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

Appraisal Stage | Date Prepared/Updated: 01-Apr-2019 | Report No: PIDISDSA26382
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>
</tr>
</thead>
<tbody>
<tr>
<td>Yemen, Republic of</td>
<td>P170241</td>
<td>Emergency Crisis Response Project Fourth Additional Financing</td>
<td>P159053</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Parent Project Name</th>
<th>Region</th>
<th>Estimated Appraisal Date</th>
<th>Estimated Board Date</th>
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</thead>
<tbody>
<tr>
<td>Yemen Emergency Crisis</td>
<td>MIDDLE EAST AND NORTH AFRICA</td>
<td>29-Mar-2019</td>
<td>30-Apr-2019</td>
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<tr>
<td>Response Project</td>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>Practice Area (Lead)</th>
<th>Financing Instrument</th>
<th>Borrower(s)</th>
<th>Implementing Agency</th>
</tr>
</thead>
</table>

Proposed Development Objective(s) Parent

The Project Development Objective is to provide short-term employment and access to selected basic services to the most vulnerable; and preserve existing implementation capacity of two service delivery programs.

Proposed Development Objective(s) Additional Financing

The Project Development Objective is to provide short-term employment and access to selected basic services to the most vulnerable; preserve existing implementation capacity of service delivery programs; and provide emergency cash transfers to the poor and vulnerable in response to the food crisis.

Components

- Labor Intensive Works and Community Services
- Project Management and Monitoring
- Emergency Cash Transfer

PROJECT FINANCING DATA (US$, Millions)

<table>
<thead>
<tr>
<th>SUMMARY</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Project Cost</td>
<td>200.00</td>
</tr>
<tr>
<td>Total Financing</td>
<td>200.00</td>
</tr>
<tr>
<td>of which IBRD/IDA</td>
<td>200.00</td>
</tr>
<tr>
<td>Financing Gap</td>
<td>0.00</td>
</tr>
</tbody>
</table>
B. Introduction and Context

Country Context

1. The proposed Additional Financing, is being processed under paragraph 12 of the Bank Policy on Investment Project Financing (Projects in Situations of Urgent Need of Assistance and Capacity Constraints), given the instability and violence currently affecting the Republic of Yemen (RoY). Gross Domestic Product (GDP) is reported to have decreased by over 40 percent, underpinned by widespread disruptions of economic activity, with enterprises operating at half the capacity compared to prior to the conflict. An estimated eight million Yemenis have lost their livelihoods or are living in communities with minimal to no basic services, and civil service salaries are only being partially paid since September 2016. Fiscal revenues are failing, and deficit financing is increasingly resorting to arrears build-up, undermining state functions and impairing the environment for private sector activities. The repeated and successive exposure to multiple shocks – protracted conflict, food insecurity, natural disasters such as the Socotra cyclone, diseases including cholera outbreak, and institutional failures such as the problem of unpaid salaries of service providers has made the Yemen crisis a formidable challenge that threatens to reverse human development. One positive economic trend has been the stabilization of the Yemeni Rial which appreciated to YR 505 to one dollar due in part to the support from Saudi Arabia with oil support grants which allowed domestic fuel prices to witness gradual reductions.

2. The situation in Yemen is worsening considerably and more people are suffering as a result of the ongoing conflict. According to the latest Integrated Food Security Phase Classification System (IPC) analysis, from December 2018 to January 2019, a total of 15.9 million people, i.e. 53% of the population analyzed are severely food insecure, despite ongoing Humanitarian Food Assistance (HFA). This includes 17% of the population (about 5 million people) classified as IPC Phase 4 (emergency); 36% (about 10.8 million people) in IPC Phase 3 (crisis); and of most concern, an additional 63,500 people in IPC Phase 5 (catastrophe). Additional analysis conducted by the Yemen IPC Technical Working Group (TWG) to estimate the severity and magnitude of food insecurity excluding the mitigating effects of the HFA delivered, shows that 20.1 million people (67% of the total population) would be in need of urgent action (IPC Phase 3 and above), including 238,000 people in IPC Phase 5 (catastrophe) had HFA not been delivered. When compared with the last IPC analysis of March 2017, there is an 18% increase in the total number of people requiring urgent action (from 17 million to 20.1 million). The analysis identified
conflict as the main driver of the food insecurity and HFA alone will not prevent further deterioration if not accompanied by actions addressing the key drivers of food insecurity.

3. The current situation in Yemen including repeated and successive exposure to multiple shocks – protracted conflict, food insecurity, natural disasters such as the Socotra cyclone, diseases including a cholera outbreak, and institutional failures such as unpaid salaries of service providers has made the Yemen crisis a formidable challenge that threatens to reverse human development. These factors provide a strong justification for the proposal to proceed with an AF to scale up the impact of the emergency response and provide an adaptive safety net mechanism. The proposed application of OP 2.30 to the proposed operation is based on the significant changes in the environment for Bank assistance, as highlighted in the World Bank’s Yemen Country Engagement Note (CEN) (FY17-18) as well as the Project Appraisal Document of the parent project. The request to process the proposed operation under paragraph 12 of the Bank Policy on Investment Project Financing stems from the urgent need to address the continuing dire situation resulting from the impact of the conflict on a large portion of the population, especially the poor and vulnerable.

Sectoral and Institutional Context

4. Prior to the conflict, Yemen instituted an array of social policies and programs providing a diverse set of social protection benefits to the population. These include Community-Driven Development (CDD) programs implemented by the Social Fund for Development (SFD); social safety net programs through a Labor-Intensive Works Program (LIWP) under SFD, a targeted cash transfer program under the Social Welfare Fund (SWF), and a labor intensive Public Works Project (PWP). These national programs were established in the mid-1990s and their capacity was developed through two decades with intensive investments from the donor community and the Government of Yemen. Prior to the armed conflict in early 2015, SFD was successfully implementing its Phase IV program with around US$1.12 billion funding that was committed by over 14 donors including the World Bank, with a planned 20 percent Government contribution. PWP was implementing its Phase IV program with US$283 million funds committed by five donors and a 4 percent Government contribution. SWF is a fully Government-funded program that has expanded its coverage over the years reaching a current coverage of 1.5 million beneficiary households.

5. The Bank and other regional, bilateral and international development agencies have funded and supported SFD and PWP since their inception in 1996. Prior to the conflict, SFD has disbursed close to US$1.67 (accumulative) billion in projects in over 13,000 villages and 3,700 urban neighborhoods across the poorest districts of Yemen’s 21 governorates. Between 1996 and 2015, the PWP implemented 5149 projects in about 11,200 villages and 1,300 urban neighborhoods, totaling an estimated US$648 million. Both programs have played a significant role in improving access of poor communities to education, water, sanitation, roads, and irrigation, among other activities. Additionally, SFD has been implementing cash for work, rain-fed agriculture, small and micro-enterprise development activities through microfinance, small enterprise lending and technical assistance, and capacity building for local government and civil society organizations. These projects have over the years improved the quality of life for millions of Yemenis and created employment for many of the Yemen’s poorest. However, the conflict and the security situation in the country have negatively impacted the funding and in turn the scalability of these critical programs at a time when their benefits and services are needed most, especially by the poor and vulnerable, and to mitigate the negative impact of the conflict, the effects of which could be long-term.
C. Proposed Development Objective(s)

Original PDO
The Project Development Objective is to provide short-term employment and access to selected basic services to the most vulnerable; and preserve existing implementation capacity of two service delivery programs.

Current PDO
The Project Development Objective is to provide short-term employment and access to selected basic services to the most vulnerable; preserve existing implementation capacity of service delivery programs; and provide emergency cash transfers to the poor and vulnerable in response to the food crisis.

Key Results

6. The achievement of the PDO will be measured by the following key indicators:

(a) The number of direct beneficiaries of wage employment (disaggregated by gender, youth, IDPs, and persons with disabilities) to measure coverage of income support
(b) The number of people provided with access to key services (disaggregated by gender and persons with disabilities) to measure potential coverage of community and social services
(c) Number of people benefited from the nutrition services (disaggregated by women and children and persons with disabilities) to measure coverage of the nutrition services
(d) The percentage of core staff positions of the SFD and PWP retained to measure preservation of the capacity of these critical national programs
(e) Beneficiary households of cash transfers (Number) (disaggregated by gender) to measure the coverage of unconditional cash transfers to beneficiaries.

D. Project Description

7. The proposed AF4 will provide resources to further scale up the impact of the project through: (i) expanding the coverage of the wage employment and livelihood support interventions and emphasizing nutrition sensitive interventions, and (ii) continue supporting emergency cash transfers (CT) to existing beneficiaries of the CT program to provide them with relative income stability and predictability (this includes the most vulnerable Yemenis, particularly the elderly, disabled, and female-headed households). The scaled-up project will be implemented over a period of two additional years, until September 2021, while supporting SFD’s Crisis Response Plan Phase II (2018-20). The project will include three components as follows: (i) Component 1 - Labor Intensive Works and Community Services implemented by UNDP; (ii) Component 2 – Project Management and Monitoring for UNDP; Component 3 – Emergency Cash Transfers, implemented by UNICEF. Detailed activities supported by each component are presented below:

8. Component 1: Labor Intensive Works and Community Services. This component will: (a) provide income support to targeted communities through temporary employment opportunities; (b) increase the productive assets and means of livelihood of beneficiary households and communities and improve access to community and social services; and (c) preserve the implementation capacity of the SFD as a key national service delivery program. Component 1 is implemented by UNDP and will include the following sub-components:

Subcomponent 1.1: Cash-for-Work and Youth-Targeted Community Services (no change)
Subcomponent 1.2: Small Community Infrastructure (discontinued under AF4)
Subcomponent 1.3: SME Revitalization and Employment Generation (no change)

9. Component 2: Project Management and Monitoring (for Component 1 implemented by UNDP). This component will continue supporting project management and monitoring and evaluation costs, including Third Party Monitoring (TPM) to ensure that the project is successfully and efficiently implemented. Under AF4, project costs for project management and monitoring will increase to cover costs of strengthening of safeguards function, including OHS as well as developing a scaled up and enhanced communications function.

10. Component 3: Emergency Cash Transfer. Component 3 will remain unchanged. Component 3 will continue to be implemented by UNICEF and includes two subcomponents as follows:

Subcomponent 3.1: Emergency Cash Transfers
Subcomponent 3.2: Project Management and Monitoring

E. Implementation

Institutional and Implementation Arrangements

11. Implementation arrangements under the proposed AF4 would be the same as those for the parent project and AF2. The ECRP parent project is currently being implemented by the UNDP, in partnership with the Social Fund for Development (SFD) and the Public Works Project (PWP), while UNICEF is implementing the Emergency Cash Transfer Component under AF2 and AF3. Both UN agencies would continue implementing their respective components under the proposed AF4; however, due to limited financing under the proposed AF4, UNDP would only continue implementing subprojects through partnering with SFD while discontinuing subprojects under PWP. The project will be implemented by UNDP and UNICEF under the Financial Management Framework Agreement (FMFA).

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

The project will be implemented on a national level and will cover all of Yemen 333 districts and 22 governorates. The governorates are located in highland and lowland with climate that is characterized as semi-arid. Rainfall is generally limited but with significant variations depending on the elevations. Temperatures are generally high, particularly in the coastal regions. The highlands have a temperate, rainy summer with an average high temperature of 21 °C (69.8 °F) and a cool, moderately dry winter with temperatures occasionally dipping below 0 °C (32.0 °F) in some areas.

G. Environmental and Social Safeguards Specialists on the Team

Amer Abdulwahab Ali Al-Ghorbany, Environmental Specialist
Ibrahim Ismail Mohammed Basalamah, Social Specialist
## SAFEGUARD POLICIES THAT MIGHT APPLY

<table>
<thead>
<tr>
<th>Safeguard Policies</th>
<th>Triggered?</th>
<th>Explanation (Optional)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental Assessment OP/BP 4.01</td>
<td>Yes</td>
<td>AF4 is categorized as ‘B’ in accordance with OP 4.01 on Environmental Assessment. Going forward, this project will apply World Bank safeguards policies and will not be implemented under the UNFPA. Triggering this policy is justified as the project will support implementing labor intensive works and community services (Cash-for-Work) under Component 1, which will be implemented by UNDP in partnership with the Social Fund for Development (SFD). Based on the implementation experience of the ongoing project, significant Occupational Health and Safety (OHS) gaps were identified, which have led to multiple fatalities under the project. There is thus a high risk of fatal incidents or serious injuries occurring under the proposed AF4, particularly, under Component 1 (Labor Intensive Works and Community Services). To mitigate potential environmental safeguards risks and impacts, including those related to OHS, UNDP has developed an Environmental and Social Management Framework (ESMF) which includes a checklist for subproject screening based on which proposals that include activities classified under environmental category ‘A’ will not be financed. Subprojects will be screened for potential environmental impacts to determine if a subproject’s ESMP is needed or mitigation measures included in the ESMF are sufficient. The ESMF sets out responsibilities for both implementation and monitoring of mitigation measures. The ESMF has been cleared by the Bank and was disclosed in country and on the World Bank website on March 29 and March 31 respectively. To mitigate potential risks and impacts related to OHS, UNDP has developed ‘Framework For Actions on Occupational Health and Safety under ECRP ’ and a ‘Toolkit for OHS Framework Implementation Support’ which will be applied under the project. Furthermore, capacity building programs were developed targeting different groups, particularly...</td>
</tr>
<tr>
<td>Performance Standards for Private Sector Activities OP/BP 4.03</td>
<td>No</td>
<td>This policy is not triggered</td>
</tr>
<tr>
<td>-------------------------------------------------------------</td>
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<tr>
<td>Natural Habitats OP/BP 4.04</td>
<td>No</td>
<td>This policy is not triggered.</td>
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<tr>
<td>Forests OP/BP 4.36</td>
<td>No</td>
<td>This policy is not triggered.</td>
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<td>Pest Management OP 4.09</td>
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<tr>
<td>Physical Cultural Resources OP/BP 4.11</td>
<td>No</td>
<td>This policy is not triggered.</td>
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<tr>
<td>Indigenous Peoples OP/BP 4.10</td>
<td>No</td>
<td>This policy is not triggered.</td>
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</table>

**Involuntary Resettlement OP/BP 4.12**

No

OP 4.12 was not triggered under the parent project and AF given that all activities under component 1: Labor Intensive Works and Community Services (Cash-for-Work) do not involve involuntary land acquisition; livelihood impacts; relocation of illegal occupants and/or restriction of access to asset. For certain activities such as the construction of water harvesting tanks, land is obtained voluntarily through community land and is endorsed by legal authorities (local council). Activities under Component 2 (Project Management and Monitoring and Component 3 Emergency Cash Transfer (ECT)) do not involve any resettlement issues. The proposed AF4 would continue expanding the scope and positive impact of the ongoing project - accordingly OP 4.12 will not be triggered.

<table>
<thead>
<tr>
<th>Safety of Dams OP/BP 4.37</th>
<th>No</th>
<th>This policy is not triggered.</th>
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</thead>
<tbody>
<tr>
<td>Projects on International Waterways OP/BP 7.50</td>
<td>No</td>
<td>This policy is not triggered.</td>
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<tr>
<td>Projects in Disputed Areas OP/BP 7.60</td>
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<td>This policy is not triggered.</td>
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**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 classification of the parent project will be maintained under AF4. The project is thus classified as Environmental Category B according to the World Bank’s Operation Policy (OP 4.01). The project includes three components, two of
which are implemented by UNDP while Component 3 - the Emergency Cash Transfer (ECT) component, is implemented by UNICEF.

AF4 will continue implementing activities under Component 1: Labor Intensive Works and Community Services (CIW), which is implemented by UNDP in partnership with the Social Fund for Development (SFD), and under Component 3: ECT implemented by UNICEF under the Financial Management Framework Agreement (FMFA).

Based on the implementation experience of the ongoing project, and identification of significant Occupational Health and Safety (OHS) gaps which have led to multiple fatalities under the project, there is a high risk of occurrence of fatal incidents or serious injuries under the proposed AF4. This is also anticipated as the project will support a cash-for-work program which will provide temporary work opportunities to a large number of local community members who are non-skilled community workers, are largely illiterate, and have little or no knowledge or experience in applying OHS measures. Other potential impacts are expected to be minor and reversible. No large scale or irreversible impacts are expected under the project.

Possible key social risks and impacts under Components 1 and 3 may include: the conflict context may produce social tensions during project implementation, concerning prioritization of subprojects, locations, and selection of poor and vulnerable groups. Additionally, the control of geographical areas of the country by different political factions could lead to interference and inappropriate targeting and selection of subprojects and/or elite capture.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:
Activities and interventions supported under this project are not expected to result in negative indirect and/or long term impacts.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.
No project. A business-as-usual scenario implies maintaining the status quo of impoverished communities, maintaining the current poverty and livelihoods situation, and continued exploitation of natural resources in a non-sustainable manner. This option would wrongly imply that there is no urgent need for investment and improved management or for improving sustainable livelihoods. The project will support local communities with extreme poverty and inability to finance basic needs, including basic food and nutritional needs. Subprojects expected under ECRP AF4 should pose no or very minimal adverse environmental impacts during the construction, implementation and operation phases.

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.
Unlike the parent project and additional financing, the proposed AF4 will not apply the Fiduciary Principles Accord (FPA) and the project will apply World Bank safeguard policies going forward under the FMFA. Based on the implementation experience of the ongoing project, and identification of significant Occupational Health and Safety (OHS) gaps which have led to multiple fatalities under the project, UNDP has reviewed and strengthened OHS aspects under the project to ensure adequate measures are in place for the proposed project. In this regard, UNDP deployed a national expert at the central level to provide support and supervision on OHS aspects. Another specialist was also recruited to supervise environmental and social safeguard aspects of the project. At the IP level, and as immediate actions to address OHS-related gaps, SFD has taken the following actions and measures: (a) set up an OHS Unit since January 2018 with two staff reporting to the Head of the Technical Division; (b) classification of all subprojects to identify high risk subprojects to ensure the application of proper OHS measures that are proportionate to the level of risk - a list of identified high-risk subprojects was shared with the Bank; (c) strictly enforcing the ban on the use of
explosives under the project; (d) strengthening on-site monitoring by site supervisors and through Third Party Monitoring (TPM), and enhancing reporting arrangements.

Similarly, UNDP and the IP have launched a comprehensive audit of the existing OHS system. Three consultants were hired by UNDP to review and enhance OHS frameworks, guidelines and practices under the project, and the audit was concluded on December 31, 2018. Prior to this audit, SFD commissioned a consultancy to review OHS policies and practices based on which tailored training manuals, first aid booklets and subproject-level guidance materials were prepared. Furthermore, key contractual and service documents were revised to enhance OHS aspects. Monitoring arrangements have been strengthened based on the findings of the review. UNDP has also developed a ‘Safeguards Action Plan (SAP)’ to further improve and strengthen safeguards aspects under the project. As part of the outputs of this plan, a project-specific Environmental and Social Management Framework (ESMF) has been developed and a final draft will be submitted to the World bank for review, clearance and disclosure. Furthermore, a ‘Framework For Actions on Occupational Health and Safety under ECRP ’and a ‘Toolkit for OHS Framework Implementation Support’ have been developed and will be implemented under the ongoing project and will continue under the proposed AF4. Furthermore, capacity building programs were developed targeting different groups and identified areas, including capacity building of senior managers and officials of implementation and monitoring agencies on ESMF and OHS Framework and capacity building program for project managers and supervisors on OHS tools and their application in field. Finally, UNDP has further strengthened the safeguard function by allocating a dedicated international environmental and social safeguards expert based in Amman supported by two national experts to be based in Sana’a.

Similarly, SFD has strengthened their OHS management system and nominated a central team to coordinate information and responses in an effort to significantly reduce reporting delays as experienced under the parent project and additional financing. SFD currently has insurance to cover OHS risks in its own executed projects where contractors are not utilized. For projects implemented by contractors, SFD has developed new contract models with built-in insurance by the contractors. In addition to application of World Bank safeguards policies, the UNDP’s 2014 Social and Environmental Standards (SES) will apply to this project which will also help mitigate potential adverse environmental and social impacts stemming from the implementation of subprojects.

Given the nature of activities under the AF4 involving cash for works implemented by UNDP and cash transfers implemented by UNICEF in a political and security sensitive environment, communication and consultation with the relevant stakeholders and intended beneficiaries will be critical under the current environment. Therefore, two separate third party (TPM) monitoring agencies were hired to monitor and report on non-compliance issues for UNDP and UNICEF. The TPMs will capture beneficiaries’ experiences with the cash for work and cash transfer activities and overall compliance with implementation procedures. In addition, UNDP and UNICEF have comprehensive grievance redress mechanism (GRM) systems in place where complaints are received through several channels. The GRM system reacts to all complaints received and ensures that all grievances are addressed efficiently and effectively. All complaints received by the implementing agencies will be recorded and documented for future verifications when needed.

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

The two implementing agencies UNDP and UNICEF are required to carry out consultations with key community leaders and targeted beneficiaries for CfW activities and the poor, orphans, widows, persons with disabilities, the elderly and female headed households for the ECT activities. Due to the conflict context and security constraints in Yemen, the optimal approach is to conduct Focused Group Discussions (FGD) or individual interviews. A questionnaire should be prepared to include a description of activities under Components 1 and 3. Additionally, during these consultations, the
target beneficiaries should be informed about the GRM systems and an Arabic form for complaints should be distributed with phone numbers and contact information. The key findings of the consultations should then be incorporated into the developed ESMF.

Field facilitation should be supported by social workers, mostly women, to ensure reaching out to female beneficiaries; and the TPM agencies should include female workers to also reach women and ensure that they are able to voice any potential concerns or complaints. Finally, similar to the arrangements under AF2 and AF3, social workers will continue to play a key role in facilitating the coordination between the ECT program and UNICEF’s nutrition interventions (under the ongoing World Bank-financed Emergency Health and Nutrition Project and Additional Financing) to link CT beneficiary households with health and nutrition supply interventions. The total number of direct beneficiaries (individuals) under the CT component is estimated to be 8 million, of which 52 percent are females.

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

<table>
<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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</thead>
<tbody>
<tr>
<td></td>
<td>08-Mar-2019</td>
<td>31-Mar-2019</td>
<td></td>
</tr>
</tbody>
</table>

"In country" Disclosure
Yemen, Republic of
29-Mar-2019

Comments
The ESMF was disclosed in-country on UNDP’s website:

If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.
If in-country disclosure of any of the above documents is not expected, please explain why:

C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting) (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
The World Bank Policy on Disclosure of Information

Have relevant safeguard policies documents been sent to the World Bank for disclosure?
No

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?
No

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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Marina Wes
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