



Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

Appraisal Stage | Date Prepared/Updated: 31-Jul-2018 | Report No: PIDISDSA24274



BASIC INFORMATION

A. Basic Project Data

Country Chad	Project ID P164748	Project Name Chad - Refugees and Host Communities Support Project	Parent Project ID (if any)
Region AFRICA	Estimated Appraisal Date 18-Jun-2018	Estimated Board Date 12-Sep-2018	Practice Area (Lead) Social Protection & Labor
Financing Instrument Investment Project Financing	Borrower(s) Republic of Chad	Implementing Agency Cellule Filets Sociaux	

Proposed Development Objective(s)

The Project Development Objectives are to improve access of refugees and host communities to basic services, livelihoods, and safety nets, and strengthen country systems to manage refugees.

Components

- Improving access to basic services
- Improving resilience of households
- Strengthening country systems to support refugees and host communities
- Project management

PROJECT FINANCING DATA (US\$, Millions)

SUMMARY

Total Project Cost	60.00
Total Financing	60.00
of which IBRD/IDA	60.00
Financing Gap	0.00

DETAILS

World Bank Group Financing

International Development Association (IDA)	60.00
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IDA Grant	60.00
Environmental Assessment Category	
B-Partial Assessment	
Decision	
The review did authorize the team to appraise and negotiate	

B. Introduction and Context

Country Context

1. **Chad is among the poorest countries in the world.** With a population of 13 million living in an area of 1.284 million km,² Chad is a sparsely populated country. Nearly half (46.7 percent) of the population lives below the poverty line and approximately 80 percent of the poor live in rural areas.¹ Chad's economy has long been based on agriculture and livestock. Cotton is the primary export, representing nearly 65 percent of total export income before oil production commenced in 2003. In the following decade, the country's Gross Domestic Product (GDP) doubled and the economy became heavily dependent on oil. Following the drastic fall in oil prices since 2014 (from US\$110 per barrel in 2014 to US\$55 per barrel in 2017), Chad has faced an unprecedented economic, fiscal and social crisis.

2. **Poor Chadian households are exposed to a variety of shocks, including climate change and instability in the region.** Reduced rainfall due to climate change is making access to water increasingly difficult in large stretches of the country, significantly reducing herding and agriculture opportunities. Livestock have limited access to pastures; low crop yields are increasing food insecurity, with negative implications for health and education outcomes; and conflicts over access to land between herders and farmers are recurrent and intensifying due to the combined effects of climate change and population pressures. The regionalization of the terrorist threat posed by Boko Haram has further disrupted Chad's economy, trade with its neighbors, and the overall fiscal situation, given significant investment by the Government of Chad in regional security initiatives. These investments are primarily in the form of increased participation of the Chadian armed forces in internationally supported military efforts against Boko Haram, including the Joint Multinational Force and the G5 Sahel Cross-Border Joint Force.²

¹Institut National de la Statistique, des Études Economiques et Démographiques, INSEED - ECOSIT 3, 2009.

²The G5 Sahel countries (Burkina Faso, Mali, Mauritania, Niger and Chad) are facing an increase in terrorist threats and organized crime, which are destabilizing the region. To address these common challenges, two initiatives have been launched: The G5 Sahel Cross-Border Joint Force, which illustrates the willingness of African nations to take charge of their own security; The Sahel Alliance, which is based on an approach of reciprocal accountability between the major development partners and the G5 States and on significant investments into economic and social development in the G5 Sahel countries. The Sahel Alliance was launched in July 2017 by France, Germany and the EU, with the WBG, UNDP and AFDB as founding partners, now joined by Italy, Spain, the United Kingdom and Luxembourg. Source: G5 Sahel Joint Force and the Sahel Alliance, *France Diplomatie*, January 2018.



3. **The 2015 Chad Systematic Country Diagnostic (SCD) found that Chad’s high rate of monetary poverty is accompanied by very low human development indicators.**³ Chad ranks 184th out of 187 countries in the 2014 Human Development Indicators Index. Average schooling was just 1.5 years in 2009. The adult literacy rate was 22 percent and the literacy rate for women was half that of men. In 2015-2016, the primary school completion rate stood at 45.5 percent, while more than half of school-age children were not enrolled in school. In 2014, the child mortality rate was estimated at 123 per 1,000 live births. Malaria, respiratory infections, diarrhea and malnutrition were the primary causes of death, and Chad’s morbidity rates for these diseases are very high. Maternal mortality was estimated at 860 deaths per 100,000 live births in 2014. A 2013 World Food Program (WFP) analysis of food insecurity found that 27 percent of children below the age of 5 suffered from chronic malnutrition and 14 percent from acute malnutrition.⁴ In 2015, more than 2.4 million rural Chadians were food insecure, of which 428,000 were severely food insecure.⁵

4. **Women and girls are disproportionately exposed to economic and social vulnerabilities,** and are particularly vulnerable to covariate and idiosyncratic shocks due to gender inequalities dictated by social and cultural norms. These inequalities contribute to gender-based violence (GBV), poor maternal health, high fertility rates, and vulnerability of female-headed households. Women have less access to productive assets including land, agricultural inputs, paid labor, and community support; they are deprived of educational and training opportunities that could contribute to their empowerment; and they are often marginalized in decision-making at all levels. In the absence of any form of social protection, households often resort to negative coping strategies such as early marriage or taking girls out of school to work or look after younger siblings. Chad’s extremely high rates of early marriage (67 percent of women between 20 and 24 were married before they were 18 years old⁶) and fertility (6 live births per woman) are evidence of these behaviors.

5. **Poor households in several parts of the country are also contending with a large influx of refugees stemming from volatile situations in neighboring countries.** Over the past 25 years, Chad has welcomed new refugees at its eastern, western, and southern borders on a yearly basis. By end-2017, Chad was hosting over 403,000 refugees and in absolute terms ranked 12th among host countries in the world and 6th in Africa.⁷ Refugees represent more than three percent of the population, making Chad the 5th largest receiving country in the world in relative terms. Poor Chadian households also face additional pressures from internally displaced persons (IDPs) and returnees (altogether around 300,000). Around 55 percent of refugees are female, and children constitute over half of refugees, who together with members of host communities⁸ live in impoverished conditions. Most refugees are

³Republic of Chad – The World Bank, Priorities for Ending Poverty and Boosting Shared Prosperity; Systematic Country Diagnostic, The World Bank Group, Report No. 96537-TD, Washington, 2015.

⁴ Source: World Food Program, 2013.

⁵ Source: World Food Program, 2015.

⁶ Source: UNICEF, State of the World’s Children, 2017.

⁷ Based on UNHCR data as of end 2017. As of April 2018, the estimated number of refugees had surged to more than 440,000. This marks a significant increase in comparison to the 391,251 refugees as of end-2016 cited in the Board Consultation Note to present eligibility for the IDA18 Sub-Window for Refugees and Host Communities.

⁸ The term “host communities” is used here to indicate those communities that are in the proximity of the camps or refugee sites. They are not necessarily physically hosting the refugees but are affected directly or indirectly by their presence, in terms of competition for food, water, health, education and economic opportunities. For a definition of host communities see Supplemental attachments, Targeting Methodology.



situated along the country's borders, in remote areas characterized by high poverty and structural underinvestment.

Sectoral and Institutional Context

Sectoral Context

6. **The longstanding migration patterns across the Sahel region have been intensified by forced displacement.** The Sahel has traditionally been a region with significant migration or displacement, as many ethnic groups are scattered around the countries and along their artificially drawn borders. These “lines in the sand”⁹ are seldom an impediment to pastoralists herding their cattle or other groups who migrate cyclically for economic reasons. Refugee inflows into Chad are therefore juxtaposed with a complex pattern of regional migration for economic or religious reasons; in response to extreme weather events; or, over the past 20 years, to escape protracted conflicts in Sudan (Darfur), South Sudan, and the Central African Republic (CAR). More recently, there has also been a significant displacement of people in the South of Chad and in the Lake Chad area due to the persistent instability in CAR and the Boko Haram insurgency.

7. **There are marked differences between the situation of refugees and host communities in the East, South, and Lake Chad areas.** (see Box 1). These result primarily from geographic and climate-related factors, which have differentiated impacts on livelihoods. In the East and partially in the South, there are relatively solid prospects for the socio-economic inclusion of refugees in hosting areas.¹⁰ Refugees and hosts have similar livelihoods strategies, mostly based on agriculture, animal husbandry, and small trade. In the arid East, the focus is on small agricultural production and out-of-camp migrations during the rainy season in search of arable land; while in the fertile South, it is mostly based on rain-fed agriculture and gardening. In the Lake Chad area, the situation remains fluid and fragile.¹¹ While the area is secured, there are unclear prospects for refugees (and IDPs) to integrate into the local economy.

8. **The ever-present security risks originating in neighboring countries, have persistently destabilized the economy of the region and have created a situation of acute humanitarian needs.**

⁹ Such are the words used by the Governor of Abéché to define the borders with Sudan. November 17, 2017 meeting with World Bank identification mission.

¹⁰This is confirmed by the early results of the qualitative study on the dynamics of inclusion, given that: (a) most refugees have been in exile for a long period and have few prospects for return; (b) coexistence with host communities is relatively peaceful; and (c) with some investment in livelihood opportunities (albeit differentiated by region to account for their respective agro-ecological and climatic constraints), it may be possible to improve economic opportunities. Watson, C., E. Dnalbaye, and B. Nan-guer “Refugees and Host Communities: Dynamics of Social & Economic Inclusion.” World Bank, Preliminary results. March-April 2018.

¹¹According to the Office for the Coordination of Humanitarian Affairs (OCHA), the current situation in the Lake Chad area is dominated by three crises: displacement of populations caused by the Boko Haram conflict; growing food insecurity; and a sanitary crisis. Livelihoods have been affected by both insecurity (including theft, destruction and displacement and the closing of transhumant routes and trade borders with Nigeria) and climate change, as well as a fragilization of the environment due to the influx of people into the area and historical trends in the desiccation of Lake Chad (though some recent analyses suggest this may be reversing). Source: Initial reports of the Study on Refugees and host communities; Social and Economic Dynamics of Inclusion.



Since the beginning of the Darfur crisis, there has been consistent financial support to refugees and for regional security initiatives, but since late 2014 resources have steadily decreased. Most refugees are hosted in camps scattered around the borders of Chad. All 19 camps are managed by the national agency for refugees (*Commission Nationale d'Accueil et de Réinsertion des Réfugiés et de Rapatriés*, CNARR) and by the United Nations High Commission for Refugees (UNHCR); and refugees receive support from a variety of donors, notably the United States Bureau of Population, Refugees and Migration (BPRM), the European Union's Humanitarian Office (ECHO), the UN's Central Emergency Response Fund (CERF), Canada, Switzerland, Educate a Child Programme (EAC/EAA), Germany, and the Bill & Melinda Gates Foundation. These donors also fund the WFP and other United Nations (UN) agencies through programs implemented directly or by national and international Non-Governmental Organizations (NGO). Ensuring security and support in camps and in refugee areas is a major financial commitment for the Government of Chad. Significant security expenditures are linked to Chad's continued efforts to combat transnational terrorism; to its support for regional stabilization and peacebuilding initiatives (2.8 percent of GDP in 2016); and to providing services for the vast number of refugees and displaced persons. In early 2014, the WFP was obliged to cut food rations in some areas because of budget constraints. UNHCR has also been downscaling its programs. As of August 2017, the appeal for US\$220 million to support Chad's United Nations Development Assistance Framework (UNDAF) for 2017-21 had mobilized only US\$27 million. Further, as of June 2018 the Humanitarian Response Plan (HRP)¹² for Chad has only been funded at US\$150 million, which represents 28 percent of the required US\$544 million identified for 2018.

9. **Although refugees and host communities alike have considerable unmet needs, humanitarian assistance has targeted mostly refugees (as well as IDPs in the Lake Chad area).**¹³ As most refugees have flocked to areas of Chad that were already characterized by high poverty prevalence and scarce access to basic services, host communities often end up having lower access to basic services such as health, education, water, and improved livelihoods than refugees. However, UNHCR policy and approach is to also include a standard 15 percent of host population beneficiaries in refugee programs and WFP provides food security and nutrition programming during the lean season to the most vulnerable of the local population. Because of limits to the long-term sustainability of humanitarian interventions, actors are increasingly targeting their assistance and gradually shifting to an approach that aims to build self-reliance and promote integration with host communities. However, many face issues of capacity limitations to implement economic and social development programs, and resource diversion to other humanitarian crises around the world.

Box 1 – Forced displacement in Chad: three distinct situations (as of December 2017)

The East. Around 309,000 Sudanese refugees are settled along the eastern border (Ennedi East, Wadi Fira, Ouaddai, and Sila)¹⁴. They have fled violence in Darfur and most have been in exile for more than a decade. These refugees belong to ethnic groups that share many cultural elements with their host communities. They usually live at specific settlement sites or in refugee camps, but have some access

¹² The Humanitarian Response Plan (HRP) is a financial and donor coordination platform through which a significant share of donor funding is received and invested in humanitarian refugee relief.

¹³ Because of recent waves of refugees from CAR, the international community is considering new financial commitments

¹⁴ By April 2018 this number is estimated to be just over 330,000.



to land under varying conditions, including during the rainy season, when many leave the camps for some months to exploit arable land far out of camp. Their prospects of returning to their homeland over the next few years are generally limited, though efforts are underway to facilitate a few voluntary repatriations to Darfur in 2018.

The South. Around 74,000 refugees from the CAR live along the southern border (Logone Oriental, Logone Occidental, Mandoul, Moyen-Chari, and Salamat).¹⁵ Some are from relatively remote areas of the CAR who fled violence and save for recent new arrivals, the majority have been in exile for more than a decade. Many are Muslim refugees living in Christian host communities. In addition, there are almost 87,000 Chadians who have "returned" to Chad from CAR after a long-term stay, sometimes over a generation; many of these returnees come from urban areas in CAR and are now residing in IDP-like sites in the areas of Gore and Maro juxtaposed with nearby refugee camps. However, some have made their way to villages of origin in different areas of Chad.

Lake Chad. Some 9,994 Nigerian refugees who fled Boko Haram now reside in the Lake Chad area on its western border with Nigeria, Niger and Cameroon. The majority, 6,900, live in a refugee camp near Bagasola in the Lake region while the remainder are hosted in Chadian villages near border areas. Most have been in exile since 2015 and come from the many ethnic groups living along Lake Chad but have limited cultural affinity with host communities. Their prospects for voluntary repatriation are uncertain in a fluctuating context often marked by insecurity. Unofficial sources estimate that at least another 5,500 refugees have yet to be registered. There are also an additional 119,000 internally displaced Chadians in the Lake Chad area due to the conflict with Boko Haram and pressure from the Government of Chad to evacuate local populations from much of the area directly affected by violence. There are also some 25,000 Chadian returnees from both Nigeria and Niger while another 40,000 Chadians (host population) are affected by displacement.

10. **Important challenges stand in the way of finding sustainable development solutions for refugees and affected populations.** Refugees are exerting significant pressure on natural resources and land availability. In many areas around the refugee camps, the availability of wood, the main source of energy, has been reduced by deforestation, obliging women and children, with increased security risks, to travel further and further from camps in search of firewood for cooking. Access to water is also being challenged by desertification, the naturally arid climate in the east, lack of development and community responsibility in water management and increased demand. In the South and East, for example, access to arable land is limited in the face of strong demand, high population density, and conflicts between farmers and herders over land use. Around Lake Chad, the situation remains volatile, and patterns of displacement are unclear and unpredictable due to new displacement of IDPs and returnees and by the lack of clarity on what their prospects may be. These factors pose a challenge to transitioning from short-term humanitarian response to programs of economic and social inclusion. Moreover, limited Government capacity at the local level constitutes a significant operational challenge to implementing development projects.

11. **Public service delivery in the East, South, and Lake regions cannot adequately support refugees and host communities.** Although a National Social Protection Strategy (NSPS) was approved

¹⁵ An additional estimated 27,000 refugees from CAR have arrived in 2018.



by the Government in 2015¹⁶, and a national social safety net system targeting the poor and vulnerable is being piloted via a World Bank and Multi Donor Trust Fund (MDTF_ US\$10 million Safety Nets Project¹⁷, service delivery remains limited, and most host communities live with little or no assistance. Health and education services are also scarce, given decades of underinvestment in these sectors. Frequent strikes over the past year due to non-payment of civil servants, particularly teachers and health workers, has further reduced service delivery outside of that provided by humanitarian actors. Moreover, the prospect of refugees returning to their homeland in the short term is low, especially in the East and the South; the continued risk of instability and conflict in the region is in fact generating additional refugee inflows, especially in the South.¹⁸

12. Despite these pressures and challenges, the Chadian context presents some unique opportunities to address the refugee situation. At the global, regional and national levels, there is growing convergence among humanitarian and development partners towards a phased, collaborative approach to addressing the refugee crisis. This integrated approach could support a successful transition from humanitarian interventions to development programs that benefit both refugees and host communities. The international community would play a critical role in supporting the Government and its agencies in the design, strengthening, and financing of such a system. UNHCR, as part of its Comprehensive Refugee Response Framework (CRRF – see box 2) which promotes an all of society approach to addressing durable solutions, will continue to catalyze and mobilize the humanitarian community in support of the government as first responder for refugees and their host communities. Under Government leadership and coordination, this all-of-society approach with humanitarian and development actors as well as private actors will foster and promote the progressive inclusion of refugees and host communities in national and local development plans and systems.

Box 2 – The New York Declaration for Refugees and Migrants and CRRF

The New York Declaration for Refugees and Migrants was adopted by all 193 Member States of the United Nations in September 2016. The New York Declaration lays out a vision for a more predictable and more comprehensive response to refugee crises, known as the Comprehensive Refugee Response Framework, or CRRF. It calls for greater support to refugees and the countries that host them. At the heart of this approach is the idea that refugees should be included in the communities from the very beginning.

¹⁶République du Tchad, Stratégie National de Protection Sociale (2014-2018), Ndjamen, Ministère de l’Economie, Planification et Coopération Internationale, Ndjamen, 2015.

¹⁷ P156479, IDA-D1340 of US\$5 million and TF-A2801: US\$5 million. Project was made effective in late December 2016 and is scheduled to close in December 2020. The MDTF is financed by the UK and French Development cooperation agencies (DFID and AFD).

¹⁸In the South, growing demographic pressure on the land and common natural resources is by all accounts taking its toll, and while the welcome and hospitality displayed by residents in the face of the massive influx of refugees and returnees has been genuine, clear problems are arising, exacerbated by local perceptions that external assistance benefitting refugees and returnees is not always bringing clear benefits to host populations. The influx of refugees and returnees into the area, along with the sedentarism of former nomadic or transhumant pastoralists now practicing agro-pastoralism is creating intense pressure on (and conflict around) shared resources and is having overall widespread negative environmental impacts (leading to increasing scarcity particularly of firewood and important gathered products such as karité, reeds for building, and niébé). From initial reports of the Study on Refugees and host communities; Social and Economic Dynamics of Inclusion.



The CRRF specifies key elements for a comprehensive response to any large movement of refugees. These include rapid and well-supported reception and admissions; support for immediate and on-going needs; assistance for local and national institutions and communities receiving refugees; and expanded opportunities for solutions.

Institutional Context

13. **The Government has adopted a progressive approach to managing the refugee situation, including a legal and institutional framework for refugee protection.** Chad is a party to the 1951 Convention Relating to the Status of Refugees, the 1967 Protocol Relating to the Status of Refugees, and the 1969 Convention Governing the Specific Aspects of Refugee Problems in Africa. There are some provisions in Chadian law for the rights of refugees, including the Law on Civil Status enacted in 2015, which facilitates access to birth certificates for refugee children born on Chadian territory. And while the international refugee conventions announce fundamental civil, social and economic rights, such as freedom of movement, the right to work and earn a living, choice of residence, and naturalization, these are not yet legally guaranteed through a national refugee law. However, a Law on Asylum comprehensively dealing with refugee issues is awaiting adoption by the Government.

14. **A dedicated agency has been set up within Government to manage refugee protection with support from line ministries, local authorities, and UNHCR.** The CNARR sits within the Ministry of Public Security, Territorial Administration and Local Governance (*Ministère de la Sécurité Publique, de l'Administration du Territoire et de la Gouvernance Locale, MSPATGL*). CNARR is present in all 19 refugee camps and most refugee-hosting areas and works with UNHCR and other partners on registering new arrivals, issuing documentation, and administering refugee camps and sites. It also serves as a technical advisor to the Government on durable solutions, notably on voluntary repatriation agreements, resettlement and local integration. The Ministry of Women, Family and National Solidarity (*Ministère de la Femme, de la Famille et de la Solidarité Nationale*) plays an important role in securing the inclusion of IDPs and returnees in the NSPS. The Ministry of Economy and Development Planning (*Ministère de l'Economie et de la Planification du Développement, MEPD*) plays a key role in coordinating line ministries in the implementation of the National Development Plan (NDP)¹⁹ and in ensuring that refugees are included in the country's long-term development strategy. Regional and local authorities are essential in translating strategies into reality as well as informing local investment decisions. Among them, the Regional Action Committees (*Comités Régionaux d'Action, CRA*) play a key role in connecting local communities with regional and national level policy structures.

15. **Although the institutional framework for refugee protection is in place, the Government relies heavily on external partners to support this agenda.** The lack of fiscal resources, as well as the limited administrative and technical capacity to manage the refugee agenda, have led Chad to rely heavily on international humanitarian actors. Under its strategic and operational leadership, UNHCR has supported the government of Chad to provide international protection, assistance and to continuously work for durable solutions for refugees. A small number of national and international NGOs play a critical role in implementing humanitarian/emergency activities for refugees. They are present in all 19 refugee camps

¹⁹ The 2017-2021 National Development Plan (NDP) is the first Government of Chad five-year strategy aimed at supporting the longer-term development strategy, *Chad 2030 Vision*.



as implementing or operational partners of UNHCR and provide basic services such as education, health, water and sanitation, and access selected income-generating opportunities. Refugee protection and assistance programs are integrated and reflected in the UNDAF. Under the leadership of the UN Resident Coordinator and the humanitarian coordination of OCHA for HRP implementation, UN agencies such as UNHCR, the WFP, and UNICEF have provided the bulk of assistance to refugees, IDPs, and to a lesser extent to host communities in Chad. The US Government and the EU/ECHO are also providing substantial additional funding for humanitarian interventions through NGOs.

16. **To provide targeted support to poor and vulnerable Chadians, the Government has taken steps to develop a safety net system which is also suitable for inclusion of refugees.** Under the World Bank/MDTF- funded Safety Nets Project, the Government of Chad established the *Cellule Filets Sociaux* (CFS) in 2016 to manage its safety net programs, particularly cash transfers and cash-for-work schemes. A Unified Social Registry (USR) is also being developed, with the aim of combining information from selected social programs funded by Government and external partners into a single database. The CFS is implementing the project using a flexible approach to identification, targeting, and registration of poor and vulnerable households. The objective is to have in place a highly adaptable system that can be scaled up to respond to urgent situations such a sudden inflow of refugees that impacts host communities²⁰.

C. Proposed Development Objective(s)

Development Objective(s)

17. The Project Development Objective is to a) improve access of refugees and host communities to basic services, livelihoods, and safety nets, and b) strengthen country systems to manage refugees.

Key Results

- Beneficiaries with improved access to community infrastructure (health and education) (by gender and status)
- Beneficiaries of social safety net programs (by gender and status)
- Beneficiaries in targeted areas included in the Unified Social Registry (by gender and status)
- Eligible refugees with identity documents issued by CNARR (by gender).

D. Project Description

Component 1: Improving access to basic services (US\$22 million)

²⁰ As part of the combined efforts to assist the Government build a shock responsive social protection system, many WFP, ECHO and UNHCR partners (NGOs) are using the harmonized questionnaire during the lean season. The harmonized questionnaire was introduced by the Government with Decree 038/PR/PM/MEPD/SE/SG/DGEP/2017 dated September 23, 2017 and it is the first step to build a Unified Social Registry (USR). Currently the Government, through the CFS is moving towards finalizing the USR manual and procuring all necessary hardware and software (servers, mainframes, etc.) to establish the USR. Subsequently, it is envisaged to create a dedicated USR unit within the Government.



18. This component will support improved access to basic services, particularly health and education, with investments to rehabilitate or build new public service infrastructure in targeted areas, and to manage operation of the facilities. The rationale is to provide improved universal access to services to refugees and host communities, since refugees currently have relatively greater access to services than their hosts. The Component will generate significant social and economic returns in the long term through a more educated and healthy population. The component will also improve communities' resilience to natural disasters by adopting a "building back better" approach. By improving access to basic services for both populations, but particularly host communities which currently have less access to them, this Component could also contribute to maintaining or improving social cohesion in targeted areas. The positioning and staffing of facilities will be aligned with national sector plans, such as those developed by the ministries of health and education. The rehabilitation or construction of new facilities will also be coordinated with other development/humanitarian partners to ensure that investments are sensible, do not overlap, and that collective resources are leveraged to provide the most equitable coverage possible for the largest number of people. Moreover, the project will finance recurrent costs associated with the supply of basic services. Improved access to other services such as water and sanitation will also be delivered as part of this first set of interventions. Though not explicitly a public works program, it is envisaged that all works will be carried out using labor-intensive methods to the extent possible with locally hired refugees and host community workers. Education and health facilities will gain access to electricity through grid connections or solar technologies and will get digital connectivity. The details on the maintenance of electricity grid connections and solar technologies will be detailed in the Project Implementation Manual (PIM).

19. This component will be structured around three sub-components. Sub-component 1.1 (US\$10 million) will finance the rehabilitation and construction of primary schools, training of community teachers, and salary subsidies for community teachers and administrative personnel, as well as other recurrent costs. Sub-component 1.2 (US\$10 million) will finance the rehabilitation and construction of health centers, training and salary subsidies for personnel, performance-based financing (PBF) grants for facilities, and other recurrent costs. Sub-components 1.1 and 1.2 will follow line ministries' guidelines and practices for hiring, training, and salary subsidies, in coordination with other World Bank-financed projects in these sectors, operating in different parts of the country. Staffing related costs (i.e. training and subsidy payments) will be provided directly through the implementing agency, in full coordination with respective line ministries, with the eventual goal to have these new staff absorbed into the health and education sectors.

20. Sub-component 1.3 (US\$2 million) will finance other sub-projects. These may include projects in water and sanitation (water points, latrines, wells, rainwater harvesting facilities); projects to rehabilitate the natural habitat to help offset some locally felt impacts of climate change, which are one of the main sources of social tensions among refugees and hosts (and even within host communities); and in the Eastern and Lake regions, water retention projects in the wadis, where temporary water courses flow only during the rainy season. This sub-component may also include financing for economic infrastructure such as markets and irrigation systems.

21. Implementation of the activities under component 1 will rely on strong community participation at the identification stage and to provide monitoring of works and maintenance. At the identification stage, communities will be mobilized to identify their priorities within a limited menu with an emphasis



on health, education, and water and sanitation. Available options will be consistent with national plans in the health, education, and water and sanitation sectors to position new facilities. Feedback from community leaders and NGOs working in these areas will be elicited to ensure consistency with local development strategies and to avoid duplication. The project will conduct a geo-referencing exercise of all facilities in the targeted areas as a tool to inform rehabilitation and construction of new facilities. The exercise will also ensure complementarity with Government and other donor resources being invested in the same areas. The project will also coordinate with the Government and external partners in these sectors to ensure ongoing support, for example in monitoring of construction-related activities, and perhaps even further down the line in support of service delivery. This support will be of importance given the long-term staffing needs and other recurrent costs related to these investments. Although procurement and financial management of the works will not be managed by the communities, they will have a role in monitoring the implementation of works, and thereafter in maintaining the infrastructure. Given the significant need for sectoral and partner coordination up front, this Component will first start with the rehabilitation of existing basic infrastructure, which will be staffed as needed upon completion. During its second year of implementation, the project will move into the construction of new facilities, and similarly staff them.

22. All infrastructure under this component will be designed to increase communities' resilience to climate change risks such as increased water scarcity due to low rainfall, soil degradation, and others. Schools and health posts will use existing or new technologies to improve rain water collection and use, while new roads are expected to increase resilience to climate change vulnerability by improving access to services, reduce transport time and Greenhouse Gas (GHG) emissions. Moreover, sub-component 1.3 will be open to finance activities such as soil conservation, rehabilitation of degraded lands, terracing, and reforestation/afforestation, thus providing positive benefits in terms of reduction of GHG emissions and enhanced adaptation to climate change.

Component 2: Improving resilience of households (US\$25 million)

23. Activities under component 2 will focus on the expansion of Chad's social protection system to include poor and vulnerable refugee and host community households in selected areas. This component seeks to provide more targeted assistance to improve the resilience of the poorest/most vulnerable households through cash assistance (sub-component 2.1) and productive measures (sub-component 2.2). All activities will be targeted at the household level, utilizing a combination of targeting approaches.

24. Sub-component 2.1 (US\$19.8 million) will finance an unconditional cash transfer program for approximately 25,000 of the poorest refugee and host community households in targeted areas, or around 125,000 individuals. Cash transfers will be provided to female caretakers in each household. The amount transferred will be of 15,000 CFAF per month per household during a period of two years, paid on quarterly installments. This amount is aligned with current Government practice and close to what other partners are doing. While the transfer will provide a boost to consumption and improved nutrition intake, it will not fill the poverty/food gap completely. However, it will help avoid households falling into complete dependency and/or discourage their potential for income self-sufficiency. Between 30 and 50 percent of the beneficiaries will be refugees, to be determined in close collaboration with humanitarian agencies that have been providing safety nets, including cash transfers, to refugees. The goal would be to avoid duplication of beneficiaries among refugees and to harmonize approaches to the extent possible



with humanitarian programs while also ensuring that the transitional nature of the intervention (i.e. from humanitarian support to a government-led national social safety net program) is understood. The assumption is humanitarian cash transfers (provided mostly by WFP) will be complemented by the phasing in of cash transfers under the Project. The Project will identify beneficiary households by building on a targeting mechanism that has been designed under the ongoing World Bank/MDTF-financed Safety Nets Project, which uses a combination of geographic targeting, community-based targeting, and proxy means testing (PMT), with some filters mainly related to presence of children below 12 years and pregnant women²¹. The project will use the refugee household data collected by WFP and UNHCR in August 2017 on the basis of tools that are closely aligned with the harmonized questionnaire used by the CFS. The targeting methodology will be tested to ensure its applicability to refugees and adapted as needed. Moreover, these activities will be complemented by a strong communications campaign designed in partnership with humanitarian agencies to ensure that program is seen as fair to both refugees and host communities.

25. Sub-component 2.1 aims to increase households' consumption for a period of two years and will be combined with accompanying measures to improve human development indicators, with a focus on early childhood development, which are being developed under the Safety Nets Project. Small, regular cash payments will enable beneficiaries to stabilize their general household consumption levels. Cash transfers will be delivered on a quarterly basis in full alignment with the ongoing Safety Nets Project, implemented by the *Cellule Filets Sociaux*, which is already delivering cash transfers to 6,200 households in Logone Occidentale and Bahr-El-Ghazel (in addition to managing a cash for work program in N'Djamena). Households will be added to the program on a gradual basis throughout with three consecutive rounds of interventions starting in the East, moving to the South after one year, and then to the Lake region.

26. Sub-component 2.2 (US\$5.2 million) will seek to increase household resilience and self-reliance in targeted areas through the provision of small grants to selected households to support productive and climate-smart income-generating activities. Activities to be promoted by this sub-component will be designed to generate climate co-benefits, such as community gardens and tree-planting. Beneficiaries will be selected based on their poverty status and potential earning capacity, and the activity will promote female-headed enterprises by targeting at least 50 percent of grants to women. Based on a simple proposal, selected beneficiaries will be given a small grant of CFAF100,000 (equivalent to US\$200) to start up their activity.²² Approximately 20,000 grants will be provided, with estimated benefits to 100,000 individuals. Thirty to 50 percent of the grants will go to refugees and the remainder to members of host communities. Cash transfer beneficiaries will be ineligible to receive productive grants at the same time, as benefits may not overlap. While sub-component 2.1 will support the poorest, most labor-constrained households (selected with a PMT approach), sub-component 2.2 will support those that follow in the PMT ranking and comply with selected requirements related to productive and earning experience and capacity. The activities under this Sub-component will expand coverage of similar small-scale initiatives funded by humanitarian agencies.

²¹For more details on the targeting methodology, see Supplemental attachments, Targeting Methodology.

²²This amount is modeled on evidence from around the world on startup costs for small enterprises, and similar activities in the Sahel, see Supplemental attachments, Economic analysis.



27. Although grants will be provided to individual households, beneficiaries will be encouraged and incentivized to pool their grants for group economic activities. The project will encourage mixed participation of refugees and host communities in these group activities. Group income-generating activities, such as those proposed by farmer associations or village groups, will be eligible under this sub-component, and all eligible households within the group will receive their respective grants, which will then be pooled together. All beneficiaries will receive coaching and training in their chosen activities after their selection, which might include mills, community gardens, small-scale farming, fishing, saving schemes, or food processing. The selection process will emphasize activities that are likely to generate spill-over effects for the community at large and that offer prospects for sustainability.

Component 3: Strengthening country systems to support refugees and host communities (US\$5 million).

28. This component will finance investments to strengthen government systems to manage current and future refugee situations, with a focus on two main areas: (a) strengthening CNARR to carry out its institutional mandate; and (b) strengthening social protection systems.

29. Sub-component 3.1 (US\$3 million) will focus on strengthening capacity within CNARR at the central and local levels. CNARR will be supported in delivering protection services to refugees, leading the policy dialogue on the refugee situation, and supporting the High Committee to be established by Government. Support will mostly be in the form of capacity building to support the implementation and management of CNARR's key operational mandate, namely the registration of new arrivals, promotion of access to identity documents, and administration of refugee camps and sites. Activities to promote access to identity documents will include: 1) issuance of refugee ID cards to eligible individuals, i.e. adults; 2) continuation of biometric registration; and 3) the issuance of birth certificates. On the policy side, this sub-component will support progress in legal protections for refugees; compliance with international treaties, protocols and agreements; and platforms for public debate on refugees.

30. Sub-component 3.2 (US\$2 million) will focus on strengthening social protection systems that are being developed in collaboration with technical and financial partners, including on-going activities on targeting and registration, such as those carried by the SCOPE program of WFP. This sub-component will support adaptation of the Safety Nets Project targeting system to the needs of this project, including by expanding coverage of the poverty targeting system to project areas to identify beneficiaries, and expanding the list of poor households to also encompass refugee households. Moreover, this sub-component will support adaptation of the Management Information System (MIS) currently being developed by CFS, to support the management, monitoring and evaluation (M&E) of project implementation. The new modules of the MIS will be fully interoperable with the Unified Social Registry. Data protection will follow principles developed for the establishment of the Unified Social Registry under the Safety Nets Project (see Box 3). This sub-component will also finance the expansion of systems currently being used by the CFS, including beneficiary registration, secure payment system (by mobile phone technologies, if possible), grievance redress mechanisms and accompanying measures, monitoring and evaluation, and geo-enabling technologies for enhanced supervision. The Sub-component will also support capacity building of the Ministry of Economy and Development Planning; Ministry of Public Security, Territorial Administration and Local Governance; Ministry of Women, Protection of Childhood and National Solidarity; and other sectoral Ministries involved in social protection.



Box 3 – The ten principles of personal data protection critical for social registries²³

- (1) **Consent:** Data treatment is only legitimate if individuals give their consent.
- (2) **Use and proportionality:** Data shall only be collected for specific ends, only if they are necessary for such ends (collection is proportional to needs).
- (3) **Complete and up-to-date data:** Data must be as exact and complete as possible, and updated as needed for the ends for which they are collected.
- (4) **Confidentiality and safety:** Those responsible for data treatment must take all necessary measures to ensure data is not manipulated, damaged, or illegally accessed by others.
- (5) **Responsible transmission:** Data transmission has to respect the core principles of confidentiality, proportionality and safety. Recipients must commit in writing to respect these principles. Data can only be transmitted to international users if their country enforces adequate protection.
- (6) **Duration:** Data can only be stored for the duration required for the stated uses for which they were collected. Any later storage is only allowed for historical, statistical or scientific purposes.
- (7) **Declaration:** Any treatment of personal data must be declared to the agency responsible for the protection of personal data, and clearly state ends, potential users and duration.
- (8) **Right to information:** Those whose personal data are collected must be informed about the institution responsible, the planned uses and users of the data, their right to refuse to respond and to oppose to the use of their data, and the duration of storage.
- (9) **Right to access and correct data:** Those whose personal data are collected have a right to obtain information on their data and treatments applied; and to correct, supplement, update, lock or suppress incorrect, incomplete, ambiguous or outdated data.
- (10) **Right to opposition:** individuals whose personal data are collected have the right to oppose to the treatment of their data.

Component 4: Project management (US\$8 million)

31. Component 4 will finance support for technical and operational assistance in day-to-day coordination, procurement, financial management, safeguards management, citizen engagement, and routine (M&E), as well as enhanced M&E in insecure geographic areas of the project. This component will include support for salaries, equipment, and other operational costs for the project implementing unit (CFS) to use in coordinating and implementing activities under components 1-3, including use of Information and Communications Technology (ICT) and geo-enabling tools.

E. Implementation

Institutional and Implementation Arrangements

32. The proposed project will be implemented using existing government institutions and national systems, strengthened and adapted to the requirements of the project. At the strategic level, a High

²³ Source: World Bank “Social Registries – How to ensure the protection of personal data” (2017)



Committee will be set up under the aegis of the President of the Republic and will hold semi-annual meetings to validate the results of the overall national programmatic approach to refugees. The High Committee will provide overall strategic orientation on policy issues related to refugees and host communities. At the operational level, the arrangements will build on those of the Safety Nets Project (PFS) by extending the skills and composition of the Steering Committee to reflect the design of the Project. The Project Steering Committee will be responsible for providing strategic guidance for the implementation of both the Project and the PFS and will validate the Project's annual plans and budgets.

33. The Project will be implemented by the Cellule Filets Sociaux (CFS), established in 2016 to manage the World Bank and the Department for International Development (DFID)-funded Safety Nets Project. Initial results from an independent institutional assessment²⁴ show that this is the preferred option in the short to medium term to implement the project. However, this will require that CFS be strengthened at both the central and local levels, including strengthening of the personnel in charge of general management, fiduciary requirements and safeguards support. While these activities will help support implementation of the project, a broader approach will be required to scale up its activities and impact in both the camps and host communities. To this end, the Letter of Development Policy signed in July 2017 discusses the possibility of establishing a new national agency. The mid-term review will be an important moment to fully assess such an option and consider whether to begin absorbing the experience of the CFS into a newly created agency which would combine the safety nets experience, the activities carried out in support of refugees and host communities, and the broader approach to local economic and social development and shock-responsive social safety nets. In the meantime, the CFS will have – in addition to those already in place in Logone Occidentale and in Bar-el-Ghazel – three other regional offices in the East, South, and Lake Chad areas, fully staffed and trained and with the authority to procure goods and services up to a predetermined threshold; and to manage related financial transactions, implementation of safeguards, coordination, and monitoring activities. These institutional arrangements will rely on strong involvement of local government authorities and deconcentrated technical services.

²⁴ Marcel Ferland, Rapport d'évaluation Institutionnelle du PARCA (Projet d'Appuis aux Réfugiées et aux Communautés d'Accueil), Mimeo, Avril 2018.



F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)

The Project will be implemented in the East, South and Lake Chad regions of the country. The project investments with potential for negative environmental and social impacts will be principally in the East and South where refugee settlements are most prevalent and established and where there are relatively solid prospects for the socio-economic inclusion of refugees in host areas. Interventions in the area of lake Chad will be based more on cash transfer types activities.

G. Environmental and Social Safeguards Specialists on the Team

Cheikh A. T. Sagna, Social Safeguards Specialist
Erik Reed, Environmental Safeguards Specialist
Bougadare Kone, Environmental Safeguards Specialist
Mamadou Diedhiou, Social Safeguards Specialist

SAFEGUARD POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	<p>This policy is triggered due to the fact that the project will finance rehabilitation, upgrading and construction of new infrastructure in several locations. This construction/rehabilitation will have adverse risks and impacts on the environment (both physical and natural). The project will also support activities in several sectors including livestock. As project sites will not be known during project preparation, an Environmental and Social Management Framework (ESMF) has been prepared, amply consulted upon and once reviewed by the Bank will be publicly disclosed both in-country and at the InfoShop.</p> <p>As regard to the investments in healthcare centers, the Government has prepared an Integrated Medical Waste Management Plan (IMWMP) that provides basic procedures for safe handling and disposal of both medical and veterinary waste during project implementation. Just as the ESMF, the IMWMP has been amply consulted upon and once reviewed by</p>



		the Bank will be publicly disclosed both in-country and at the InfoShop.
Performance Standards for Private Sector Activities OP/BP 4.03	No	The Policy is not triggered as the Project will not include provisions for implementation by the private sector.
Natural Habitats OP/BP 4.04	No	The Policy is not triggered as the Project will not affect natural habitats.
Forests OP/BP 4.36	No	The Policy is not triggered as the Project will not have any adverse impact on forests, nor engage in afforestation.
Pest Management OP 4.09	Yes	The policy is triggered even though the current project will not finance pesticides procurement but will support targeted pest management measures for improved agricultural and livestock practices. The activities justify the preparation of an Integrated Pest Management Plan (IPMP) and the provision of awareness raising and information campaigns for the benefit of farmers. The IPMP has been amply consulted upon and once reviewed by the Bank will be publicly disclosed both in-country and on the World Bank's website.
Physical Cultural Resources OP/BP 4.11	Yes	This policy is triggered as the project will involve new construction of basic infrastructure that will imply land excavations. Specific measures of "Chance Find Approach" in case of discovery of cultural and archeological artifacts has been incorporated in the ESMF.
Indigenous Peoples OP/BP 4.10	No	The Policy is not triggered as there are no Indigenous People, as defined by the policy, in Chad.
Involuntary Resettlement OP/BP 4.12	Yes	The Policy is triggered because of the foreseen construction and agriculture activities the project will be financing during its implementation that will require acquisition of land, loss of assets or source of livelihood, leading to the payment of compensation with or without the physical displacement of project affected people. To ensure project compliance on the policy requirements, and because project sites will be mostly unknown during project preparation, the Borrower has prepared a Resettlement Policy Framework (RPF) that sets forth the basic principles and prerogative. The Borrower will comply with during project implementation. The RPF has been developed through a consultative process and once



		reviewed by the Bank will be publicly disclosed both in-country and on the World Bank's website.
Safety of Dams OP/BP 4.37	No	The policy is not triggered as Project foreseen activities will not affect dams nor depends on waters from such dams.
Projects on International Waterways OP/BP 7.50	No	The policy is not triggered as Project foreseen activities will not occur in international waterways
Projects in Disputed Areas OP/BP 7.60	No	The policy is not triggered as Project foreseen activities will not occur in disputed areas.

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:

Environmental and social risks are substantial. Despite significant environmental challenges in the areas of intervention, no large scale, significant or irreversible negative impacts are foreseen to be induced by the project's activities. Environmental risks in the areas of intervention are exacerbated by the vagaries of climate change and contribute to the relative insecurity of rural populations that are highly dependent on natural resources to secure basic livelihood needs.

The proposed project will rehabilitate, upgrade and construct new infrastructure in several locations to deliver social and economic services. The activities financed by the proposed project are not expected to induce adverse, irreversible environmental and social impacts. The potential environmental impacts of the project will be limited, site specific, and manageable to an acceptable level of risk if consistent monitoring of safeguards compliance is in place.

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

The proposed project is expected to have a positive impact by improving access to and delivery of health and education services and improving management of natural resources, such as through improved and sustainable agricultural production and livestock management. The project is also expected to strengthen the mechanisms of responding to situations of forced displacement due to national and or international crises. There are no long-term impacts expected from the implementation of activities to be financed by this project.

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

The project has considered a variety of potential activities for support and those tentatively identified were done through analyses and consultations to meet the most important needs of the target populations. Activities that are relatively low in potential negative environmental and social impacts were prioritized for consideration although the specific activities are still to be identified.

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.

As a mitigation strategy the borrower has prepared safeguard instruments (Environmental and Social Management Framework (ESMF), Resettlement Policy Framework, Integrated Pest Management Plan, and Biomedical Waste



Management Plan) that are being finalized and will be submitted to the Bank for review and disclosed prior to Appraisal.

Borrower capacity to implement the measures foreseen is generally weak and it will be necessary to strengthen the capacity of the implementing partners. Safeguards implementation will be led by the Cellule Filets Sociaux (CFS), which has developed some capacity to implement World Bank safeguards through the Safety Net Pilot Project. However, the extent of the environmental and social risks and safeguards instruments go beyond what for example the CFS has already implemented and will require additional environmental and social capacity building, including the hiring of environmental and social specialists.

Capacity building will also be needed for technical services, particularly at the regional level, local implementing partners, and local communities Training and capacity building for the DEELCPN, the national authority for environmental and social oversight, will also be provided through the project. The CFS will be responsible for monitoring safeguards implementation, in cooperation with DEELCPN, and will ensure that screening and mitigation requirements for each subproject will be applied. A training and capacity building plan has been included in the ESMF.

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

Key stakeholders were met for the preparation of safeguard instruments including: the Interministerial Technical Committee (CTI) in charge of the project preparation, the department in charge of environmental assessment (DEELCPN), the social safety nets unit (CFS), Social Action Directorate, UNHCR, CNARR, Environmental Health Directorate, ITRAD, Local Authorities (Prefects, Traditional Chiefdoms, Development Committees), the PRAPPS and PARIIS coordinators, the deconcentrated structures of the Ministry in charge of the environment and the Ministry of Public Health. These meetings allowed both to inform the actors, to collect sectoral data, to assess the institutional capacities and the responsibilities in the implementation.

Stakeholder consultations were also conducted with local stakeholders which are representative of populations where activities will be implemented outside of N'Djamena including AMBORKO, DOHOLO, KOBITEYE, DANMADJA and MOISSALA. Experiences and lessons from consultations held in and around refugee camps in Abeche and Farchana were also integrated into the preparation of the instruments.

The project safeguard instruments (ESMF, RPF, IPMP, MWMP) have been prepared through a consultative process and will be publicly disclosed both in-country and on the World Bank's website once reviewed by the Bank.

B. Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other

Date of receipt by the Bank	Date of submission for disclosure	For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors
17-May-2018	01-Jun-2018	

"In country" Disclosure



Resettlement Action Plan/Framework/Policy Process

Date of receipt by the Bank
17-May-2018

Date of submission for disclosure
01-Jun-2018

"In country" Disclosure

Pest Management Plan

Was the document disclosed prior to appraisal?
Yes

Date of receipt by the Bank
17-May-2018

Date of submission for disclosure
01-Jun-2018

"In country" Disclosure

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:

It is expected that all instruments will be disclosed.

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

Does the project require a stand-alone EA (including EMP) report?
NA

OP 4.09 - Pest Management



Does the EA adequately address the pest management issues?

NA

Is a separate PMP required?

NA

If yes, has the PMP been reviewed and approved by a safeguards specialist or PM? Are PMP requirements included in project design? If yes, does the project team include a Pest Management Specialist?

NA

OP/BP 4.11 - Physical Cultural Resources

Does the EA include adequate measures related to cultural property?

NA

Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?

NA

OP/BP 4.12 - Involuntary Resettlement

Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?

If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?

NA

The World Bank Policy on Disclosure of Information

Have relevant safeguard policies documents been sent to the World Bank for disclosure?

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?

NA



All Safeguard Policies

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?

NA

Have costs related to safeguard policy measures been included in the project cost?

NA

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?

NA

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?

NA

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Country Director:	Francois Nankobogo	02-Aug-2018