INTEGRATED SAFEGUARDS DATA SHEET
APPRAISAL STAGE

Date ISDS Prepared/Updated: 21-Feb-2012

I. BASIC INFORMATION

1. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Tanzania</th>
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<td>Project Name:</td>
<td>Tanzania Third Social Action Fund - Productive Social Safety Net (TASAF III-PSSN) (P124045)</td>
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<tr>
<td>Task Team Leader:</td>
<td>Ida Manjolo</td>
<td></td>
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**Financing (In USD Million)**

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Environmental Category: B - Partial Assessment

Is this a Repeater project? Yes

2. Project Objectives

The Project Development Objective of APL Phase 1 is to create a comprehensive, efficient, well-targeted productive social safety net system for the poor and vulnerable section of the Tanzanian population.

3. Project Description

Project Components

1. To achieve the development objectives, the PSSN would support the implementation of the proposed operation based on 2 components:

   Component 1 – Consolidation of Integrated Social Safety Net Interventions for extremely poor and food insecure households (Total Cost: US$142.6 million; IDA- US$135.7 million; DFID US$7,000,000)
   
   In order to maximize the impact of a social safety net in Tanzania, different interventions will be coordinated to target the extreme poor and food insecure groups. In this framework, the entry point of the social safety net will be based on the implementation and scale up of two complementary interventions: labor intensive public works and cash transfers. Both programs offer complementary benefits for the same group of the population (extremely poor and food insecure) and consequently will be implemented in the same villages and target the same households.
   
   The cash transfer intervention is intended to increase the household income on a permanent basis while the public works program seeks to provide a predictable transfer during the lean season to encourage beneficiary families to avoid negative coping decisions, which include selling assets, pulling children out of school and sending children to work. The cash transfer scheme also involves a mid- to long-term element through the introduction of co-responsibilities to encourage beneficiaries to invest in the education and health of their children and pregnant women. The public works also seeks to provide a source of funds for beneficiaries to start accumulating some assets. Therefore, the combined interventions will offer support to extremely poor families to cope with current low consumption and seasonal shocks, as well as opportunities for a sustained improvement of living conditions.

   The approach adopted by the PSSN, in which the target group for both interventions (public works and cash transfers) is the same household, requires a common targeting mechanism to select eligible households and a unified registry of beneficiaries. While the PSSN is nationwide, geographical targeting intra-district, and community targeting methods with additional verification tools to minimize inclusion errors (Component 1) will be used to reach the poor.

2. It is expected that the combined intervention will support about 280,000 households (more than 1 million people) during the first phase of the APL series. Preliminary estimates show that no less than 85 percent of the eligible households have both children less than 18 years of age and adults able to work, so they would be eligible to participate in the programs and receive the three modalities of transfers. Households will receive up to three transfers following their selection using a common targeting system: (i) a basic monthly transfer equivalent to US$5 to improve household consumption on an ongoing basis, transferred to all households registered in the program; (ii) a Variable Conditional Transfer for households with eligible members equivalent to up to US$5 per month per household to serve as an incentive for households to invest in the
human capital of their children and the health of the pregnant women, which is subject to participants’ compliance with a set of activities; and (iii) a seasonal transfer linked to participation in labor-intensive public works to increase and sustain household assets, and smooth consumption during lean seasons for up to 60 days during a four-month period each year at a daily wage of US$1.35 per day. The final number of households actually receiving the Variable Conditional Transfer (linked to conditionality) will be determined only when the supply side assessment is completed. This is the assessment to identify access to schools and health facilities as well as the quality of those services).

5. Given that the program will target the poorest segments of the population, it is expected to contribute to poverty reduction significantly. Preliminary estimates indicate that a combined intervention of cash transfers and public works under the above mentioned general framework and programs’ generosity would reduce the poverty headcount (FTG(0)) by around 8 percent and the poverty gap (FTG(1)) by about 15-20 percent as an annual cost equivalent to less than 0.25 percent of the GDP per year once full coverage of the PSSN programs is reached (accounting for targeting errors).

6. The government will scale up the interventions gradually, in the following stages: in 2012-2013 will cover up to 10 LGAs in the first year and up to 30 in the second year; and the second wave of the program will be delivered during the period 2014-2015 in which all LGAs in the country will be supported by the PSSN and the target of 280,000 households will be achieved.

Component 1A – Conditional Cash Transfers

7. The overall objective of the conditional cash transfer intervention is increasing household consumption throughout the year and improving food consumption (quantity and quality of meals) in order to reduce food insecurity and a number of related illnesses, while creating an incentive for extremely poor families to invest in the education and health of their children and pregnant women and prevent chronic malnutrition.

8. The cash transfer program will comprise two benefits. (1) A Basic Transfer (BT) equivalent to US$5 per month per household to be transferred to all eligible registered families; and (2) a Variable Conditional Transfer (VCT) for households with children younger than 18 and/or a pregnant woman equivalent to up to US$5 per households per month. The VCT will be transferred subject to compliance with co-responsibilities by each of the eligible members of the household, as follows:

a. Education: Annual enrollment of school-age children aged 6-18 in pre-primary, primary and secondary schools (where available) and regular attendance of at least 80 percent of the school days per month.

b. Maternal and Infant Health: For pregnant women attendance to regular ante-natal checkups, delivery at a health facility or assisted by skilled personnel and a post natal check up at the country’s health protocol. For children younger than two years, regular check-ups at health services at least once every month including regular growth monitoring and counseling and distribution of micro-nutrients; and for children older than two but younger than six years check-ups every two months. For all children younger than six, the health facility will provide full immunization.

c. Workshops to reinforce nutrition practices and investment in human capital: At least one parent will attend monthly workshops organized by the program in coordination with the education, health and/or social welfare sectors to promote good nutritional practices, child care, home hygiene, water usage, as well as other topics including the importance of starting education at the right age.

9. As in other conditional cash transfer interventions, bimonthly payments under the PSSN will be authorized on the basis of compliance with co-responsibilities, following a management of benefits to be defined in the Manual of Operation. Transfers will be received by mothers. Beneficiary households with three or less eligible members (e.g., three children less than fourteen years or a pregnant woman and two school-age children) will register all three members in the program. Beneficiary households will register all eligible members in the program (i.e., children younger than 18 and pregnant women).

Component 1B – Labor Intensive Public Works Plus

Public Works Program

10. The objective of the Public Works (PW) Program under the PSSN is to contribute to the overall goal of ensuring timely and predictable transfers to poor and vulnerable households to help them build and maintain household assets, and smooth consumption. A secondary objective of the PW Program is to contribute to an enabling environment for development through creation of community assets. A number of other multiplier benefits are expected from the program that include, but are not limited to, increased incomes and related effective demand in local markets, savings and investment.

11. The beneficiary households, selected through the common targeting mechanism set up to identify all program beneficiary households, will be offered to participate in the labor-intensive public works program provided they have at least one adult able to work. The PW program will offer those households with a guaranteed number of working days (60) per year, with a limit of 15 days per month during each of the 4 months of implementation of PW activities. The same beneficiary households will be able to participate every year. The number of days, combined with the agreed daily wage rate, will provide them a predictable monthly cash transfer, every year during the period of implementation of the PW activity.

12. PW will operate only during certain periods of the year, when labor demand for agricultural activities is at its lowest – and just before and when additional income is most needed. The exact period of implementation of PW in each LGA will be determined at the LGA level, depending on the particularities of each LGA.

13. Participants to the PW program will work at a daily wage rate of US$1.35 per day in the initial phase of the program (this rate may be revised over the course of implementation to take into account increases in prices of the food basket and basic needs). This rate, which is lower than the average market rate for unskilled labor, will provide a certain degree of self-targeting. It is expected that only those participants with no other more attractive livelihood alternatives or employment opportunities will be willing to participate in the PW program.

14. In order to maximize the number of households that can benefit from the transfers the wage part of PW funding will represent a minimum of 75 percent of the Labor-intensive PW budget allocated for each LGA per year. This allocated budget per LGA, combined with the agreed daily rate and agreed number of days to be worked, will allow for a pre-determined number of households to participate in the PW program in each selected LGA. The 75 percent labor-intensity will be an average per LGA, as certain activities may use slightly more materials than others and will be compensated by others that will be more labor-intensive. The other 25 percent of PW budget allocation will be used towards financing administrative costs including technical supervision and monitoring and capital inputs. Financing for these costs will be transferred before the
beginning of the public works activities to ensure that tools and materials are procured in a timely manner.

15. In addition to the criteria related to labor-intensity, PW activities will have to meet a number of criteria, such as addressing public goods and services, and meeting social and environmental safeguards requirements. A technical manual of labor-intensive activities will be developed before the start of the project and will propose a menu of possible activities to be financed by the project. This menu will guide the community planning and identification of PW subprojects at the local level. It may expand after the first year of implementation, depending on the evaluation of the first cycle of PW activities. It is expected that program will focus on small agricultural assets rehabilitation (such as small irrigation schemes), soil and water conservation, environmental and natural resources management activities, and small rural access roads. The technical PW manual will explore the range of activities to be funded and will include technical design, work productivity norms, social and environmental mitigations measures etc.

Community Savings Promotion

16. The Community Savings Promotion (COMSP) will complement PW activities of the program. The sub-component will focus on mobilization of savings through a group savings methodology. Activities to be financed will include community mobilization for savings, community groups institutional building, record keeping and technology based innovations (for example, using ICT where possible and provision of well-designed savings massages to communities on a regular basis using mobile technology). The groups will be linked to legally-constituted financial institutions (FIs) to ensure that the poor operate in a viable and sustainable savings framework. In order to deduce evidence on the impact of this intervention, rigorous impact evaluation will be part and parcel of the sub-component implementation. For the experience obtained through implementing Community Savings and Investment Program (COMSP) under TASAF II, see Box 1.

Component 2 – Institutional Strengthening (Total Cost: US$93; IDA US$79.3; DFID US$10.0 million; Government of URT US$3.0 million; USAID US$0.75 million)

17. The objective of this component is to: (i) support the Government of URT in the process of institutionalizing the PSSN as part of the National Social Protection Framework; (ii) support TASAF to start the implementation of the PSSN under the current structure and gradually move towards permanent institutional arrangements; and (iii) support program management and monitoring of the PSSN. The component will finance activities at national, district, and community levels aimed at improving accountability and transparency in the use of Project resources. It will have two sub-components:

Sub-component 2A – Institutional and Implementation Strengthening of the PSSN

18. The objective of this sub-component is to support TASAF and other implementing entities such as the department of Social Welfare in carrying out the required operational reform to effectively implement the PSSN. Given the shifted focus of the PSSN compared with the achievements and performance of TASAF under the previous two phases, there is need to provide ongoing support and assistance. The proposed operation will provide financial and technical assistance to implement activities including the following: (i) operational reforms and institutional strengthening that TASAF may require to improve efficiency in the implementation and monitoring of the PSSN; (ii) program management including procurement, financial management, supervision of operations including safeguards and human resource management; (iii) capacity building through training and technical assistance, advisory services, study tours and operational trips; (v) use of ICT in support of Component 1A and 1B; (vi) research and development; and (vii) overall project development communication including IEC.

19. The proposed project will support the institutionalization of the PSSN in the context of the National Social Protection Framework through two sets of activities:

Institutional strengthening of TASAF, for both implementing the PSSN and becoming a key actor within the new NSPF through four sets of activities that were identified as key factors in TASAF’s new role:

(a) Integrating social intervention strategies for beneficiary communities that combine different social protection programs and initiatives in the same community.
(b) The managing model of these integrated social intervention strategies at the national, regional and local levels (Local Government Authority – LGA), in order to harmonize the coordination schemes that each program encourages at different levels.
(c) Training and technical assistance to enhance capacity for the institutional staff. Under this component, training and technical assistance resources will be shared with key actors of the partner institutions in the implementation of the new social protection framework.
(d) Strengthening the process of internal coordination within TASAF; (i) by adjusting its management tools; (ii) restructuring TASAF internal organization at national and sub-national levels; and (iii) enhancing the TASAF institutional leadership role that is expected for implementing both the PSSN and the NSPF.

Institutional support to other actors involved in the decision-making and implementation of SP programs will include:

The set of activities included in this sub-component will help the Government of Tanzania to increase the effectiveness of its social protection spending by helping enhance its capacity to (1) plan programs and policies, (2) inform budgetary allocation, (3) coordinate program design and implementation, (4) monitor program implementation and progress, and (5) evaluate the impact of specific interventions. Through this component, the project will support activities to strengthen the overall government institutional arrangements for social policy in its role of steward of social protection through the following activities:

(a) Strengthening Government capacity for improved policy and decision making, coordination, and monitoring in the social sectors. This set of activities will finance technical assistance, advisory services, and training to enhance government’s capacity to develop effective institutional arrangements for policy-making and coordination, generate the knowledge and tools required for informed and coordinated decision-making, and foster greater governance and transparency in the social sectors.

(b) Enhancing Government capacity for knowledge generation for informed policy making. This subcomponent intends to finance activities of knowledge generation which will provide an information basis for coherent and coordinated decision-making and for greater effectiveness of social spending. Among others, such activities include the analysis of public spending and services in the social protection sector, the analysis of
living conditions and access to services, as well as impact, and institutional assessment of selected social programs.

Component 2B – Development of systems for implementation of social safety net intervention

20. To support the implementation of the social safety net interventions (Public Works and Targeted Cash Transfers), the proposed operation will provide assistance to develop and finance a set of instruments and systems that need to be in place before or during the initial stages of both programs. Specifically, the proposed project will support the following activities:

(a) A unified Registry of Beneficiaries of Social Programs (URB). Beneficiaries of the social safety net interventions will be registered in a URB and selected through a single targeting scheme.
(b) Management Information Systems. The APL I operation will provide support to strengthen, complement and integrate current information systems operated by TASSAF.
(c) Information Education and Communication Campaigns (IEC). Even though TASSAF has gained much experience regarding CCTs and public works, the full implementation of the PSSN requires a different approach compared with the current intervention system of TASSAF. Therefore, as the international experience shows, both Programs will be accompanied by comprehensive IEC strategies at national, regional, LGA and community levels.
(d) Supply side assessments. These will be undertaken to determine the specific co-responsibilities that will be enforced in each village and inform TASSAF and the education, health and nutrition sectors on where social infrastructure and service provision needs to be updated.
(e) Strengthening operational capacity of TASSAF and CMCs. The implementation of the PSSN and the scale up of a cash-for-work and a conditional cash transfer require significant capacity enhancement.

Component 2C – Development and strengthening of the M&E systems

21. The PSSN M&E system will transform data collection, processing and information management into an integrated data system to facilitate the operation of PSSN components (CT, PW and COMSP) through the entire cycle, across all levels of government (CMU, Regional, and Local Government Authorities). To implement the M&E system, the project will finance consultant and non-consultant services, IT equipment, goods and operational costs to carry out the following activities:

(a) A comprehensive impact evaluation based on a baseline and at least two follow up surveys contracted with a recognized international firm.
(b) Regular process evaluations to assess program’s operations. These evaluations will be carried out for both CT and PW interventions, the first one after one year of expansion.
(c) Beneficiary surveys and qualitative evaluation. The program will hire firms to run two beneficiary surveys and focus groups to gather beneficiary perception on the program.
(d) Design and test grievance mechanism and enhance program accountability mechanisms
(e) Field-based sampling verifications (spot checks) to assess whether program is being implemented as planned.
(f) Audits. Regular audits including financial and technical

Activities funded by Government and other donors (Total Cost: US$31.5million; Government of URT US$26.0 million; Spain US$5.5 million)

22. An agreement had been reached during the preparation of the PSSN that construction of health and education infrastructure for closing service gaps will be funded by part of the Government’s resources and other development partners'. It is anticipated that there will be other donors coming in at a later stage who might be interested to fund such infrastructure. The aim is to provide support to communities who need such public infrastructure to have better access to improved basic services in education and health so the children can attend school; and enable pregnant women, the elderly, and children attend clinics. In this regard, the infrastructure support will be directly linked to Subcomponent 1A. The infrastructure to be supported will include: teachers' houses, classrooms, sanitation facilities, basic solar systems for lighting, connections to the national electricity grid where feasible and furniture. Sector norms and standards will always determine the list and service packages. However, following the experience of TASSAF II, the subproject ceiling will be US$40,000, which is sufficient to provide functional infrastructure. To date the government has made available US$30 million for this intervention.

23. The Government of Spain will support infrastructure as in teachers' houses, water and capacity building for the district level staff and community management committees in five districts. Annex 12 has the details.

24. USAID will support a government led program that aims at building a national social protection system. USAID will make available US $450,000 for the first year and US$300,000 for the second year of the first phase as support towards national systems development and strengthening of psychosocial support to Most Vulnerable Children program.

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

The proposed project will be implemented in all 161 LGAs including Unguja and Pemba in Zanzibar. It will finance subprojects under the first component which is “Consolidation of Integrated Social Safety Net Interventions for extremely poor and food insecure groups”. Under this component labor intensive public works will be financed. The activities will include construction and rehabilitation of rural community roads, and watershed management. Health and education infrastructure will be constructed under the financing of the Government of the URT. The Project beneficiaries will be selected using a combination of community based targeting and the Proxy Means Testing.

5. Environmental and Social Safeguards Specialists

Helen Z. Shahriari (AFTCS)
Ann Jeannette Glauber (AFTEN)
Ida Manjolo (AFTSP)
II. Key Safeguard Policy Issues and Their Management

A. Summary of Key Safeguard Issues

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

   1. The project is rated as environmental Category B - Partial Assessment. To manage the potential environmental and social issues associated with the project, the Project Preparation Team (PPT) has updated the existing Environmental and Social Management Framework (ESMF) that was prepared for TASAF II in 2004. The updating was done based on an assessment of a sample of already-implemented TASAF II subprojects.

      The project will fund sub-projects related to sub-component 1B - Public Works Program and targeted infrastructure development. While the exact type and location of subprojects will be chosen by communities, possible kinds of subprojects include but are not limited to:
      • Subproject related to environmental conservation
      • Control of gullies through soil conservation
      • Rehabilitation of community roads (earth/gravel) and not feeder roads
      • Small scale irrigation using both surface and ground water
      • Small earth dams using labor based construction
      • Nurseries development
      • Rainwater harvesting techniques
      • Construction of markets
      • Soil conservation

      Connection of households/community infrastructure to the national power grid
      • Construction /rehabilitation of education facilities in existing primary and secondary schools, including housing for teachers
      • Construction/rehabilitation of health facilities in existing dispensary and health centers
      • Construction/rehabilitation of of community water points

      According to the ESMF, the project’s positive impacts are expected to stem from the creation of employment and income for poor households. Sub projects are expected to strengthen traditional systems of environmental and social governance and embrace the notion of community dialogue through effective functioning of Village/Shehia/Mtaa or inter-Village/Shehia committees for community land, environmental and social management. Additionally, the project will help promote the decentralization process through support to capacity building interventions, raise awareness on impacts of degradation of natural resources and encourage conservation, improve access to infrastructure, and improve conservation and natural resource management use through a variety of known soil and water conservation techniques.

      Under public works sub component, environmental conservation and watershed management subprojects have the potential of increasing labor intensity to targeted 75 percent and are highly recommended for prioritization by communities during implementation of TASAF III. At the same time, there is an envisaged plan to integrate Disaster, Risk and Climate Change Adaptation (DRCCA) into public works sub projects so as to have them shielded from related risks which could erode benefits of the social safety net in the medium and long term. This will involve encouraging and promoting climate change adaptation, green public works and gender mainstreaming.

      The potential negative environmental and social impacts of the Project are expected to be localized due to the small-scale nature of investments. The overall negative environmental and social impact predicted under TASAF III project include: 1) increase in area of cultivation, leading to increased demand on natural resources or degrade the surrounding environment; 2) possible increase in land-related conflicts, stemming from rising population pressures, a deteriorating resources base, desertification and drought due to climate change and intensification of the agricultural production systems; 3) subprojects supported by TASAF III may not bring the intended benefits to certain vulnerable groups and to the poor and may further contribute to inequitable distribution of resources and marginalizing of these groups; and 4) minor impacts associated with construction, however, the small-scale and scope of subproject interventions is not expected to yield significant environmental impacts.
2. Experience from TASAF II points to the need for improvements to the safeguards process to address a number of key issues that may undermine the effective and efficient delivery of environmental and social management under TASAF III. These will include: (i) subproject screening process should be refined by streamlining and clarifying guidance. This would involve revising the screening checklist (that will be included in Operational Manual), making it much simpler and sector specific rather than the generic checklist used during TASAF II; (ii) ensuring presence of a dedicated and well-trained safeguards team within TMU for coordinating safeguards implementation, monitoring and reporting. This will be done through enhancing the capacity of the existing team; (iii) developing and enhancing capacity in implementing LGAs to facilitate implementation of the safeguards process; and (iv) developing monitoring indicators for safeguards implementation and compliance.

3. Final agreements with government concluded that TASAF III subproject investments will not affect international waterways.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:
   There are not expected to be any significant indirect and/or long-term impacts associated with the project.

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

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.

   1. Based on an assessment of a number of subprojects implemented under TASAF II, the existing safeguards instruments have been updated. Like its predecessors, the Project triggers OP 4.01 on Environmental Assessment and OP 4.12 on Involuntary Resettlement. Additionally, TASAF III, being a nationwide Project, triggers the Indigenous People Policy OP 4.10. As mentioned, TASAF III -- like its predecessors -- is a Safeguard Category B because it has potential adverse environmental and social impacts on human populations or environmentally important areas including wetlands, forests, grasslands, and other natural habitats. However, the negative impacts are site-specific, and their mitigation measures can be designed more readily. These include measures needed to prevent, minimize, mitigate, or compensate for adverse impacts; and improve environmental and social performance.

   2. The Government updated the Environmental and Social Management Framework (ESMF) and a Resettlement Policy Framework (RPF), which were prepared for TASAF II in 2004 in order to adapt them for TASAF III. The updated ESMF and RPF were cleared by the Bank and disclosed. The ESMF was disclosed in-country on November 14 and at the Infoshop on November 15, 2011 and the RPF was disclosed in-country on January 18, 2012, and at the Infoshop on January 18, 2012.

   3. Since the Indigenous Peoples (IPs) Policy 4.10 was triggered, the Government prepared an Indigenous Peoples Policy Framework (IPPF). The IPPF was discussed with the stakeholders and was submitted to the Bank for clearance on October 21, 2011 and cleared. The IPPF was disclosed in-country on January 18, 2012 and at the InfoShop on January 18, 2012. The IPPF outlines the steps needed to be taken if a subproject under the PSSN is located in an area where any of the known Indigenous Peoples (IP) in Tanzania live. The main aim of the IPPF is to ensure that the development process fully respects the dignity, rights, economies, and cultures of these communities. Accordingly, the IPPF aims to ensure that the subprojects under TASAF III have the broad community support of the affected Indigenous Peoples and other vulnerable marginalized groups. Subprojects to be financed under TASAF III will be screened and if Indigenous Peoples are in the subproject area, a subproject specific Indigenous Peoples Plan (IPP) will be prepared. These subprojects will not be implemented until the associated IPP has been developed in agreement with the affected Indigenous Peoples’ communities, cleared and disclosed.

   4. These three key documents, the ESMF, RPF and the IPPF, will provide step-by-step description on how to identify those subprojects that have potential environmental and/or social risks under sub component 1B – Labor Intensive Public Works Plus, and plan, implement and monitor the necessary mitigation and/or preventive measures. The updated RPF contains a compensation matrix translated in Kiswahili, which has been made available to the affected people. In the case a subprojects under TASAF III will require land, a subproject specific Resettlement Action Plan (RAP) or an abbreviated RAP, if less than 200 persons will be affected, will be prepared, according to the principles of the RPF, and disclosed.

   5. The LGAs and communities have varying levels of capacity to implement subprojects with adherence to the IPPF, ESMF, RPF and the Operational Manual; as such the project will support capacity enhancement measures with specific emphasis on monitoring and reporting on the implementation of the IPPF, ESMF and the RPF.

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

   The key stakeholders include: communities, civil society organizations; regional administration, district and village government authorities.

B. Disclosure Requirements Date

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### Indigenous Peoples Development Plan/Framework

Was the document disclosed prior to appraisal? Yes

date of receipt by the Bank: 17-Jan-2012

date of "in-country" disclosure: 18-Jan-2012

date of submission to InfoShop: 17-Jan-2012

If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.

If in-country disclosure of any of the above documents is not expected, please explain why:

### C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting)

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

Are the cost and the accountabilities for the EMP incorporated in the credit/loan? Yes [ ] No [ ] NA [ ]

#### OP/BP 4.10 - Indigenous Peoples

If the whole project is designed to benefit IP, has the design been reviewed and approved by the Regional Social Development Unit or Sector Manager? Yes [ ] No [ ] NA [ ]

#### OP/BP 4.12 - Involuntary Resettlement

If yes, then did the Regional unit responsible for safeguards or Sector Manager review the plan? Yes [ ] No [ ] NA [ ]

#### The World Bank Policy on Disclosure of Information

Have relevant safeguard policies documents been sent to the World Bank’s InfoShop? Yes [ ] No [ ] NA [ ]

Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs? Yes [ ] No [ ] NA [ ]

#### All Safeguard Policies

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies? Yes [ ] No [ ] NA [ ]

Have costs related to safeguard policy measures been included in the project cost? Yes [ ] No [ ] NA [ ]

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies? Yes [ ] No [ ] NA [ ]

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents? Yes [ ] No [ ] NA [ ]

### III. APPROVALS

Task Team Leader: Ida Manjolo

Approved By:

Regional Safeguards Coordinator: Name: Alexandra C. Bezeredi (RSA) Date: 21-Feb-2012

Sector Manager: Name: Lynne D. Sherburne-Benz (SM) Date: 21-Feb-2012