Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 12/06/2019 | Report No: ESRSA00378
**Basic Information**

**A. Basic Project Data**

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
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<td>China</td>
<td>EAST ASIA AND PACIFIC</td>
<td>P168025</td>
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**Project Name**

Sichuan Water Supply and Sanitation PPP Project

**Practice Area (Lead)**

Water

**Financing Instrument**

Investment Project Financing

**Estimated Appraisal Date**

12/12/2019

**Estimated Board Date**

3/5/2020

**Borrower(s)**

Jingyang Project Management Office

**Proposed Development Objective(s)**

The project development objective is to improve water supply and sanitation services in Jingyang district of Deyang City in Sichuan Province.

**Financing (in USD Million)**

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<th>Amount</th>
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<td>154.40</td>
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**B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?**

No

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

This project will be the first water sector PPP project supported by the World Bank Group in China. The approach developed under this project is intended to be replicated throughout Sichuan province and China. The project seeks to transform services through the creation of an integrated WSS utility that will be established through a special purpose vehicle project company (Project Company) by the winning bidder under the PPP. In line with international best practice, the PPP partner is being competitively procured (procurement is expected to be completed by the third quarter of 2020 and financial close is expected before the end of 2020) and the PPP agreement is designed to be output and performance based, to incentivize efficiency, customer service and expanded coverage. The PPP agreement will require the PPP partner to partly finance the infrastructure investments, to ensure that the PPP
partner is invested in the project and is incentivized to achieve efficiency gains and connect households to the WSS networks. The prequalification criteria have been developed to ensure that only bidders with relevant operating experience are eligible to bid. SOEs are not precluded from bidding and market sounding carried out in preparation of the procurement indicated potential interest from SOEs and private companies. The Project Company will be required to hire existing members of the workforce that wish to transfer.

**Component 1: Improving WSS Services in Peri-Urban and Rural Areas of Jingyang District (Estimated Cost: US$153.9 million; IBRD loan: US$99.5 million).** This component has two key activity areas, being:

a. **Establishment of a Modern WSS Utility:** The project will support the establishment of the utility and the systems and equipment to enable full-service WSS delivery. Under the PPP agreement, the Project Company will take on the functions of a utility and be responsible for: service delivery; long-term asset management; efficient and optimized system operations; customer interface and customer service; billing, accounting, and administration; as well as the core responsibilities of WSS service provision and water quality compliance. The PPP agreement will set out include a performance regime with KPIs for supply and sewage management. KPIs will include, but not be limited to, service coverage, extent of water metering, targets for NRW, water and treated effluent quality, efficiency in redressing customer complaints. Project support will also include an integrated smart water management platform and smart meters to enable the Project Company to monitor, manage, and operate the assets efficiently.

b. **Support for Engineering Works:** The project will support (i) increased access to improved sanitation - through construction of rain and sewage pipe networks, connections of households to sewers, collection and treatment of septage from septic tanks, improved septic tanks and improved/ increased wastewater and septage treatment capacity (investments of RMB 507 million); and (ii) increased access to improved and more efficient piped water systems - through consolidation and upgrading of the current 40 ground water treatment facilities operated by different providers to a more integrated configuration using two central surface water treatment plants (WTPs) operated by a single service provider, protection of drinking water source sites and water intakes/wells, construction and rehabilitation of pipe networks to expand the network and reduce losses/ NRW, and connection of households and installation of smart meters (RMB 235 million). All investments under the project will be implemented and operated by the Project Company, providing the JDG with one interface and contracting party, rather than the many contractors and operators it currently oversees.

**Component 2: Technical Assistance (TA) for PPP Scale Up, Capacity Building, and Project Management (Estimated Cost: US$0.5 million; IBRD loan: US$0.5 million).** This component has two key activity areas, namely:

a. **Capacity Building and Project Management:** The public counterpart to the PPP (especially HUDC and the PMO) will have key functions that are not delegated to the PPP operator, including implementation of WSS policy and regulations, regulatory oversight of the PPP operator, business planning, tariff setting, long-term asset management and planning, and supervision of citizen engagement activities. The project will include capacity building activities to support HUDC and the PMO carry out these functions, such as training in project management and monitoring of the PPP, regulation, business and asset management planning, study tours of successful water sector PPP projects in China and abroad, training and workshops in project/utility technical and financial management, and training in PPP procurement processes. Project management and implementation support will include: engagement of a project manager/ independent engineer to oversee performance of the PPP contract, construction supervision, and environmental and social management; establishment and operation of a monitoring and evaluation system, and training and acquisition of office equipment, vehicles, and other operating resources. It will also support the JDG to develop a roadmap for moving towards cost recovery. It is expected that this model of institutional strengthening for
PPPs (in particular, the PPP regulatory and contract management aspects) can be potentially replicated across some of the 2,854 counties and districts in China and can serve as a model for closing the rural WSS gap and advancing the SDGs globally.

b. Dissemination of Experience, Lessons Learned, and PPP Project Templates: The project will support technical assistance activities to study and inform mechanisms to scale up the PPP approach developed under the project to other areas across Sichuan and China. Specific TA activities include: (i) review and recommendations for the existing NDRC and MOF PPP policy and guidance documents; (ii) preparation of PPP template documents to be used in the scale-up and replication of the project approach (e.g. model contracts, bidding documents, project management tools, etc.); and (iii) dissemination activities to share project experience at provincial and national levels.

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]

Jingyang District (Jingyang) is the main district of Deyang City, located in the northeast edge of the Chengdu Plain in Sichuan Province, about 70 kilometers northeast of Chengdu City, the capital city of Sichuan. The topography of Jingyang District slopes from the northwest to the southeast. The landform in the west is primarily formed by the alluvial plain, while the east has rolling terrain. This region is situated amidst the upper tributaries of the Yangtze River, and is a priority area for pollution control and water quality improvement. The total population of Jingyang is over 750,000, with about 250,000 living in rural areas. In 2016, the district had total economic output of RMB 298 billion. Despite some rural water and environmental protection projects in the 2000’s, accelerating urban construction and development pose significant challenges to the local water environment in Jingyang.

Jingyang District is in the region influenced by the subtropical humid and semi-humid climate characterized with distinct seasons and rich precipitation, which gives rich water resource to Jingyang. The earthquake risk is moderate given the seismic degree being 7, and the flood risk is low in the project area as it is on the upstream of the Tuojiang River and Jialingjiang River.

The total area of Jingyang District is 648 km². The district is the main urbanized area of Deyang Municipality, including 4 urban communities namely Jingyang, Gongnong, Chengbei, and Chengnan, 10 towns by the name Huangxv, Xiaouan, Bolong, Dexin, Yangjia, Tianyuan, Xiaoan, Xinzhong, Shuangdong, and Hexinzhen and 1 township called Donghu Xiang. The project will be developed in the outskirts and rural area of the Jingyang District to provide service for the total population of 250,000, living in the 10 towns and 1 township. Citizens in the 4 urban communities already have sufficient water supply and will not be serviced by the project. Under 2% of people in Jingyang District (4,700) are ethnic minority based on their formal documentation and the remainder are Han Chinese. The people in the project area live in urban and peri-urban areas, are generally intermarried with the Han majority, adopt the cultural norms of the the broader economy and community. Accordingly they do not form a distinct social and cultural group within the community, nor do they have collective attachment to land, customary institutions distinct from the broader society or a distinct language used in the community. they do not meet the Therefore, these people do not meet the ESS7 definition of ethnic minorities.
Approximately 73 percent of the population in the project area currently has access to a piped water supply system (211,600 people), in line with the national average of 73 percent. The current quality of piped supply, however, is intermittent and unreliable and water quality also poses potential health concerns. The water source is mostly shallow aquifer groundwater, along with some local reservoirs, both of which can be easily contaminated. Naturally occurring iron and manganese content in the groundwater exceed standards. Water quality testing is sporadic, with the district lacking appropriate equipment and personnel; and drinking water sources are not properly protected from encroachment and pollution, posing further risks to drinking water hygiene and safety. Non-revenue water (NRW) is high at around 32 percent and the systems are typically small-scale, incomplete, and scattered. Even though the water supply systems are relatively new (having been largely re-built after the 2008 Sichuan earthquake), the focus (including funding allocations) has been on construction rather than operations, maintenance, and service delivery. This has led to premature breakdowns of systems, affecting service and sustainability.

Only 15 percent of the population in the project area is connected to a formal sewer system (43,350 people), with the rest of the population being served by septic tanks and onsite treatment, many of which are not well designed or are malfunctioning. There are six recently commissioned wastewater treatment plants (WWTPs) and 154 anaerobic tanks (large septic tanks) in the project area. These WWTPs all reportedly meet required standards but are operating sub-optimally due to over-design and insufficient inflows (inflows are only 10-15 percent of design capacity). The local government has no capacity to operate the WWTPs and they are currently operated by the construction companies that built them, under year-to-year contracts. Local government has not focused attention until now on building sewers and connecting households to the wastewater system. Some households in the area use septic tanks (most are functioning), otherwise wastewater is discharged directly into nearby rivers without treatment – leading to environmental pollution, and broader public health risks downstream. Wastewater tariffs are only charged in a few parts of the project area.

The project has been designed to address the environmental and social risks covered by the ESF. To this end, the following E&S assessments/management tools have been prepared by the client;

- Social Impact Assessment
- Environmental impact assessment
- Environmental and Social Management plan
- Resettlement Action Plan
- Resettlement Policy Framework
- Labor Management Procedure
- Stakeholder Engagement Plan
- Environmental and Social Commitment Plan

D. 2. Borrower’s Institutional Capacity

The Government of Jingyang District has very limited experience in managing projects financed by international financial institutions. The staff of the government has limited technical capacity themselves. Their capacity largely depends on the quality and capacity of the technical teams hired. For this project, the government of Jingyang District has established the PMO for implementing the project, with staff all from the government agencies. However, the coordination and monitoring of the environmental management, particularly for the contractors/sub-contractors,
require the full-time input of staff. In addition, given the implementation arrangement of the project, a private company (SPV) will be procured by the PMO at the beginning stage of the implementation. According to the FSR, all IBRD loan will be on-lent to the SPV company, who then will take over the responsibility for construction and operation of the project, including the preliminary design and the final design. It is widely recognized that the SPVs at market in China are capable of managing the environmental and social issues associated with the water and sanitation facilities at similar size to the project. A staff of the PMO will be designated to incorporate such requirement into the bidding document and contract for the SPV. A capacity training plan has been developed and incorporated into the ESMP for the PMO staff, the SPV and the contractors to strengthen their capacities of environmental management in the construction and operation stages of the project.

A PMO has been established for daily work during the preparation of the project. Four young staff from the EPB and the DRC are designated to work under the PMO and coordinate the ESIA preparation. Experienced EIA consultants were engaged to prepare the ESIA. A social consultant team has been commissioned to assist PMO to undertake social assessment and stakeholder engagement. The Bank’s social specialists provided hands-on assistance to the social team in order to undertake proper social assessment, and prepare required ESF instruments of acceptable quality.

Land acquisition and resettlement for this project will be implemented at township level by a resettlement office comprising township officials and village representatives, led and guided by county land bureau. Land acquisition and resettlement will be in accordance with the Resettlement Plan (RP) and Resettlement Framework (RF) by local land bureaus who have (or can readily recruit) appropriately skilled and experienced staff.

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

A. Environmental and Social Risk Classification (ESRC)

Environmental Risk Rating

The project covers both physical and non-physical activities. The physical activities include the construction, upgrading, and rehabilitation of municipal wastewater and drinking water facilities, and rehabilitation and beautification of public areas of eleven villages in the project area. The size of each specific facilities ranges from very small (less than 50m3/day) to medium (25,000m3/day), with the average capacity being 900 m3/day, and the total capacity of the water supply and wastewater treatment being 27,000 m3/d and 22,000 m3/d respectively. The locations of the activities are generally in rural areas already intensively disturbed by human activities, without involving critical natural habitats and legally protected cultural heritages. The treated effluent of the wastewater treatment facilities will be discharged into three rivers which are identified as natural habitats with low biodiversity value. In addition, a small pumping station will be built in vicinity of a small temple built by villagers recently. This temple is not a legally protected cultural heritage.

Overall, the project will have positive environmental and social benefits in terms of reducing the water-borne diseases and water pollution in receiving water bodies by providing clean drinking water and collecting and treating the wastewater. The adverse environmental and social impacts of the project in construction stage include noise,
dust, solid waste and wastewater, soil erosion, and the social disturbance, such as the traffic and road safety. In the operation stage, the project will produce odor, noise and sludge, occupational health and safety concern due to bacteria/pathogens within the wastewater treatment facilities and working in confined space. These impacts are expected to be at limited magnitude given the size of the project.

The non-physical activities involve the technical assistance and construction of cloud platform. Implementation of the non-physical activities essentially will not cause any adverse environmental impacts, except some dismantled water meters. The technical assistance is limited to capacity building through trainings, project management, and dissemination of the lessons and experience on water service PPP through workshops, and this project will not implement any recommended actions.

The environmental impacts are moderate, site-specific, predictable and/or reversible. These adverse impacts can be readily and reliably managed through the environmental mitigation hierarchy. Per the Environmental and Social Directive, the environmental risk for this project is classified as Moderate.

Overall, the Jingyang District Government (the client) has good experience and adequate capacity in managing environmental issues associated with the wastewater and water facilities at the size commensurate with this project in line with domestic requirements. But it has little experience with the IFIs and international E&S standards. The PMO has been committed to allocate adequate resources in terms of budget and full-time staff to coordinate and procure a qualified SPV. The ESMP has been prepared in which a training plan has been developed for the staff of the PMO to strengthen their capacity and knowledge on environmental management. The SPV company will be procured through a competitive procedure where the adequate environmental and social management capacity is to be a critical criteria. The ESMP also sets out a training session for the SPV company on environmental management to facilitate the transition from the PMO to the SPV company.

Social Risk Rating

The client commissioned a social assessment team to conduct social impact assessment to identify risks based on aspects specified by the ESF, and the social assessment report indicates that a total of 1.25 hectare (18.7 mu) collectively owned land will be acquired to accommodate installation of water supply and waste water treatment facilities, impacting 179 persons from 58 households.

A water source protection plan is still pending approval, which is expected to further increase the total amount of restricted land by an estimated 4.67 hectare (70 mu) in order to protect water quality. There are existing facilities invested by both public and private participants, such as 3 waste water treatment plants currently being constructed by different companies, and 34 water supply stations/centers which will be consolidated. There are 115 staff employed by these existing facilities. Their future employment and livelihood is expected to be impacted when this project is planning to consolidate these existing facilities, which will reduce staffing level. At time of appraisal, a draft transition plan is being formulate, and the final plan has been included in the ESCP as an action point to ensure that the retention or retirement of existing employees does not cause livelihoods loss to affected persons. The environmental baseline in the project area is overall not sensitive or vulnerable, with project implementation expected to affect mainly areas with existing human habitat and infrastructure footprints.
The client’s internal management structure in relation to water supply and waste water treatment is complex, calling for coordination among different agencies, a challenge faced by most previous projects in China. A few key stakeholder agencies, such as labor bureau and administration of workplace safety, are missing from the currently identified and invited list by the PMO. Given the institutional complexity, the lack of experience of the PMO in implementing Bank financed projects, and that the social consultants already commissioned will be among the first to observe new ESF requirements, the amalgamated social risk for this project is classified as Substantial at time of project appraisal. A more hands-on approach has been adopted to assist the social assessment team in conducting social impact assessment, which focused on all ESSs and in particular ESS1 and ESS10.

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

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The environmental and social specialists reviewed the environmental and social instrument, including the EIA, SIA, ESMP, ESMF, RAP, RPF, SEP and ESCP, the Feasibility Study Report, and conducted site visit. The environmental and social instrument is prepared following the ESF and the EHSGs of the WBG, and relevant requirements of China, covering all the project activities including TA. Given that the borrow pits/deposit sites can not be determined before appraisal and the site and alignment of water/wastewater facilities may be subject to modifications at the preliminary design stage, the ESMF and RPF have been prepared. In addition, the water source protection plan for the drinking water source from which the project will take water has not been finally determined, although a comprehensive action plan has been drafted to protect the drinking water source, the E&S documents will be updated/prepared according to the ESMF and RPF for the protection actions.

Overall, the project will have positive environmental and social benefits in terms of reducing the water-borne diseases and water pollution in receiving water bodies by providing clean drinking water and collecting and treating the wastewater. The project will largely improve the efficiency of the wastewater treatment plants in the project area from current 20% to 80%.

The adverse environmental and social impacts of the project in construction stage include the noise, dust, solid waste and wastewater, soil erosion, and social disturbance/community safety due to increased traffic, construction workers, and construction of pipeline in villages connected with gas supply. In the operation stage, the project will produce odor, noise, wastewater, solid waste, limited amount of sludge, and occupational health and safety issues. The project will not use liquid chlorine to disinfect the effluent of wastewater treatment facilities and the drinking water. UV, ClO2 and sodium hypochlorite will be used which are not toxic to human beings and the environment. This project will not cause significant land conversion and will not involve any critical natural habitats and legally protected cultural heritages.

The assessment focuses on the sludge management and the treated effluent from WWTPs in the operation stage. The sludge was sampled from the existing wastewater treatment plants to be renovated by the project and the results show that the sludge is not toxic and can be applied in municipal greening. The preliminary quantity estimate indicates that only 12 t/d with 80% water content will be produced by this project. A sludge management plan has
been developed as a part of the ESMP. The sludge to be produced by the project will be transported to a sludge disposal facility being constructed (not developed in anticipation of the project and therefore not considered an associated facility). Due diligence review of the sludge disposal facility has been made and found no legacy issues.

The treated effluent from the wastewater treatment plants will be discharged into three rivers of Mianyuan, Shiting and Kai, which are currently receiving wastewater discharge after limited treatment. The river sections within the assessment area are identified as natural habitats but with low biodiversity value. Through site survey and consultation with relevant government departments per the SEP, it is confirmed that there are neither rare and valuable species nor the sites for breeding, spawning and wintering for fish. The water quality in the three rivers currently is good and meets the standard of China for sustaining common natural habitats (Class III of surface water quality). But they are facing the risk of degradation due to the increasing discharge of wastewater along the rivers. Although the project, which will construct and upgrade wastewater sewers and WWTPs, will improve the water quality in the three rivers by collecting and treating the wastewater in the project area, the water quality in areas downstream of the outfalls may be degraded due to the concentrated discharge of pollution loads by the project WWTPs, thus threatening the natural habitats in these areas. The impact of the treated effluent has been assessed in line with the ESS 6, and it is found that very limited areas of the rivers will be marginally affected by the discharge of the treated effluent from the project WWTPs, but the function of the rivers will not be degraded by the project.

A village level cultural heritage will be affected by the project. This is a small temple built by local villagers in year 2010 for good harvest blessing. A small pumping station will be built by the project just 5 m from this temple that will cause dust, noise, vibration and bad behavior of workers to this temple. These impacts are to be moderate and readily mitigated by good engineering design and measures. Mitigation measures including the code of conduct for workers have been developed.

This project will not take water from reservoirs. Nearly all of the project water will be taken from the Renmin Canal which was built in 1958 to transfer water from the Minjiang River to irrigate farms in the Chengdu Plain. A water resource study has been completed by the Deyang Municipal Government, indicating that the impact on the downstream users by the project is negligible.

The section of Renmin Canal within Deyang Municipality is zoned for supplying drinking water and irrigation water. The water quality analysis shows that the water quality in the Renmin Canal is being polluted by the domestic wastewater directly discharged by the households near the canal. A water source protection plan has been prepared by the Deyang Municipal Government which stipulates comprehensive actions including a water source protection zone to be established and wastewater interception works for the households, etc.. The details of the actions are subject to further evaluation by the local expert panel. A provision has been incorporated into the ESCP to cope with this issue.

Due diligence has been conducted on the existing water and wastewater facilities to be rehabilitated or upgraded by the project. The due diligence covers the legal compliance and the environmental performance including the sludge management. It is found that there are no major legacy issues, but the EA permits for the existing water facilities were not issued by local EPB. This issue has been recognized by the local EPB, which issued an official document permitting these water facilities to continue operating until they are upgraded or rehabilitated by the project. The EA for this project covers all the existing water facilities and will be reviewed and approved by local EPB through the
domestic procedure. Thus, this legacy issue will be addressed after the environmental permit is granted by local EPB based on its review of the EIA and ESMP prepared for this project.

The SEP has been disclosed at the early stage of the EA preparation on March 6, 2019 at local website, and disclosed at the website of the Bank on March 24, 2019. All the environmental and social documents have been disclosed locally at the website and the places easily accessible to the public on Sept. 4 2019, and at the website of the Bank on XXX (to be updated once disclosed). The consultation with stakeholders, i.e. affected people/entities and relevant government agencies have been conducted in two rounds per the SEP in March 2019 and July 2019 respectively.

Local laws and practice regulating labor and working conditions is adequate based on initial social assessment. Jingyang PMO has commissioned 43 project workers and 30 contracted workers to prepare this project. A Labor Management Procedure has been prepared to guide management of these workers at preparation stage. Labor management system of participating private sector will be assessed when these entities are being selected. Labor management of contractors will be managed through the bidding process, with sound labor management system as requirements in the bidding document.

Social impact assessment indicated that Land acquisition/resettlement cannot be avoided, and a RAP and RPF has been prepared. The RAP will be implemented once project is approved to address confirmed land acquisition and resettlement. Since the draft water source project plan was only made available at a later stage and pending for final approval, this plan will cause around 4.67 hectare (70 mu) additional land to be restricted from agricultural activities, therefore a RPF has been prepared to guide implementation of this additional restriction. Land use procedures of some existing water stations and waste water treatment plants have not been properly completed. It has been decided that all these facilities will complete proper land use approval process prior to project construction starts. Over 100 employees are currently working for existing facilities that will be consolidated after project implementation. SEP has included consultation with these employees, and ESCP has included a transition plan as an action to ensure proper arrangements for these employees so that no economic losses will occur as a result of project intervention.

The social assessment indicates that presence of ethnic minorities as described in ESS7 is not identified.

ESS10 Stakeholder Engagement and Information Disclosure

The SEP has been developed and disclosed at the early stage of the project preparation on March 6 2019 at the local website, and on March 24, 2019 at the Bank’s website. Then the SEP was updated in September 2019 after receiving feedbacks from stakeholders including end users of water such as individual families on water pricing, employees of existing facilities to support project construction through reaching a transition plan, public institutions and enterprises who are big water users, and households affected by land acquisition who indicated their support to the project as long as proper compensation is paid following local standards. The SEP includes the summary of the project and the potential environmental and social impacts and proposed mitigation measures; the identification and analysis of the stakeholders, especially the stakeholders to be directly affected and have direct interests, and the
vulnerable groups/individuals; the strategy and plan for information disclosure and consultation, especially for the
vulnerables; response, reporting and GRM. Two rounds of information disclosure and consultation have been
conducted per the SEP in March 2019 and Sept. 2019 respectively. All of the environmental and social document
have been disclosed locally at the website and the places easily accessible to the public on Sept. 4, 2019, and at the
website of the Bank on XXX. Concerns and suggestions raised by the stakeholders have been recorded and responded
by the PMO, and reflected in the updated SEP.

Based on the site survey, the key stakeholders have been identified at the early stage of the EA preparation. They are
the residents/schools near water supply facilities and wastewater treatment plants and networks who are to be
affected by the traffic safety, noise and dust, etc in construction and operation stage; the villagers whose temple will
be affected by a small pumping station; the rural and agricultural bureau who is in charge of the management of
water ecology; the EPB who is in charge of the establishment of outfalls of WWTPs, and environmental impacts; the
water resource bureau, in charge of soil erosion control, water resource, and permit for pipeline crossing rivers; the
management of the Renmin Canal, in charge of water quantity and quality management in the Renmin Canal; traffic
bureau, in charge of traffic management; cultural bureau, in charge of management of cultural heritages above
county level; railway bureau and highway bureau, respectively in charge of permitting pipelines crossing railways and
highways. These stakeholders have been consulted via the interviews, public meetings and questionnaires, developed
based on the analysis of their demand and features. The first round of consultation was carried out in March 2019 for
screening and scoping purpose. The stakeholders’ views and comments were solicited by the EA team after the local
disclosure of the project information. Generally most of them are supportive of the project, and the relevant
government agencies gave specific comments and advices for project design, e.g. siting, location of protected cultural
heritages, locations and status of natural habitats, etc., but some villagers raised concerns on wastewater and noise
control. These comments, advices and concerns have been adopted to inform the development of the EA preparation
by the EA team. Through the internal liaison mechanism within the client, the technical team learned these issues and
considered them in the project design. The second round of consultation was carried out in Sept. 2019 after the draft
EA instruments were disclosed locally, e.g. placing the hardcopies at township offices, and the website of the district
government. No comments and concerns have been received so far.

Key government agencies include housing and urban-rural development bureau (where the PMO is hosted,
responsible for water supply to urban areas and waste water treatment), water resources bureau (responsible for
water supply to rural areas), planning commission, finance bureau, EPB, labor bureau, administration of work safety,
land bureau, and possibly forestry, civil affairs, ethnic minority affairs commission for confirming status of ethnic
minorities in Jingyang District, and public health bureau. Existing facilities including current WUAs managing water
supply centers/stations established at township level, and three waste water treatment plants invested by private
companies, have been included into the project. These facilities have over 90 employees, whose livelihoods may be
affected depending on how the project will absorb these facilities. The Stakeholder Engagement Plan (SEP) has been
developed and disclosed at the early stage of the preparation. These key stakeholders have been engaged and
consulted during the project preparation by means of interviews, hearings and questionnaires. The private entities are
regarded as the key stakeholder for this project and will be engaged during the implementation stage. An ESCP has
been prepared to include actions addressing risks identified. The GRM will have a dedicated component to respond
to complaints related to construction nuisance, especially since there will be civil works to connect households to
sewers.
A Stakeholder Engagement Plan has been prepared to guide the engagement process.

B.2. Specific Risks and Impacts

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

**ESS2 Labor and Working Conditions**

Around 50 direct and contracted workers have been involved to prepare the project. The physical activities will involve limited number of direct workers, contracted workers, and the TA will involve limited number of direct workers and contracted workers. The number of contracted workers at peak time is about 60 to construct planned facilities. In addition, government staff will be involved in the early stage of the project implementation. Given the nature and size of the project, the potential occupational health and safety are determined to be largely associated with the operation of the wastewater facilities, e.g. physical damage by height fall from the tanks and the confined space such as manholes that trap or engulf the operational staff, as well as the infection by pathogens and bacteria in wastewater treatment plant causing acute diarrhea and extraintestinal infection for operating workers. The occupational health and safety measures have been developed, including the entry permit and the first aid, etc., and integrated into the ESMP and the ESCP. In addition, a labor camp will be established near the Bailong Water Treatment Plant with the total number of workers around 60 persons. A Labor Camp Management Plan has been developed and incorporated into the ESMP, which provides measures and conditions to accommodate the workers by clean drinking water and food, and disease control.

The labor management procedure for direct workers and contracted workers has been developed as part of the ESMP. The GRM has been established separately for this ESS2 in the ESMP. The labor management procedure and the GRM on ground will be established prior to the employment of the first workers, and these requirements have been incorporated into the ESCP.

At Huangxu town, a prison with around 10,000 prisoners has been identified. The project will provide services to the prison in terms of water supply and waste water treatment. Consultations with local justice department confirmed that no prisoners will be allowed outside the prison for the whole duration of serving time. This project will not use any products or services (including labor) from the prison.

A Labor Management Procedure has been prepared for use during implementation.

**ESS3 Resource Efficiency and Pollution Prevention and Management**

This project will not be located in water scarce areas, and the water consumption in the project area will not be significantly increased during construction or operation of the project. Conversely, groundwater resources will be conserved by using more surface water to replace the groundwater in this project. In addition, this project will neither consume large amounts of energy and raw materials, nor use or procure pesticides. The project will largely improve the efficiency of wastewater treatment in the project area from 20% to 80%.
This project will not produce toxic or hazardous waste but general wastes, such as spoils and domestic wastewater in construction and operation stages. The sludge from existing water treatment plants has been tested and qualifies as general municipal waste. These general wastes will be readily managed by good engineering design and mitigation measures, using existing handling, transport and disposal systems. The due diligence conducted by the EA team indicates that there are no legacy issues related to pollution.

This project will produce the dewatered sludge of 12 t/d with 80% water content in the operation of the facilities for wastewater treatment and water treatment. The sludge was sampled from the existing wastewater treatment plants to be renovated by the project. The heavy metal content in the sludge is compared with domestic and international standards; contents in heavy metals and other potential pollutants are such that the sludge is not toxic and can be applied as topsoil or or soil enrichment for municipal greening purposes. The baseline survey for wastewater collection areas has confirmed that no industrial wastewater will be collected by the project. Alternatives have been developed to explore the means to minimize/reduce the amount of sludge. A sludge management plan has been developed as a part of the ESMP and is referred to in the ESCP. It covers the sludge quantity estimate, handling, transportation and disposal arrangements, and supervision requirements. The monitoring for sludge quality on regular basis has been incorporated into the environmental monitoring plan. The sludge of the project will be transported to a sludge disposal facility at a capacity of 100t/d to produce compost for municipal greening. The due diligence review of the sludge disposal facility indicates that the EA has been completed in compliance with China’s requirements and the facility will become operational before March 2020, and the quantity of the sludge from this project is considered in the design of the disposal facility. The due diligence confirmed that this sludge disposal facility is not associated facilities to this project as the viability of the sludge disposal facility is not determined by this project in terms of sludge quantity.

In addition, the project will create a total water supply capacity of 27,000 m3/d, of which 21,600 m3/d will be converted to wastewater requiring collection, treatment and disposal. This demand has been considered in the project design, where the wastewater treatment facilities with a total capacity of 22,000 m3/d are to be constructed/rehabilitated under this project to accommodate the wastewater produced by the project.

During the construction, small amount of diesel would be used in the power generation equipment with medium power rate (about 200 kW) at construction site in case that electricity connection is not available. Safety measures have been developed for the use of diesel, particularly on the storage and security. During the operation, liquid chlorine will not be used for disinfection. UV, ClO2 and sodium hypochlorite will be used which are not toxic to human beings and the environment.

**ESS4 Community Health and Safety**

The section of Remin Canal within Deyang Municipality is zoned for supplying drinking water and irrigation water. The water quality analysis shows that the water quality in the Renmin Canal meets most of the indicators of the standard for drinking water purpose, except some indicators such as fecal coliform, NH3-N and TP, which are deemed from the wastewater directly discharged by the households near the canal. The water source protection plan has been
prepared by the Deyang Municipal Government which stipulates comprehensive actions including a water source protection zone to be established and wastewater interception works for the households, etc. These actions have been incorporated into the ESMP and will be updated upon the final version approved. Implementation of the actions may produce noise, duct, wastewater and general solid wastes in construction stage, and noise in operation stage. Besides, establishment of the protection zone may block the traffic on the small roads along the canal. This protection plan is being reviewed by an expert panel. The ESCP includes a commitment of the Deyang Municipal Government that the approval of the protection plan should be obtained from the expert panel prior to the start of the construction of the water supply plants and the E&S documents will be updated/prepared according to the ESMF and RPF. In addition, two small existing water treatment stations will continue taking groundwater to supply drinking water of 250 m3/d to villagers remote from the centralized water treatment plants under the project. The water quality of the groundwater is good but high in hardness. Softening process will be adopted by the two stations under the project to reduce the hardness to the standard. Local EPB will establish protection zones around groundwater potable water sources and supervise the management of the water quality. The water supply plants under this project will set up backup water supply system including back water sources according to national requirements, and the management of the backup system will be part of SPV’s operational plan.

This project will not take water from reservoirs, hence dam safety aspects are not relevant. Nearly all of the project water will be taken from the Renmin Canal which was built in 1958 to transfer water from the Minjiang River to irrigate farms in the Chengdu Plain. A water resource study has been completed, indicating that the project will only take 0.6% of the average flow rate in the Renmin Canal, and the management of the canal agreed to this study and issued the permit for this project to take water from the canal. This permit also has confirmed that the water amount to be taken by the project has been considered in the annual plan of water transfer from the Minjiang River. This means that the management will transfer adequate water from the Minjiang River in the high demand season to compensate for the water quantity taken by the project. Thus, the impact on the downstream users by the project is negligible.

The water supply and wastewater pipelines will be constructed along the roads that will disturb the local traffic during the construction phase. In addition, the increased traffic of vehicles transporting equipment and materials on the roads near the communities, particularly schools, may pose safety impact given the rural context. Thus, a traffic management plan has been developed as an integral part of the ESMP and ESCP, which also contains a traffic safety awareness program for the affected schools and communities where the awareness of traffic safety is particularly weak in rural areas. In the operation stage, repair and maintenance of pipelines and manholes may pose safety risk to local communities in terms of open ditch and open manholes etc. Measures have been developed to protect the communities from being injured by the repair and maintenance works.

Up to 60 workers will be introduced to the site for construction of the facilities given the overall size of the project. Local people will be largely hired, so the potential impact of influx of workers on local communities is minimized. The procedure for management of contractors/subcontractors has been prepared and incorporated into the ESMP and the ESCP where the code of conduct and monitoring and reporting system are provided. However, a workers’ camp will be established near the Bailong Water Treatment Plant with about 60 persons. The location of the camp is selected far from surface waters and sensitive social receptors such as villages and schools. A worker camp management plan has been prepared and incorporated into the ESMP and ESCP where the code of good conduct, hygiene management and disease control measures including GBV prevention have been provided. Social assessment
screened risks of GBV, and concluded that given the largely urban and peri-urban character of the area and the location of the camps that the GBV risks will be low. Notwithstanding this, the contractors will be required to sign Codes of Conduct and the external monitor will be required to monitor compliance. The ESMP requires that worker camps provide clean and safe living and working environment for both female and male.

This project will not affect any ecosystem services for the communities and will not involve any dams. The risk of water-borne diseases will be reduced by the project by providing clean drinking water and collecting and treating wastewater. Local endemics information indicates that the morbidity of kidney stone is high in the project area due to the high content of hardness in the drinking water. This project will use surface water low in hardness to replace the groundwater high in hardness to reduce the morbidity of kidney stone in the area.

Construction of water pipeline in villages may accidentally break gas pipeline causing explosion. The mitigation measures have been developed and incorporated into the ESMP, including the identification of gas pipeline corridors with gas supply companies prior to construction, and the use of gas detection devices, etc.

Use of well trained security personnel at the sites is very limited and there is no armed security personnel in China for civil facilities..

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
The social assessment indicates that a total of 2.95 hectare (44.18 mu) land will be acquired to accommodate project activities, including 1.70 hectare (25.48 mu) state land and 1.25 hectare (18.70 mu) collectively owned land. A total of 179 persons from 58 households will be impacted by the collectively owned land. Two enterprises will be resettled affecting 2 persons from 2 households. The water source protection plan is expected to be finalized during early implementation. This plan is expected to further increase land restrictions in order to protect water source, and it is estimated that a further 4.67 hectare (70 mu) land will be restricted for agricultural activities. An RPF has been prepared to address land acquisition that can only be confirmed at implementation stage.

Due diligence reviews of existing facilities indicated that these water stations are on land provided through community level agreements, in most cases many years (even decades) ago. In any event, these facilities were not developed in anticipation of the Bank supported project. The status of these land holdings will be further validated via the community consultation process and legal review where relevant during implementation.

The RAP and resettlement framework prepared has been informed by consultations with the affected persons, and the draft RAP and RPF has been disclosed to all stakeholders before finalizing.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources
The project is located in the rural area around the urban developed area, and the project area has already been intensively disturbed by human activities. The project will not involve any critical natural habitats. The treated effluent from the wastewater treatment plants under the project will be discharged into three rivers of Mianyuan, Shiting and Kai, which are currently receiving wastewater discharge from rural and urban areas. The river sections within the assessment area are identified as natural habitats but with low biodiversity value, which is composed by local common species dominated by carp, chub, and bighead. Currently the section of Mianyuan River within the assessment area is zoned for aesthetics and industrial water supply, while another two are not zoned for any beneficial use. Through site survey and consultation with relevant government departments per the SEP, it is confirmed that there are neither rare and valuable species nor the sites for breeding, spawning and wintering for fish. The water quality in the three rivers currently is good and meets the standard of China for sustaining common natural habitats (Class III of surface water quality). But they are facing the risk of degradation due to the increasing discharge of wastewater along the rivers. Although the project, which will construct and upgrade wastewater sewers and WWTPs, will improve the water quality in the three rivers by collecting and treating the wastewater in the project area, the water quality in areas downstream of the outfalls may be degraded due to the concentrated discharge of pollution loads, thus threatening the natural habitats in these areas. Alternative locations for wastewater outfall have been explored but the outfalls discharging into the three rivers are the only one feasible technically and financially. To understand to what extent the water quality will be impacted by the concentrated discharge of treated effluent from the project WWTPs, static modelling of the effluent impact on water quality in the three rivers has been run and show that the water quality will be marginally affected in a very limited area downstream of the outfalls, without degrading the water quality and functions in the rivers. Conversely, the water quality of the rivers will be improved by the project, which will help achieve the net gain of biodiversity in the long term. The pollution load likely to be reduced by the project for the three rivers has been estimated, as COD 107.40 t/a, NH3-N 15.77 t/a, TN 23.36 t/a and TP 0.95 t/a.

In addition, this project will neither introduce alien species nor purchase and use natural products.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
The social assessment confirms that no ethnic minorities as defined by World Bank ESF in project sites has been identified.

ESS8 Cultural Heritage
Screening on cultural heritage was conducted at the early stage of the EA preparation via site visit and consultation with relevant government departments per the SEP. This project will not affect any legally protected cultural heritage. However, at village level some cultural heritage will be affected. This is a small temple built by local villagers in year 2010 for good harvest blessing. A small pumping station will be built by the project just 5 m from this temple. Dust, noise, vibration and bad behavior of workers may do detriment to this temple in construction stage, and noise and vibration in operation stage. These impacts are to be moderate and readily mitigated by good engineering design and measures. The villagers have been sufficiently consulted with adequate information on the potential impacts disclosed. The villagers are very supportive of the project even there is the risk on their temple
integrity. The potential impact on the temple has been adequately analyzed and mitigation measures developed. It is expected that there would not be material damage to the temple provided that the mitigation measures are implemented. Alternative analysis for the siting of the pumping station indicates that this site is the only one feasible environmentally, socially and financially. Mitigation measures including the code of conduct for workers have been developed. Consultation with the local villagers has been conducted per the SEP and all the villagers agreed to this site selection option. The chance find procedure has been developed and incorporated into the ESMP and the ESCP.

No intangible cultural heritage has been identified by the social assessment.

ESS9 Financial Intermediaries
This project will not involve any FIs.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways
No

OP 7.60 Projects in Disputed Areas
No

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

<table>
<thead>
<tr>
<th>DELIVERABLES against MEASURES AND ACTIONS IDENTIFIED</th>
<th>TIMELINE</th>
</tr>
</thead>
<tbody>
<tr>
<td>ESS 1 Assessment and Management of Environmental and Social Risks and Impacts</td>
<td></td>
</tr>
<tr>
<td>ORGANIZATIONAL STRUCTURE: SPV Corporation will establish adequate environmental and social management system and capacity in line with the Good International Industry Practice (GIIP) of the World Bank.</td>
<td>06/2020</td>
</tr>
<tr>
<td>The PMO should ensure the SPV will establish an adequate and appropriate Environmental and Social Management System (ESMS) in line with the GIIP of the World Bank before the SPV can commence its duties agreed in the SPV contract, and PMO should monitor and supervise to ensure the SPV will operate and maintain the ESMS through its contract period.</td>
<td>12/2024</td>
</tr>
<tr>
<td>Update, adopt, and implement, the Environmental and Social Impact Assessment that has been prepared for the Project, in a manner acceptable to the Bank.</td>
<td>12/2024</td>
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<tr>
<td>Prepare/update E&amp;S documents based on the updated information on the water source protection plan</td>
<td>06/2019</td>
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<td>Task</td>
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<tr>
<td>Prepare/update E&amp;S documents based on the updated information on</td>
<td>06/2019</td>
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<tr>
<td>water source protection plan.</td>
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<tr>
<td>MANAGEMENT TOOLS AND INSTRUMENTS : Environmental and Social</td>
<td>10/2019</td>
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<tr>
<td>Management Plan (ESMP) including: Sludge Management Plan (SMP),</td>
<td></td>
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<tr>
<td>Occupational Health and Safety Management Plan (OHSMP), Labor Camp</td>
<td></td>
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<tr>
<td>Management Plan, Traffic Management Plan (TMP), Contractor</td>
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<tr>
<td>Management Procedure, Labor Management Procedure, Environmental</td>
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<tr>
<td>Codes of Practice for Generic Civil Works (ECOP), Specific mitigation</td>
<td></td>
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<tr>
<td>measures for sensitive receptors (EMP), Resettlement Action Plan</td>
<td></td>
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<tr>
<td>(RAP), Resettlement Policy Framework (RPF) and SEP.</td>
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<tr>
<td>Screen any proposed activities in accordance with the ESMF</td>
<td>12/2020</td>
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<tr>
<td>prepared for the Project, and, thereafter, draft, adopt, and</td>
<td></td>
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<tr>
<td>implement the activities ESMP, as required, in a manner</td>
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<tr>
<td>acceptable to the World Bank.</td>
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<tr>
<td>Obtain or, where appropriate assist in obtaining, permits, consents</td>
<td>06/2019</td>
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<tr>
<td>and authorizations including &quot;Opinions on Project Siting&quot;,</td>
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<tr>
<td>&quot;Preliminary Opinions of Land Use&quot;, &quot;Approval of Environmental</td>
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<tr>
<td>Impact Assessment&quot;, &quot;Approval of Soil Conservation&quot;, and &quot;</td>
<td></td>
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<tr>
<td>&quot;Establishment and Approval of Water Resources Protection Areas&quot;</td>
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<td>etc. applicable to the Project from relevant national authorities</td>
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<td>and comply or cause to comply with all required conditions, and</td>
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<tr>
<td>maintain in full effect for project implementation.</td>
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</tr>
<tr>
<td>SPV Corporation: Executing the ESMP and ESMF</td>
<td>12/2024</td>
</tr>
<tr>
<td>Jingyang District Government: Executing the RAP and the RPF.</td>
<td>12/2024</td>
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<tr>
<td>ESS 10 Stakeholder Engagement and Information Disclosure</td>
<td></td>
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<tr>
<td>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION:</td>
<td>12/2024</td>
</tr>
<tr>
<td>A draft SEP and Stakeholder Engagement Framework (SEF) has been</td>
<td></td>
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<tr>
<td>prepared and disclosed before appraisal.</td>
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<tr>
<td>Update, adopt, and implement Stakeholder Engagement Plan (SEP).</td>
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<tr>
<td>PROJECT GRIEVANCE MECHANISM: Prepare, adopt, maintain and operate a</td>
<td>12/2024</td>
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<tr>
<td>grievance mechanism, as described in the SEP.</td>
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<tr>
<td>ESS 2 Labor and Working Conditions</td>
<td></td>
</tr>
<tr>
<td>LABOR MANAGEMENT PROCEDURES:</td>
<td>06/2020</td>
</tr>
<tr>
<td>Develop HR policy and other relevant corporate documents compliant</td>
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<tr>
<td>with GIIP. Develop, update, adopt, and implement the Labor</td>
<td></td>
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<tr>
<td>Management Procedures (LMP) for the Project. LMP should be</td>
<td></td>
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<tr>
<td>revised once PPP is established.</td>
<td></td>
</tr>
<tr>
<td>Finalize the Transition Plan to manage retention and redundancy of</td>
<td>06/2019</td>
</tr>
<tr>
<td>115 staff employed by existing water facilities.</td>
<td></td>
</tr>
</tbody>
</table>
### OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES
Prepare, adopt, and implement occupational, health and safety (OHS) measures specified in the ESMP regarding possible occupational health and safety impacts  
12/2024

Establish, maintain, and operate a grievance mechanism for Project workers, particularly requiring no use of child labor, non-discrimination and provision of equal work opportunities and no forced labor upon engaging employees.  
12/2024

### ESS 3 Resource Efficiency and Pollution Prevention and Management
Pollution prevention and management measures will be covered under the ESMP to be prepared under action 1.2 above. Review wastewater treatment plants upgrading designs and designs for the for the two water supply plants to meet GIIP requirements.  
12/2020

Prepare, adopt, and implement including the sludge management plan specified in the ESMP.  
12/2024

Confirm water supply network leakage reduction. Review and agree on sludge management final design. Monitor the efficacy and efficiency of wastewater treatment plants.  
12/2024

Prepare the borrow pits management plan per to the requirements specified in the ESMF  
12/2020

### ESS 4 Community Health and Safety
TRAFFIC AND ROAD SAFETY: Adopt and implement a Traffic Management Plan (TMP) specified in the ESMP; Jingyang District Traffic Management Bureau takes the leading role in implementing the TMP and coordinates with the relevant media in publicizing meas  
05/2020

COMMUNITY HEALTH AND SAFETY: Prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities e.g. behavior of Project workers, risks of labor influx, response to emerg  
05/2020

GBV AND SEA RISKS: Provide the non-local employees with education on local social and cultural practices to avoid the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA); providing female employees with safe living facilities  
05/2020

GBV AND SEA RISKS DURING PROJECT IMPLEMENTATION: No hazardous articles likely to lead to emergencies are identified during project investigation.  
05/2020

### ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
RESETTLEMENT PLANS and RESETTLEMENT POLICY FRAMEWORK: Prepare, adopt, and implement resettlement plans (RAPs) and resettlement policy framework (RPF) in accordance with ESS 5.  
05/2020

TRANSITION PLAN: Prepare a transition plan through consultations with all affected stakeholders for employees of existing facilities which will be consolidated and merged as result of project intervention. The plan needs to be agreed by WB task team.  
05/2020
GRIEVANCE MECHANISM: A grievance mechanism (GM) is already established in the RAP and grievance channels and contact information are already disclosed to the affected persons. 05/2020

ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

BIODIVERSITY RISKS AND IMPACTS: three rivers, e.g. Shiting, Mianyuan and Kai, will receive treated effluent from the Project. Prepare, adopt and implement the measures covered in the ESMP to ensure the net gain of biodiversity in the long term. 05/2020

ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

ESS 8 Cultural Heritage

CHANCE FINDS: Prepare, adopt, and implement the chance finds procedure described in the ESMP developed for the Project. 05/2020

Cultural heritage: Prepare and execute measures for protecting the Temple in Songbai Village. 05/2020

ESS 9 Financial Intermediaries

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

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

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

Although China has an advanced E&S Framework, its use for the project is not recommended due to the limited experience of the implementing agencies in implementing and applying ESF and its associated environmental and social standards. Also, a comprehensive assessment of the borrower framework has not been completed.

IV. CONTACT POINTS

World Bank

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Borrower/Client/Recipient

Dec 06, 2019
Implementing Agency(ies)
Implementing Agency: Jingyang Project Management Office

V. FOR MORE INFORMATION CONTACT
The World Bank
1818 H Street, NW
Washington, D.C. 20433
Telephone: (202) 473-1000
Web: http://www.worldbank.org/projects

VI. APPROVAL
Task Team Leader(s): Victoria Hilda Rigby Delmon, Gang Qin
Practice Manager (ENR/Social) Susan S. Shen Cleared on 05-Dec-2019 at 18:58:50 EST
Safeguards Advisor ESSA Peter Leonard (SAESSA) Concurred on 06-Dec-2019 at 10:10:59 EST