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

Appraisal Stage | Date Prepared/Updated: 13-Oct-2018 | Report No: PIDISDSA23536
BASIC INFORMATION

A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Project ID</th>
<th>Project Name</th>
<th>Parent Project ID (if any)</th>
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<tbody>
<tr>
<td>Afghanistan</td>
<td>P160619</td>
<td>Cities Investment Program</td>
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<td>18-Dec-2018</td>
<td>Social, Urban, Rural and</td>
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<td>Resilience Global Practice</td>
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<th>Financing Instrument</th>
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<th>Implementing Agency</th>
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<td>Islamic Republic of Afghanistan</td>
<td>Independent Directorate for Local Governance</td>
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Proposed Development Objective(s)

The CIP Program Development Objective (PRDO) is to improve the sustainability and livability of nine regionally-balanced Provincial Capital Cities (PCCs).

The Project Development Objective (PDO) for the first in the Series of Projects (SOP I) is to introduce sustainable municipal finance and management systems in nine participating PCCs and rehabilitate municipal infrastructure in five participating PCCs.

The Project Development Objective (PDO) for SOP II is to rollout sustainable municipal finance and management systems and expand municipal infrastructure and service coverage in nine participating PCCs.

Components

Component 1: Rehabilitate Municipal Infrastructure
Component 2: Strengthen the Municipal Finance Framework
Component 3: Improve the Municipal Management Framework
Component 4: Project Implementation Management

PROJECT FINANCING DATA (US$, Millions)

SUMMARY

<table>
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B. Introduction and Context

Country Context

1. Substantial improvements in development outcomes have been observed in Afghanistan since 2001, particularly in expanded access to water, sanitation and electricity, and improved outcomes in education and health. Moreover, following the economic shock of the withdrawal of international troops, the associated decline in aid and deterioration in security, the Afghan economy has regained momentum as reforms have been implemented and confidence restored. However, some gains are now being eroded and risks are arising from the prospects of political instability around the 2018-2019 elections. Business confidence is declining, and economic activity is slowing. Civilian casualties have reached unprecedented levels in 2017 (10,451 killed or wounded) and 2018 (8,050 in the first 9 months). Some areas of the country remain difficult to access because of insecurity.

2. Real GDP growth, after accelerating to 2.7 percent in 2017 from a low of 1.5 percent in 2015, is projected to moderate to 2.4 percent in 2018 amid growing political and security concerns around the parliamentary and presidential elections. Growth is expected to accelerate further to 3.7 percent by 2021 assuming a smooth
political transition after the 2018-19 elections. With the population growing at 2.7 percent, however, the projected growth path will not be strong enough to improve incomes and livelihoods for most Afghans.

3. **The poverty rate in Afghanistan has increased significantly: from 38 percent in 2011/12 to 55 percent in 2016/17.** It is expected to remain high in the medium-term, driven by weak labor demand (despite an increasing labor force) and security-related constraints on service delivery. Living standards are further threatened by the worsening drought conditions and displacement (more than 1.7 million Afghans are internally displaced, and more than 2 million have been returning to Afghanistan – mostly from Pakistan and Iran – since 2015).

4. **Stronger growth is predicated on improvements in security, political stability, steady progress with reform, and sustained aid.** Growth could also be enhanced by mobilizing investment in extractives, energy and connectivity, building and harnessing the skills of Afghanistan’s youth and women, and taking steps to realize the job creation potential of agriculture and agribusinesses.

5. **According to the Global Climate Risk Index, Afghanistan ranks in the top fifth of countries with substantial climate change vulnerabilities.** The country is likely to be negatively affected by drought and flooding anticipated in the western and central regions of the country. In areas affected by increased precipitation, there is a greater risk for urban flooding and landslides, particularly in informal settlements located in flood plains, embankments and hillsides. In areas expected to receive higher extreme temperatures and greater incidence of drought, the impact on agriculture may induce greater urban migration, and exacerbate existing violent conflicts. Current assessments by FAO and WFP indicate that as many as 20 of Afghanistan’s 34 provinces are facing drought conditions. The project considers these vulnerabilities and their potential impact on urban service provision in the selected municipalities, particularly as part of the Strategic Development Framework (SDF) analysis that will be carried out for participating municipalities.

### Sectoral and Institutional Context

6. **Afghanistan has 154 municipalities, of which 34 are designated as Provincial Capital Cities (PCCs).** The country’s 34 Provincial Capitals are home to roughly one-third of the total population. While Kabul hosts 41 percent of the total urban population, the regional hubs of Herat, Mazar-i-Sharif, Kandahar and Jalalabad account for nearly 70 percent of the urban population in provincial capitals outside of Kabul. In addition to these five largest cities, eight trading and transit cities consisting of Lashkar Gah, Kunduz, Taloqan, Pul-i-Khumri, Sheberghan, Zaranj, Maimana, and Ghazni host sizable populations and are important regional economic and transit centers. The Deputy Ministry of Municipalities (DMM) under the Independent Directorate of Local Governance (IDLG) is responsible for overseeing and guiding the PCCs.

7. **PCCs are important for promoting balanced economic development in Afghanistan.** They play an important economic role in connecting Afghanistan to neighboring countries, especially in terms of trade through a linear network of urban settlements linked to key border crossings, and they are key links on the urban-rural continuum, playing an important role in the transit and marketing of agricultural goods, both within Afghan cities and outside the country.

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8. **Institutional arrangements for urban development and municipal management are in flux but improving.** Recent improvements to the legal framework governing municipalities and urban planning have helped to improve an outdated and contradictory legal and regulatory framework. An Urban Development Law was recently passed by Parliament (2017) that helps establish a hierarchy for planning, clarifying institutional roles, and defining specific tools and modalities to be used. Also, a new Municipal Law was issued by Presidential Decree on August 5, 2018 to replace the 2000 version. The Municipal Law stipulates greater responsibilities for local governments along with an incentive-based budget allocation from central government (i.e. Incentive Fund), streamlining and rationalizing functional responsibilities, and improving overall governance and efficiency in the sector.

9. **Inability to keep pace with infrastructure investment needs is a critical challenge facing Afghan cities.** PCCs in Afghanistan face unprecedented economic, demographic, fiscal and environmental challenges. Inadequate infrastructure has been a constant complaint of businesses voiced in recent surveys. The local economy needs reliable infrastructure to connect supply chains and efficiently move goods and services. Afghan cities need to invest in infrastructure and utility extensions that encourage economic growth either through the expansion of existing industrial areas, creating new ones, or providing infrastructure to promote business retention and expansion.

10. **Cities are underfinanced.** Afghanistan remains among the very few countries where local governments receive little or no financial support from central government on a regular annual basis. The safayi tax (which is a key source of local own-source revenue for most municipalities) is essentially earmarked as a street cleaning and solid waste collection fee and does not cover the cost of municipal infrastructure investments. Recent efforts to address this fiscal discrepancy have been made through a modest US$5 million and US$7.5 million allocated by the central government in the last two budget years on a trial basis. However, rules governing the distribution of these resources have not been established, resulting in allocations that may not be equitable, transparent or could encourage moral hazard and the perverse incentive for municipalities to overspend when allocations are used as financial bailouts for distressed municipalities.

11. **Urban development has been placed at the forefront of the Government’s agenda.** In October 2016, the Government of the Islamic Republic of Afghanistan (GoIRA) issued its Afghanistan National Peace and Development Framework (ANPDF) for the period 2017-2021, which serves as it overarching strategy for the next five years. ANPDF cites the important role of cities both as potential engines of economic growth and as hosts of incoming migrants. GoIRA sets three major goals for the sector: (i) creating networks of dynamic, safe, livable urban centers; (ii) turning urban centers into economic growth hubs that are cultural centers promoting social inclusion; and (iii) decentralizing urban planning and promoting participatory urban governance.

12. **The World Bank has already initiated a structured engagement in the urban sector, in line with the Government of Afghanistan’s recent emphasis on elevating its urban policy and programs.** The GoIRA’s urban flagship program, the Urban National Priority Program (U-NPP), sets key objectives that are supported by the Bank's integrated and growing urban portfolio. The ongoing Kabul Municipal Development Project (KMDP) provides immediate and geographically intensified support for urban upgrading in Afghanistan's capital city with

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the aim of achieving tangible results in addressing informality and urban poverty. The proposed Cities Investment Program (CIP) aims to achieve geographical balance by broadening impact beyond Kabul to nine cities through investments in priority and catalytic projects using performance-based financing. The ongoing Urban Development Support Project (UDSP 2017-20), focuses on policy and institutional reforms in the sector, building the capacity of national regulatory agencies and updating key urban policies, while initiating strategic development planning at the local level in a structured and consultative manner. At the central level, both the CIP and the UDSP will help to inform the decentralization policy debate in the country by providing the analytical underpinnings and policy options.

C. Proposed Development Objective(s)

Development Objective(s) (From PAD)
13. The CIP Program Development Objective (PRDO) is to improve the sustainability and livability of nine regionally-balanced Provincial Capital Cities (PCCs).

14. The Project Development Objective (PDO) for the first in the Series of Projects (SOP I) is to introduce sustainable municipal finance and management systems in nine participating PCCs and rehabilitate municipal infrastructure in five participating PCCs.

15. The Project Development Objective (PDO) for SOP II is to rollout sustainable municipal finance and management systems and expand municipal infrastructure and service coverage in nine participating PCCs.

Key Results

16. The proposed PDO-level results indicators are:
   - Percent of surveyed project beneficiaries who rate municipal services satisfactory or better, disaggregated by gender
   - Number of urban residents benefitting from project components, disaggregated by gender
   - Number of PCCs meeting their planned budgetary improvement targets
   - Number of PCCs meeting their own source revenue targets

D. Project Description

17. The Project would be implemented by IDLG over a five-year period and would have the following components:

18. **Component 1: Rehabilitate Municipal Infrastructure ($30 million).** This component would provide financing on a performance basis to support five participating PCCs (Herat, Jalalabad, Kandahar, Khost, and Mazar-e-Sharif) in the rehabilitation of urgently-needed basic municipal infrastructure. The PCCs will be responsible for identifying priority projects in consultation with their communities, participating in evaluation committees established to select contractors, monitoring contractor implementation of works in accordance with design specifications, and authorizing IDLG to make payments to contractors for completed portions of civil works in
accordance with technical specifications. The PPs would address the backlog of urgent infrastructure needs in each city, aimed at improving service delivery and livability and would consist of localized and small-scale interventions with limited and mitigatable environmental and social impacts. (See Annex 2 for the Detailed Project Description). Financing will be allocated to the participating PCCs based on an allocation formula using the GoIRA official municipal classification and population size, which will serve as a proxy for development need. Women and disadvantaged groups will be specifically targeted for inclusion in both the consultation and selection processes for PPs with a minimum requirement of one investment project targeting women.

19. **Performance Allocations for PP investment funding will be awarded against achievement of specific performance criteria in three cycles.** After the Project is declared effective, five participating PCCs will be able to utilize 5 percent of the formula-based allocation investment financing amount as the first Cycle. The remaining portion of the financing for investments will be distributed in the second and third budgetary cycles. Awards will be aligned with budgetary cycles in FY2019 (Cycle 2) and FY2021 (Cycle 3). Performance Allocations in the second cycle (45 percent of the overall financing allocation) will be awarded based on a participating PCC committing to prepare a Municipal Performance Improvement Plan (MPIP) signed between each PCC and IDLG. This will represent the "Condition of Entry" as set out in Annex 2. Cycle 3, which will comprise 50 percent of the overall financing allocation under the Project, will be allocated once the MPIP is prepared by each participating PCC. The MPIP will set out a broad-based reform program where the municipality will need to establish the baseline and performance improvement targets against nine criteria, as set out in Annex 2. Upon receiving Cycle 3 financing (2021), each participating PCC will be actively working to improve their performance against targets set out in the MPIP by the end of CIP SOP I (2024). Meeting those targets will be the Entry Condition for SOP II, which will include more stringent performance criteria (Incentive Triggers) as set out in Annex 2. Awards will be determined by the Working Group (WG), who will apply the rules and performance criteria established in advance of each cycle and will determine the city allocation for any remaining unallocated funds.

20. **Component 2: Strengthen the Municipal Finance Framework (US$2 million).** In line with the Municipal Law, issued by Presidential Decree, this component will support GoIRA and 9 participating PCCs in building municipal capacity for improved own source revenue (OSR) collection and design of a system for performance-based fiscal allocations. The Component will be implemented by IDLG and would comprise technical assistance, systems development, and training aimed at: (i) developing custom-designed OSR Enhancement Strategies and Plans for 9 participating PCCs; (ii) supporting IDLG and MOF in designing an institutionalized performance-based fiscal allocation to municipalities; and (iii) designing and integrating a Municipal Finance Database. This assistance would be provided to IDLG, MOF and nine PCCs.

21. **Component 3: Improve the Municipal Management Framework (US$14 million).** This component would provide support for strengthening municipal planning and management at 9 PCCs through technical assistance, training, and the supply of urgently needed equipment and software. This component will be implemented by IDLG and will be comprised of the following subcomponents:

(a) **Sub-Component 3.1: Technical Assistance Support through Municipal Capacity Building Packages.** All nine of the participating PCCs will have custom-designed Municipal Capacity Building Packages (MCBPs) provided through consultant services, training and equipment financed under the project. These will consist of (i) an Asset Inventory and Management Plan (AIMP) that will help survey, record and set out operational and management arrangements for municipal infrastructure and facilities to ensure full utilization of their asset life; (ii) a Unified
Municipal Chart of Accounts and a municipal-level automated AFMIS (AFMIS-M) with three modules (budget, revenue and expenditure) that is fully compatible with the national government AFMIS; and (iii) Municipal Budget Planning, Execution and Reporting Tools, Templates and Guidelines for improved municipal budgetary planning and reporting. The above will integrate climate change and natural disaster considerations into capacity building activities, capital investment planning and asset management. A detailed breakdown of the MCBPs is provided in Annex 2 by performance improvement area and funding cycle.

(b) **Sub-Component 3.2: Preparation of Strategic Development Frameworks (SDFs).** The CIP will support four second-generation participating PCCs (to be determined) in undertaking SDFs, building and expanding on the first generation of five cities supported under UDSP. The SDFs will help supported cities carry out intensive socio-economic data-gathering, SWOT analysis, explore land use patterns and resource constraints, development opportunities, as well as project urban growth trajectories into the future, allowing for the planning and prioritization of investment needs within a multiyear Capital Investment Plan, which will be developed as a final output of SDF assignment. SDF preparation will also consider climate change vulnerabilities and include these factors in planning and design of future investments. Parallel support would be provided to mapping out baseline and benchmarked improvements through streamlining annual municipal capital investment budget preparation and approvals. The SDF will also inform the preparation by the municipality of Municipal Strategic Plans as required by the Municipal Law.

(c) **Sub-Component 3.3: Feasibility and Design Studies for Catalytic Investment Projects.** Following completion of the SDF at all 9 PCCs, including their Capital Investment Programs, each PCC will be eligible to receive consultant services to help prepare feasibility and design studies for the identified catalytic investments in the multiyear Capital Investment Program, which would be financed under SOP II of CIP. This subcomponent will address directly the problem of under-executed municipal capital investment budgets by helping to develop viable and tender-ready capital investment projects to accelerate investment project programming and implementation.

(d) **Sub-Component 3.4 Technical Assistance for Urban Policy Reforms.** This Sub-Component, provided through consultant services and training, will extend support to MUDH as the beneficiary for (i) an affordable housing action plan, and (ii) urban planning framework strengthening. The affordable housing support will elaborate an Action Plan for the identified housing market gap analysis and sector reform recommendations developed under UDSP, while the urban planning framework would be further developed through regulations and guidelines to facilitate implementation of the new legal framework.

22. **Component 4: Project Implementation Management (US$4 million).** This component would support IDLG in managing the implementation of the CIP in coordination with the participating PCCs and MUDH. This component would cover the costs of technical consultants recruited to support CIP implementation under the Project Implementation Unit (PIU) as well as project staff incremental operating costs (IOC)\(^5\). Also, since PIU staff would be contracted under CIP project, existing staffing arrangements would be used for the implementation of the EZ-Kar project. However, non-staff incremental operating expenditures would be charged under the respective financing source, based on the nature of activities. In addition, this component will cover the cost of engaging an independent verification consultant to track and report on municipal performance improvements in

\(^5\) Staffing costs covered under IOC will be restricted to essential staff for project implementation only and will be contracted only after the World Bank no objection is received.
accordance with the signed MPIPs. The tiers of PIU- and PCC-level implementation teams and monitoring agents will play a vital role in maintaining project continuity and reinforce implementation support with real-time monitoring of procurement, contract management, and the quality and timeliness in the delivery of civil works infrastructure.

E. Implementation

Institutional and Implementation Arrangements

23. At the national level, the Independent Directorate for Local Governance (IDLG)\(^6\) will be responsible for overall implementation of the Project. IDLG was established by Presidential Decree in 2007 with the mandate of strengthening sub-national institutions, improving accountability between local government institutions and citizens, and supporting local governments in promoting balanced development and economic growth. IDLG reports directly to the President. IDLG has 481 professional and administrative staff at its headquarters in Kabul, structured within 12 Departments. Its unique structure also features broad geographical reach, including 34 Provincial Governorate offices, 376 District Governorate Offices and 33 Provincial Municipal Offices. This structure allows IDLG to administer six ongoing national programs in support of sub-national institutions in partnership with several donors, including USAID, UNDP, the European Union, SIDA, Swiss Cooperation Office, Italy, Germany, UN-Habitat, and, most recently, the World Bank, under the Citizen’s Charter Afghanistan Program (CCAP).

24. Through these programs and partnerships, IDLG has helped to develop a broad-based legislative agenda of reforms to the legal framework affecting local governments; assisted cities in defining boundaries to support more effective urban planning; helped to create municipal customer service centers; supported municipalities in improving local revenue mobilization; and helped create 22 gender committees under the municipal framework to increase women’s voice in local governance and development planning\(^7\). IDLG’s more than ten years of experience in implementing donor-financed programs has exposed it to development agency performance and accountability standards, and its broad geographical reach will enable CIP to effectively operate at the local level and position for rollout of the program nation-wide over time. IDLG has already been assessed and deemed suitable to implement the Bank’s CCAP urban program for community development project implementation, and this gained-experience with World Bank procedures will serve as an important foundation on which CIP will build and further strengthen IDLG implementation capacity.

25. While IDLG will assume the main project implementation responsibilities, PCCs will have a substantial role, including involvement on the selection committee for civil works and technical assistance assignments for which they are the beneficiaries, overseeing infrastructure investments on the ground, and gathering data and coordinating inputs to document and support verification of performance improvements against acceptable benchmarks over time. They will also be the first point of contact for the consultants preparing the Strategic

\(^6\) While IDLG is responsible for overseeing all sub-national administrations (provinces, municipalities and rural areas), Deputy Ministry for Municipalities (DMM) is a department within IDLG that deals specifically and only with municipalities and municipal affairs. However, the term used throughout the document for the CIP institutional counterpart will be IDLG.

\(^7\) During the project preparation phase, IDLG and Kabul Municipality counterparts are being requested to review lessons learned from ongoing operations (CCAP and KMDP respectively) and highlight opportunities in working with these marginalized communities. This will serve as a vital input to the gender analysis for CIP and provide guidance on the most optimal intervention strategies.
Development Frameworks (SDFs), which will be wholly owned and adopted at the local level prior to being submitted to higher authorities for official approval.

26. A detailed Project Operations Manual (POM)\(^8\) will be prepared for the project and will include an implementation responsibility matrix to clearly identify the roles and functions of all project-involved agencies. This is especially important given the effort to improve efficiency and synergies between different Bank operations implemented by IDLG, where linkages are being made with EZ-Kar\(^9\) and Citizen's Charter-Afghanistan Program CCAP\(^{10}\) through coordinated safeguards and fiduciary "back office" operations. At the center of project implementation will be an IDLG Project Implementation Unit (PIU) located in Kabul and linked to provincial offices of IDLG in the relevant PCC regions (See CHART 1). It will be supported by a procurement "engine room" where consultants working with CIP-dedicated IDLG staff will assist in overseeing the quality and completeness of technical designs and will package tender documents to facilitate procurement. Furthermore, IDLG will form a Program Working Group (WG) comprised of IDLG (Chair), Ministry of Urban Development and Housing (MUDH), Ministry of Finance (MOF), and PCC representatives that will ensure that decision-making is transparent and equitable at all levels of project implementation. The MOF confirmed its strong interest in partnering with IDLG on the preparation of the performance-based municipal finance framework in which it will be actively engaged.

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

27. The project will include implementation of civil works in five participating PCCs. Subproject investments will be small-scale, on a limited and existing footprint, have minimal environmental impact and will be selected from a positive list that will exclude all Environmental Category A projects. A screening process has been instituted to identify and approve subprojects based on this criteria and may require a partial environmental assessment in some cases. As such, the project is classified as Environmental Category B.

G. Environmental and Social Safeguards Specialists on the Team

Mohammad Arif Rasuli, Environmental Specialist
Mohammad Yasin Noori, Social Specialist

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\(^8\) A detailed listing of POM contents is provided in Annex 2.
\(^9\) Eshtighal Zaiee – Karmondana Project (EZ-Kar) or Improving Economic Opportunities in Hosting Cities Project is a proposed World Bank Project under preparation and providing support to Afghan cities, towns and villages that are host communities of recent waves of forcibly displaced refugees through financing for small-scale investments and job creation schemes. Where the cities supported under EZ-Kar overlap with CIP, the nature of the investments will be complementary, as EZ-Kar will be focusing on urgent, district-level projects that create economic opportunities, while CIP focuses on the medium term with investments linked to urban plans, prioritized in Strategic Development Frameworks and where financing is dependent on meeting performance criteria.

\(^{10}\) Citizen's Charter - Afghanistan Program (CCAP) is a multi-phase, country-wide program of GoIRA, financed by the World Bank, with the aim of promoting citizen engagement at the community and district level in both rural and urban areas and supporting this engagement with financing for small-scale development projects that are community-identified.
<table>
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<tr>
<th>SAFEGUARD POLICIES THAT MIGHT APPLY</th>
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<td><strong>Safeguard Policies</strong></td>
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<td>Projects on International Waterways OP/BP 7.50</td>
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**Development Support Project (UDSP)** to identify any such cultural resources, to develop construction phase Chance Find procedures in accordance with national law, and to develop a suitable cultural heritage management plan (CHMP) in cases where cultural resources have been identified. Guidelines for preparing a CHMP will be provided in the ESMF.

OP/BP 4.10 is not triggered, as there are no Indigenous Peoples that meet the criteria of this OP/BP in the project areas that could potentially benefit or be adversely affected by the Project's activities.

Subprojects financed under CIP will be identified on the basis of their having minimal negative social and environmental impact as one key criteria, using a Positive List that is agreed up front with the Bank. Nevertheless, there are instances where subprojects may require resettlement. In such cases, a RAP will be prepared in accordance with the RPF that has been prepared for the project.

RAPs will be prepared based on TORS cleared by the Bank for consultants working under the direct guidance of IDLG. Consultations with local stakeholders, including communities will take place as part of the RAP preparation procedures. The RPF will include draft terms of reference for RAP preparation and will be shared with local stakeholders and communities for their review and feedback.

The draft ESMF and RPF for CIP were prepared with and consulted upon in the local community and disclosed in country on IDLG/DMM and participating municipality websites and public venues and at Bank's External Website prior to project appraisal.

The project activities will not require land acquisition (Sub-projects requiring land acquisition will be screened out).

This safeguard policy is not triggered, as Dams are not within the scope of the Project.

This safeguard policy is not triggered, as there are no subprojects involving international waters.
The World Bank
Cities Investment Program (P160619)

| Projects in Disputed Areas OP/BP 7.60 | No | This safeguard policy is not triggered, as there are no subprojects 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:
   The project is not expected to have any significant negative environmental or social impacts. All subprojects are of a small-scale nature, within existing footprints, and will be confirmed as Category B or lower through a pre-screening process to eliminate those that involve any involuntary resettlement or significant environmental impacts. Workshops and training sessions have been organized with project counterparts by the Bank's social and environmental safeguards team, including training for consultants carrying out the work. Pre-screening checklists have been reviewed and cleared by the Bank.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:
   No potential indirect or long term negative impacts are anticipated, as such projects would not be eligible for financing and would not be cleared through the pre-screening process.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.
   A positive list of eligible subprojects was prepared to filter out those that might have indirect or long term negative impacts.

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.
   IDLG has developed an Environmental and Social Management Framework (ESMF) for CIP, which draws upon relevant national environmental and social safeguards policies, as well as meeting World Bank safeguard requirements.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.
   IDLG is the entity responsible for overall implementation of the project. It will have, within its PIU, two fully dedicated Social and Environmental Safeguards Specialists. They will work directly with the PCCs in reviewing the parameters of the safeguards policies, along with the Bank social and environmental specialists on the team, and will ensure adherence to the ESMF, RPF, and to all other instruments developed to be used during the implementation process.

**B. Disclosure Requirements (N.B. The sections below appear only if corresponding safeguard policy is triggered)**

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<thead>
<tr>
<th>Environmental Assessment/Audit/Management Plan/Other</th>
<th>Date of receipt by the Bank</th>
<th>Date of submission for disclosure</th>
<th>For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors</th>
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**In country** Disclosure

Afghanistan

22-Oct-2018

Comments

Stakeholder consultations in five PCCs on the ESMF and RPF were organized in September 2018. The two documents were publicly disclosed at the IDLG website on October 22, 2018 and at the World Bank website on October 29, 2018.

<table>
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<tr>
<th>Resettlement Action Plan/Framework/Policy Process</th>
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"In country" Disclosure

22-Oct-2018

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C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting) (N.B. The sections below appear only if corresponding safeguard policy is triggered)

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

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

No

**OP/BP 4.11 - Physical Cultural Resources**

Does the EA include adequate measures related to cultural property?

Yes

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

**OP/BP 4.12 - Involuntary Resettlement**

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

Yes

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

Is physical displacement/relocation expected?

No
Is economic displacement expected? (loss of assets or access to assets that leads to loss of income sources or other means of livelihoods)
No

The World Bank Policy on Disclosure of Information

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

All Safeguard Policies

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?
Yes
Have costs related to safeguard policy measures been included in the project cost?
Yes
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?
Yes
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?
Yes

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