

**INTEGRATED SAFEGUARDS DATASHEET
RESTRUCTURING STAGE**

I. Basic Information

Date prepared/updated: 06/13/2011

Report No.: AC6311

1. Basic Project Data

Country: Kenya	Project ID: P095050	
Project Name: Kenya - Natural Resource Management Project		
Task Team Leader: Christian Albert Peter		
Estimated Appraisal Date: January 11, 2007	Estimated Board Date: March 27, 2007	
Managing Unit: AFTEN	Lending Instrument: Specific Investment Loan	
Sector: Irrigation and drainage (58%);Forestry (31%);General agriculture, fishing and forestry sector (6%);Central government administration (5%)		
Theme: Water resource management (40%);Other rural development (40%);Rural services and infrastructure (20%)		
IBRD Amount (US\$m.):	0.00	
IDA Amount (US\$m.):	68.50	
GEF Amount (US\$m.):	0.00	
PCF Amount (US\$m.):	0.00	
Other financing amounts by source:		
BORROWER/RECIPIENT		7.40
<u>Local Communities</u>		<u>2.10</u>
		9.50
Environmental Category: B - Partial Assessment		
Repeater <input type="checkbox"/>		
Is this project processed under OP 8.50 (Emergency Recovery) or OP 8.00 (Rapid Response to Crises and Emergencies)	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Project Objectives

The project development objective, as provided in the original (PAD 2006), was "to enhance the institutional capacity to manage water and forest resources, reduce the incidence and severity of water shocks, such as drought, floods and water shortage in river catchments and improve the livelihoods of communities in the co-management of water and forest resources" Since the project will not finance activities to actively reduce water shocks in river catchments, and to simplify the objectives and outcome, the revised project development objective (PDO) is "to improve management of water and forest resources in selected districts." Consequently, the Results Framework has been adjusted to better measure the revised PDO, as follows: (i) replacing indicators for which baselines could not be established within the first two years of implementation (e.g. reduction of sediment load); and (ii) changing some indicators to improve their alignment to the revised PDO. As per the request of the GoK, the restructured project agreements will cover: (i) the revision and simplification of the PDO; (ii) a revision of the results framework (which includes changes to outcome indicators); (iii) reallocation of about

21% of project funds to allow coverage of financing gaps in irrigation investments and underestimated costs in technical consultancies, and to carry out sedimentation control and water flow regulation infrastructure investments; and (iv) deletion of two dated covenants.

3. Project Description

The proposed restructured project will retain four components: (i) Water Resource Management and Irrigation; (ii) Management of Forest Resources; (iii) Livelihood Investments in the Upper Tana Catchment; and (iv) Management and Monitoring and Evaluation. The first two components support the legal and institutional reforms contained in recent legislation, as well as investments in catchment areas. The third component provides assistance to communities participating in management of natural resources. The fourth component provides managerial oversight and monitoring and evaluation for the project. Changes in components or sub-components are intended to address implementation delays while retaining the general project design. The adjustments focus on: (i) modifying expenditure categories within components/sub-components, either by reducing scope or enabling Implementing Agencies to implement activities directly rather than through community driven development (CDD) approaches only, thereby speeding up project implementation on the ground; and (ii) shifting resources to better align the project to institutional priorities (e.g. water allocation/quality monitoring and control, climate change). In addition, and in acknowledgment of the need to engage with indigenous peoples (IPs) in the Cherangany Hills, changes in project intervention will cover this area.

The following section describes the project activities by component.

Component 1 - Water Resource Management and Irrigation (USD44.5 m). Water is one of Kenya's key natural resources upon which it depends for development and growth. Over the past several years the Government of Kenya (GOK) undertook a far-reaching program of reform in the water sector which resulted in the promulgation of the 2002 Water Act. This has substantially improved the country's potential to manage its water resources but the effectiveness of the reform program depends on the ability to implement the principles of the new Act. The key areas of implementation which this project supports are the following: (i) Strengthening the capacity of the Water Resource Management Authority (WRMA), with direct investments in the Upper Tana Catchment, such as erosion control and terracing, small to medium water storage investments as well as improvement of on-farm agronomic practices; and (ii) Consolidation of irrigation reforms and investments, including the development of a new irrigation infrastructure in the Lower Nzoia and rehabilitation of existing structures in the Mwea irrigation scheme.

Component 2 - Management of Forest Resources (USD22.4 m). With the passage of the Forest Act in 2005, Kenya is advocating a major shift away from exclusive government conservation and management of forest resources towards greater joint management with local communities and the private sector for the protection and sustainable use of forests. This would require improved forest governance and participation and investment by private sector stakeholders. This approach is consistent with the wider and ongoing

reforms in related sectors such as water resources. To assist the Ministry of Forestry and Wildlife (MoFW), and the newly established Kenya Forest Service (KFS), in carrying out these reforms, the project will provide: (i) assistance in creating a transparent and accountable regulatory and institutional framework; and (ii) targeted support to implement the Forest Act. Investments are expected to complement activities already undertaken in the sector and in critical watersheds that have involved partnerships by the Bank with FAO, USAID and the Government of Finland. Foremost among the needs covered in these activities are: (i) Supporting Forest Sector institutional reforms to assist the GOK with the reforms necessary to transform the Forest Department into a semi-autonomous KFS at national level; (ii) Enabling community participation and benefit sharing, providing assistance to identify and prioritize an array of partnership models to implement the legislative framework and improve benefit sharing; and (iii) Community and private sector investment in commercial forestry to strengthen institutional support services for the creation of an enabling environment for community and private sector involvement in development and management of production forests.

Component 3 - Livelihood Investments in the Upper Tana Catchment (USD6.2 m). Using a CDD approach, proposals are sought from communities in the catchment to invest in livelihood enhancing micro-projects which support the natural resource base. For example, opportunities to establish afforestation schemes in the watersheds, development of private sector/community partnerships for timber, fuelwood and pulp production, production and sale of seedlings, introduction of productivity-enhancing techniques of agro-forestry or conservation farming, and other investments in farm agriculture development are considered.

Component 4 - Management and Monitoring and Evaluation (USD4.9 m). The component provides the resources necessary for effective management and monitoring of the project. Management of the tasks undertaken by the two line ministries and their respective organizations is mainstreamed.

4. Project Location and salient physical characteristics relevant to the safeguard analysis

The project is implemented at several levels where the environmental and social safeguards frameworks are applied. At the national level, the legal framework for environmental safeguards is primarily based on the 2002 Water Act, the 2005 Forest Act, and the Lands Policy, coupled with the associated National Environment Management and Coordination Act of 1999. These policies cover institutional, financial, and technical aspects and arrangements for ensuring environmentally and socially sustainable management of natural resources. The overall project has been designed to support this framework, including some sub-project activities at the basin, catchment, sub-catchment like flood plains and gazetted forests, and community levels.

In particular for social safeguards, the Lands Policy recognizes the rights of communities, forest dwellers, pastoralists, hunter and gatherers and other vulnerable groups. These continue to be addressed in the proposed restructured project through CDD approaches. The other areas of coverage include: (i) participatory catchment

management; (ii) improved governance of water resources and irrigation schemes; (iii) consolidation of irrigation investments and reforms; (iv) building capacities of river basin authorities, such as the MoWI, the WRMA (including Water Resource User Associations - WRUAs), National Irrigation Board (including Irrigation Water Users Associations - IWUAs), and the KFS (including Community Forest Associations - CFAs); (v) control measures to ecosystem degradation; and (vi) establishment of environmental flow requirements.

To improve project implementation with respect to OP4.10 and OP4.12, the following measures have been agreed to during the January 2011 restructuring mission: (i) preparation of VMGPs (advancing the IPPF into specific plans) and a Process Framework (PF); and (ii) providing technical assistance to facilitate the establishment and operation of an Inter-Ministerial Task Force on Lands and Resource Rights, to be chaired by the Ministry of Forestry and Wildlife, in liaison with relevant key ministries such as Ministry of Lands and the Offices of the President and Prime Minister. Rather than developing a National Resettlement Policy, the project will support the work of the Task Force, facilitating the provision of inputs into the ongoing review of laws and regulations as part of the Constitution Implementation process to ensure that land tenure and user rights are being taken into account.

At the sub-national level, the project will involve construction of some small to medium sized water storage structures and check dams in the Upper Catchment of the Tana River, which is Kenya's largest river, and supplies water to the hydroelectric dams and is a key source of Nairobi's main water and electricity supply. In addition, the project will also rehabilitate the Mwea irrigation schemes and develop a new 3,500 ha scheme in the lower catchment of River Nzoia. Other areas in the Western Province, particularly where they relate to water resources and forestry management, include Mt. Elgon, Kakamega, Cherangany Hills, Nandi Hills, and Lower Nzoia Catchment. In the forest areas, especially in Mt. Elgon and Cherangany Hills, there are possible relocations of forest dwellers and/or restrictions of access to forest resources, some of whom have already been relocated in the past to nearby glades.

The project intervention areas include the following districts: Kiambu, Thika, Murang'a, Nyeri, Kirinyaga, Laikipia, Nyandarua, Mbeere, Machakos, Mt. Elgon, West Pokot, Kakamega, Vihiga, Butere Mumias, Lugari, Bungoma, Busia, Uasin Gishu, Trans Nzoia, Keiyo, Nandi North, Nandi South, Marakwet, Ugunja, Siaya, Bunyala, Kirinyaga East, Mwea East and Mwea West.

5. Environmental and Social Safeguards Specialists

Ms Gibwa A. Kajubi (AFTCS)

Ms Maria Concepcion J. Cruz (AFTCS)

Ms Junko Nishikawa (AFTEN)

6. Safeguard Policies Triggered	Yes	No
Environmental Assessment (OP/BP 4.01)	X	
Natural Habitats (OP/BP 4.04)	X	
Forests (OP/BP 4.36)	X	
Pest Management (OP 4.09)		X
Physical Cultural Resources (OP/BP 4.11)	X	
Indigenous Peoples (OP/BP 4.10)	X	
Involuntary Resettlement (OP/BP 4.12)	X	
Safety of Dams (OP/BP 4.37)		X
Projects on International Waterways (OP/BP 7.50)	X	
Projects in Disputed Areas (OP/BP 7.60)		X

II. Key Safeguard Policy Issues and Their Management

A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts: There are no changes in the safeguards policies triggered by the Project. The 2007 Project Appraisal Document (PAD) and Integrated Safeguards Datasheet (ISDS) classified the project as Category B since the investments will be of a small or medium sized nature, with environmental, human health and safety, and transboundary impacts, that can be easily identified and mitigated. Despite the complexities in addressing issues related to vulnerable Indigenous Peoples, restricted access to resources, and possibly, involuntary resettlement, a change in category is not considered warranted at this time.

Overall, the set of project investments suggests no critical environmental issues. An environment and social management framework (ESMF) outlines the screening for sub-projects and identifies potential environmental and social impacts. The ESMF addresses several safeguards policies as follows: (i) OP4.01 (Environmental Assessment) is triggered and mitigation measures are included in the design of sub-projects, based on completed environmental impact analysis (EIA), and as applicable, environment management plans (EMPs); (ii) OP4.36 (Forests) applies and actions to reduce forest destruction due to encroachment and resulting loss of water, non-timber forest products, timber, and cultural values and forest management are core activities under the restructured project; (iii) OP4.04 (Natural Habitats) applies and mitigation measures covering the natural habitats in two catchments, including the Aberdares and Lake Victoria catchment areas and flood plain management are in place; (iv) OP4.09 (Pest Management) applies but is not triggered, and guidelines for pesticide use were developed even though it is anticipated that pesticide use will be minimal or non-existent; (v) OP4.11 (Physical Cultural Resources) is triggered and specific mitigation measures are incorporated in the ESMF and covered in construction contracts of infrastructure works; and (vi) OP4.37 (Safety of Dams) is not triggered since there are no new capital investments in large scale dams. At the same time, some of the subprojects (such as irrigation and water storage infrastructure as well as CDD activities), may have localized adverse environmental impacts on human populations or environmentally important areas for which specific environment management plans (EMPs) will be developed based on

the ESMF guidelines. The ESMF was disclosed in the Bank's InfoShop on January 10, 2007.

The social safeguards policies triggered are OP4.10 (Indigenous Peoples) and OP4.12 (Involuntary Resettlement). The impacts on indigenous peoples (vulnerable and marginalized groups), namely the Ogiek and Sengwer/Cherangany, who reside or use resources, in and around forest areas in Mt. Elgon and Cherangany Hills will be addressed under OP4.10. Since the number of villages and indigenous peoples (vulnerable and marginalized groups) affected have not been determined at the time of the PAD (in 2006), an Indigenous Peoples Policy Framework (IPPF) was disclosed in the Bank's InfoShop on January 10, 2007. The IPPF referred mainly to activities under the forest component. However, in retrospect, the IPPF posed a number of implementation challenges. It included a number of undertakings that would require significant policy interventions and multi-agency actions regarding ancestral and land rights, that were beyond the remit of the project to implement and that could not realistically be completed within the time horizon of the project, particularly in light of the delays that have occurred in project implementation. Specifically, the IPPF included three commitments which the project was not designed to implement: (i) a commitment to hasten the provision of titles for land presently occupied and used by these communities in the Project areas, including support for necessary steps (such as land survey and demarcation, registration, and documentation) to ultimately provide IPs in the Project area with letters of allotment, group ranch titles, etc.; (ii) a commitment to establish a comprehensive strategy to rehabilitate the livelihoods of evicted indigenous peoples to the level of December 30, 2002; and (iii) a commitment for the Project to offer specific assistance within the land restitution process to indigenous peoples to claim all lands over which indigenous peoples have lost control between 1895 and December 30, 2002. In accordance with the IPPF, the restructured project will support preparation and implementation of what would be equivalent to Indigenous Peoples Plans (IPPs) in Kenya, called Vulnerable and Marginalized Group Plans (VMGPs) -- [NOTE: Given sensitivities with respect to the term Indigenous Peoples in Kenya the new Constitution of Kenya uses the term "vulnerable and marginalized groups" (VMGs) Since adoption of the Constitution in 2010, the GoK has requested that project instruments related to the implementation of OP 4.10 use the constitutionally-sanctioned terminology. OP 4.10 contemplates that different terminology may be applied in different countries without affecting the application or substance of the policy. It states "Indigenous Peoples may be referred to in different countries by such terms as indigenous ethnic minorities; aboriginals, hill tribes, minority nationalities, scheduled tribes, or tribal groups."]

The VMGPs would include livelihood and CDD types of programs, building upon a Social Assessment (SA) that has already been completed in June 2010. Consultations during preparation of the VMGPs will include explicit discussion and explanation of the fact that it is now clear that the project will not be able to support the measures mentioned above. It should be noted that these measures, while desirable on their own account, were not clearly related to the mitigation of anticipated project impacts

Under OP4.12, a separate Resettlement Policy Framework (RPF) was disclosed in January 10, 2007 since the construction of a new irrigation scheme in Lower Nzoia may involve the involuntary resettlement of households for which necessary programs, including compensation and livelihood restoration, will be provided. In addition, the RPF applied to possible relocation of forest dwellers into areas outside of gazetted forests. The RPF has been updated and re-disclosed in the Infoshop on May 31, 2011 and in-country on June 3, 2011. When relocation and displacement are to be undertaken, the RPF provides the guidelines for development of Resettlement Action Plans (RAPs). The restructured project will re-disclose a stand-alone Process Framework (PF) currently being consulted upon, which was originally included in the 2007 RPF. The PF, as a separate safeguards document, provides guidelines for dealing with possible restrictions of access to forest resources and describes an approach for management of sustainable forest uses by vulnerable and marginalized groups (Indigenous Peoples) in and around the Cherangany Hills and Mt. Elgon areas.

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

There are three potential environmental and social impacts that would need to be managed and monitored carefully under the restructured project. The first is the increase in the influx of migrants from other areas that can be stimulated by the project once some infrastructure and development programs are started. These migrants would increase the already high land and population pressures in the project areas, which could lead to further deforestation and degradation. The increased influx of migrants into the fragile watersheds could also lead to occupation of steep hills for agricultural production, which could increase soil erosion rates. The restructured project will ensure there are sufficient measures for catchment rehabilitation and sustainable land/water management programs integrated into social and economic investments in the project areas.

The second set of impacts have to do with unintended consequences of the new Forest Act which envisages not only the establishment of a semi-autonomous forest service but also promotes greater involvement for the private sector and communities in the management of plantations and natural forests. Together with the potential lifting of the existing logging ban, this may result in increased pressures on forest resources. It is therefore critical to ensure that any harvesting (while not financed by the project) is being done according to management plans based on agreed and recognized forest management standards.

The third set of impacts are those occurring in directly affected forest communities, such as encroachments, restricted access, and weakness in conduct of free, prior, and informed consultations. There are underlying tensions and conflicts between the KFS and forest dwellers and encroachers which have affected project implementation, including alleged evictions and inhibitive measures toward settlers inside demarcated forest areas*. These have been the subject of extensive discussions and correspondence between the Bank, KFS and indigenous communities. In a letter dated April 7, 2011, the Bank required written assurance from the GOK confirming that no further evictions of people from forests in the project areas will be carried out until applicable safeguard instruments

satisfactory to the Bank (including a Vulnerable and Marginalized Groups Plan, Process Framework and, where displacement is envisaged, a Resettlement Action Plan) have been developed and disclosed. A response from the Ministry of Finance (dated April 27, 2011) has been received confirming that no further evictions of people from forests in the project areas will be carried out until a Process Framework or Resettlement Action Plan, as required, has been put in place. Throughout these events, the Bank Task Team: (i) engaged in discussions, led by the Country Director in Nairobi, with high-level GoK officials (organized by the Ministry of Finance) specifically on issues related to indigenous peoples; and (ii) organized enhanced field supervision missions, which started in 2009 (the latest in May 2011), including free, prior and informed consultations involving numerous meetings and focus groups in the affected areas.

The risk of lack of free, prior, and informed consultations. Because the restructured project will deal with policy and local level types of interventions, community consultations will be important. These include conduct of intensive field visits, village meetings, and focus groups, and strengthening of the CFAs and user groups. Implementing agencies are currently elaborating a project's communication strategy, including practical guidelines specifying steps and procedures for ensuring the process of free, prior, and informed consultations is undertaken in a culturally appropriate, gender sensitive, and inter-generationally inclusive manner. In addition, in order to address observed communications challenges by indigenous communities (vulnerable and marginalized groups), such as lack of and/or delays in information flow as well as incidents of distortion of information by "gate keepers", the project has established Vulnerable and Marginalized Groups Coordinating Committees to formalize the communications channels with communities based on the recommendations in the Social Assessment. Furthermore, to address the risk of deprivation, the restructured project proposes development of VMGPs that will include specific activities for participatory livelihood enhancement and services delivery.

Finally, the RPF and the stand-alone PF address the risks associated with displacement, including potential restrictions of access to forest resources. The processes for ensuring that adequate mitigation measures, such as Resettlement Action Plans (RAPs) in cases of relocation of people and assets, will be followed are defined in the RPF.

* The 2005 Forest Act prohibits residing or erecting any structure inside a gazetted forest without a license, permit or a management agreement issued under the Act. Another focus of tension concerns earlier displacement of some indigenous groups which occurred before the project, but which has emerged as a prominent issue in the post-2008 election violence in Kenya.

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

The sub-project activities will be assessed in accordance with procedures for environmental and social screening as defined in the ESMF (2006). This screening process will allow project proponents at central and district levels to identify, plan, and mitigate any potential adverse impacts, where needed, by conducting environmental and

social impact assessments. Mitigation measures in the ESMF (2006) include proposing design modifications or alternatives that take into consideration the environmental and social criteria.

To achieve the expected outcomes, the restructured project will introduce some changes in Components 1 and 2, but the major changes will be in Component 2 where three enhancements related to social safeguards, under the existing activities, are proposed. First, the project will assist the government in carrying out a livelihood and rural development program, especially for indigenous forest communities. This program will be part of the project's VMGP which government will adopt as part of a community driven development approach. In 2009, the government completed a Task Force Report for the Embobut Forest (part of the Cherangany Hills Ecosystem), and which described the types of livelihoods and social services to be provided to relocated households in sites near forests. In 2010, the project also completed a Social Assessment (SA) of forest communities in the Cherangany Hills and Mt. Elgon forests, and a needs assessment, for the design of community support programs. Second, technical assistance, as originally planned under the project for formulation of a strategy to improve forest management, will be expanded to cover integration of guidelines for vulnerable and marginalized communities, which is the term adopted by the government, consistent with the new Kenyan constitution. Third, the restructured project will have the opportunity to strengthen the decentralized structure of community forest associations and user groups. In this context, together with the other components dealing with water resources management, and irrigation, the restructured project will have an overall impact on the country's participatory approach to sustainable development and poverty reduction programs.

Comprehensive land rights and access issues that are related to implementation of the VMGPs, RPF, and PF go beyond the forestry sector and the mandate of forest sector institutions (MoFW and KFS), and the remit and time-horizon of the project. While the project will make targeted contributions to these issues through the preparation of relevant safeguards instruments, a more comprehensive resolution of land issues will need to be addressed as part of the overall GoK-Bank dialogue. In this context, it also has become clear that the preparation of a National Resettlement Policy (as anticipated at project appraisal) cannot be delivered through the project. However, the restructuring will support the GoK through the testing of tools and instruments which would help to strengthen its capacity towards developing country systems to deal with these issues in the future. This is important, as it is evident that conflicts over access to, and use of, forest land will only become more prominent.

With this in mind, it is important that the proposed set-up and operationalization of the Inter-ministerial Task Force to continue the land tenure and legacy related commitments, alluded in the IPPF is driven by GoK. The Bank's role will be to facilitate the logistical support, such as providing financing for dedicated Technical Assistance at the ministerial level.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described. The measures taken by the GoK and project implementation units to address safeguards related issues include: (i) completion and disclosure of relevant safeguards documents which include participatory programs for livelihood and services for the Sengwer/Cherangany and Ogiek Indigenous Peoples; (ii) dissemination and consultations on safeguards issues and programs, in particular, appropriately conducted free, prior, and informed consultations as defined under OP4.10; and (iii) recruitment of environment and social specialists in the implementation agencies. As summarized in Table 1, the project has prepared and disclosed the following safeguards documents: (i) Environmental and Social Management Framework (ESMF); (ii) Resettlement Policy Framework (RPF); and (iii) Indigenous Peoples Planning Framework (IPPF) The mitigation measures specified under operational policies on Natural Habitats, Forests, and Physical Cultural Resources are covered under the ESMF. In compliance with OP7.50, a notification was sent to the Nile Basin Council of Ministers.

Under OP4.10, VMGPs will be developed, including participatory programs for livelihood and services benefitting Sengwer/Cherangany and Ogiek peoples under the restructured project. A PF, which is already covered in the existing RPF, will also be re-disclosed as a stand-alone document to cover guidelines affecting people with restrictions of access to forest resources.

The livelihood investments provided under the NRMP will be linked to the decentralization agenda, provided for in Kenya's new Constitution and the Bank's ongoing dialogue on a country wide program to provide support to marginalized areas. This will not only help in leveraging support for the sustainable management of natural resources, but activities under the project are expected to guide and encourage GoK to use CDD type investments. These will be important when seeking longer-term solutions for dealing with scarce land resources given population pressure and increasing degradation of the natural resource base in the country.

Monitoring, auditing and reporting requirements, covering both biophysical and socio-economic parameters, at each stage of the restructured project's implementation are already described in the ESMF and RPF. More detailed activities and mitigation measures will be applied to specific sub-components, as appropriate, through development of EMPs and RAPs; chance finds procedures in contracts for infrastructure and works; specific activities and support under the VMGPs, and updated guidelines on access to forest resources in the PF. Measures required for the implementation of the various safeguards related activities, including capacity building and training, are budgeted and conducted as part of the restructured project's core activities.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people. The key stakeholders include, but not limited to, national and local government authorities, NGOs and CBOs active in the project intervention areas, target communities including indigenous communities (vulnerable and marginalized groups), the private sector, and development partners. These mechanisms will help in mapping the

settlements, analyzing their current status and issues thereof, and drawing future course of actions.

B. Disclosure Requirements Date

Environmental Assessment/Audit/Management Plan/Other:

Was the document disclosed prior to appraisal?	Yes
Date of receipt by the Bank	11/09/2006
Date of "in-country" disclosure	11/22/2006
Date of submission to InfoShop	01/10/2007
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	

Resettlement Action Plan/Framework/Policy Process:

Was the document disclosed prior to appraisal?	Yes
Date of receipt by the Bank	07/07/2006
Date of "in-country" disclosure	06/03/2011
Date of submission to InfoShop	05/31/2011

Indigenous Peoples Plan/Planning Framework:

Was the document disclosed prior to appraisal?	Yes
Date of receipt by the Bank	11/09/2006
Date of "in-country" disclosure	11/22/2006
Date of submission to InfoShop	01/10/2007

Pest Management Plan:

Was the document disclosed prior to appraisal?	
Date of receipt by the Bank	
Date of "in-country" disclosure	
Date of submission to InfoShop	

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

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

The safeguards documents are being re-disclosed as follows: updated RPF (stand-alone from joint RPF with WKCDD project); PF section in the RPF re-disclosed as stand-alone document after completion of new consultations consistent with free, prior and informed consultations.

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

OP/BP/GP 4.01 - Environment Assessment

Does the project require a stand-alone EA (including EMP) report?	Yes
If yes, then did the Regional Environment Unit or Sector Manager (SM) review and approve the EA report?	Yes

Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	Yes
OP/BP 4.04 - Natural Habitats	
Would the project result in any significant conversion or degradation of critical natural habitats?	No
If the project would result in significant conversion or degradation of other (non-critical) natural habitats, does the project include mitigation measures acceptable to the Bank?	N/A
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?	Yes
OP/BP 4.10 - Indigenous Peoples	
Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?	Yes
If yes, then did the Regional unit responsible for safeguards or Sector Manager review the plan?	Yes
If the whole project is designed to benefit IP, has the design been reviewed and approved by the Regional Social Development Unit or Sector Manager?	N/A
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 Sector Manager review the plan?	Yes
OP/BP 4.36 - Forests	
Has the sector-wide analysis of policy and institutional issues and constraints been carried out?	Yes
Does the project design include satisfactory measures to overcome these constraints?	Yes
Does the project finance commercial harvesting, and if so, does it include provisions for certification system?	No
OP 7.50 - Projects on International Waterways	
Have the other riparians been notified of the project?	Yes
If the project falls under one of the exceptions to the notification requirement, has this been cleared with the Legal Department, and the memo to the RVP prepared and sent?	N/A
Has the RVP approved such an exception?	N/A
The World Bank Policy on Disclosure of Information	
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	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?	Yes
All Safeguard Policies	
Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard	Yes

policies?

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

D. Approvals

<i>Signed and submitted by:</i>	<i>Name</i>	<i>Date</i>
Task Team Leader:	Mr Christian Albert Peter	05/10/2011
Environmental Specialist:	Ms Jane A. N. Kibbassa	06/03/2011
Social Development Specialist	Ms Gibwa A. Kajubi	06/03/2011
Additional Environmental and/or Social Development Specialist(s):	Ms Maria Concepcion J. Cruz	05/16/2011
<i>Approved by:</i>		
Regional Safeguards Coordinator:	Ms Alexandra C. Bezeredi	06/10/2011
Comments:		
Sector Manager:	Ms Idah Z. Pswarayi-Riddihough	06/06/2011
Comments: Cleared		