and new planned KAP disposal cell. The overall objectives of the comprehensive ESIA study for the remediation of the contaminated sites were: a) to identify and assess environment and social impacts, both adverse and beneficial, in the project's area of influence; to avoid, or where avoidance is not possible, minimize, mitigate, or compensate for adverse impacts on communities and the environment; c) to ensure that affected communities are appropriately engaged on issues that could potentially affect them; d) to ensure that the procedure of public consultation is carried out and documented according to the national and World Bank requirements. Draft ESIA reports, including Environmental Management Plans (EMPs), were completed in July 2012 and underwent several rounds of public consultation at the local level. The final version of the comprehensive ESIA was published by the World Bank InfoShop in August 2012 and a revised version was published in the Bank's Infoshop on January 23, 2013 to take into account the associated investment in Sumani coal ash facility, and was made available publicly in the country. More detailed site specific EIAs, satisfactory to the Bank and in line with the EMP will be prepared in parallel with and independently from the detail design work.

The requirements triggered by the Bank's Safety on Dams safeguard policies (OP/BP 4.37) are observed through the input of international dam safety experts in the core team of the Consultant that has prepared the feasibility study and the conceptual design for the remediation works that for some locations include existing dams or impoundments that trigger OP/BP 4.37. During project preparation site investigations and preliminary dam / slope stability and risk assessments have been conducted for these sites and stabilization measures identified, which will be incorporated in the remediation designs of these sites. A review of investigation data, the conceptual designs and an inspection of the dams by one of the Bank's dam safety specialists confirmed that provisions of the Policy for existing dams apply to the three dams of the Project as these dams are not considered to have special hazards that would require a regime for high-risk dams. This review resulted in the following recommendation for measures during project implementation in addition to the remediation/stabilization works identified in the feasibility study: (i) for the dam of the ash disposal facility in Pljevlja, to include monitoring equipment and commence a frequent monitoring program with early warning system upon completion of remediation work; and (ii) for the impoundment of the red-mud basins at the KAP site, to collect additional geotechnical site data during the detailed design stage of project implementation. These measures and independent monitoring and review actions for implementation of the project in compliance with the Safety of Dams policy will be confirmed during project appraisal for inclusion in the Loan Agreement.

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

Project implementation will result in substantial reduction in environmental impacts and risk to public health and the environment. It is also expected that the project will support efforts in Montenegro to identify long-term solutions for on-going day-to-day industrial waste management issues.

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

Significant adverse impacts from the Project are not expected. For some of the industrial waste sites a comprehensive and site specific ESIA looked at the different remediation methods indicating potential impacts and benefits of each method. A comprehensive remediation approach has been adopted to minimize future impacts or post-remediation maintenance efforts.

**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.**

The client has prepared comprehensive and site specific ESIAs. The purpose of ESIA was to assess the existing situation, present technical alternatives for site closure, determine current and future environmental impacts and prepare the associated Environmental Management Plans (EMPs) to determine the mitigation measures, environmental monitoring plans, institutional arrangements, capacity development and estimated costs for the mitigation measures and monitoring programs for both the construction and operation phases. The documents have been prepared on the basis of national legal requirements as well as applicable Bank safeguard policies. The EMPs include environmental monitoring programs for both construction and operation phases. The parameters to be monitored include noise, dust, soil quality, water and groundwater quality, and waste disposal. To ensure the strict and efficient implementation of the mitigation measures proposed, including environmental obligations during construction, a program of monitoring activities has been developed as part of the EMP. The project progress reports furnished by the implementing agency will include a section for EMP implementation and related environmental monitoring reports.

It was assessed that all activities envisaged under Component 1, beside remediation of the Lead and Zink Tailing Ponds in Gradac might affect international waterways. The KAP red mud basin present a current risk due to potential leakages of alkaline waters to local groundwater and to the Moraca and Cijevna Rivers, which are tributaries of Skadar Lake. The alkaline water will be removed and treated, after which treated waters will be discharged into the sewage system or into the Moraca or Cijevna Rivers, dependent on the final design. For this reason, the client sent a notification letter on March 6, 2013 regarding this investment to notify the Government of Albania as the Skadar Lake basin is shared with Albania. For the remaining remediation activities that could involve the use or potential pollution of international waterways under OP 7.50 envisaged under Component 1, especially a) Bijela Adriatic Shipyard, located at the Boka Bay and b) the Ash Dump Facility of Pljevlja Thermo-Electric Power Plant, While OP 7.50 has been triggered for these activities, a notification exception under paragraph 7 of OP 7.50 is being sought as the works will not adversely affect the quantity or quality of water flow to any riparian states, and will be not adversely affected by the other riparians' possible water use and it was determined that the works qualified as rehabilitative in nature and therefore as on-going scheme as referred to in the OP 7.50 . More importantly, the envisaged works will minimize risk of pollution of the riparians' waters. Montenegro is signatory of Barcelona Convention and also involved in several partnerships with the above riparian countries in the framework of the Adriatic Ionian Initiative for the Protection of the Adriatic Sea. The proposed Project activities do not conflict with any of the principles of the above agreements, and those agreements do not require additional notification of



other riparians. Montenegro is also a party to the International Commission for the Protection of the Danube. However, because of the nature of the works, there is no requirement for notifying other riparians of the proposed project under this treaty.

For the associated investment in the Sumani Ash coal ash facility which is being developed by EPCG. Upon the completion and approval of the detail design for the new Ash Facility and the planning for the development of that facility in relation to settlements, the possible impacts and timing of the development of the Sumani site and the footprint will be known. Due to the current uncertainty of the exact impacts as well as the phasing from the development of Sumani site, it is not known whether and when there would be a need for resettlement. Therefore, according to the OP/BP 4.12 precautionary principle, a Resettlement Policy Framework with the principles for the resettlement has been prepared and disclosed which would require preparation of a Resettlement Action Plan if resettlement or loss of assets, income or access is involved.

The existing legal framework in Montenegro is of a great significance as it provides for the establishment of an integral management system for natural resources, prevention and pollution control, informing the public and public participation in decision making. Implementation of this legal framework still possess some challenges due to conflicts between environmental legislation and other laws that do not necessarily mention the need for EIA as a part of the permitting process. However, the EU-type national Environmental Protection Agency (EPA), that will be the implementing agency for the Project, has been established in November 2008. Montenegro has developed environmental protection instruments that include environmental standards; strategic environmental assessment (SEA), several sector-wide EIAs; system for Integrated Pollution Prevention and Control; spatial and physical development plans; EMAS and other instruments for environmental protection established by special regulation. However, their implementation is not yet uniform throughout the country due to lack of institutional capacities. The environmental inspection and enforcement capacities have been strengthened during past two years, although their further improvement is required in order to reach EU-compatible levels. During the early stage of project implementation the team in EPA will participate in WB organized safeguards training.

Montenegro has declared itself an ecological state and its prospects hinge strongly on development of tourism sector, which puts additional pressure on the government to deal with the existing (historic) industrial pollution hot-spots.

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

The beneficiaries of the project would be (a) Communities neighboring currently poorly managed legacy pollution sites, which would benefit from reduced exposure to public health risks related to the production and inadequate management of industrial waste; (b) National industries, from the cleanup of legacy waste disposal sites that are now part of their facilities and from the development of a national facility to manage hazardous waste in the future, which is currently a particularly difficult category of industrial waste to dispose of; (c) Government institutions with responsibilities in the domain of industrial (hazardous and non-hazardous) waste management, who will get support to further develop the regulatory framework and instruments to execute these institutional roles adequately; and (d) the tourism and service industry which will benefit from the reduced risks of pollution of natural resources and the elimination of the presence of open and visible industrial disposal sites.

Implementation of the Project will start with the preparation of detailed designs for the remediation works including an active separate cell with the same environmental protection standards to facilitate the disposal of future hazardous waste from KAP's aluminum production. As part of procedures for obtaining environmental and construction permits under national legislation, detail design EIAs will be prepared for these works that will incorporate further public consultation steps, which will be satisfactory to Bank and in line with the EMP. The procedures for further consultations and resulting EIAs will be reviewed by the Bank prior to commencement of the works.

### **B. Disclosure Requirements**

<b>Environmental Assessment/Audit/Management Plan/Other</b>	
Date of receipt by the Bank	01-Aug-2012
Date of submission to InfoShop	08-Aug-2012
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	02-Aug-2012
<b>"In country" Disclosure</b>	
Montenegro	27-Jun-2012
<i>Comments:</i> and updated ESIA disclosed in-country on January 23, 2013	
<b>Resettlement Action Plan/Framework/Policy Process</b>	
Date of receipt by the Bank	15-Mar-2013
Date of submission to InfoShop	15-Mar-2013
<b>"In country" Disclosure</b>	
Montenegro	15-Mar-2013
<i>Comments:</i>	
<b>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.</b>	
<b>If in-country disclosure of any of the above documents is not expected, please explain why:</b>	

### **C. Compliance Monitoring Indicators at the Corporate Level**

<b>OP/BP/GP 4.01 - Environment Assessment</b>	
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ]
<b>OP/BP 4.12 - Involuntary Resettlement</b>	
If yes, then did the Regional unit responsible for safeguards or Sector Manager review the plan?	Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ]
<b>OP/BP 4.37 - Safety of Dams</b>	
Has an Emergency Preparedness Plan (EPP) been prepared and arrangements been made for public awareness and training?	Yes [ <input type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input checked="" type="checkbox"/> ]
<b>OP 7.50 - Projects on International Waterways</b>	
Has the RVP approved such an exception?	Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ]
<b>The World Bank Policy on Disclosure of Information</b>	

Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ]
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 [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ]
<b>All Safeguard Policies</b>	
Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ]
Have costs related to safeguard policy measures been included in the project cost?	Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ]
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ]
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?	Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ]

### III. APPROVALS

Task Team Leader:	Frank Van Woerden	
<b><i>Approved By</i></b>		
Regional Safeguards Coordinator:	Name: Agnes I. Kiss (RSA)	Date: 27-Mar-2013
Sector Manager:	Name: Elisabeth Huybens (SM)	Date: 28-Mar-2013